

FINAL

Environmental Assessment No. CEQ210007
for the
Mountain View Wind Repower Project

Prepared for:

Riverside County Planning Department

4080 Lemon Street 12th Floor

Riverside, California 92501

Contact: Jay Olivas, Project Planner

Prepared by:

DUDEK

605 Third Street

Encinitas, California 92024

Contact: Wendy Worthey

JUNE 2021

Table of Contents

<u>SECTION</u>	<u>PAGE NO.</u>
TABLE OF CONTENTS	I
ACRONYMS AND ABBREVIATIONS	v
FINAL MND PREFACE	P-1
A Overview.....	P-1
A1. Contents of the Final IS/MND.....	P-1
B Revisions to the Draft IS/MND	P-2
C Response to Comments.....	P-5
C1 Introduction	P-5
C2 List of Comments Letters Received.....	P-5
C3 Comments and Responses to Comments.....	P-5
Comment Letter A - Quechan Tribe	P-5
Comment Letter B - Cabazon Band of Mission Indians	P-9
Comment Letter C - San Manuel Band of Mission Indians	P-13
Comment Letter D - Mission Springs Water District.....	P-17
Comment Letter E - Coalition for a Balanced Environment	P-21
Comment Letter F - California Department of Fish and Wildlife	P-27
Comment Letter G - Sierra Club & Center for Biological Diversity.....	P-57
Comment Letter H - Adams Broadwell Joseph & Cordozo on behalf of California Unions for Reliable Energy	P-73
1 INTRODUCTION	1
1.1 Background	1
1.2 California Environmental Quality Act Compliance	1
1.3 Document Organization	2
1.4 Public Review Process.....	3
2 PROJECT OVERVIEW	5
2.1 Project Location.....	5
2.2 Regional Overview	5
2.3 Project Description	6
2.4 Project Components.....	8
2.4.1 Wind Turbine Generators	8
2.4.2 Electrical Collection System	9
2.4.3 Meteorological Tower	12
2.4.4 Access Roads	12
2.4.5 Laydown Yard and Parking	12
2.5 Project Construction.....	13

2.5.1	Decommissioning of Existing Wind Turbine Generators and Meteorological Towers	14
2.5.2	Flagging/Staging	15
2.5.3	Clearing and Grading	16
2.5.4	Foundation Construction and Tower Erection	16
2.5.5	Construction of Electrical Collection System	16
2.5.6	Facility Testing and Commissioning	17
2.6	Project Operations	17
2.6.1	Supervisory Control and Data Acquisition System	17
2.7	Final Decommissioning and Reclamation	18
2.8	Land Use Considerations and Approvals	18
2.8.1	Land Use and Zoning Designations	18
2.8.2	Coachella Valley Multiple Species Habitat Conservation Plan Joint Project Review	19
2.8.3	Federal Aviation Administration Obstruction Evaluation	20
2.8.4	Riverside Airport Land Use Consistency Review	20
2.9	Design Considerations	20
2.9.1	Height Limits	21
2.9.2	Setbacks	21
3	ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY CHECKLIST	41
I.	PROJECT INFORMATION	43
II.	APPLICABLE GENERAL PLAN AND ZONING REGULATIONS	45
III.	ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED	53
IV.	ENVIRONMENTAL ISSUES ASSESSMENT	55
	Aesthetics	55
	Agriculture & Forest Resources	61
	Air Quality	64
	Biological Resources	64
	Cultural Resources	92
	Energy	98
	Geology and Soils	102
	Greenhouse Gas Emissions	109
	Hazards and Hazardous Materials	118
	Hydrology and Water Quality	125
	Land Use/Planning	128
	Mineral Resources	131
	Noise	132
	Paleontological Resources	135
	Population and Housing	136
	Public Services	137
	Recreation	140
	Transportation	141
	Tribal Cultural Resources	145

	Utilities and Service Systems.....	148
	Wildfire	152
	Mandatory Findings of Significance	154
V.	EARLIER ANALYSES	162
VI.	AUTHORITIES CITED	163

APPENDICES

A	Air Quality and Greenhouse Gas Assessment
B	Biological Technical Report
C	Cultural Resources Report
D	County Geotechnical Design Report No. 200044
E	Phase I Environmental Site Assessment
F	Paleontological Resources Inventory Report

FIGURES

Figure 2-1	Project Location	25
Figure 2-2	Project Site Assessor’s Parcel Numbers.....	27
Figure 2-3	Site Plan.....	29
Figure 2-4	General WTG Dimensions	31
Figure 2-5	Typical Sections for Electrical Collection System Installation.....	33
Figure 2-6	Existing Zoning Designations.....	35
Figure 2-7	Proposed Zoning Designations	37
Figure 2-8	Setbacks	39
Figure 3-1	Photosimulation Vantage Points	169
Figure 3-2A	Vantage Point 1: Southbound SR-62 - Existing Conditions	171
Figure 3-2B	Vantage Point 1: Southbound SR-62 – Proposed Conditions	173
Figure 3-3A	Vantage Point 2: Westbound I-10 – Existing Conditions.....	175
Figure 3-3B	Vantage Point 2: Westbound I-10 – Proposed Conditions.....	177
Figure 3-4A	Vantage Point 3: Eastbound Garnet Road (dirt) – Existing Conditions.....	179
Figure 3-4B	Vantage Point 3: Eastbound Garnet Road (dirt) – Proposed Conditions.....	181
Figure 3-5A	Vantage Point 4: Westbound Garnet Road (paved) – Existing Conditions	183
Figure 3-5B	Vantage Point 4: Westbound Garnet Road (paved) – Proposed Conditions	185
Figure 3-6A	Vantage Point 5: Adkins Road – Existing Conditions	187
Figure 3-6B	Vantage Point 5: Adkins Road – Proposed Conditions	189
Figure 3-7A	Vantage Point 6: Oreana Way – Existing Conditions.....	191
Figure 3-7B	Vantage Point 6: Oreana Way – Proposed Conditions.....	193
Figure 3-7	Project Impacts –CVMSHCP	195
Figure 3-8	Impacts to Biological Resources within the Project Site.....	197

TABLES

Table P-1. Index of Comments Received on the Draft IS/MND5

Table. 2-1. Proposed Disturbance by Jurisdiction7

Table2-2. Project Site Disturbance.....7

Table 2-3. Overhead Electrical Collection System Upgrades 10

Table 2-4. Construction Worker Trips, Vendor Trips, and Equipment Use per Day 13

Table 2-3. Safety Setbacks 21

Table 2-5. Wind Access Setback Variances 22

Table 2-6. Scenic Setbacks..... 24

Table 3-1. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions 67

Table 3-2. Estimated Maximum Daily Decommissioning Criteria Air Pollutant Emissions 68

Table 3-3. Localized Significance Thresholds Analysis for Project Construction 69

Table 3-4. Construction Equipment Fuel Demand 99

Table 3-5. Construction Vehicle Fuel Demand 100

Table 3-6. Estimated Annual Construction Greenhouse Gas Emissions..... 109

Table 3-7. Estimated Annual Decommissioning Greenhouse Gas Emissions 110

Table 3-8. Project Consistency with the County Climate Action Plan Greenhouse Gas Emission
Reduction Strategies 111

Table 3-9. Project Consistency with the 2020 SCAG RTP/SCS – Connect SoCal..... 112

Table 3-10. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies 113

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AADT	annual average daily trips
AB	Assembly Bill
ALUC	Airport Land Use Commission
APE	area of potential effect
APLIC	Avian Power Line Interaction Committee
applicant	Mountain View Power Partners LLC
AQMP	Air Quality Management Plan
BLM	Bureau of Land Management
BMP	best management practice
BTR	Biological Technical Report
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CARB	California Air Resources Board
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CNDDDB	California Natural Diversity Database
County	County of Riverside
CRMP	Cultural Resources Monitoring Program
CVMSHCP	Coachella Valley Multiple Species Habitat Conservation Plan
CVCC	Coachella Valley Conservation Commission
DPM	diesel particulate matter
ECHO	U.S. Environmental Protection Agency Enforcement and Compliance History Online
EIR	Environmental Impact Report
EO	Executive Order
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
GHG	greenhouse gas
I-	Interstate
IS/MND	Initial Study/Mitigated Negated Declaration
JPR	Joint Project Review
kW	kilowatt
LST	localized significance threshold

Acronym/Abbreviation	Definition
met	meteorological
MM	Mitigation Measure
MT	metric ton
MVPP	Mountain View Power Partners
MW	megawatt
MWh	megawatt-hours
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NO ₂	nitrogen dioxide
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O&M	operations & maintenance
O ₃	ozone
OSHA	Occupational Safety and Health Administration
PM ₁₀	particulate matter less than or equal to 10 microns in diameter
PM _{2.5}	particulate matter less than or equal to 2.5 microns in diameter
proposed project	Mountain View Power Partners Wind Repower Project
PDF	Project Design Feature
ROW	right-of-way
RR	Regulatory Requirement
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCADA	supervisory control and data acquisition
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SO _x	sulfur oxides
SR-	State Route
SSAB	Salton Sea Air Basin
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VOC	volatile organic compound
WECS	Wind Energy Conversion System
WIMP	Wind Implementation Monitoring Program
WFCA	Whitewater Floodplain Conservation Area
WTG	wind turbine generators

Final MND Preface

A Overview

The County of Riverside distributed the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Mountain View Wind Repower Project (proposed project) for public review on April 16, 2020. The duration of public review period was 30 days, from April 16, 2021, to May 17, 2021. During this time, seven comment letters were received on the Draft IS/MND. Based on review of the Office of Planning and Research, State Clearinghouse project portal at <https://ceqanet.opr.ca.gov/2021040421>, the only state agency comment letter received is the letter from the California Department of Fish and Wildlife that was also submitted directly to the County.

The Final IS/MND has been prepared pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.), and in accordance with the guidelines for implementation of CEQA (14 CCR 15000 et seq.). Although CEQA does not explicitly require a lead agency to provide written responses to comments received on a proposed IS/MND, the lead agency may do so voluntarily. Comment letters received and responses have been included as part of this Preface, in Section C.

The Final IS/MND will be used by the County (as the CEQA lead agency), in conjunction with other information developed in County's formal record, including comments received and response provided, to support the decision makers' approval or denial of the proposed project. Under CEQA requirements, the County will adopt the Final MND if, based on the whole record, including the Initial Study, it determines that there is no substantial evidence that the proposed project would have a significant effect on the environment (14 CCR 15074(b)).

The project applicant has continued to refine the project design and layout since the Draft IS/MND was circulated for public review. Through value engineering, the overall ground disturbance associated with project implementation has been reduced from 139.10 acres to 129.41 acres. The reduced disturbance area is confined within the overall disturbance area analyzed throughout this document and the locations of project structures are unchanged. Given that the reduction in ground disturbance would not increase environmental impacts associated with the project, no text revisions were made to the Final MND.

A1. Contents of the Final IS/MND

This final version of the IS/MND includes revisions made to the Draft IS/MND and written responses to the comments received during the public review period. No revisions to the Draft IS/MND were necessary based on the comments received during the public review period. The Final IS/MND has been completely reprinted from the Draft IS/MND and the following sections have been incorporated into the Final IS/MND as the first three chapters:

- Section A Final MND Preface
- Section B Revisions to the IS/MND
- Section C Comment Letters and Response to Comments

B Revisions to the Draft IS/MND

Revisions have been made to the Draft IS/MND to clarify revisions to the proposed project, to summarize additional analyses completed (but, with no change to significance conclusions), and to address comments on the Draft IS/MND received during the 30-day public review period. All revisions to the Draft IS/MND are summarized below and shown in the Final IS/MND with new text double-underlined and deleted text ~~stricken through~~.

In accordance with Section 15073.5 of the CEQA Guidelines, these revisions to the Draft IS/MND do not constitute significant new information that would require recirculation of the Draft IS/MND. Recirculation is only required when the new information added (1) identifies a new, or more severe, avoidable significant effect and mitigation measures or project revisions must be added in order to reduce the effect to less than significant or (2) leads to a determination by the lead agency that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant levels and new measures or revisions must be required. None of the revisions or additional details included in the Final IS/MND meet those standards as required to support the recirculation of the Draft IS/MND.

Section 1, Introduction

- Page 1: Revise text to Clarify that BLM extended the Right-of-Way grant for the six WTGs on BLM land to December 31, 2042.
- Page 3: Update phone number for Project Planner.

Section 2, Project Description

- Page 13-14: Table 2-4 revised to reflect updated construction and decommissioning assumptions provided by the project applicant. The applicant provided the updated construction and decommissioning assumptions to reflect longer workdays during tower erection and additional construction equipment recommended by the contractor.
- Page 22: Revise language to remove wind access setback variance for existing WTGs that will remain (subsequent revisions made on page 46 and page 129 for consistency).

Section 3.I, Project Information

- Page 43: Reorder “Case Types” and “Project Description” to include the Change of Zone first, because it is a higher-level case.
- Page 43: Update project description summary to address minor project updates and clarify project entitlements.

Section 3.IV.6, Air Quality Impacts

- Appendix A, Air Quality and Greenhouse Gas Emissions Analysis Technical Report: Report has been revised to reflect air emissions modeling based on updated project construction and decommissioning assumptions.
- Page 67: Table 3-1, Estimated Maximum Daily Construction Criteria Air Pollutant Emissions, has been revised to reflect updated air emissions modeling included in Appendix A.
- Page 86: Table 3-2, Estimated Maximum Daily Decommissioning Criteria Air Pollutant Emissions, has been revised to reflect updated air emissions modeling included in Appendix A.

- Page 69: Table 3-3, Localized Significance Thresholds Analysis for Project Construction, has been revised to reflect updated air emissions modeling included in Appendix A.

Section 3.IV.7, Biological Resources

- Appendix B, Biological Technical Report: For consistency, report has been revised to reflect revisions to the IS/MND.
- Page 78, 79 and 87: Text has been updated to clarify that **PDF-BIO-3** requires implementation of the fatality monitoring plan and adaptive management included in the BBCS.
- Page 79 and 86: Text has been updated to clarify that the applicant chose to remove and not replace the 11 WTGs located within the recharge pond parcel, once the existing BLM ROW grant expires, knowing that removal without replacement would minimize impacts to eagles.
- Page 80: **PDF-BIO-1** has been updated to clarify that a CDFW-approved qualified biologist would conduct pre-construction surveys and biological monitoring.
- Page 81: **PDF-BIO-2** has been updated to clarify that the measure includes raven and raptor nest management associated with the meteorological (met) tower.
- Page 83-84: **PDF-BIO-3** has been updated to clarify post-construction fatality monitoring and adaptive management are required pursuant to the Bird and Bat Conservation Strategy.
- Page 91: Text has been updated to clarify that implementation of **RR-BIO-7** would avoid/minimize direct and indirect impacts to jurisdictional waters.

Section 3.IV.10, Energy

- Page 99: Text revised to reflect updated total hours of operation for diesel fuel construction equipment.
- Page 99: Table 3-4, Construction Equipment Fuel Demand, has been revised to reflect updated construction and demolition assumptions.
- Page 100-101: Table 3-5, Construction Vehicle Fuel Demand, has been revised to reflect updated construction and demolition assumptions. The total fuel consumption in the paragraph below Table 3-5 has also been updated for consistency.

Section 3.IV.20, Greenhouse Gas Emissions

- Page 109: Table 3-6, Estimated Annual Construction Greenhouse Gas Emissions, has been revised to reflect updated air emissions modeling included in Appendix A. The total and amortized construction GHG emissions in the paragraph below Table 3-6 have also been updated for consistency.
- Page 110: Table 3-7, Estimated Annual Decommissioning Greenhouse Gas Emissions, has been revised to reflect updated air emissions modeling included in Appendix A. The total and amortized decommissioning GHG emissions, and the total amortized GHG emissions in the paragraphs below Table 3-7 have also been updated for consistency.
- Page 111: The GHG benefits analysis has been revised to reflect the new net total GHG emissions avoided by the project and the resulting total amortized GHG emissions, as a result of the updated air emissions modeling included in Appendix A.

Section 3.IV.21, Hazards and Hazardous Materials Impact Analysis

- Appendix E, Phase I Environmental Site Assessment: Report has been revised to reflect soil sampling conducted within the historical dump area.
- Page 120-121: The impact analysis regarding release of hazardous materials into the environment has been updated to reflect the revised Phase I ESA, included as Appendix E.

Section 3.IV.46, Mandatory Findings of Significance

- Page 155-160: Section 3.IV.46(b) updated to include a cumulative impact discussion for each impact section that would result in less-than-significant impacts or less-than-significant impact with mitigation. The cumulative analysis relies upon the impact discussions included throughout Section 3 of the Draft IS/MND, supporting documentation that was made available with the Draft IS/MND, and general public knowledge regarding the established San Geronio Pass Wind Energy Policy Area.

Section 3.VI, Authorities Cited

- Page 165-167: Based on additional references presented in the responses to comments included in the Final MND preface, for clarification purposes, 11 references have been added to this section.

C Response to Comments

C1 Introduction

This section provides responses to comments received during the Draft IS/MND public review period (April 16, 2021, through May 17, 2021). Detailed responses to individual comments are provided in Section C3, Comments and Responses to Comments, which also includes copies of comments submitted on the Draft IS/MND.

C2 List of Comments Letters Received

Table P-1 provides an index of the eight comment letters received from agencies and other interested parties. For this Final IS/MND, comment letters are organized chronologically in the order the letters were received.

Table P-1. Index of Comments Received on the Draft IS/MND

Letter	Letter Date	Commenter
A	04.16.2021	Quechan Tribe (Jill McCormick)
B	04.20.2021	Cabazon Band of Mission Indians (Michael Mirelez)
C	04.20.2021	San Manuel Band of Mission Indians (Ryan Nordness)
D	04.22.2021	Mission Springs Water District (Luiz Santos)
E	05.06.2021	Coalition for a Balanced Environment (Ron Berger)
F	05.14.2021	California Department of Fish and Wildlife (Alisa Ellsworth)
G	05.14.2021	Sierra Club (Joan Taylor) & Center for Biological Diversity (Ileene Anderson)
H	05.17.2021	Adams Broadwell Joseph & Cardozo on behalf of California Unions for Reliable Energy (Tanya A Gulesserian)

C3 Comments and Responses to Comments

This section includes all written comment letters on the Draft IS/MND received by the County. Each comment letter is bracketed to identify individual comments within the letter. Each comment letter is reproduced in its entirety and is followed by responses that correlate to each bracketed comment.

INTENTIONALLY LEFT BLANK

Comment Letter A

Audrey Nickerson

From: Jill McCormick <hpoquechantribe@gmail.com >
Sent: Friday, April 16, 2021 3:47 PM
To: Audrey Nickerson
Subject: Re: Notice of Availability: Draft Environmental Assessment for the Mountain View Wind Repower Project

This email is to inform you that we have no comments on this project. We defer to the more local Tribes and support their decisions on the project.] A-1

H. Jill McCormick, M.A.
Historic Preservation Officer
Quechan Tribe
Cell: 928-261-0254
Office: 760-572-2423



INTENTIONALLY LEFT BLANK

Response to Comment Letter A

**Quechan Tribe
H. Jill McCormick, M.A
April 16, 2021**

- A-1** This response acknowledges that the Quechan Tribe does not have any comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND). Because the commenter does not raise an issue related to the adequacy of the Draft IS/MND, no further response is required.

INTENTIONALLY LEFT BLANK

Comment Letter B

Audrey Nickerson

From: Mirelez, Michael <mmirelez@cabazonindians.nsn.gov>
Sent: Tuesday, April 20, 2021 4:16 PM
To: Audrey Nickerson
Subject: Re: Notice of Availability: Draft Environmental Assessment for the Mountain View Wind Repower Project
Attachments: image001.png; image002.jpg

Ms. Nickerson –

Good afternoon, Please consider this email as the Cabazon Band of Mission Indians official response.

The Cabazon Band of Mission Indians appreciates your concern and consideration for its Cultural Resources within your proposed project.

In reviewing the info you have provided within your notification letter, although it is outside the existing reservation, the project area does fall within the bounds of our Tribal Traditional Use Areas. At this time the Cabazon Band of Mission Indians does not have any specific concerns regarding known cultural resources in the specified areas that the project encompasses, but does request that the appropriate consultation continue to take place between concerned tribes, project proponents, and local agencies. I would also advise that you contact the Agua Caliente Band of Cahuilla Indian's THPO Patricia Garcia Plotkin since they are closer to you project area.

| B-1
| B-2
| B-3

Best wishes on your project.

Respectfully,
Michael Mirelez
Director of Cultural Affairs
Cabazon Band of Mission Indians
84-245 Indio Springs Parkway
Indio Ca. 92203-3499
Office: 760.238.5770
Cell:760.984.9374
[signature_1244935584]

INTENTIONALLY LEFT BLANK

Response to Comment Letter B

Cabazon Band of Mission Indians

Michael Mirelez

April 20, 2021

- B-1** This response acknowledges the comment as an introduction to the comment letter. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft Initial Study/Mitigated Negative Declaration (IS/MND); therefore, no further response is required.
- B-2** The comment states that the project site is within the bounds of the Tribe's Traditional Use Area. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft IS/MND; therefore, no further response is required.
- B-3** The commenter notes that the Tribe does not have any specific concerns regarding known cultural resources in the project area, but requests that the County continue consultation with concerned tribes, the project applicant, and local agencies. Pursuant to Assembly Bill (AB) 52, the County notified Native American Tribes of the proposed project on December 8, 2020. Based on responses received, the County initiated formal AB 52 consultation with two tribes, Agua Caliente Band of Cahuilla Indians and Soboba Band of Luiseno Indians. The County incorporated mitigation measures requested by the consulting tribes into the Draft IS/MND to avoid potential impacts to unknown Tribal Cultural Resources, implementation of Native American monitoring during construction, compliance with procedures for inadvertent discovery of Tribal Cultural Resources, appropriate artifact disposition, and appropriate handling of human remains pursuant to PRC Section 5097.98. The County and project applicant will continue to coordinate with the consulting tribes throughout project construction (e.g., tribal monitoring during construction) to ensure successful implementation of mitigation measures and ensure that any potential impacts to any previously unknown Tribal Cultural Resources are reduced to less-than significant levels.

INTENTIONALLY LEFT BLANK

Comment Letter C

Audrey Nickerson

From: Ryan Nordness <Ryan.Nordness@sanmanuel-nsn.gov>
Sent: Tuesday, April 20, 2021 4:20 PM
To: Audrey Nickerson
Subject: RE: Notice of Availability: Draft Environmental Assessment for the Mountain View Wind Repower Project

Dear Audrey,

Thank you for contacting the San Manuel Band of Mission Indians (SMBMI) regarding the above-referenced project. SMBMI appreciates the opportunity to review the project documentation, which was received by the Cultural Resources Management Department on April 16, 2021. The proposed project is located outside of Serrano ancestral territory and, as such, SMBMI will not be requesting to receive consulting party status with the lead agency or to participate in the scoping, development, or review of documents created pursuant to legal and regulatory mandates.

C-1

Kind regards,
Ryan Nordness
Cultural Resource Analyst
San Manuel Band of Mission Indians

Ryan Nordness
CULTURAL RESOURCE ANALYST
Email: Ryan.Nordness@sanmanuel-nsn.gov
O: (909) 864-8933 x50-2022
Internal: 50-2022
M: 909-838-4053
26569 Community Center Dr Highland California 92346



INTENTIONALLY LEFT BLANK

Response to Comment Letter C

San Manuel Band of Mission Indians

Ryan Nordness

April 20, 2021

- C-1** The commenter notes that the project site is outside of Serrano ancestral territory, and the San Manuel Band of Mission Indians does not request consultation with the County. This response acknowledges that the San Manuel Band of Mission Indians does not have any comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND). Because the commenter does not raise an issue related to the adequacy of the Draft IS/MND, no further response is required.

INTENTIONALLY LEFT BLANK

Comment Letter D

From: Luiz Santos <lsantos@mswd.org>
Sent: Thursday, April 22, 2021 3:57 PM
To: Olivas, Jay <JOLIVAS@RIVCO.ORG>
Subject: CEQ210007 - MVPP EA Comments

Jay,
This project is within Mission Springs Water District service area and we have no comments.
Thank you,

| D-1

LUIZ SANTOS
Associate Engineer
Mission Springs Water District
66575 Second Street
Desert Hot Springs, CA 92240
O: (760) 660-4331 ext 125
D: (760) 699-2410
M: (760) 285-4318
lsantos@mswd.org

Confidentiality Disclaimer

This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. The information contained in this message may be privileged and confidential and protected from disclosure. If you are not the author's intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error please delete all copies, both electronic and printed, and contact the author immediately.

[County of Riverside California](#)

INTENTIONALLY LEFT BLANK

Response to Comment Letter D

**Mission Springs Water District
Luiz Santos
April 22, 2021**

- D-1** This comment acknowledges that Mission Springs Water District has no comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND). Because the commenter does not raise an issue related to the adequacy of the Draft IS/MND, no further response is required.

INTENTIONALLY LEFT BLANK

Comment Letter E



305 W Arenas Rd.
Palm Springs, CA 92262

May 6, 2021

Riverside County Planning Department
Attention: Jay Olivas, Project Planner
4080 Lemon Street, 12th Floor
Riverside California, 92501
jolivas@viveo.org

Re: CEQ210007 – MVPP EA Comments

Dear Jay,

I am writing today to urge you to reject the application, known as The Mountain View Wild Repower Project unless the design is raven proof. The remaining wild populations of the Desert Tortoises (*Gopherus agassizii*), our State Reptile and a threatened species under the California Endangered Species Act is dwindling rapidly. For numerous reasons, this is an initiative demanding leadership within California, because our State contains -75% of populations remaining within the geographic range. The tortoise was seriously declining when listed as threatened by the State in 1989 but surveys in critical habitat conducted between 2004-2014 now show further declines in breeding adults of 51% in the western, central, and southern Mojave, 56% in the northeastern Mojave, and a 36% decline in the Colorado Desert, with a large population showing 65% decline. Even worse, the densities of adults are now so low, the tortoise faces endangerment of extinction in the wild. The viability of populations is in question. Of course, scattered individuals may remain but not viable, breeding populations.

E-1

On of the principal reasons for the decline of the tortoise is predation by the Common Raven (*Corvus corax*) on baby and juvenile tortoises and most recently on adults, which is preventing juveniles from growing up to becoming breeding adults. Raven populations have exploded and as many of the 5,000 birds roost in single nest sites in or in close proximity to places like Apple Valley and California City. This problem was documented in a publication by a California Department of Fish and Game seasonal employee, Tom Campbell, in 1983.

E-2

Simply put, the raven population grows exponentially as humans subsidize these birds by leaving ample supplies of garbage and water wherever they go. Open dumpsters at restaurants often have dozens of ravens feasting throughout the day. Campgrounds and residential waste containers, as well as dumps, provide food as well. Golf courses, lawns and the like provide ample water. And when the ravens wish to supplement their diets, they simply consume tortoises, in addition to songbird eggs, fledging birds, and other desert animals. The project being considered could provide nesting and resting space for ravens. Then Lieutenant Governor Gavin Newsom issued a letter on April 12, 2017, attached. As

Governor Newsom put it in his April 2017 letter, 'raven overpopulation and its detrimental impact on the broader ecosystem represents an ecological challenge to California.' We agree. And we believe the time is now to act.

Please act now, before it is too late, while viable tortoise populations can hopefully recover.

All the best,



Ron Berger, President
Coalition for a Balanced Environment

↑
E-2
Cont.



GAVIN NEWSOM
LIEUTENANT GOVERNOR

April 12, 2017

Lawrence Alioto
Executive Director
Coalition for a Balanced Environment
81 Brookmead Place
San Anselmo, CA 94960

RE: Support for Coalition for a Balanced Environment

Dear Lawrence,

I write in support of the Coalition for a Balanced Environment.

Raven over-population and its detrimental impacts on the broader ecosystem represents an ecological challenge to California.

I applaud the initiative and measures taken by the Coalition for a Balanced Environment and its member organizations to reduce the human trash subsidies associated with the extraordinary growth in raven populations in and around California's cities and towns. For the benefit of wildlife, agriculture and ecological balance, I support your organization's efforts to change human activities that are contributing to this problem.

I commend the Coalition for a Balanced Environment for its commitment to the environment, and am proud to support this initiative.

Sincerely,



Gavin Newsom
Lieutenant Governor

INTENTIONALLY LEFT BLANK

Response to Comment Letter E

Coalition for a Balanced Environment

Ron Berger

May 6, 2021

E-1 This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft Initial Study/Mitigated Negative Declaration (IS/MND). Therefore, no further response is required.

E-2 As stated in the Biological Technical Report (BTR) Section 4.4.1, desert tortoise is a Covered Species under the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). Furthermore, surveys conducted within the project site did not detect live desert tortoise or recent desert tortoise sign (i.e., scat, tracks, recent burrows). A total of seven potential desert tortoise burrows were observed during surveys. All seven burrows were characterized as Class 4 burrows (i.e., good condition and possibly belonging to desert tortoise) per the U.S. Fish and Wildlife Service (USFWS) Desert Tortoise (Mojave Population) Field Manual (USFWS 2009). Four of the seven burrows displayed recent use by burrowing owl and two of the burrows did not show signs of desert tortoise occupancy. Therefore, this species was determined to have a low potential to occur within the project.

Nevertheless, the proposed project would replace 93 existing wind turbine generators (WTGs) with 16 new, higher-capacity WTGs. As such, there would be a decrease in permanent ground disturbance associated with WTGs when comparing baseline existing conditions and proposed project conditions.

As stated in the BTR Section 5.4.2.1, the project applicant made every effort to pursue incorporating a monopole-type met tower into the project design instead of using a lattice tower structure. However, due to high winds in the area and the reduced stability of a monopole, the data generated from a monopole-type met tower would not be as accurate compared to the data generated from a more stable lattice-type met tower structure. The existing lattice met tower is located within the Whitewater Floodplain Conservation Area (WFCA) approximately 165 feet from the proposed new met tower location. The existing lattice met tower will be removed shortly after the new met tower is installed. Furthermore, two other lattice towers are being permanently removed with project implementation. As such, there would be a decrease in perching and nesting opportunities for ravens between existing conditions and proposed project conditions.

According to the Environmental Assessment to Implement a Desert Tortoise Recovery Plan Task: Reduce Common Raven Predation on the Desert Tortoise (USFWS 2008b), proposed modifications to all utility poles and towers to preclude raven perching or nesting were researched and analyzed by the USFWS. Specifically, it was found that ravens are efficient hunters and scavengers and do not rely on perch sites for hunting as do some raptors, nor does perch availability facilitate raven population size. Therefore, the USFWS dismissed this alternative (i.e., proposed modifications to utility poles and towers) as not being an effective way of reducing raven predation on hatchling and juvenile desert tortoise survivorship (USFWS 2008). Instead, USFWS recommends reducing or eliminating the likelihood of these structures being used as nest sites by ravens, which typically require high locations (e.g., tree,

utility pole, freeway sign, or cliff), along with adequate food and water within their nesting territory (USFWS 2008). Therefore, specific to potential impacts to desert tortoise from raven predation, the project applicant is proposing the removal of raven nesting opportunities on the lattice met tower. Specifically, impacts from potential raven predation to desert tortoise would be reduced to less than significant through implementation of **PDF-BIO-2**, which would remove nest material, prior to and after nesting season, to discourage raven use of the met tower. In addition, the project team will implement standard best management practices (BMPs) through **PDF-BIO-1** implementation during construction and operation activities. These BMPs include keeping the area free of trash to prevent attraction of predators and potential prey sources, as well as removing any road-killed animals and carcasses.

As noted above, desert tortoise is a Covered Species under the CVMSHCP. The project applicant initiated the Joint Project Review (JPR) process on October 7, 2020, pursuant to Section 6.6.1.1 of the CVMSHCP. The County of Riverside and the Coachella Valley Conservation Commission, with concurrence by USFWS and the California Department of Fish and Wildlife, issued JPR findings on January 22, 2021, finding the proposed project consistent with the CVMSHCP. Furthermore, and relevant to **MM-BIO-1**, the project applicant is donating 247.48 acres¹ to conservation in perpetuity that will benefit numerous species, including desert tortoise.

¹ The applicant is donating a 248.12-acre Set-aside Parcel, of which, 247.48 acres would be conserved (omitting area of disturbance for the met tower and associated access road).

Comment Letter F



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



May 14, 2021

Mr. Jay Olivas
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501
(JOlivas@rivco.org)

Subject: Initial Study - Mitigated Negative Declaration
Mountain View Wind Repower Project
(CEQ210007–MVPP)
State Clearinghouse No. 2021040421

Dear Mr. Olivas:

The California Department of Fish and Wildlife (CDFW) received an Initial Study (IS) with proposed Mitigated Negative Declaration (MND) from the County of Riverside (Lead Agency) for Mountain View Wind Repower Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

Thank you for the opportunity to provide comments and recommendations regarding the activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

ROLE OF CDFW

CDFW is California’s Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Id., § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California’s Wildlife Since 1870

F-1

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 2 of 16

need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT LOCATION

The Mountain View Wind Repower Project site is located near Whitewater and Bonnie Bell communities in Riverside County, California, at South of Garnet Street, approximately 3 miles west of Indian Canyon Drive, and at north of the City of Palm Springs, in the northwestern portion of the Coachella Valley. A portion of the underground electrical collection system and Mount Wind substation improvements are situated within the City of Palm Springs. State Route 111 and the City of Palm Springs are located south of the site, and Interstate 10 is situated at north of the site. The Project site occurs within Section 13 of Township 3 South, Range 3 East, and Sections 17 and 18 of Township 3 South, Range 4 East, of the Desert Hot Springs and Whitewater U.S. Geological Survey (USGS) Quadrangles. The approximate geographic center of the Project site is positioned at 33°54'28.04"N (latitude) and 116°35'32.03"W (longitude). The Project site includes 42 parcels and a portion of two additional parcels. The Project covers 139.1 acres on a 1,255.19-acre site, and of the 1,255.19 acres, 1,202.86 acres occur on private land and 52.34 acres are situated within Bureau of Land Management (BLM) jurisdiction.

The site is located within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) area, and about 383.39 acres in the western portion of the Project site overlap the Whitewater Floodplain Conservation Area (WFCA). The site is positioned in the northwestern portion of the Coachella Valley within unincorporated Riverside County and the City of Palm Springs. The Coachella Valley extends approximately 45 miles southeast of the San Bernardino Mountains and constitutes the westernmost portion of the Colorado Desert. The Coachella Valley connects with the greater Los Angeles region to the west via the San Geronio Pass. Facilities on private lands would be within the jurisdiction of the County of Riverside and the City of Palm Springs, and the facilities on public lands would be within the jurisdiction of BLM. The land uses within the vicinity of the Project site can broadly be described as mixed wind energy resources, industrial and commercial properties, and rural residences. The Union Pacific Railroad ROW runs east-west, south of the Project site, and Coachella Valley Water District percolation ponds are placed south of the ROW. I-10 runs northwest-southeast, north of the Project site, and additional wind energy development, SR-62, and vacant desert land are situated at north of I-10. Existing wind energy development is also present southeast of the Project site. Some commercial and industrial land uses are present east of the Project site, adjacent to North Indian Canyon Drive. The land between the noncontiguous portions of the site consists of wind energy development, rural residential, and undeveloped land.



F-1
Cont.

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 3 of 16

PROJECT DESCRIPTION

CEQA Lead: County of Riverside

Applicant: Mountain View Power Partners LLC (MVPP)

The proposed Project would repower the existing wind energy facilities with modern, higher capacity Wind Turbine Generators (WTGs), and is anticipated to be operational by December 2022. The Project activities will comprise removal of 93 existing Mitsubishi 600-kilowatt (kW) WTGs and the subsequent installation of 16 Vestas 3.6 and 4.3 MW WTGs with a maximum height of 492 feet. Seven existing Mitsubishi 600 kW WTGs would remain as part of the proposed Project. The Project would be capable of producing approximately 229.90 gigawatt hours (GWh) of power per year for operational years 1 through 10 and 215.90 GWh of power annually beyond operational year 10, assuming decommissioning of the seven Mitsubishi 600 kW WTGs.

The applicant requested a setback reduction for two WTGs in the northeast portion of the Project site to reduce scenic setback from 1,320 feet to 1,000 feet. The Project also proposed to modify a 281.81-acre portion of an existing 600-acre parcel from Rural Residential (R-R) to Wind Energy (W-E). A wind access setback Variance proposed to reduce the five (5) times rotor diameter wind access setback for seven (7) existing WTGs and four (4) new WTGs. Five (5) times the rotor diameter for the existing and new WTGs would be 225 meters (738.19 feet) and 585 meters (1,919.29 feet), respectively.

Two Environmental Impact Reports were previously certified by the Riverside County in 2000 and 2001 for portions of existing MVPP I & II Projects on privately owned land. Existing electrical infrastructure runs east of the Project site and delivers the electrical power generated by the existing MVPP I & II wind energy facility the Southern California Edison (SCE) Mount Wind Substation, located in the City of Palm Springs. Separately, BLM issued two right-of-way (ROW) grants for WTGs on federal lands managed by BLM: ROW Grant CACA-42139 authorized six WTGs, which were brought into operation in 2001. A second ROW Grant CACA-40557 authorized 11 WTGs, which were brought into operation in 2003.

Commercial WECS Permit No. 200003 proposes removal of 93 existing Mitsubishi 600-kilowatt (kW) WTGs and the subsequent installation of 16 Vestas 3.6 and 4.3 MW WTGs with a maximum height of 492 feet. Seven (7) existing Mitsubishi 600 kW WTGs would remain as part of the proposed Project. The proposed Project would be capable of producing approximately 229.90 gigawatt hours (GWh) of power per year for operational years 1 through 10. Beyond operational year 10, assuming decommissioning of the seven Mitsubishi 600 kW WTGs, the proposed Project would produce approximately 215.90 GWh of power annually for the remainder of its operational life. The proposed Project would repower the existing wind energy facilities



F-1
Cont.

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 4 of 16

with modern, higher capacity WTGs. The Project is planned to be operational by December 2022.

Change of Zone No. 2000032 proposes to modify a 281.81-acre portion of an existing 600-acre parcel (APN 522-070-027) from Rural Residential (R-R) to Wind Energy (W-E). Variance Case No. 210001 proposes to reduce the five (5) times rotor diameter wind access setback for seven (7) existing WTGs and four (4) new WTGs. Five (5) times the rotor diameter for the existing and new WTGs would be 225 meters (738.19 feet) and 585 meters (1,919.29 feet), respectively. The applicant proposes reducing the five (5) times rotor diameter wind access setback for the 11 existing and new WTGs to a minimum of 110 meters (360.89 feet).

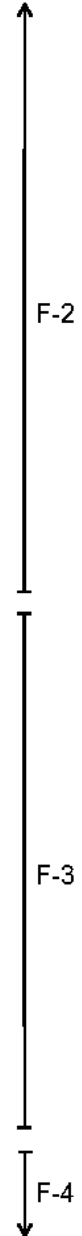
COMMENTS AND RECOMMENDATIONS

CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (biological resources). CDFW offers the comments and recommendations to assist the Lead Agency for adequately identifying and mitigating the Project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the proposed Project with respect to impacts on biological resources. CDFW recommends that the MND addresses the ensuing comments.

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a Project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following 2009 or current version of The Manual of California Vegetation. Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions. CDFW's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Please note that CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the potential presence of species within the general area of the Project site.

The assessment should include a comprehensive, recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special



Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 5 of 16

Concern (SSC) and California Fully Protected Species (Fish and Game Code § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought. CDFW recommends species-specific surveys for the desert tortoise. CDFW-approved desert tortoise pre-construction surveys cover 100 percent of the Project area and adjacent habitat using the methods described in the most recent United States Fish and Wildlife Service (USFWS) Desert Tortoise Field Manual. CDFW recommends survey for burrowing owl, a Species of Special Concern. Survey recommendations and guidelines are provided in the Staff Report on Burrowing Owl Mitigation (Department of Fish and Game, March 2012). Development of a desert kit fox and American badger mitigation and monitoring plan is recommended. Desert kit fox is a protected species, and American badger is a Species of Special Concern. CDFW also recommends a thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities.

F-4
Cont.

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The special-status wildlife species that were observed in the Project site during the 2017, 2018, and 2020 field surveys included red diamond rattlesnake (*Crotalus ruber*), California glossy snake (*Arizona elegans occidentalis*), burrowing owl (*Athene cunicularia*), loggerhead shrike (*Lanius ludovicianus*), Swainson's hawk (*Buteo swainsoni*), LeConte's thrasher (*Toxostoma lecontei*), golden eagle (*Aquila chrysaetos*), Palm Springs ground squirrel, Palm Springs pocket mouse, pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and pocketed free-tailed bat (*Nyctinomops femorosaccus*). Of these species, burrowing owl, LeConte's thrasher, Palm Springs ground squirrel, and Palm Springs pocket mouse are covered under the CVMSHCP. In addition to these special-status species, nesting birds are also likely to occur within the Project site. Three bald eagles were observed during the fixed-point avian surveys over recharge ponds. Desert tortoise, LeConte's thrasher, and Palm Springs pocket mouse were also indicated to have the potential to occur within the Project site. Also, listed species that have a potential to be impacted by the proposed Project include desert tortoise (*Gopherus agassizii*), Swainson's hawk (*Buteo swainsoni*), and bald eagle (*Haliaeetus leucocephalus*). The Project would impact habitat for Palm Springs pocket mouse,

F-5

Mr. Jay Olivas, County of Riverside
 State Clearinghouse No. 2021040421
 Page 6 of 16

triple-ribbed milkvetch (*Astragalus tricarinatus*), desert tortoise (*Gopherus agassizii*), Palm Springs ground squirrel, and Le Conte's thrasher (*Toxostoma lecontei*).

According to the IS, the Project would result in impacts to 4.48 acres of habitat for triple-ribbed milkvetch, 20.22 acres of habitat for desert tortoise, 2.01 acres of habitat for Palm Springs ground squirrel, 20.17 acres habitat for Palm Springs pocket mouse, 20.22 acres habitat for Le Conte's thrasher, 20.22 acres habitat of fluvial and aeolian sand transport, and 20.22 acres habitat of biological corridors within the WFCAs. The proposed Project would result in a total of 27.69 acres of permanent and temporary impacts within the WFCAs including previously authorized disturbance prior to implementation of the CVMSHCP. The Project would also result in impacts to fluvial and aeolian sand transport and biological corridors. The IS informs about 7.24 acres (6,274 linear feet) of non-wetland streambed subject to Fish and Game Code Section 1602.

The IS proposes that the impacts are to be offset with donation of 248.12-acre land, of which 247.48 acres would be conserved, within the WFCAs. Revegetation or restoration of temporary impacts is not proposed after Project completion. Typically, the applicant would be required to pay a per acre mitigation fee to Coachella Valley Association of Governments; however, The IS proposes that the Set-aside Parcel donation would offset impacts in lieu of payment of CVMSHCP mitigation fees. The proposed Project would also impact 111.41 acres (40.37 acres of permanent and 98.72 acres of temporary) outside of the CVMSHCP WFCAs. Revegetation or restoration of temporary impacts is not proposed after Project completion outside of the WFCAs. The Project would be required to adhere to CVMSHCP Land Use Adjacency Guidelines regardless of these areas being outside of the WFCAs.

Two CVMSHCP-covered plant species, Coachella Valley milk-vetch (a federally endangered and California Rare Plant species) and triple-ribbed milkvetch (a federally endangered and California Rare Plant species), known to occur within the immediate vicinity of the Project site. Therefore, the proposed Project could result in impacts to federally listed plant species potentially present in off-site areas during construction activities due to generation of fugitive dust, the release of chemical pollutants, and the adverse effect of invasive plant species. The Project site contains 291.73 acres of triple-ribbed milkvetch, of which a total of 4.48 acres would be directly impacted by Project implementation.

The IS indicated occurrence of Class 4 burrows for desert tortoise, a federally and state threatened and CVMSHCP Covered Species within the Project site. The Project site contains 383.39 acres of habitat for desert tortoise, of which a total of 20.22 acres would be directly impacted by Project implementation. There is a plausible concern about the type of structure (lattice or monopole) proposed for the new met tower located just inside of the WFCAs. This concern pertains to the tower's potential to facilitate increased perching and nesting opportunities for ravens that could then potentially prey on existing and/or future desert tortoise in the WFCAs.

F-5
 Cont.

F-6

F-7

F-8

F-9

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 7 of 16

Swainson's hawk, a state-listed threatened species and not covered under the CVMSHCP, was observed within the Project site, and potentially may nest or fly within the Project site. Bald eagle, a state-listed endangered species and not covered under the CVMSHCP, was observed foraging over the recharge ponds. This species could occur within and around the Project vicinity. During operation, The Project has high potential to directly impact golden eagles, a CDFW Fully Protected Species that is not covered by the CVMSHCP. This species has a high potential to fly through the Project site. Also, the IS informs 3.7% increase in total rotor-swept area relative to the existing wind farm. CDFW recommends comprehensive avian monitoring during the operation of the proposed Project.

F-10

The IS should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. To ensure that Project impacts to biological resources are fully analyzed, the following information should also be included in the MND.

1. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by zoning of development Projects or other Project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g. National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).
3. An evaluation of impacts to adjacent open space lands from both the construction of the Project and long-term operational and maintenance needs.
4. A cumulative effects analysis developed as described under CEQA Guidelines § 15130. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future Projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
5. The Project has decades long life-span, and the potential loss in desert tortoise and other habitat expansion and population density changes with time needs be

F-11

F-12

F-13

F-14

F-15

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 8 of 16

accounted for considering fully mitigated standards. For adequacy of mitigation analysis, there is a need to consider both spatial and temporal effects on habitat as well as cumulative impacts of the activities on habitat biodiversity and microclimate variability for sustaining desert tortoise and other species.

F-15
Cont.

Mitigation Measures for Project Impacts to Biological Resources

The MND should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the Project. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following comments.

F-16

Fully Protected Species

Several Fully Protected Species (Fish and Game Code § 3511) have the potential to occur within or adjacent to the Project area. Fully protected species may not be taken or possessed at any time. Project activities described in the MND should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the MND fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead Agency include in the analysis appropriate avoidance, minimization and mitigation measures to reduce any possible indirect impacts to fully protected species.

F-17

Sensitive Plant Communities

CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in the 2009 or current version of The Manual of California Vegetation. The MND should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts. Minimization measures may include transplanting perennial species, seed collection and dispersal from annual species, and other conservation strategies that will protect the viability of the local population. If minimization measures are implemented, monitoring of plant populations will be conducted annually for 5 years to assess the mitigation's effectiveness. The performance standard for mitigation will be no net reduction in the size or viability of the local population.

F-18

Mitigation

CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the MND should include

F-19

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 9 of 16

mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. The MND should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, land dedications, long-term monitoring and management, control of illegal dumping, water pollution, and human intrusion.

F-19
Cont.

Moving out of Harm’s Way

The proposed Project is anticipated to result in the clearing of natural habitats that support native species. To avoid direct mortality, CDFW recommends that the lead agency condition the MND to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to move out of harm’s way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities. Movement of wildlife out of harm’s way should be limited to only those individuals that would otherwise be injured or killed, and individuals should be moved only as far a necessary to ensure their safety. Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss.

F-20

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to the California Endangered Species Act (CESA). A CESA Incidental Take Permit (ITP) is issued to conserve, protect, enhance, and restore State-listed CESA species and their habitats. CDFW recommends that a CESA ITP be obtained if the Project has the potential to result in “take” (California Fish and Game Code Section 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of CESA-listed species. Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). If the Project, including the Project construction or any Project-related activity during the life of the Project, results in take of CESA-listed species, CDFW recommends that the Project proponent seek appropriate authorization prior to Project implementation through an ITP. Desert tortoise and Mohave ground squirrel are two CESA-listed threatened species that have potential to occur within the Project Area, presence needs to be determined by protocol surveys required by the Lead Agency. CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. Please

F-21

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 10 of 16

note that the proposed avoidance, minimization, and mitigation measures must be sufficient for CDFW to conclude that the Project's impacts are fully mitigated and the measures, when taken in aggregate, must meet the full mitigation standard.

F-21
Cont.

Desert Tortoise

CDFW recommends inclusion of mitigation measures to avoid potentially significant impacts to desert tortoise, a CESA-listed species as threatened and a candidate for endangered species. The measures need to include specificity on who will perform the survey, what type of survey will be performed, and what actions will be taken should desert tortoise presence be confirmed during the survey. The measures need to address avoidance, minimization, or mitigation measures should desert tortoise enter the Project site during the life of the Project. Take (hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill) is prohibited unless authorized by state law (Fish and Game Code, §§ 2080 & 2085). Project activities have the potential to take desert tortoise. The measure as written does not ensure a qualified biologist, experienced in locating desert tortoise individuals in all life stages and their sign, will complete the survey following CDFW approved protocols. Additionally, should desert tortoise presence be confirmed, the measure needs to include avoidance, minimization and mitigation to avoid take.

F-22

If the Project, including the Project construction or any Project-related activity during the life of the Project, may result in take of CESA-listed species, CDFW recommends that the Project proponent seeks appropriate authorization prior to Project implementation through an incidental take permit (ITP). CDFW recommends inclusion of protocol level survey and a measure for a qualified biologist in the environmental document. A qualified biologist shall conduct a protocol level presence or absence survey no more than 14 days prior to initiating Project activities in accordance with the survey methodology described in U.S. Fish and Wildlife Service Desert Tortoise (Mojave Population) Field Manual. In addition, the survey shall utilize perpendicular survey routes and 100-percent visual coverage of the Project area and 50-foot buffer zone for desert tortoise and their sign. If the survey confirms absence, a qualified biological monitor shall remain on-site during all Project activities to confirm desert tortoise do not enter the Project site. If the survey confirms presence, the Project Proponent shall obtain an ITP for desert tortoise prior to the start of Project activities. If the biological monitor during the life of the Project encounters a desert tortoise, work shall be suspended, and the Project Proponent shall obtain an ITP for the species prior to the restarting Project activities. All clearance surveys need to be conducted during the active season for desert tortoise.

F-23

Burrowing Owl

Burrowing owls, a CDFW Species of Special Concern and a CVMSHCP Covered Species, were observed during the 2020 field surveys. One occupied burrow within the WFCA and one unoccupied burrow outside of the WFCA were observed. Potential construction-related direct impacts to burrowing owl could result from destruction of

F-24

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 11 of 16

burrowing owl dens; destruction of nests, eggs, and young; and entombment of adults. CDFW recommends inclusion of mitigation measures to avoid potentially significant impacts to burrowing owls, a Species of Special Concern. The measures need to include specificity on who will perform the burrowing owl survey, what type of survey will be performed, and what actions will be taken should burrowing owl presence be confirmed during the survey. It is necessary to address avoidance, minimization, or mitigation measures. Project-related activities have potential to take burrowing owl individuals and their nests and may result in loss of burrowing owl habitat. Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5 and 3513. Take is defined in Fish and Game Code Section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Burrowing owls are dependent on burrows at all times of the year for survival and/or reproduction, evicting them from nesting, roosting, and satellite burrows may lead to indirect impacts or take. Loss of access to burrows will likely result in varying levels of increased stress on burrowing owls and could depress reproduction, increase predation, increase energetic costs, and introduce risks posed by having to find and compete for available burrows.

F-24
Cont.

Eviction of burrowing owls is a potentially significant impact under CEQA. CDFW recommends inclusion a measure for a qualified biologist in the environmental document. Burrowing owl surveys shall be conducted by a qualified biologist at least 14 days prior to any Project activities, at any time of year. Surveys shall be completed following the recommendations and guidelines provided within the Staff Report on Burrowing Owl Mitigation (CDFG, March 2012) or most recent version by a qualified biologist. If an active burrowing owl burrow is detected within any Project disturbance area, or within a 500-foot buffer of the disturbance area, a 300-foot radius buffer zone surrounding the burrow shall be flagged, and no impacts to soils or vegetation or noise levels above 65 dBA shall be permitted while the burrow remains active or occupied. Disturbance-free buffers may be modified based on site-specific conditions in consultation with CDFW. The qualified biologist shall monitor active burrows daily and will increase buffer sizes as needed if owls show signs of disturbance. If active burrowing owl burrows are located within any work area and impact cannot be avoided, a qualified biologist shall submit a burrowing owl exclusion plan to CDFW for review and approval. The burrowing owl exclusion plan shall include permanent compensatory mitigation consistent with the recommendations in the Staff Report on Burrowing Owl Mitigation such that the habitat acreage, number of burrows and burrowing owls impacted are replaced. Passive relocation shall take place outside the nesting season (1 February to 31 August).

F-25

LeConte's Thrasher

LeConte's thrasher is a CDFW Species of Special Concern and a CVMSHCP Covered Species. The Project site contains 383.39 acres of habitat for LeConte's thrasher, of which a total of 20.22 acres of direct impact due to Project implementation. Consistency with CVMSHCP requires a pre-construction survey for LeConte's thrasher. During the nesting season, January 15 through June 15, prior to the start of construction activities,

F-26

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 12 of 16

a Qualified Biologist will conduct surveys within the Whitewater Floodplain Conservation Area, within 500 feet of the impact area, or to the property boundary if less than 500 feet. If nesting Le Conte's thrashers are found, an exclusion buffer will be established around the nest site in any location where work may occur within 500 feet of the active nest. The exclusion buffer will be staked and flagged. No construction will be permitted within the buffer during the breeding season of January 15 through June 15 or until the young have fledged.

F-26
Cont.

Nesting Birds and Migratory Birds

It is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). In addition, sections 3503, 3503.5, and 3513 of the Fish and Game Code (FGC) also afford protective measures as follows: Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by FGC or any regulation made pursuant thereto; Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; and Section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA. CDFW recommends that the analysis includes the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The measures should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. For pre-construction surveys, CDFW recommends that the surveys be required no more than three days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

F-27

Special Status Plant Species

The Biological Resources Assessment needs to include explanation of methodology and results of the survey of special status plants. CDFW recommends California Natural Diversity Database be used as a starting point in gathering information about the potential presence of species within the general area of the Project site, and surveys should not be restricted or limited to generated lists. It is unclear if a botanical field survey to identify all plants to the taxonomic level necessary to determine rarity and listing status was performed. Botanical field surveys should be conducted during times of year when plants are evident and identifiable (i.e. flowering or fruiting), which may warrant multiple surveys during the season to capture floristic diversity. Habitats, such as desert plant communities that have annual and short-lived perennial plants as major

F-28

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 13 of 16

floristic components may require yearly surveys to accurately document baseline conditions for purposes of impact assessment. Sensitive plant species are listed under the CESA as threatened, or endangered, or proposed or candidates for listing; designated as rare under the Native Plant Protection Act; or plants that otherwise meet the definition of rare, threatened, or endangered species under CEQA. Plants constituting California Rare Plant Ranks 1A, 1B, 2A, and 2B generally meet the criteria of a CESA-listed species and should be considered as an endangered, rare or threatened species for the purposes of CEQA analysis. Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). Fish and Game Code Sections 1900–1913 includes provisions that prohibit the take of endangered and rare plants from the wild and a salvage requirement for landowners. To ensure that Project impacts to biological resources are fully analyzed, CDFW recommends a thorough floristic-based assessment of special status plants and natural communities. Note that CDFW generally considers biological field assessments for rare plants valid for a period of up to three years. CDFW recommends inclusion of the following mitigation measure.

F-28
Cont.

Pre-construction botanical surveys shall be conducted at the appropriate time of year by a qualified biologist following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, March 2018) or most recent version. Should special status plants or natural communities be present in the Project area, a qualified biologist shall develop species specific avoidance, minimization, and mitigation measures to ensure there is no net reduction in the size or viability of the local population. CDFW also recommends that the Lead Agency reviews the listing status of Western Joshua Tree (*Yucca brevifolia*) prior to finalizing the MND and implements appropriate measures. If the Project, including the Project construction or any Project-related activity during the life of the Project, may result in take of CESA-listed species, CDFW recommends that the Project proponent seeks appropriate authorization prior to Project implementation through an incidental take permit (ITP). Should any CESA-listed plant species be present at the Project site, the Project Proponent shall obtain an incidental take permit for those species prior to the start of Project activities.

American Badger and Desert Kit Fox

American badger is a Species of Special Concern. Desert kit fox is a protected species and may not be taken at any time pursuant to Title 14 of the California Code of Regulations Section 460. Project activities have the potential to take American badger and desert kit fox individuals, and development may result in loss of habitat and/or foraging habitat. CDFW recommends inclusion of pre-construction American Badger and Desert Kit Fox survey and suggests the following measure be included in the environmental document. No more than 30 days prior to the beginning of ground disturbance and/or Project activities, a qualified biologist shall conduct a survey to determine if potential desert kit fox or American badger burrows are present in the Project Area. If potential burrows are located, they shall be monitored by the qualified biologist. If the burrow is determined to be active, the qualified biologist shall verify there

F-29

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 14 of 16

are suitable burrows outside of the Project Area prior to undertaking passive relocation actions. If no suitable burrows are located, artificial burrows shall be created at least 14 days prior to passive relocation. The qualified biologist shall block the entrance of the active burrow with soil, sticks, and debris for 3-5 days to discourage the use of the burrow prior to Project activities. The entrance shall be blocked to an incrementally greater degree over the 3-5-day period. After the qualified biologist has determined there are no active burrows the burrows shall be hand-excavated to prevent re-use. No disturbance of active dens shall take place when juvenile desert kit fox and juvenile American badgers may be present and dependent on parental care. A qualified biologist shall determine appropriate buffers and maintain connectivity to adjacent habitat should natal burrows be present.

F-29
Cont.

Wildlife in Pipes and Construction Materials

Biological Monitor(s) shall visually check all sections of pipe/construction materials for the presence of wildlife sheltering within them prior to the pipe sections being placed in the trench and attached together, or shall have the ends capped while stored on site so as to prevent wildlife from entering. After attachment of the pipe sections to one another, whether in the trench or not, the exposed end(s) of the pipeline shall be capped at the end of each day during construction to prevent wildlife from entering and being trapped within the pipeline.

F-30

Escape Ramp in Trench

At the end of each work day, the Biological Monitor(s) shall place an escape ramp at each end of the open trench to allow any animals that may have become entrapped in the trench to climb out overnight. The ramp may be constructed of either dirt fill or wood planking or other suitable material that is placed at an angle no greater than 30 degree.

F-31

Coachella Valley Multiple Species Habitat Conservation Plan

The proposed Project occurs within the CVMSHCP area and is subject to the provisions and policies of the CVMSHCP. In order to be considered a covered activity, the Project should demonstrate that proposed actions are consistent with the CVMSHCP and the associated Implementing Agreement. In 2008, CDFW issued Natural Community Conservation Plan Approval and Take Authorization for the CVMSHCP per Section 2800, *et seq.*, of the California Fish and Game Code. The CVMSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit. Compliance with approved habitat plans, such as the CVMSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the CVMSHCP as a result of this Project is necessary to address CEQA requirements. Because the proposed Project is located within a Conservation Area, it is subject to the Joint Project

F-32

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 15 of 16

Review process through the Coachella Valley Conservation Commission. To obtain take through the CVMSHCP, the Project needs to demonstrate consistency with the Conservation Objectives, and address Avoidance, Minimization, and Mitigation Measures, and Land Use Adjacency Guidelines as identified in CVMSHCP. If any part of the Project that is not processed through the CVMSHCP for covered species, then the Project may be subject to the Federal Endangered Species Act (FESA) and/or CESA for threatened, endangered, and/or candidate species. Regardless of whether take is obtained through the CVMSHCP or through a CESA ITP, the MND needs to address how the proposed Project will affect the conservation objectives of the CVMSHCP. All surveys required by the CVMSHCP to determine consistency should be conducted and detailed results are to be included in the final assessment.

F-32
Cont.

Lake and Streambed Alteration Program

Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: Substantially divert or obstruct the natural flow of any river, stream or lake; Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or Deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources. CDFW's issuance of an LSA Agreement is a "Project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the MND should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources.

F-33

Environmental Data

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB).

F-34

Filing Fees

Mr. Jay Olivas, County of Riverside
State Clearinghouse No. 2021040421
Page 16 of 16

Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

F-35

CDFW appreciates the opportunity to comment on the MND to assist the Lead Agency in identifying and mitigating Project impacts on biological resources. Questions regarding this letter should be directed to Dr. Shankar Sharma, Senior Environmental Scientist Specialist and Renewable Energy Lead at Shankar.Sharma@wildlife.ca.gov or (909) 228-3692.

F-36

Sincerely,

DocuSigned by:
Alisa Ellsworth
84FBB8273E4C480...

Alisa Ellsworth
Environmental Program Manager

ec: Shankar Sharma, Senior Environmental Scientist (Specialist), CDFW
Shankar.Sharma@wildlife.ca.gov

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@opr.ca.gov

HCPB CEQA Program, Habitat Conservation Planning Branch
CEQAcommentletters@wildlife.ca.gov

Response to Comment Letter F

California Department of Fish and Wildlife

Alisa Ellsworth

May 14, 2021

F-1 This comment provides an introduction to the comment letter, provides the role of the California Department of Fish and Wildlife (CDFW) as a Trustee Agency, reiterates the project location, and summarizes the project description. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft Initial Study/Mitigated Negative Declaration (IS/MND).

F-2 As stated in the Biological Technical Report (BTR), included as Draft IS/MND Appendix B, vegetation community classifications used in the Draft IS/MND follow A Manual of California Vegetation (2nd edition) (Sawyer et al. 2009), and areas located within the Set-aside Parcel² follow the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) vegetation mapping. The entire project site, including areas outside the impact locations, was mapped in 2020.

As stated in the BTR, a California Natural Diversity Database (CNDDDB) search was conducted in 2020 for special-status species occurring within the White Water and/or Desert Hot Springs USGS Quadrangles within which the proposed project is located, and the ten surrounding USGS Quadrangles: San Gorgonio Mountain, Catclaw Flat, Morongo Valley, Yucca Valley South, Seven Palms Valley, Cathedral City, Palm Springs, San Jacinto Peak, Lake Fulmor, and Cabazon. Results of the CNDDDB search for special-status plants with moderate or high potential to occur are included in BTR Section 4.3, and species with low potential to occur are included in BTR Appendix J. Results of the CNDDDB search for special-status wildlife species with moderate or high potential to occur are included in BTR Section 4.4, and species with low potential to occur are included in BTR Appendix K.

The biological consultants who have gathered environmental data for special-status species and natural communities occurring on the project site shall coordinate with the CDFW regarding an efficient way to have the data incorporated into the CNDDDB. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft IS/MND.

F-3 As stated in BTR Section 2.2, surveys were conducted in 2020 by qualified biologists during the appropriate time of year and day when the sensitive species would have been observable and followed the appropriate protocol when required. All exceptions to these requirements are noted in BTR Section 2.2.9.

As stated in the BTR Section 5.4.2.1 and 5.4.2.2, desert tortoise (*Gopherus agassizii*) and burrowing owl (*Athene cunicularia*) are Covered Species under the CVMSHCP. The project applicant initiated the Joint Project Review (JPR) process on October 7, 2020, pursuant to Section 6.6.1.1 of the CVMSHCP. The County of Riverside and the Coachella Valley Conservation Commission (CVCC), with concurrence by U.S. Fish and Wildlife Service

² "Set-aside Parcel" refers to the 248.12 acres of land, of which 247.48 acres would be conserved, that the applicant is donating to the Coachella Valley Conservation Commission to be contributed to the Coachella Valley Multiple Species Habitat Conservation Plan as conservation land in perpetuity.

(USFWS) and CDFW, issued the JPR findings on January 22, 2021. The JPR findings determined that with the donation of the Set-aside Parcel, implementation of CVMSHCP Section 4.4 Required Avoidance, Minimization, and Mitigation Measures, and adherence to CVMSHCP Section 4.5 Land Use Adjacency Guidelines, the project is consistent with the CVMSHCP (refer to BTR Appendix E for details). As stated in the BTR Section 2.2.3, surveys for desert tortoise were conducted in 2020 consistent with the USFWS's Preparing for any Action That May Occur Within the Range of Mojave Desert Tortoise (USFWS 2019), which requires a 100% coverage, pedestrian transect survey prior to the start of construction, and according to the CVMSHCP survey requirements within the Whitewater Floodplain Conservation Area (WFCA) for desert tortoise. As stated in the BTR Section 2.2.3, protocol-level surveys for burrowing owl were not conducted as the species is covered under the CVMSHCP; however, burrowing owl and their sign (e.g., burrows, whitewash, feathers, pellets) were documented during the May 2020 desert tortoise and focused special-status plant surveys, and additional burrow checks were conducted in June 2020 to further determine burrow occupancy or to gain additional information on burrowing owl use of the project site.

No desert kit fox (*Vulpes macrotis arsipus*) or American badger (*Taxidea taxus*) individuals or diagnostic sign of the species (i.e., burrows with claw marks, digs, or scat) were observed during the 2020 burrow surveys or incidentally observed during other focused surveys conducted throughout the project site. American badger is a CDFW Species of Special Concern and is included in the BTR as having low potential to occur within the project site due to lack of observation of suitable burrows and diagnostic sign. The closest CNDDDB occurrence for American badger is from 1949, located approximately 13 miles north of the project site. Desert kit fox is considered a "fur-bearing mammal," protected from take under the California Fish and Game Commission's Mammal Hunting Regulations (Subdivision 2, Chapter 5), which effectively protects it from hunting and trapping pressure. However, no hunting or trapping is proposed or would be allowed by the proposed project. Desert kit fox is not listed by the USFWS or CDFW under any special-status designation and was therefore not included in BTR Appendix K. Furthermore, a literature review of some of the recent projects in the vicinity also did not find occurrences of either species. Impacts to these species are not anticipated, and therefore, preparation of a desert kit fox and American badger mitigation and monitoring plan is not warranted.

As stated in the BTR Section 2.2.3, survey methods identified in standard rare plant protocol documents such as the USFWS Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants (USFWS 2000), the Bureau of Land Management (BLM) Survey Protocols Required for National Environmental Policy Act (NEPA) and Endangered Species Act (ESA) Compliance for BLM Special Status Plant Species (BLM 2009), the CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018), and the California Native Plant Society (CNPS) Botanical Survey Guidelines of the California Native Plant Society (CNPS 2001) were taken into consideration during the 2020 focused special-status plant surveys.

Please also refer to response to comment F-2 above, which addresses some of the same issues raised in this comment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

- F-4** The comment incorrectly states that the following species were observed on the project site: LeConte's thrasher (*Toxostoma lecontei*), pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), pocketed free-tailed bat (*Nyctinomops femorosaccus*), and Palm Springs pocket mouse (*Perognathus longimembris bangsi*). As stated in the BTR Section 4.4, these five species have a low to moderate potential to occur within the project site but were not observed during surveys. Comment accurately states that three bald eagles (*Haliaeetus leucocephalus*) were observed during the fixed-point avian surveys over the recharge ponds; however, it should be noted that the recharge ponds have been excluded from the project site to reduce eagle risk. No bald eagles were observed within the project site. Comment accurately states the project would impact habitat for Palm Springs pocket mouse, triple-ribbed milkvetch (*Astragalus tricarinatus*), desert tortoise, Palm Springs ground squirrel, and LeConte's thrasher; however, as noted, these species are covered under the CVMSHCP and the project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 above, for details on the project's JPR findings. Furthermore, and relevant to Mitigation Measure **(MM)-BIO-1**, the applicant is donating 247.48 acres towards conservation in perpetuity that will benefit numerous species, including Palm Springs pocket mouse, triple-ribbed milkvetch, desert tortoise, Palm Springs ground squirrel, and LeConte's thrasher. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.
- F-5** The comment correctly summarizes the project impacts. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.
- F-6** The comment correctly summarizes the project's impacts and mitigation as presented in the Draft IS/MND. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.
- F-7** The comment incorrectly states that the project site contains 291.73 acres of triple-ribbed milkvetch. This sentence should state that the project site contains 291.73 acres of CVMSHCP modeled Other Conserved Habitat for triple-ribbed milkvetch. The project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 above, for details on the project's JPR findings. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.
- F-8** The comment incorrectly states that the project site contains 383.39 acres of habitat for desert tortoise. This sentence should state the project site contains 383.39 acres of CVMSHCP modeled Other Conserved Habitat for desert tortoise.
- As stated in the BTR Section 5.4.2.1, the applicant made every effort to pursue incorporating a monopole-type met tower into the project design instead of using a lattice tower structure. However, due to high winds in the area and the reduced stability of a monopole, the data generated from a monopole-type met tower would not be as accurate compared to the data generated from a more stable lattice-type met tower structure. The existing lattice met tower is located within the WFCA approximately 165 feet from the proposed new met tower location. The existing lattice met tower will be removed shortly after the new met tower is installed.

Furthermore, two other lattice towers are being removed as part of the decommissioning effort. As such, there would be a decrease in perching and nesting opportunities for ravens between existing conditions and proposed project conditions.

According to the Environmental Assessment to Implement a Desert Tortoise Recovery Plan Task: Reduce Common Raven Predation on the Desert Tortoise (USFWS 2008b), proposed modifications to all utility poles and towers to preclude raven perching or nesting were researched and analyzed by the USFWS. Specifically, it was found that ravens are efficient hunters and scavengers and do not rely on perch sites for hunting as do some raptors, nor does perch availability facilitate raven population size. Therefore, the USFWS dismissed this alternative (i.e., proposed modifications to utility poles and towers) as not being an effective way of reducing raven predation on hatchling and juvenile desert tortoise survivorship (USFWS 2008). Instead, USFWS recommends reducing or eliminating the likelihood of these structures being used as nest sites by ravens, which typically require high locations (e.g., tree, utility pole, freeway sign, or cliff), along with adequate food and water within their nesting territory (USFWS 2008). Therefore, specific to potential impacts to desert tortoise from raven predation, the applicant is proposing the removal of raven nesting opportunities on the lattice met tower. Impacts from potential raven predation to desert tortoise would be reduced to less than significant through implementation of Project Design Feature **(PDF)-BIO-2**, which would remove nesting material, prior to and after nesting season, to discourage raven use of the met tower. In addition, the project team will implement standard BMPs as directed by **PDF-BIO-1** during construction and operation activities. These BMPs will include keeping the area free of trash to prevent attraction of predators and potential prey sources, as well as removing any road-killed animals and carcasses. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-9 Comment incorrectly states that Swainson's hawk may nest within the project site. As stated in the Draft IS/MND Section 3.IV.7, this species nests in open woodland and savanna, riparian, and in isolated large trees, which are absent from the site. Therefore, this species is not expected to nest on or in the project vicinity.

Comment accurately states that bald eagle (*Haliaeetus leucocephalus*) was observed during the fixed-point avian surveys over the recharge ponds. No bald eagles were observed within the project site; however, as stated in the BTR, this species could occur infrequently during the non-breeding season within the project vicinity. Golden eagle (*Aquila chrysaetos*) has a high potential to fly near the project site. As stated in the Draft IS/MND, the applicant chose to remove and not replace the 11 WTGs located within the recharge pond parcel, associated with the existing facility, knowing that removal without replacement would minimize impacts to eagles. Based on the assumption that eagle use is positively associated with risk (USFWS 2016), removing the existing WTGs from the recharge ponds and not replacing them with new WTGs should substantially reduce the risk to eagles posed by the project. Please refer to the Avian Risk Assessment and Survey Report for the project (BTR Appendix A) for details regarding avian risk within the project site.

The project represents only a slight (3.7%) increase in total rotor-swept area when comparing the proposed repower project to the existing project. The USFWS recommends using pre-construction eagle use data to predict post-construction fatalities. However, the existing project, consisting of WTGs that have been in operation since September 2001, was developed prior to the 2009 Eagle Rule. As such, there is no true, pre-construction eagle use

data available to inform the collision risk model. Instead, site-specific eagle use data (i.e., risk minutes) were collected from October 2017 through October 2018 to provide information on seasonal avian use patterns in and around the project (see BTR Appendix A). Therefore, the amount of take associated with the existing project would not have to be mitigated per the Eagle Rule. Because the data were collected consistent with the Eagle Conservation Plan Guidance (other than being during existing operations), the site-specific eagle use data were used to update the exposure priors in the Collision Risk Model and presented along with the 'priors only' model to provide a range of outcomes given the two sets of data inputs available for use in the Collision Risk Model. For the priors only model, the difference between the existing project and the repower project is 0.045 eagles per year, or 1.34 over 30 years. For the model with updated priors, based on site-specific eagle use data, the difference between the existing project (i.e., baseline) and the repowered project is only 0.001 per year, or 0.039 eagles over 30 years.

In addition, to reduce potential collision and electrocution risks to avian species, including raptors, the applicant will construct the overhead electrical collection system in compliance with current Avian Power Line Interaction Committee (APLIC) guidelines (APLIC 2012). These guidelines ensure a minimum separation between electrical components to prevent simultaneous contact and/or covering electrical components with protective materials to prevent simultaneous contact between electrical phases and/or electrical phases and grounds.

As part of the project design and post-construction due diligence, **PDF-BIO-3** requires implementation of the Post-Construction Avian and Bat Fatality Monitoring Plan, which is included within the Bird and Bat Conservation Strategy (BBCS) prepared for the project (BTR Appendix D). Fatality monitoring is required in order to estimate bird and bat mortality during the first two years of operation and a requirement to prepare and implement an adaptive management strategy, should higher than anticipated mortality to bird and bat species occur. The BBCS was prepared in coordination with CDFW and USFWS. BBCS Section 9 includes thresholds that would trigger an adaptive management response including (1) unexpected mortality of an eagle or a species listed as endangered or threatened under the federal ESA and/or California ESA; or (2) unexpected significant levels of mortality of unlisted species of birds or bats. Annual reporting required by the BBCS includes a summary of number and type of fatalities, estimated annual fatality rates, including the results of bias correction and detection probability, and a summary of adaptive management actions that have been or may be undertaken should the need to study or mitigate effects be deemed necessary. Furthermore, as needed, an assessment of why impacts are occurring would also be conducted to aid in developing adaptive avoidance, minimization, or mitigation measures. Some of these actions/measures may extend for the life of the project, if required by CDFW and USFWS. **PDF-BIO-3** has been revised for clarification.

In summary, due to the removal of numerous existing WTGs, including those located on the recharge pond parcel where the majority of golden and bald eagle observations occurred, and replacement with fewer WTGs within the project site, the slight increase in rotor-swept area, implementation of APLIC guidelines, and implementation of **PDF-BIO-3**, the project is not anticipated to have a significant effect on bald or golden eagles.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

- F-10** A discussion of the proposed project impacts from lighting, noise, human activity, and wildlife-human interactions, exotic and/or invasive species, and drainage is included in Draft IS/MND Section 3.IV.7 and in BTR Section 5. Impacts specific to drainage and water quality are addressed in BTR Section 5.6. Furthermore, the project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3, for details on the project's JPR findings. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.
- F-11** A discussion of the proposed project's indirect impacts to species covered under the CVMSHCP and to species not covered under the CVMSHCP are included in Draft IS/MND Section 3.IV.7 and in BTR Section 5. For the species and their associated habitats covered by the CVMSHCP, the project was determined to be consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project's JPR findings. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.
- F-12** An evaluation of the proposed project's impacts to open space lands is included in Draft IS/MND Section 3.IV.7 and in BTR Section 5.9. The project was also determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project's JPR findings. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.
- F-13** The cumulative analysis for biological resources used the CVMSHCP coverage area as the geographic scope. The project site is within the CVMSHCP boundaries, and the species and associated habitats affected by construction of new WTGs (and decommissioning of existing WTGs) would be similar to those considered for all projects within the CVMSHCP boundaries. Specific to the CVMSHCP, projects cannot conflict with CVMSHCP as determined through the California Environmental Quality Act (CEQA) review process, and if located within a designated conservation area, projects such as the proposed project, are also subject to the JPR process. Refer to Draft IS/MND Section 3.IV.7(a) for a discussion of the proposed project's consistency with the CVMSHCP as well as how project-specific potential impacts to biological resources are addressed. All other projects are subject to similar reviews for impacts to sensitive biological resources through compliance with CEQA and CESA, or, if on BLM-administered lands, subject to the federal regulations. For projects subject to the CVMSHCP, note that this is an approved regional plan that, during this plan's approval and initiation, inherently considered cumulative impacts to the species and habitats it covers.
- Specific to special status bird and bat species, construction and decommissioning activities of the existing WTGs within the project site would not be expected to contribute to bird and bat mortality. Similarly, other repower projects would not be expected to contribute to mortality during construction and decommissioning. Bird and bat impacts from operations were cumulatively considered within the proposed project's BBCS (BTR Appendix D). Biological resource data was compiled from several wind energy facilities with similar site characteristics within the project vicinity (i.e. within 2 miles of the project site) and conducted over the past 20 years in conjunction with the data obtained during the project's 2017-2018 fixed-point avian use surveys. The pre- and post-construction studies compiled from these wind energy facilities were reviewed and are summarized Table 2 and presented in Figure 3 of the BBCS.

Based on the relatively low levels of bat mortality observed at nearby projects and for the Pacific Southwest Region in general (BTR, Appendix D), significant project-related impacts to bat populations are not anticipated. Furthermore, based on the data available for the region and removal of 11 WTGs from the percolation ponds (with no replacement) it is reasonable to assume that the project would not contribute to significant adverse impacts to any of special-status bat or bird species potentially present in the area. Nevertheless, as described in the proposed project BBCS, and consistent with recommendations in the Land-based Wind Energy Guidelines (WEG; USFWS 2012) and Eagle Conservation Plan Guidance (USFWS 2013), the BBCS was developed to address birds and bats through adaptive management. Although the WEG specifically focuses on greenfield site wind energy developments rather than repowering existing operational wind projects, guidance within the WEG provides a framework for risk assessment that can be adopted by repower projects. The BBCS uses that framework to assess risk to bird and bat species.

Implementation of the requirements set forth in the BBCS, including post-construction fatality monitoring and adaptive management (**PDF-BIO-3**), appropriately addresses potential impacts from proposed project operations. Similarly, other new wind and wind repower projects have been, and will continue to follow the same acceptable WEG framework or a similar framework, where required. For repower projects, such as the proposed project, that are implementing a BBCS, there are opportunities to use this data from operational wind energy facilities within the vicinity as well as project-specific data to predict potential impacts for this and other future projects. Furthermore, the current project's BBCS includes requirements for bird and bat mortality monitoring and adaptive management strategies that will continue to contribute to improving the understanding of bird and bat mortality during project operations.

Specific to jurisdictional waters, the proposed project will directly and indirectly avoid all state waters. Furthermore, all projects with impacts to state waters would be subject to permitting and would be required to mitigate impacts accordingly.

The proposed project would avoid, minimize, and/or mitigate all impacts to sensitive biological resources, including CVMSHCP-covered and non-CVMSHCP-covered species and habitats, through incorporation of **PDF-BIO-1** through **PDF-BIO-3**, compliance with **RR-BIO-1** through **RR-BIO-7**, as well as implementation of **MM-BIO-1** (dedication of the Set-aside Parcel to conservation). With implementation of applicable PDFs, RRs, and MMs during decommissioning, construction, and operations, the project's incremental contribution to impacts on biological resources would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Based on the information above, there are no significant environmental issues regarding the adequacy or accuracy of information provided in the Draft IS/MND.

- F-14** Desert tortoise is a Covered Species under the CVMSHCP. The Draft IS/MND mitigation analysis concluded impacts to desert tortoise to be less than significant, and the project was determined to be consistent with the CVMSHCP. Please refer to response to comment F-3 for details on the project's JPR findings. Furthermore, and relevant to **MM-BIO-1**, the applicant is donating 247.48 acres towards conservation in perpetuity that will benefit numerous species, including desert tortoise. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-15 All avoidance, minimization and/or mitigation measures, required to reduce significant impacts to species covered and not covered under the CVMSHSP, are included in Draft IS/MND Section 3.IV.7. Furthermore, for the species and their associated habitats covered by the CVMSHCP, the proposed project was also determined to be consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project's JPR findings. In addition, and relevant to **MM-BIO-1**, the applicant is donating 247.48 acres to conservation in perpetuity that will benefit numerous species and reduce significant impacts potentially resulting from the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-16 Please refer to response to comment F-9, which addresses similar issues raised in this comment.

Specific to habitat modification and loss of foraging habitat, the proposed project is a repowering of an existing project located in the existing San Gorgonio Pass Wind Energy Policy Area, which was established by the County of Riverside in 1982, specifically for wind energy development. Disturbance areas are being reduced as a result of removal of more WTGs than are being replaced. Furthermore, 247.48 acres outside of the project area are being donating to the CVCC to be contributed to the CVMSHCP as conservation land in perpetuity.

Specific to interruption of migratory and breeding behaviors, the analysis acknowledged the risk to migratory birds early on and conducted site-specific field studies (point count surveys) to assess the presence and abundance of birds in the project area. As such, the project applicant implemented standardized avian point count surveys, the most common avian survey method recommended (CEC and CDFG 2007, USFWS 2012) to assess the presence and abundance of avian species at proposed wind energy projects, including potential impacts to avian migration. The results of the avian surveys and associated risk assessment (BTR Appendix A) clearly illustrated that water-associated bird species utilized the perc ponds (located to the south of the project site) during migration and for overwintering (fall-spring), with use by water-associated birds exceeding 20 observations per survey in fall, compared to less than one observation per survey during summer (BTR Appendix A). While large bird use, and more specifically use by water-associated species, was substantially higher in the fall-spring migration and overwintering period, the use was highly associated with the perc ponds and substantially minimized by the project applicant's decision to exclude repowering the WTGs located on the perc pond berms (BTR Appendix A).

While migratory birds of all sizes may pass over the project, bird fatality rates measured at the two nearest projects with project-wide fatality monitoring data (1.63 birds/MW/Year at Mountain View IV and 4.7 birds/MW/year at Dillon) have been relatively low compared to the range of 4.79 – 6.02 birds/MW/year most commonly seen at a national scale (BTR Appendix D). This suggests that projects in the local area are not likely having a significant impact on avian migration. Furthermore, with a minimal increase of only 3.7% in rotor swept area (the area of potential impact for avian species), increases in collision risk from the current baseline condition (i.e., the currently operating project) are anticipated to be relatively small, with actual impacts to be assessed during the fatality monitoring studies called for in the project's BBCS (BTR Appendix D). With implementation of **PDF-BIO-3**, the project is committed to monitoring impacts to birds post-construction and will continue coordinate with the agencies (CDFW and

USFWS) as required by the BBCS. Adaptive mitigation related to birds may be required should the results of fatality monitoring indicate higher than anticipated levels of bird mortality. Please refer to response to comment F-9 above, which addresses similar issues raised in this comment.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-17 As stated in Section Draft IS/MND 3.IV.7, none of the vegetation communities within the project are considered sensitive by CDFW. The proposed project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project's JPR findings. Consistency with the CVMSHCP, including Land Use Adjacency Guidelines outlined in BTR Section 5.9.3, as well as implementation of **PDF-BIO-1** and Regulatory Requirement **(RR)-BIO-1**, would reduce indirect impacts to vegetation communities to less than significant. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-18 All avoidance, minimization and/or mitigation measures required to reduce significant impacts to sensitive species and habitats, including those that are covered and not covered under the CVMSHCP, are discussed in IS/MND Section 3.IV.7. For the species and their associated habitats covered by the CVMSHCP, the proposed project was determined to be consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project's JPR findings. Furthermore, and relevant to **MM-BIO-1**, the applicant is donating 247.48 acres towards conservation in perpetuity that will benefit numerous sensitive species. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-19 As stated in Section Draft IS/MND 3.IV.7, to avoid direct impacts to special-status species, the proposed project would implement **PDF-BIO-1**, which states that prior to any grading or other ground-disturbing activities, a Qualified Biologist will complete pre-construction surveys within ground-disturbance areas for all special-status wildlife and plant species with potential to occur on the project site. **PDF-BIO-1** has been revised to include a "CDFW-approved" Qualified Biologist.

Mitigation for habitat loss within the WFCAs would include the donation of the 247.48-acre Set-aside Parcel to the CVMSHCP. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-20 Desert tortoise is a Covered Species under the CVMSHCP. Please refer to response to comment F-3 and F-14, which addresses the same issue raised in this comment. In addition, the proposed project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project's JPR findings. Mohave ground squirrel (*Xerospermophilus mohavensis*) is not discussed within the Draft IS/MND or BTR given that the project is not located within this species' known geographic range, and this species did not come up during the literature review search of special-status species occurring within the vicinity (refer to comment F-2 above). Therefore, this species is not expected to occur. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-21 The comment incorrectly states that **RR-BIO-3a** does not ensure a Qualified Biologist, experienced in locating desert tortoise individuals in all life stages and their sign, will complete the survey following CDFW approved protocols. As stated in Draft IS/MND Section 3.IV.7, direct impacts to desert tortoise within the WFCA would be reduced to less than significant through implementation of **RR-BIO-3a**, which would require pre-construction surveys conducted according to the most recent Wildlife Agency protocols, by a Qualified Biologist within the impact areas of the WFCA. The measure also states that if fresh sign is located, the impact area within the WFCA must be fenced with tortoise-proof fencing and a clearance survey conducted during the clearance window. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-22 The proposed project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment E-3, for details on the project's JPR findings. For consistency with the CVMSHCP Section 4.4, the project would implement **RR-BIO-3a**, which states that the pre-construction survey for desert tortoise will be conducted no more than 90 days prior to construction consistent with the CVMSHCP requirement (not 14 days as stated in the comment). In addition, preconstruction surveys will cover a 200-foot buffer around the impact area. Furthermore, **RR-BIO-3b**, which requires notification to the USFWS for potential desert tortoise salvage, would be implemented in areas of the project outside the WFCA as required by the USFWS CVMSHCP Amended Permit (USFWS 2015). Given that the project is consistent with the CVMSHCP, and desert tortoise is a Covered Species under the CVMSHCP, CDFW's suggested revisions to this measure are not required.

To avoid direct impacts to special-status species, the project would implement **PDF-BIO-1**, which states that prior to any grading or other ground-disturbing activities, a Qualified Biologist will complete pre-construction surveys within ground-disturbance areas for all special-status wildlife and plant species with potential to occur in the project. **PDF-BIO-1** has been revised to include "CDFW-approved" Qualified Biologist; refer to response to comment F-19 above. **RR-BIO-3a** also states that clearance surveys for desert tortoise shall occur between February 15 to June 15 and September 1 to October 31. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-23 Burrowing owl is a CVMSHCP Covered Species, and the proposed project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment E-3 for details on the project's JPR findings. To avoid impacts to burrowing owl and for consistency with the CVMSHCP, the Draft IS/MND includes **RR-BIO-5**, which requires pre-construction surveys for burrowing owl within the project by a Qualified Biologist between 14 and 30 days of ground disturbance or vegetation removal.

If occupied burrowing owl burrows are found, consistent with the CVMSHCP Section 4.4, an establishment of exclusion buffers including a 160-foot exclusion buffer during the non-breeding (September 1 to January 31), a 250-foot exclusion buffer during the breeding season (February 1 to August 31), or a buffer to the edge of the property boundary, if less than 500 feet, shall be established, staked, and flagged until the young are no longer dependent on the burrow, as determined by a Qualified Biologist. If occupied burrowing owl burrows cannot be avoided, **RR-BIO-5** requires preparation of a Burrowing Owl Protection and Relocation Plan

(Plan) to be reviewed and approved by the CVCC, CDFW, and USFWS prior to any ground disturbance that could potentially impact burrowing owl. This Plan shall include, but shall not be limited to, the following elements: (1) burrowing owls shall be relocated to suitable habitat areas within the Set-aside Parcel pursuant to accepted CDFW protocols; (2) determination of the appropriate method of relocation, such as eviction/passive relocation or active relocation, shall be based on the specific site conditions (e.g., distance to nearest suitable habitat and presence of burrows within that habitat) of the Set-aside Parcel; (3) active relocation and eviction/passive relocation will require the preservation and maintenance of suitable burrowing owl habitat occurring within the Set-aside Parcel; and (4) some level of monitoring for success of the relocation may be required. Furthermore, and relevant to **MM-BIO-1**, the applicant is donating 247.48 acres to conservation in perpetuity that will benefit numerous species, including burrowing owl. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-24 Comment incorrectly states that the project site contains 383.39 acres of habitat for LeConte's thrasher. This sentence should state the project site contains 383.39 acres of CVMSHCP modeled habitat for LeConte's thrasher. The comment accurately describes **RR-BIO-6**, which requires a preconstruction survey for LeConte's thrasher within the WFCA portion of the project site. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-25 As stated in Section 3.IV.7 of the Draft IS/MND, direct impacts to nesting birds would be reduced to less than significant through implementation of **RR-BIO-4**, which would require a pre-construction nesting bird survey no more than 7 days prior to any on-site construction activities within a 500-foot buffer around work areas. Active nests identified during pre-construction surveys will be flagged, and all site personnel will be notified of their presence and the necessary avoidance buffers will be established. Per the language indicating "no more than 7 days", the Qualified Biologist will make every attempt to conduct surveys 3 days prior to vegetation clearing or ground disturbance activities. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-26 As stated in the BTR Section 4.3, focused surveys for special-status plants were conducted in April and May 2020, and no special-status plants species were observed within the project site. Therefore, pre-construction botanical surveys are not required. However, as required by CVMSHCP Section 4.4, the proposed project would implement **RR-BIO-2**, which requires a pre-construction survey for triple-ribbed milkvetch within the WFCA portion of the project site. Furthermore, the proposed project was determined consistent with the CVMSHCP through the JPR process. Please also refer to responses to comments F-2 and F-3 above, which address the same issues raised in this comment.

Joshua tree individuals were not observed during focused surveys for special-status plants. Therefore, measures to avoid take of this species are not necessary. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-27 No desert kit fox or American badger individuals or diagnostic sign of the species (i.e., burrows with claw marks, digs, or scat) were observed during burrow surveys or incidentally observed

during other focused surveys conducted within the project site. Therefore, impacts to these species are not anticipated, and preconstruction surveys for desert kit fox and American badger are not required. Please also refer to response to comment F-3, which addresses the same issue raised in this comment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

- F-28** The proposed underground electrical collection infrastructure would be installed via excavation. Covering trenches overnight and including escape ramps are standard operating procedures and included as part of the standard Worker Environmental Awareness Program used in training on-site employees and construction workers on the sensitive resources potentially found on the project site. Furthermore, to avoid direct impacts to special-status species, the project would implement **PDF-BIO-1**, which states that prior to any grading or other ground-disturbing activities, a Qualified Biologist will complete pre-construction surveys within ground-disturbance areas for all special-status wildlife and plant species with potential to occur in the project. Employees and contractors will also be instructed to look under equipment for the presence of wildlife before movement of equipment. **PDF-BIO-1** has also been revised to include “CDFW-approved” Qualified Biologist (refer to response to comment F-19 above). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.
- F-29** Please refer to response to comment E-28 above, which addresses the same issue raised in this comment.
- F-30** BTR Section 5.9 includes the CVMSHCP Consistency analysis for the proposed project. The proposed project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project’s JPR findings. Furthermore, and relevant to **MM-BIO-1**, the applicant is donating 247.48 acres to conservation in perpetuity that will benefit numerous Covered Species. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.
- F-31** BTR Section 5.9 includes the CVMSHCP Consistency analysis for the proposed project. The proposed project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project’s JPR findings. Furthermore, and relevant to **MM-BIO-1**, the applicant is donating 247.48 acres to conservation in perpetuity that will benefit numerous Covered Species. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.
- F-32** As stated in the Draft IS/MND Section 3.IV.7, the results of the jurisdictional delineation conducted in 2020 and 2021 concluded there are approximately 7.24 acres (6,274 linear feet) of non-wetland waters of the state and streambed under the jurisdiction of the Regional Water Quality Control Board (RWQCB) and CDFW, respectively, within the project area (refer to Appendix F of the BTR). The proposed project was designed to avoid direct impacts to jurisdictional waters. However, due to the close proximity of proposed work areas near jurisdictional, non-wetland waters, **RR-BIO-7** would be implemented to avoid/minimize direct and indirect impacts to waters during construction-related ground disturbance. Therefore, construction of the project, as well as Operations & Maintenance (O&M) activities, would not

result in any impacts to jurisdictional waters. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft IS/MND.

- F-33** This comment states that CEQA requires that environmental data be incorporated into the CNDDDB. The biological consultants who have gathered environmental data for special-status species and natural communities occurring on the project site shall coordinate with the CDFW regarding an efficient way to have the data incorporated into the CNDDDB. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft IS/MND.
- F-34** This comment states filing fees are required. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft IS/MND.
- F-35** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft IS/MND.

INTENTIONALLY LEFT BLANK

Comment Letter G



May 17, 2021

Riverside County Planning Department
Attention: Jay Olivas
4080 Lemon Street, 12th Floor

Riverside, California 92501

BY EMAIL TO jolivas@rivco.org (Subject line: "CEQ210007 – MVPP EA Comments")

Re: Mountain View Wind re-power project CEQ210007 – MVPP EA

Dear Mr Olivas:

This letter is being submitted on behalf of Sierra Club and the Center for Biological Diversity regarding the Mountain View Wind re-power project ("the project"). Increasing efficiencies of renewable energy is a critical component of efforts to reduce greenhouse gas emissions, avoid the worst consequences of global warming, and to assist California in meeting emission reductions. However, like all projects, wind power repowering projects should be thoughtfully planned to minimize impacts to the environment. In particular, repower projects should avoid impacts to sensitive species and habitat. Only by maintaining the highest environmental standards with regard to local impacts, and effects on species and habitat, can renewable energy production be truly sustainable.

The Sierra Club and the Center for Biological Diversity strongly support re-powering wind farms as highly preferable to new projects on pristine lands. However, we do believe that re-powers (in addition to new renewable projects) should be properly analyzed under environmental laws.

G-1

The proposed project's draft MND has failed to adequately analyze or fully disclose impacts associated with the proposed project and the avoidance, minimization and mitigation for same.

G-2

Analysis and mitigation of potentially significant impacts to bats are deferred and unmitigated

The MND is notable for its deficient analysis of the project's potential risk to bats, taking a generic and superficial approach, for example:

"Potential direct impacts could occur to special-status species, including bats, during project operation. Based on the relatively low levels of bat mortality observed at nearby projects and for the Pacific Southwest Region in general (see Appendix D for details), significant project-related impacts to bat populations are not anticipated. However, as part of the project's due diligence, project design feature PDF-BIO-3, which requires fatality monitoring to estimate bird and bat mortality during operation of the proposed project, will be implemented in accordance with the Post-Construction Avian and Bat Fatality Monitoring Plan developed for the project (Appendix D)." Bio-Technical Report p. 73

The MND fails to analyze current bat use of the site, which is likely relatively high due to the project's close proximity to the CVWD percolation ponds (perc ponds). These ponds often contain extensive expanses of water. This water, though intermittent, would serve as an attractant to invertebrates and therefore the birds and especially bats which prey on insects. The MND's biological assessment admits the perc ponds serve as an attractant to bald eagles, but ignores the potential for attracting bats and other insectivorous birds.

G-3

The proponent did not even perform bat surveys or acoustic monitoring on the project site, relying instead on old monitoring reports of unknown protocols from other projects. In sum, the MND has deferred legitimate analysis and failed to determine and mitigate the project's impact to bats and insectivorous birds which is potentially significant due to its proximity to the perc ponds. In particular, this is especially troublesome because some sensitive populations of bats which are already at risk have been found at nearby wind projects. Because of its siting, these bats have an especially high potential for occurrence on this project. Table at B-5 and B-6, Appendix B within the Bio Technical Report lists various bat species in the region:

Order		Found on 149 pages		
<i>Adiantum species</i>	CYMBIPC: C	Highly dependent on riparian habitat, especially along the Salton Sea, and freshwater meadows, along the lower Colorado River and its tributaries.	Year-round	projects, and no nearby CNDDB records. Occurrences are expected to be rare.
Bats				
Packaged free-tailed bat <i>Myotis californicus</i>	CA: SSC	Inhabits a variety of arid areas in Southern California including pine (sage) woodlands, desert shrubs, palm oases, desert wash, and desert riparian. Roosts in rock crevices or caves and cliffs.	Year-round	High. Suitable foraging habitat is present. Feasibility of this species known to occur at a nearby wind project (WEST 2009), and use nearby CNDDB records. Occurrences are expected to be infrequent year-round.
Western yellow bat <i>Lasiurus xanthus</i>	CA: SSC CYMBIPC: C	Found in desert regions of the southwestern United States. Yellow bats are found in a variety of habitats throughout their range. In California, this foliage-roosting species appears to roost exclusively in the skirts of palm trees. Capture sites are often associated with water features (e.g., stock tanks, ponds, streams, and rivers) in open grassy areas and scrub, as well as riparian habitats.	Year-round	High. Suitable foraging habitat is present. Feasibility of this species known to occur at a nearby wind project (WEST 2009), and three nearby CNDDB records. Occurrences are expected to be infrequent and during the migration period.
Pleary bat <i>Lasiurus cinereus</i>	US: WEC	Found in deciduous and coniferous forests. Often forages in early evening along watercourses. Feeds primarily on moths. Roosts in trees, often at the edge of clearings.	Migration and wintering period (September to May)	High. Suitable foraging habitat is present. Feasibility of this species known to occur at a nearby wind project (Balderson et al. 2005, WEST 2009), and use nearby CNDDB records. Occurrences are expected to be during the migration and wintering periods.
Big free-tailed bat <i>Myotis macrootis</i>	CA: SSC	Typically lives in desert and arid grassland areas where rocky soil-crocks, canyons, or cliffs provide ideal roosts. Found in low lying arid areas in Southern California.	Year-round	Moderate. Suitable foraging habitat is present. Two nearby CNDDB records. Occurrences are expected to be infrequent year-round.

Tetra Tech, Inc. B-5 Mountain View Wind Repower Project BRCS

Appendix B. Bird and Bat Species of Concern with Known or Potential Occurrence at the Project

Species	Status ¹	Habitat and Distribution	Activity Period	Occurrence Probability ²
Falchid bat <i>Azureoestes pallidus</i>	CA: SSC	Inhabits deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts in shallow caves, crevices, rock outcrops, buildings, tree canopies, and bridges.	Year-round	Moderate. Suitable foraging habitat is present. Two nearby CNDDB records. Occurrences are expected to be infrequent year-round.
Townsend's big-eared bat <i>Corynorhinus townsendii</i>	CA: SSC	Their most typical habitat is arid western desert scrub and pine forest regions. Found in a wide variety of habitats throughout California, but most common in mesic sites. Its distribution is strongly correlated with the availability of caves or cave-like roosting habitat. Roosts in caves, cliffs, rock ledges, abandoned mines and other man-made structures.	Year-round	Moderate. Suitable foraging habitat is present. Several nearby CNDDB records. Occurrences are expected to be infrequent year-round.

1. Iwerson 2012; Swales et al. 1996; CDFW 2020; Tetra Tech 2015; Tetra Tech 2016a; WEST 2009; WEST 2011; WEST 2016a; CDFW 2019
 2. US Federal Classifications:
 PE: Taxa Federally listed as Endangered.
 FT: Taxa Federally listed as Threatened.
 BDEFA: Taxa protected by Bird and Golden Eagle Protection Act.
 WDF: Species of Concern in the Land-Based Wind Energy Guidelines
 CA State Classifications:
 SE: Taxa State listed as Endangered.
 ST: Taxa State listed as Threatened.
 SSC: California Species of Special Concern. Refers to animals with vulnerable or seriously declining populations.
 CFF: California Fully Protected. Refers to animals protected from take under Fish and Game Code Sections 3011, 3090, 3091, and 3015.
 CNDDBP Status

G-3 Cont.

Yet in spite of the fact that project is close to a foraging site (perc ponds) as well as potential roosting and maternity site habitat (nearby mountainous slopes) for bats, analysis of project impacts to bats has been almost entirely deferred.

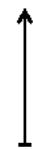
For further information regarding the threat of wind turbines to bats, including Hoary Bats that have a high potential to occur onsite, see: <https://www.sciencedirect.com/science/article/abs/pii/S0006320716310485>

Avian Migration

The MND and supporting documents fail to adequately analyze impacts to avian migration as a potential significant impact of the project. It is a well-known fact the site is well within the Pacific Flyway and that it is a key migratory route (McKernan et al. 1984, Utilization by Migrant and Resident Birds of the San Geronio Pass, Coachella Valley and Southern Mojave Desert of California 1979-1980). In fact in 1982, McCrary et al. estimated 32 million birds flew through the Coachella Valley. (McCrary et al 1983, San Geronio Nocturnal Avian Migration) This is primarily because the Salton Sea is a critical migratory stopover on the Flyway, recognized as "one of the most important places for birds in North America" and a globally significant Important Bird Area" by national Audubon Society. <http://ca.audubon.org/conservation/conservation/important-bird-areas/salton-sea> The San Geronio pass serves as the only low elevation "funnel" between of the

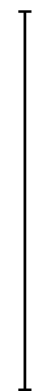
G-4

Coachella Valley to migratory stopovers to the northwest for birds wishing to avoid flying over the 9,000 to 11,000' high mountain ranges flanking the Salton Sea and Coachella Valley. See map of Important Bird Areas, attached and at <https://databasin.org/maps/new#datasets=e09fb7f243df4964a94aad51efb5d371>



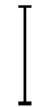
The MND is unclear as to the status and content of any Avian and Bat Protection Plan

The MND and its Bio Technical Report (BTR) variously refer to an Avian and Bat Protection Plan (ABBP) and a Post-Construction Avian and Bat Fatality Monitoring Plan (monitoring plan). The MND also claims that adaptive management will respond to the monitoring plan, which is included in the Bio Technical Report. However, while the monitoring plan requires data gathering and reporting, it does not require any adaptive management to address mortality. Data gathering and reporting do not constitute mitigation.

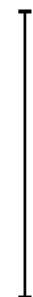


In sum the MND does not provide certainty whether an ABBP is required, and if so, what it accomplishes. This is especially troubling given the MND's abject lack of data, analysis or mitigation for individually or cumulatively significant impacts to bats.

Further, we question the monitoring plan's proposal for a mere two years of monitoring. The norm is three years or more depending on the results of such monitoring.



Clearly, given the use of the San Geronio Pass as a migratory corridor on the Pacific Flyway, plus the project's proximity to the perc ponds with their Bald Eagle and bat use, the project requires an ABBP. The County must require same. California Department of Fish and Wildlife regulations provide coverage making "incidental take" illegal in California. The ABBP should outline a minimum of a three-year monitoring regime as well as adaptive management plans if thresholds of mortality merit same. We request that CDFW and/or a Technical Advisory Committee review the monitoring reports generated and that their recommendations regarding adaptive management be mandatory.



Met tower

The MND claims that a monopole tower is infeasible and that the new nearly 400 foot high met tower will be lattice. It acknowledges that lattice towers are problematic in that they may provide perching for raptors depending on the size of the lattice, and may actually attract ravens, but that the project will be required to remove raven nesting materials prior to and post nesting season. This does not address the potential for protected raptors to use the lattice for perching and



nesting, putting them unnecessarily in harm's way¹.

Guy wires used for stabilizing towers including meteorological towers, are a known mortality source for birds² and therefore the conditions of approval should include addressing this known mortality source by prohibiting the use of guy wires. If infeasible, flight diverters must be required to be installed on the guy wires in order to reduce avian mortalities and have been used effectively to reduce mortalities on transmission lines in general³. Newer technologies using near-ultraviolet light have been documented to reduce mortalities for one sensitive species by 98% (https://www.researchgate.net/profile/James_Dwyer2/publication/333903783_Near-ultraviolet_light_reduced_Sandhill_Crane_collisions_with_a_power_line_by_98/links/5e1cd67ba6fdcc2837711658/Near-ultraviolet-light-reduced-Sandhill-Crane-collisions-with-a-power-line-by-98.pdf). The project should be required, at a minimum, to utilize new technologies to reduce avian mortality.

↑ G-8
Cont.

G-9

Cumulative impacts

Given California's recently adopted aggressive renewable energy portfolio standard of 60% by 2030 and the new requirement that all the state's electricity must come from carbon-free resources by 2045, (<http://www.cpuc.ca.gov/RPS/Homepage/>), plus the current extent of wind energy development in the San Geronio Pass WRA and the potential for expansion and re-powering in this wind resource area -- the potential for cumulative negative impacts to birds and bats is very real. (https://www.researchgate.net/publication/301572349_Avian_interactions_with_renewable_energy_infrastructure_An_update)

The MND fails to properly analyze the potential for cumulatively considerable impacts.

G-10

Conclusion

Because of the inadequately analyzed potential for impact to sensitive species, we request that the County address these short-comings in a supplemental CEQA document and include a full analysis of the potential impacts to these sensitive species, a requirement for an ABPP that includes minimization measures and mitigation of impacts to avian and bat species based on the final monitoring plan for these species, which should be included for public and decision-maker review.

G-11

¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3338802/>

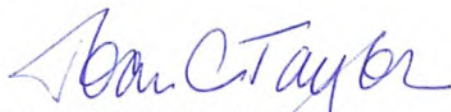
² <https://www.fws.gov/migratorybirds/pdf/management/gehringetal2011theroleoftowerheight.pdf>

³ https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterf/x/exhibits/docs/SOSC/sosc_59.pdf

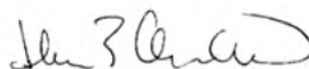
https://www.aplic.org/uploads/files/15518/Reducing_Avian_Collisions_2012watermarkLR.pdf

Thank you for the opportunity to comment. Please make this letter part of the record on the matter.

Very truly yours,



Joan Taylor, Conservation Chair
Tahquitz Group of the Sierra Club



Heene Anderson
Senior Scientist
Center for Biological Diversity
handerson@biologicaldiversity.org
323-490-0223

Response to Comment Letter G

Sierra Club and Center for Biological Diversity
Joan Taylor and Ilene Anderson
May 17, 2021

G-1 This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft Initial Study/Mitigated Negative Declaration (IS/MND).

G-2 The Draft IS/MND does adequately analyze and disclose impacts associated with the proposed project and provides project design features (PDFs), compliance with regulatory requirements, and implementation of avoidance, minimization, and mitigation measures to reduce impacts to less than significant. The proposed project is the repowering of an existing project located within the existing San Gorgonio Pass Wind Energy Policy Area, which was established by the County of Riverside (County) in 1982, specifically for wind energy development.

The proposed project appropriately completed the Joint Project Review Process (JPR) pursuant to the Coachella Valley Multiple Species Conservation Plan (CVMSHCP) prior to the California Environmental Quality Act (CEQA) process. For the Covered species and habitats, the project was deemed consistent with the CVMSHCP by County, the Coachella Valley Conservation Commission (CVCC), the California Department of Fish and Wildlife (CDFW), and the U.S. Fish and Wildlife Service (USFWS). Furthermore, the project applicant is donating 247.48 acres of conservation land that will contribute directly to the Whitewater Floodplain Conservation Area (WFCA) and will benefit numerous sensitive species. The amount of land being donating is well in excess of the amount required for mitigation of potential impacts to CVMSHCP modeled species and those potentially occurring on this project site. Without the proposed project, or if any delays in approving the project occur, this valuable contribution towards assembling the CVMSHCP conservation reserve will not occur.

Specific to bird and bat species not covered by the CVMSHCP, the Draft IS/MND includes analyses and implementation of practices and measures similarly relied on for other wind repowering projects, including preparation of a Bird and Bat Conservation Strategy (BBCS) and post-construction fatality monitoring as part of project design (**PDF-BIO-3**), and ongoing coordination with CDFW and USFWS, as well as development of an adaptive management strategy intended to form the basis for adaptive avoidance, minimization and/or mitigation measures, if determined necessary by these agencies. **PDF-BIO-3** has been revised for clarification. There are no significant environmental issues regarding the adequacy or accuracy of information provided in the Draft IS/MND.

G-3 The Draft IS/MND adequately analyzed and disclosed impacts associated with the proposed project to bat species based on the analysis included in the BBCS (BTR Appendix D), and insectivorous birds based on the analyses included in the BBCS (BTR Appendix D) and the Avian Risk Assessment and Survey Report (BTR Appendix A), with all attached to the Draft IS/MND. Information from these documents is summarized below. Additional information and research are summarized below that provide continued support for the IS/MND.

Bat (and Insectivorous Birds) Risk Analysis

While the percolation ponds may provide a source of insects to locally foraging bats, the extent to which this potential food source extends beyond the aerial space above the percolation ponds is unknown, and depends on the mobility of the insects themselves as well as local wind patterns that may carry insects away from the percolation ponds. While insects from the percolation ponds could move under their own power into the project site, given the strong prevailing west to east winds in the area, insects coming from the ponds are likely to be more abundant east of the ponds (i.e., downwind). This is in contrast to the project site, which is located to the north-/northwest of the percolation ponds, minimizing the risk of high concentrations of insects being transported into the project site by winds. Data from a recent study conducted by Huso et al. (2020) on the impacts of turbine size on mortality in the San Geronio Pass Wind Resource Area (SGPWRA) support this hypothesis, as they documented substantially higher bat mortality (approximately 2-6 times higher, depending on the metric used) at sample turbines located approximately 400 meters downwind of the percolation ponds (outside of the project site) relative to all other turbines sampled in the study. Included in their sample of 34 turbines (29 full search plots) across the SGPWRA are six of the project's existing wind turbine generators (WTGs), all of which were located in the southeastern portion of the project site, and among the closest to the percolation ponds. Given that the mortality rate for the sampled turbines within the project were consistent with all others in the study except for the sample area immediately downwind of the percolation ponds (Huso et al. 2020), the data suggests that the project WTGs do not pose an elevated risk to bats due to their proximity to the ponds. The Huso et al. (2020) results for the project WTGs (less than 3 bat fatalities/MW) were also consistent with results from other regional projects as noted in the project's BBCS (Biological Technical Report [BTR] Appendix D), suggesting that the project's location proximal to the percolation ponds does not present a substantially elevated risk to bats.

It is also worth noting that the project applicant will be removing, and not replacing, the 11 WTGs currently operating on the berms within the percolation ponds. This project modification should reduce the potential impact to bats (and birds), as the location of these WTGs in the eastern portion of the percolation ponds is clearly within an area that likely harbors increased insect activity and potentially presents a higher risk to bats, unlike those WTGs sited within the project site.

With respect to insectivorous birds specifically, the year of avian use surveys conducted on behalf of the project (refer to BTR Appendix A for details) found no evidence that the percolation ponds served as a significant attractant for insectivorous birds, and more specifically, aerial insectivores such as swifts and swallows that more typically forage within the rotor swept heights of proposed WTGs. As noted in the Avian Risk Assessment (included in BTR Appendix A), only four groups (defined as one or more birds) of swallows and swifts, totaling 32 observations, were observed in the project site during the year of avian use surveys; whereas most avian species observed were those typical of the desert scrub environment (e.g., wrens, thrashers, and other shrub associated species). Only one observation of a swallow was recorded at a survey point located on the berms within the percolation ponds, an indication that the ponds did not serve as a significant attractant to aerial insectivores in the same way it attracted water-associated birds (e.g., ducks, coots) and the raptors (e.g., eagles) that prey upon those water-associated species. As such, while the risk assessment clearly indicated the percolation ponds serve as an attractant to water-

associated birds and birds that prey upon them (e.g., bald eagles); the avian data collected during site-specific surveys did not support a similar callout relative to risk to insectivorous birds.

Bat Surveys and Acoustic Monitoring

The comment specifically calls out the lack of acoustic bat surveys (or other bat surveys) as a key concern in assessing the risk posed to bats by the proposed project. As acknowledged in the project's BBCS, bats are likely to occur in the project site, including some species of special concern. No state or federally threatened or endangered species, or candidates for such listing are expected to occur in the project site. While some sensitive bat species may occur in the project site, data from other regional projects suggest that the majority of bat fatalities in the local area consist of Mexican free-tailed bats (*Tadarida brasiliensis*; WEST 2019 referenced in BTR Appendix A), one of the most common bat species in North America. While publicly available data are limited, data collected during fatality monitoring studies at the Dillon Wind Project (2008-2009), Mountain View IV Wind Project (2012-2013), and San Geronio (1997-2000) were provided in the project's BBCS and included documentation of 32 bat fatalities during the studies. The 32 documented fatalities represented five identified species: Mexican free-tailed bat (15 fatalities), big brown bat (*Eptesicus fuscus*; 3 fatalities), western yellow bat (*Lasiurus xanthinus*; 3 fatalities), hoary bat (*Lasiurus cinereus*; 2 fatalities), and pocketed free-tailed bat (*Nyctinomops femorosaccus*; 1 fatality), along with eight unidentified bats. While two of these species (pocketed free-tailed bat and western yellow bat) are listed as California Species of Special Concern, they represented less than 15% of the fatalities reported, and therefore represent a small proportion of the relatively low bat mortality documented at nearby projects (0.97 to 2.17 bats/MW/year at nearby Mountain View IV and Dillon Wind Projects, respectively).

Acoustic monitoring at the project could have provided baseline information on bat activity rates and species composition in the project vicinity; however, acoustic monitoring has not been shown to be a good predictor of overall impacts to bats. While it has been generally presumed that pre-construction bat activity rates are positively related to post-construction bat fatalities (Kunz et al. 2007), researchers have yet to establish a significant relationship between pre-construction activity rates and post-construction fatality rates (Hein et al. 2013, Lintott et al. 2016, Solick et al. 2020). Therefore, while acoustic studies may have provided information on species presence and bat activity levels, the species likely to be present had already been established based on desktop analysis and data from other surrounding projects (refer to BTR Appendix D for details). Furthermore, there were no state or federally listed bat species with the potential to occur within the project site that would require permitting under state or federal Endangered Species Acts (ESAs). Given the lack of correlation between pre-construction acoustic data and post-construction mortality rates, such data would have provided no meaningful improvement in assessing risk to bats relative to the risk based on actual bat mortality rates documented at other nearby projects. In lieu of designing and recommending mitigation measures based on studies that do not reliably predict risk (e.g., pre-construction acoustic surveys), Lintott et al. (2016) concluded that emphasis should be placed on assessing the actual impacts post-construction and developing effective mitigation strategies based on those results. This is consistent with the process put forth in the project's BBCS (refer to BTR Appendix D for details), which requires fatality monitoring, reporting, and

follow-up coordination with CDFW and USFWS regarding adaptive management and implementation of adaptive measures, should observed impacts be greater than anticipated.

While researchers continue to investigate the potential utility of pre-construction acoustics in predicting post-construction fatalities, the current science remains consistent with that depicted in the California Wind Energy Guidelines (California Energy Commission [CEC] and California Department of Fish and Game [CDFG] 2007 referenced in BTR Appendix D), which state that passive acoustic surveys can provide pre-permitting information useful in establishing baseline patterns of seasonal bat activity, but that a fundamental gap exists regarding links between pre-permitting assessments and bat fatalities during WTG operations. The approach taken to assess risk to bats at the project site is also consistent with the USFWS Land-based Wind Energy Guidelines (USFWS 2012 referenced in BTR Appendix D), which indicate that site-specific field studies may not be necessary or warranted if sufficient information is available to indicate a low probability of significant adverse impacts to wildlife. The existing data were sufficient to assess risk to bats; therefore, this was the approach taken for the project relative to bats. This approach was discussed with agencies (USFWS and CDFW) starting in 2017, when the project applicant met with the agencies to review the field studies and survey protocols being proposed for the project. The project applicant also met with the agencies in 2019 to discuss study results, and again reviewed the expected low risk to bats based on other regional data. The project applicant also coordinated closely with CDFW and USFWS in 2020 during the development of the BBCS and post-construction monitoring protocol. The agencies did not present concern over the lack of acoustic bat surveys proposed during these early meetings, and in the recent letter from CDFW to the County, dated May 14, 2021, CDFW also did not raise concerns over the lack of field studies or evaluation of risk to bats. The project applicant also coordinated closely with CDFW and USFWS in 2020 during the development of the BBCS and post-construction monitoring protocol. The project applicant is committed to conducting post-construction fatality monitoring for birds and bats, and consistent with the project's BBCS, will continue to coordinate with the agencies as it may relate to adaptive measures should the results of fatality monitoring indicate higher than anticipated levels of mortality of listed and/or unlisted birds or bats (refer to the project's BBCS, BTR Appendix D, for details).

Based on the summary above, as well as the impact analysis included in the Draft IS/MND and information in the IS/MND supporting documentation, significant project-related impacts to bats and insectivorous birds are not anticipated. There are no significant environmental issues regarding the adequacy or accuracy of information provided in the Draft IS/MND.

- G-4** The Draft IS/MND adequately analyzed impacts to avian migration as a potentially significant impact of the project. Two geographical features primarily used by raptors during migration are ridgelines and the shorelines of large bodies of water. Updrafts formed as wind deflects off ridges and thermals created over land (and not water) make for energy-efficient travel over long distances (Liguori 2005). These are two key reasons that raptors tend to follow corridors or pathways, such as prominent ridges with defined edges or shorelines, during migration. Given the lack of either geographic feature at the project site, the potential for raptor migration through the project site was considered minimal, and studies focused on raptor migration were not conducted. This decision was supported by the avian use survey results, which found low raptor use year-round, with the highest use by diurnal raptors documented during the winter, not during the migration seasons (refer to BTR Appendix A for details). Collision mortality of

nocturnal migrants, and Passerines in particular, has generally been low at wind energy facilities, particularly in the western U.S., and multi-bird fatality events are rare. Relatively large numbers of nocturnal migrant fatalities, such as those found at communication towers, have not been documented at wind energy facilities, likely due to the use of a different type of lighting. Even at facilities within a well-defined migration corridor, such as along the Texas Gulf Coast, migrant fatalities were relatively low and not quantitatively different from facilities further inland in the region (Erickson et al. 2016). Relative to impacts to nocturnal migrants, Anderson et al. (2005 referenced in BTR Appendix A) noted the work McCrary et al. (1983, 1984, 1986) in the SGPWRA, recognizing their estimates of 69 million birds passing through the Coachella Valley annually during migration; 32 million in the spring and 37 million in the fall. They also recognized the findings of McCrary et al. (1986) that estimated 6,800 bird fatalities annually (calculated from 38 nocturnal migrant fatalities found representing 15 passerine species) within the SGPWRA, and the authors' conclusion that this level of fatality was biologically insignificant (McCrary et al. 1986 as cited in Anderson et al. 2005 referenced in BTR Appendix A).

The project applicant has acknowledged the risk to migratory birds early on and conducted site-specific field studies (point count surveys) to assess the presence and abundance of birds within the project site. Nocturnal radar surveys are another field survey method used to assess avian migration and potential impacts at sites proposed for wind energy development; however, results from these studies have demonstrated limited utility in assessing risk to nocturnal migrants. While radar can be a useful tool to study nocturnal avian migration patterns, no correlation exists between pre-construction radar studies and post-construction fatality estimates. Based on an analysis of 15 seasonal nocturnal migration studies conducted at wind energy sites between 1999 and 2009, no correlation was found between pre-construction passage rates and flight heights and post-construction fatality estimates (Tidhar et al. 2010). Stantec (2017) analyzed the relationship between publicly available pre-construction radar studies and post-construction fatality data at 20 wind energy facilities in Maine. Those results showed no correlation between the pre-construction radar data (including both passage rates and percentage of targets below turbine height) and the level of post-construction avian mortality documented at each site (Stantec 2017). In addition, radar studies fail to provide species-specific information, which is important in the assessment of potential impacts to sensitive species. Given the limitations on data derived from radar studies, they are no longer used regularly to assess risk to migrating birds or bats at land-based wind energy projects. As such, the project applicant implemented standardized avian point count surveys, the most common avian survey method recommended (CEC and CDFG 2007, USFWS 2012) to assess the presence and abundance of avian species at proposed wind energy projects, including potential impacts to avian migration.

The results of the avian surveys and associated risk assessment (refer to BTR Appendix A for details) clearly acknowledged that water-associated bird species utilize the percolation ponds during migration and for overwintering (fall-spring), with use by water-associated birds exceeding 20 observations per survey in fall, compared to less than one observation per survey during summer (refer to BTR Appendix A for details). Small bird use was also greater during the fall-spring period; however, small bird use was very low (less than one observation/survey) throughout the year, regardless of season (refer to BTR Appendix A for details), indicating that the project site does not serve as a stopover site for high numbers of smaller migratory birds (e.g., passerines).

While large bird use, and more specifically, use by water-associated species was substantially higher in the fall-spring migration and overwintering period, the use was highly associated with the percolation ponds and substantially minimized by the project applicant's decision to exclude repowering the WTGs located on the percolation pond berms (refer to BTR Appendix A for details). While migratory birds of all sizes may pass over the project, bird fatality rates measured at the two nearest projects with project-wide fatality monitoring data (1.63 birds/MW/Year at Mountain View IV and 4.7 birds/MW/year at Dillon) have been relatively low compared to the range of 4.79 – 6.02 birds/MW/year most commonly seen at a national scale (refer to BTR Appendix D for details). This suggests that projects in the vicinity are not likely having a significant impact on avian migration. Furthermore, with a minimal increase of only 3.7% in rotor swept area (the area of potential impact for avian species), increases in collision risk from the current baseline condition (i.e., the currently operating project) are anticipated to be relatively small, with actual impacts to be assessed during the fatality monitoring studies required in the project's BBCS (BTR Appendix D). As with bats, the project applicant is committed to post-construction monitoring for impacts to birds, as well as reporting and follow-up coordination with CDFW and USFWS regarding adaptive management, and possibly adaptive avoidance, minimization and/or mitigation, should observed impacts be greater than anticipated (BTR Appendix D). There are no significant environmental issues regarding the adequacy or accuracy of information provided in the Draft IS/MND.

G-5 Comment incorrectly states that the BTR variously refers to an Avian and Bat Protection Plan and a Post-Construction Avian and Bat Fatality Monitoring Plan (monitoring plan). This sentence should state that the BTR refers to an Avian Risk Assessment and Survey Report (included as BTR Appendix A) and a BBCS (included as BTR Appendix D).

The BBCS is an integral part of the proposed project, was provided with Draft IS/MND supporting documentation, and includes post-construction fatality monitoring and a requirement to prepare and implement an adaptive management strategy, should higher than anticipated mortality to bird and bat species occur. **PDF-BIO-3** has been revised for clarification. The BBCS was developed in collaboration with CDFW and USFWS, the agencies with regulatory oversight over special-status bird and bat species. BBCS Section 9 includes thresholds that would trigger an adaptive management response including (1) unexpected mortality of an eagle or a species listed as endangered or threatened under the federal and/or California ESAs or (2) unexpected significant levels of mortality of unlisted species of birds or bats. Annual reporting required by the BBCS includes a summary of number and type of fatalities, estimated annual fatality rates, including the results of bias correction and detection probability, and a summary of adaptive management actions that have been or may be undertaken should the need to study or mitigate effects be deemed necessary. Furthermore, as needed, an assessment of why impacts are occurring would also be conducted to aid in developing adaptive avoidance, minimization, or mitigation measures. Some of these actions/measures may extend for the life of the project, if required by CDFW and USFWS.

With implementation of **PDF-BIO-3**, the project applicant is committed to adaptive management and will report to, and work collaboratively with, CDFW and USFWS to address these potential adaptive measures to be considered that support regional conservation of birds and bats. As appropriate, the project applicant will also periodically review and update the master BBCS document to ensure the document is consistent and up to date with the most current information collected at the project site, as well as add updated scientific

research information and regulatory requirements. The BBCS annual reports will be submitted to USFWS and CDFW within three months of completion of the monitoring year. **PDF-BIO-3** has been revised for clarification.

There are no significant environmental issues regarding the adequacy or accuracy of information provided in the Draft IS/MND.

G-6 The project applicant and their consultant, WEST, have been engaged with CDFW and USFWS regarding the BBCS since 2017. Coordination meetings were held to discuss the post-construction fatality monitoring, and to date, the agencies have not raised any concerns with 2 years of post-construction fatality monitoring, which is the recommendation in the California Wind Energy Guidelines (CEC and CDFG 2007) and exceeds the minimum recommendation of one year in the USFWS WEG (USFWS 2012). The project applicant will continue to coordinate with CDFW and USFWS prior to the end of construction and through 2 years of operations. Should the agencies with regulatory authority over special-status birds and bats recommend an extension out to 3 years of post-construction fatality monitoring, based on the first 2 years of monitoring results, this extension will be addressed between the project applicant and agencies at that time. **PDF-BIO-3** has been revised for clarification. In addition, the CDFW comment letter received on May 17, 2021, did not raise this issue. There are no significant environmental issues regarding the adequacy or accuracy of information provided in the Draft IS/MND.

G-7 Please refer to response to comments G-5 and G-6 above, which address the same issues raised in this comment. There are no significant environmental issues regarding the adequacy or accuracy of information provided in the Draft IS/MND.

G-8 As stated in IS/MND Section 2.4.3, three existing met towers within the project site would be decommissioned prior to project construction. The proposed project would install one new freestanding met tower. As such, there would be an overall decrease in potential perching and nesting for ravens and raptors as compared to baseline conditions of the existing project.

As stated in the BTR Section 5.4.2.1, the applicant made every effort to pursue incorporating a monopole-type met tower into the project design instead of using a lattice tower structure. However, due to high winds in the area and the reduced stability of a monopole, the data generated from a monopole-type met tower would not be as accurate compared to the data generated from a more stable lattice-type met tower structure. The existing lattice met tower is located within the WFCA, approximately 165 feet from the proposed new met tower location. The existing lattice met tower will be removed shortly after the new met tower is installed. And as noted above, two other lattice towers are being permanently removed. As such, there would be a decrease in perching and nesting opportunities for ravens and protected raptors when comparing the existing project to the proposed project. Per revised **PDF-BIO-2**, nesting material for both ravens and raptors will be removed prior to and after nesting season.

There are no significant environmental issues regarding the adequacy or accuracy of information provided in the Draft IS/MND.

G-9 As stated in Comment G-8 above, the proposed met tower would be freestanding and would not require guy wires. Furthermore, as stated in BTR Section 5.4.2.2, the project applicant elected to construct the overhead electrical power line upgrades and retrofitting in compliance

with current APLIC guidelines (APLIC 2012) to reduce impacts from electrocution and collision. There are no significant environmental issues regarding the adequacy or accuracy of information provided in the Draft IS/MND.

G-10 Potential environmental impacts associated with the proposed project were analyzed throughout Section 3 of the Draft IS/MND. Section 3.IV.46 (Mandatory Findings of Significance) of the Draft IS/MND explains that the proposed repower would result in minimal changes compared to existing conditions and generally describes that the potential impacts would not be cumulatively considerable.

The proposed project would have no impact on agriculture and forestry, mineral resources, population and housing, public services, and recreation. Pursuant to section 15130(a)(1) of the CEQA Guidelines, discussion of cumulative impacts is not required if no impact would occur. As such, no additional cumulative impact analysis has been included for these impact categories.

Pursuant to Sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances. As such, as discussed in Section 3.IV.46, it was concluded that impacts associated with aesthetics, air quality, energy, GHG emissions, hydrology and water quality, noise, utilities and service systems, and wildfire would not be cumulatively considerable due to "compliance with existing policies or regulations," which are discussed specifically for each impact in Section 3.

CEQA Guidelines Section 15064(h)(2) provides that a lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus not significant. When a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable in a mitigated negative declaration, the initial study must briefly indicate and explain how the contribution has been rendered less than cumulatively considerable (14 C.C.R. 15064(h)(2)). Compliance with regulatory requirements and implementation of PDFs, including how birds and bats are addressed through BBCS implementation relative to operations, was provided in the IS/MND supporting documentation. The BBCS also included cumulative information for other repower projects in the region.

For clarification, a cumulative impact discussion has been added to Section 3.IV.46 of the Final MND for each impact section that would result in less-than-significant impacts or less-than-significant impact with mitigation. The cumulative analysis relies upon the impact discussions included throughout Section 3 of the Draft IS/MND, supporting documentation that was made available with the Draft IS/MND, and general public knowledge regarding the established San Gorgonio Pass Wind Energy Policy Area. The cumulative information is also provided with the understanding that for repower projects, the reasonable metric used includes a comparison of the change between existing baseline conditions (existing wind energy projects) and the proposed repowering of these existing projects, and where information, if any, is known or can be assumed. The additional cumulative information does not change the impact conclusions in the Draft IS/MND. There are no significant environmental issues regarding the adequacy or accuracy of information provided in the Draft IS/MND.

G-11 The Draft IS/MND adequately analyzed and disclosed impacts associated with the proposed project. Specific to bats, based on the relatively low levels of bat mortality observed at nearby projects and for the Pacific Southwest Region in general (BTR, Appendix D), significant project-related impacts to bat populations are not anticipated. Furthermore, specific to bats and birds, using the data available for the region and removal of 11 WTGs from the percolation ponds (with no replacement), it is reasonable to assume that the project would not contribute to significant adverse impacts to any of special-status bat or bird species potentially present in the area. Nevertheless, the project applicant chose to prepare and implement a project-specific BBCS, consistent with recommendations in the WEG (USFWS 2012) and Eagle Conservation Plan Guidance (USFWS 2013), that includes a commitment to addressing birds and bats through adaptive management.

As stated in the Land-based Wind Energy Guidelines (USFWS 2012 referenced in BTR Appendix D), an Avian and Bat Protection Plan (ABPP) is the term used for transmission projects and BBCS is used specifically for wind energy projects. The Draft IS/MND includes a project-specific BBCS, which was prepared in accordance with the California Wind Energy Guidelines (CEC and CDFG 2007 referenced in BTR Appendix D), Land-based Wind Energy Guidelines (WEG; USFWS 2012 referenced in BTR Appendix D), and the Eagle Conservation Plan Guidance (USFWS 2013 referenced in BTR Appendix D), and in coordination with CDFW and USFWS. The BBCS includes standard post-construction fatality monitoring as part of project design, ongoing coordination with CDFW and USFWS, as well as development of an adaptive management strategy intended to form the basis for adaptive measures, if determined necessary by these agencies that have the regulatory authority over certain bird and bat species. The BBCS states that within the USFWS WEG, the USFWS defines adaptive management as “an iterative decision process that promotes flexible decision-making that can be adjusted in the face of uncertainties as outcomes from management actions and other events become better understood” (USFWS 2012). In addition, CEQA does not require one specific approach to accomplishing mitigation to reduce impacts to a level of less than significant.

Pursuant to CEQA Guidelines Section 15073.5(c), the County is not required to recirculate an ND/MND if:

- Mitigation measures are replaced with equal or more effective measures.
- New project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects.
- Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.
- New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

All revisions to the Final MND are clarifying and amplifying in nature and do not make substantial revisions to the project or introduce any new, avoidable significant effects. As such, the cumulative analysis added to the revised IS/MND to create the Final MND does not warrant recirculation of the IS/MND.

In addition, the commenter is not referencing the relevant metric for addressing potential impacts in the context of this and other wind repowering projects, that is, whether impacts from the proposed project and other wind repower projects will actually increase in severity relative to existing baseline conditions. The Final MND, including all revisions to the IS/MND, as well as the public comments and responses to comments, will be provided to the decision-makers for review prior to making a decision regarding the proposed project. Based on all information provided above, a supplemental document for public review is not necessary or required under CEQA.

Comment Letter H

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

801 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (850) 589-1880
FAX: (850) 589-5082

tgulesserian@adamsbroadwell.com

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350
SACRAMENTO, CA 95814-4721

TEL: (916) 444-8201
FAX: (916) 444-8209

DANIEL L. CARDOZO
KEVIN T. GARMICHAEL
CHRISTINA M. CARO
JAVIER J. CASTRO
THOMAS A. ENSLOW
KELILAH D. FEDERMAN
ANDREW J. GRAF
TANYA A. GULESSERIAN
KENDRA D. HARTMANN
KYLE C. JONES
DARIEN K. KEY
RACHAEL E. KOSS
AIDAN P. MARSHALL

MARC D. JOSEPH
Of Counsel

*XX admitted in California.
Licensed in Colorado.

May 17, 2021

VIA EMAIL ONLY

Charissa Leach, Assistant TLMA Director
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501
Email: cleach@rivco.org

Jay Olivas
Project Planner
Email: jolivas@rivco.org

Re: AES Mountain View Wind Repower Project

Dear Ms. Leach and Mr. Olivas:

We are writing on behalf of California Unions for Reliable Energy whose member unions represent hundreds of men and women living in Riverside County and working in the construction trades performing work on renewable energy facilities throughout the region. CURE is pleased to support the AES Mountain View Wind Repower Project. The Project will contribute to meeting California's goal of having 100% of all electricity come from renewable resources by 2045. CURE supports projects, such as the AES Mountain View Wind Repower Project, that provide good jobs and sustained viability and growth of California's renewable energy industry. The Project will hire trained local construction workers, maintain area wage standards and provide health insurance. This will ensure that the Project provides economic and employment benefits to Riverside County.

H-1

CURE believes that construction and operation of this renewable energy project will benefit Riverside County and the State of California. We are pleased to be able to support the Mountain View Wind Repower Project.

Sincerely,

Tanya A. Gulesserian

:TAG

4896-013tag

printed on recycled paper

INTENTIONALLY LEFT BLANK

Response to Comment Letter H

Adams Broadwell Joseph & Cardozo on behalf of California Unions for Reliable Energy

Tanya A Gulesserian

May 17, 2021

- H-1** This response acknowledges and appreciates this comment letter and notes that Adams Broadwell Joseph & Cardozo has no comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND). Because the comment does not raise an issue related to the adequacy of Draft IS/MND, no further response is required.

INTENTIONALLY LEFT BLANK

1 Introduction

The County of Riverside (County) received a Wind Energy Conversion System (WECS) permit application from Mountain View Power Partners LLC (MVPP) (applicant) to repower a portion of its existing Mountain View I & II wind energy facilities, hereafter referred to as the Mountain View Power Partners Wind Repower Project or proposed project. The proposed project would repower the existing 66.6-megawatt (MW) MVPP I & II wind energy facilities through removal of 93 existing wind turbine generators (WTGs), leaving 7 existing WTGs in place, and installing 16 new, larger WTGs.

1.1 Background

The project site is located within the Western Coachella Valley Area Plan, specifically within the San Gorgonio Pass Wind Energy Policy Area (County of Riverside 2019a). With a stable wind flow caused by warm desert air mixing with cooler coastal air, the Coachella Valley and the San Gorgonio Pass have proven to be a reliable location for wind energy production. Based on counts obtained from the 2020 version of the U.S. Wind Turbine Database, there are approximately 717 commercial WTGs installed in the northern part of Palm Springs and in its adjacent sphere of influence. These facilities have been distributed over approximately 11,568 acres (18 square miles). An additional 1,247 WTGs have been installed nearby on County land and in portions of Desert Hot Springs. The total rated capacity of all the WTGs in this area is approximately 605.2 MW (U.S. Wind Turbine Database 2020).

Two Environmental Impact Reports (EIRs) were previously certified by the County for the portion of existing MVPP I & II projects on privately owned land. Final EIR No. 422 was certified by the County on January 30, 2001, for the following entitlements: Change of Zone No. 6486, Commercial WECS Permit No. 107, and Variance No. 1679. Final EIR No. 416 was certified on September 29, 2000, which covered the following entitlements: Commercial WECS Permit No. 103 and Variance No. 1693. Together, the entitlements permitted construction and operation of 111 Mitsubishi 600 kilowatt (kW) WTGs with a nameplate generation capacity of 66.6 MW. Existing electrical infrastructure runs east of the project site and delivers the electrical power generated by the existing MVPP I & II wind energy facility the Southern California Edison (SCE) Mount Wind Substation, located in the City of Palm Springs.

Separately, the Bureau of Land Management (BLM) issued two right-of-way (ROW) grants for WTGs on federal lands managed by BLM: ROW Grant CACA-42139 authorized six WTGs, which were brought into operation in 2001. ROW Grant CACA-42139, which was set to will expire on April 21, 2027, has been extended to expire on December 31, 2042. A second ROW Grant CACA-40557 authorized 11 WTGs, which were brought into operation in 2003. ROW Grant CACA-40557 will expire on December 31, 2022. These 17 WTGs (10.2 MW) have been operated as part of the existing MVPP I & II projects.

1.2 California Environmental Quality Act Compliance

Pursuant to the California Environmental Quality Act (CEQA) Statute Section 21067 and CEQA Guidelines Article 4 and Section 15367, the County of Riverside is the lead agency for the proposed project. Because the proposed project involves a change to the existing site, the County's consideration of the proposed project and its potential environmental effects is a discretionary action that is subject to CEQA. This Initial Study, also known as the County's Environmental Assessment form (herein only referred to as the Initial Study), and its appendices have been prepared in accordance with CEQA Statute and Guidelines. Based on the results of the Initial Study, included in Section 3 of this document, the

County will determine the appropriate CEQA document (Mitigated Negative Declaration or EIR) for the proposed project.

The overarching goal of CEQA is to protect the physical environment. To achieve this goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider mitigation measures, if necessary, that could avoid or reduce significant adverse impacts when avoidance or minimization is not feasible. It also gives the public and other public agencies an opportunity to comment on the proposed project. If the appropriate CEQA document is determined by the County to be an EIR, then alternatives would also be considered.

1.3 Document Organization

Section 1 Introduction

This section includes a concise introduction of the proposed project, project applicant, and lead agency. This section also describes the County’s CEQA compliance approach and the organization of the Initial Study.

Section 2 Project Overview

Section 2 details the project location, regional overview, and project description. The project description includes details regarding the proposed areas of disturbance, project components, project construction, land use designations, and design considerations.

Section 3 Environmental Assessment Form: Initial Study Checklist

Section 3 has been prepared pursuant to CEQA Guidelines Sections 15063–15065. The County’s Environmental Assessment was used as basis for the Initial Study and the environmental impact evaluation, to indicate whether a project would have an adverse impact on the environment. All references consulted for the impact evaluation are cited after the significance determination table for each impact category. A discussion of each significance determination is provided following the checklist question(s) for each impact category. For the impact analysis, one of the following four significance determinations is possible for each environmental issue area:

1. Potentially Significant Impact
2. Less-Than-Significant Impact with Mitigation Incorporated
3. Less-Than-Significant Impact
4. No Impact

The checklist with accompanying explanation of each checklist response provides the analysis necessary to assess relevant environmental impacts of the proposed project. Using this analysis, the County will determine the extent of additional environmental review for the proposed project.

1.4 Public Review Process

In accordance with CEQA, all efforts will be made to contact affected agencies, organizations, and persons who may have an interest in this project.

In reviewing the CEQA document, public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the project's possible impacts on the environment.

The document is also available on the County's website at <https://planning.rctlma.org/> under "Ongoing Projects". In accordance with Governor's Executive Order N-80-20, public notices are not required to be made physically publicly available, but are required to be posted on the lead or responsible agency's website for the same length of time that would be required for physical posting.

Comments on the CEQA document may be made in writing before the end of the public review period. Per Section 15072(a) of the CEQA Guidelines, a 30-day review and comment period from April 16, 2021 to May 17, 2021 has been established. Following the close of the public comment period, the County will consider this CEQA document and comments in determining whether to approve the proposed project.

Written comments on the CEQA document should be received at the address listed above by 5:00 p.m., May 17, 2021.

Contact: Jay Olivas, Project Planner
Telephone: (951) 955-6863 ~~(760) 863-7050~~
Email: jolivas@rivco.org

INTENTIONALLY LEFT BLANK

2 Project Overview

This section includes a description of the project location, regional overview, project description, project components, project construction, and project operations. Land use considerations and design considerations, including the project's conformance with existing design standards and development criteria of the County's Zoning Code, are summarized in this section.

2.1 Project Location

The proposed project boundary encompasses approximately 1,255.19 acres of existing energy facilities within unincorporated Riverside County. Specifically, the project site is located within the County, north of the City of Palm Springs, in the northwestern portion of the Coachella Valley. State Route (SR-) 111 and the City of Palm Springs are located south of the project site, and Interstate (I-) 10 is located north of the project site (Figure 2-1, Project Location).

The project site is mostly located within the boundaries of the existing MVPP I & II wind energy projects and covers 1,202.86 acres of private land and 52.34 acres of BLM lands. The project site encompasses 42 parcels and a portion of two additional parcels, as shown on Figure 2-2, Project Site Assessor's Parcel Numbers. The project site is located within Section 13 of Township 3 South, Range 3 East, and Sections 17 and 18 of Township 3 South, Range 4 East, of the Desert Hot Springs and Whitewater U.S. Geological Survey (USGS) Quadrangles. The approximate geographic center of the project site is located at 33°54'28.04"N (latitude) and 116°35'32.03"W (longitude).

In addition, the entire project site is located within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). Within the CVMSHCP, approximately 383.39 acres in the western portion of the project site overlap the CVMSHCP Whitewater Floodplain Conservation Area (hereafter referred to as Conservation Area).

Surrounding land uses can be broadly described as developed with a mix of wind energy facilities, industrial and commercial properties, and rural residences. The Union Pacific Railroad corridor runs east–west south of the project site, and Coachella Valley Water District percolation ponds are located south of the railroad ROW. I-10 runs northwest–southeast north of the project site, and SR-62 and vacant desert land are located north of I-10. Existing wind energy projects are located on all sides of the project site, and some commercial and industrial land uses are developed east of the project site, adjacent to North Indian Canyon Drive. The area of land between the noncontiguous portions of the project site consists of wind energy development, rural residential, and undeveloped land. An open space area is located west of the project site.

2.2 Regional Overview

The Coachella Valley extends approximately 45 miles southeast of the San Bernardino Mountains and constitutes the westernmost portion of the Colorado Desert. The Coachella Valley connects with the greater Los Angeles region to the west via the San Gorgonio Pass. The topography of the project region is generally flat with some gently southeast sloping areas. The regional elevation ranges from approximately 975 to 1,260 feet above mean sea level. This region is classified as a continental desert region with climate conditions characterized by low rainfall, low humidity, hot days, and cool nights. The Peninsular Mountain Ranges to the west block coastal influence such as cool and damp marine air that traverses inland from the Pacific Ocean. The geographic barriers and atmospheric conditions often limit

the amount of precipitation for the area. Locally, the climate conditions in Palm Springs are characterized by relatively low rainfall, with warm summers and mild winters. Average temperatures range from an average high of 108°F in July to an average low of 42°F in December. Annual precipitation averages about 5.5 inches, falling mostly from August through March.

2.3 Project Description

The proposed project would involve the removal of 93 existing Mitsubishi 600-kilowatt (kW) WTGs and the subsequent installation of 16 Vestas 3.6 and 4.3 MW WTGs; 7 existing Mitsubishi 600 kW WTGs would remain as part of the proposed project. The proposed project would be capable of producing approximately 229.29 gigawatt hours (GWh) of power per year for operational years 1 through 10. Beyond operational year 10, assuming decommissioning of the seven Mitsubishi 600 kW WTGs, the proposed project would produce approximately 215.90 GWh of power annually for the remainder of its operational life. The proposed project would repower the existing wind energy facilities with modern, higher capacity WTGs. Detailed information regarding the specific project components is provided below in Section 2.4, Project Components. A layout of the proposed project is provided on Figure 2-3, Site Plan.

Six of the existing WTGs that would remain as part of the proposed project (WTG74-09 through WTG74-14) are located on BLM parcel no. 668-310-038 (ROW Grant CACA-42139), and one WTG (WTG74-15) is located on privately owned parcel no. 669-020-008.

The seven WTGs to remain would be upgraded with new and/or refurbished gearboxes, generators, and other components, to improve electrical generation efficiency. Via a pending application, the applicant is requesting that BLM extend ROW Grant CACA-42139 to December 31, 2042. BLM, as the lead agency pursuant to the National Environmental Policy Act, is anticipated to apply a Categorical Exclusion for the proposed improvements to existing WTGs within BLM land. Via a subsequent application, the applicant will request that BLM modify those terms and conditions of ROW Grant CACA-42139 requiring removal of all improvements upon ROW grant termination, to allow the foundations to remain in place at decommissioning.

The 10 existing WTGs located adjacent to the Mount Wind Substation in the eastern portion of the project site, authorized by the City of Palm Springs 5.0779-CUP/6.423/VARIANCE, will be decommissioned as part of the project, subject to a ministerial permit to be issued by the City of Palm Springs.

No changes are proposed with respect to the 11 existing Mitsubishi WTGs authorized by ROW Grant CACA-40557. These 11 WTGs are located on land that is not contiguous with the proposed project site and no changes are proposed to them as part of the proposed project. The 11 WTGs authorized by ROW Grant CACA-40557 have independent utility and will not be operated as part of the proposed project. They are therefore not part of the proposed project analyzed in this Initial Study.

Estimated impact acreages within the 1,255.19-acre site, plus off-site acreages, and proposed land dedication for conservation, are provided in Table 2-1.

Table. 2-1. Proposed Disturbance by Jurisdiction

Land Ownership	Disturbance (acres)		
	Permanent	Temporary	Total
On-site			
Private Land	40.35	98.57	138.92
Public Land (BLM)	0.00	0.00	0.00
Total On-site	40.35	98.57	138.92
Off-site			
Public ROW	0.02	0.16	0.18
Total Off-Site	0.02	0.16	0.18
TOTAL	40.37	98.73	139.10

Notes: BLM = Bureau of Land Management; ROW = right-of-way.

Approximately 383.39 acres of the project site are within the CVMSHCP Whitewater Floodplain Conservation Area (WFCA). The proposed project has focused development within the Conservation Area to existing and previously authorized disturbance areas, to the extent feasible, to limit new ground disturbance within the WFCA. Table 2-2 identifies proposed project disturbance within disturbed/developed land, previously authorized disturbance areas, and undisturbed land.

Table2-2. Project Site Disturbance

Land Type	Disturbance (acres)		
	Permanent	Temporary	Total
Within Whitewater Floodplain Conservation Area			
Undisturbed Land	1.40	18.04	19.44
Disturbed/Developed Land ¹	0.08	0.70	0.78
Previously-Authorized Disturbance Area ²	3.57	3.90	7.47
Total within Conservation Area	5.05	22.64	27.69
Outside Whitewater Floodplain Conservation Area			
Undisturbed Land	27.06	65.39	92.45
Disturbed/Developed Land ¹	8.26	10.70	18.96
Previously-Authorized Disturbance Area	0.00	0.00	0.00
Total outside Conservation Area	35.32	76.09	111.41

Notes:

1. Disturbed/Developed land calculated using vegetation communities identified in the Biological Technical Report (Appendix B)
2. Previously-Authorized Disturbance Area acreage provided by Coachella Valley Conservation Commission

As identified in Table 2-2, the project would result in 28.46 acres and 83.43 acres of permanent and temporary disturbance on previously undisturbed land, respectively. The applicant would convey 248.12 acres within the WFCA to the Coachella Valley Conservation Commission (CVCC) to achieve compliance with Rough Step requirements of the CVMSHCP.

2.4 Project Components

The following describes the key proposed project components associated with construction, operation and maintenance (O&M) activities, and decommissioning.

2.4.1 Wind Turbine Generators

The project proposes the installation of 8 new Vestas V117-4.3 MW WTGs and 8 new Vestas V117-3.6 MW WTGs. WTG technology is continually improving, and the cost and availability of specific WTGs can vary from year to year. As such, minor changes to the proposed Vestas models to be installed may occur prior to project construction. The maximum characteristics of WTGs for the proposed project are described as follows:

- Tubular steel towers
- Rotor diameter – 117 meters (384 feet)
 - Blade length – 57.15 meters (188 feet)
 - Three blades per WTG
- Hub height – 91.5 meters (300 feet)
- Total height of WTG (highest point) – 150 meters (approximately 492 feet)

All proposed WTGs would be three-bladed, pitch regulated upwind WTGs. Each WTG would be mounted on a concrete pedestal supported by a permanent concrete foundation. Each WTG would have a WTG rotor and nacelle mounted on top of its tubular tower. The elevations for the proposed WTGs are shown on Figure 2-4. WTGs would be arranged within the project site in accordance with applicable industry siting recommendations for optimum energy production.

Wind Turbine Generator Pad

Each WTG would be installed in an area designated as the WTG pad, which would include the subterranean foundation, up to 15 feet deep, and a crane pad to provide the appropriate working surface and strength for safe operation of the high-capacity crawler crane required to erect each WTG. Each WTG pad would require a temporary construction area, including a permanent 33-foot by 380-foot crane pad assembly area.

Safety Features

Consistent with Federal Aviation Administration (FAA) rules established in Advisory Circular 70/7460-1L: Obstruction Marking and Lighting, all WTG components (including towers, nacelles, and rotors) would be painted or finished using low-reflectivity, neutral white colors. Exterior lighting installed on WTGs would be restricted and would only include FAA aviation warning lights.

The WTGs' control system includes provisions to safely stop the rotor by pitching the blades to a stall position under all foreseeable upset conditions. The WTGs would also be equipped with a parking brake to keep the rotor stationary while maintenance or inspection is performed. The proposed WTGs would include built-in safety measures to comply with Occupational Safety and Health Administration (OSHA) and American National Standards Institute requirements.

Each WTG would also be equipped with a lightning protection system to protect the WTG against physical damage caused by lightning strikes. The lightning protection system would include (1) lightning receptors on each blade, (2) a system to conduct lightning current down the WTG, (3) protection against overvoltage and overcurrent, (4) shielding against magnetic and electrical fields, and (5) an earthing system. A smoke detection system within each WTG would interface with the internal WTG safety system, ensuring automatic shut-off if smoke is detected.

Transformer

A step-up high voltage transformer would be used at each WTG to step up power generated by the WTG to the appropriate voltage to deliver to the Mount Wind Substation. The transformer would be contained within the WTG unit itself, in a separate locked room within the nacelle. Electrical cables in underground and overhead electrical collection systems would transmit electricity from the WTG transformers to the point of interconnection at the substation.

2.4.2 Electrical Collection System

The WTGs would be connected to the Mount Wind Substation through an above- and below-ground electrical collection system. The proposed project's electrical collection system would upgrade the existing aboveground electrical infrastructure and install all new underground electrical infrastructure.

Substation Upgrades

The Mount Wind Substation encompasses approximately 0.85 acres within Assessor's Parcel No. 668-412-001. This substation is currently used for the existing MVPP I & II wind energy facilities. The project applicant is currently working with SCE regarding any substation modifications that may be necessary to support the proposed project. For the purposes of this analysis, it is assumed that any required improvements would occur within the existing disturbed footprint of the substation.

MVPP will replace the existing electrical transformer in the Mount Wind Substation with a new transformer. The old (current) transformer would be stored immediately adjacent to the existing Mount Wind Substation in an existing disturbed area in the eastern portion of the project site. The location of this spare transformer would allow quick replacement in the event the new transformer fails. The spare transformer would require up to 3,600 square feet of ground disturbance. A concrete foundation would be constructed to support the transformer. The foundation would include a secondary containment trench surrounding the transformer. The secondary containment trench would be approximately 3 feet deep and treated with oil resistant sealant. The secondary containment trench would confine any transformer oils in the event they escape from the primary storage within the transformer.

Underground Electrical Infrastructure

New underground electrical infrastructure, shown on Figure 2-3, would consist of 34.5-kilovolt electrical collector circuits that would collect the electrical energy generated from the proposed project's WTGs and transfer it to the 115-kilovolt Mount Wind Substation. However, the underground electrical collection infrastructure for the existing 7 Mitsubishi WTGs would remain intact between turbine number 74-09 and the overhead electrical collection system and will not be replaced.

Overhead Electrical Infrastructure

The new underground electrical infrastructure would tie into the existing onsite overhead electrical collection system that includes 55 utility poles from WTG-04 in the western portion of the site, extending past WTG-16 to the eastern project boundary. A total of 43 existing, 45-foot tall utility poles would be replaced. Most new poles would be 55 feet tall, but some would be up to 65 feet tall. Four utility poles would be replaced in-place, requiring a temporary 25-square foot work area at each pole. Thirty-nine utility poles would be replaced immediately adjacent to the existing pole, requiring a temporary 100 square foot work area at each pole. To reduce potential collision and electrocution risks to avian species, the applicant would construct the overhead electrical collection system in compliance with current Avian Power Line Interaction Committee (APLIC) guidelines (APLIC 2012). These guidelines ensure a minimum separation between electrical components to prevent simultaneous contact and/or covering electrical components with protective materials to prevent simultaneous contact between electrical phases and/or electrical phases and grounds. A 10-foot wide spur road would be built to provide vehicle access to 22 of the utility poles that are currently inaccessible from existing access roads.

The disturbance required for overhead electrical collection system upgrades is shown in Figure 2-3. Table 2-3 summarizes the improvements and work area required for the overhead electrical infrastructure upgrades.

Table 2-3. Overhead Electrical Collection System Upgrades

Pole #	Whitewater Floodplain Conservation Area	Replace	Pole Disturbance Footprint	Access Road	Access Road Disturbance Footprint
1	Yes	No	None	None	NA
2	Yes	In Place	5' X 5'	None	NA
3	Yes	In Place	5' X 5'	None	NA
4	Yes	No	None	None	NA
5	Yes	No	None	None	NA
6	Yes	In Place	5' X 5'	None	NA
7	Yes	No	None	None	NA
8	Yes	In Place	5' X 5'	None	NA
9	Yes	No	None	None	NA
10	Yes	No	None	None	NA
11	Yes	No	None	None	NA
12	Yes	No	None	None	NA
13	Yes	No	None	None	NA
14	Yes	No	None	None	NA
15	No	No	None	None	NA
16	No	No	None	None	NA
17	No	Adjacent	10'x 10'	None	NA
18	No	Adjacent	10'x 10'	None	NA
19	No	Adjacent	10'x 10'	None	NA
20	No	Adjacent	10'x 10'	None	NA
21	No	Adjacent	10'x 10'	None	NA

Table 2-3. Overhead Electrical Collection System Upgrades

Pole #	Whitewater Floodplain Conservation Area	Replace	Pole Disturbance Footprint	Access Road	Access Road Disturbance Footprint
22	No	Adjacent	10'x 10'	None	NA
23	No	Adjacent	10'x 10'	None	NA
24	No	Adjacent	10'x 10'	None	NA
25	No	Adjacent	10'x 10'	None	NA
26	Yes	Adjacent	10'x 10'	Yes	10' wide
27	No	Adjacent	10'x 10'	None	NA
28	No	Adjacent	10'x 10'	None	NA
29	No	Adjacent	10'x 10'	Yes	10' wide
30	No	Adjacent	10'x 10'	Yes	10' wide
31	No	Adjacent	10'x 10'	Yes	10' wide
32	No	Adjacent	10'x 10'	Yes	10' wide
33	No	Adjacent	10'x 10'	Yes	10' wide
34	No	Adjacent	10'x 10'	Yes	10' wide
35	No	Adjacent	10'x 10'	Yes	10' wide
36	No	Adjacent	10'x 10'	None	NA
37	No	Adjacent	10'x 10'	Yes	10' wide
38	No	Adjacent	10'x 10'	Yes	10' wide
39	No	Adjacent	10'x 10'	Yes	10' wide
40	No	Adjacent	10'x 10'	Yes	10' wide
41	No	Adjacent	10'x 10'	Yes	10' wide
42	No	Adjacent	10'x 10'	Yes	10' wide
43	No	Adjacent	10'x 10'	Yes	10' wide
44	No	Adjacent	10'x 10'	Yes	10' wide
45	No	Adjacent	10'x 10'	Yes	10' wide
46	No	Adjacent	10'x 10'	Yes	10' wide
47	No	Adjacent	10'x 10'	Yes	10' wide
48	No	Adjacent	10'x 10'	Yes	10' wide
49	No	Adjacent	10'x 10'	Yes	10' wide
50	No	Adjacent	10'x 10'	Yes	10' wide
51	No	Adjacent	10'x 10'	None	NA
52	No	Adjacent	10'x 10'	None	NA
53	No	Adjacent	10'x 10'	None	NA
54	No	Adjacent	10'x 10'	None	NA
55	No	Adjacent	10'x 10'	None	NA

2.4.3 Meteorological Tower

One new free-standing lattice meteorological (met) tower would be erected within the southwest portion of the project site. The proposed tower would be up to 100 meters (approximately 328 feet) tall and would be equipped with applicable FAA-compliant marking or lighting for aviation safety. Preferred lighting color has not yet been finalized but is anticipated to be in warm tones (e.g., reds or oranges) as opposed to LED or bright lighting in order to lower increased predation risk for small mammals. The proposed met tower would be used to monitor and verify wind characteristics at the project site. The met tower would be constructed atop a concrete foundation within a graded work area, including a crane pad for tower assembly and erection. A new 16-foot-wide access road would be constructed to provide access to the proposed met tower. A total of 0.5 acres of new ground disturbance would be required for construction of the proposed met tower and associated components. The three existing met towers within the project site, one of which is located within the WFCA, would be decommissioned prior to project construction.

2.4.4 Access Roads

Where feasible, the existing network of permanent access roads would be retained and reused for the new WTGs. In addition to the existing access roads, approximately 6.25 miles of new permanent access and maintenance roads would be constructed to provide access and circulation within the project site. Access roads would consist of compacted native material covered by approximately 4 to 6 inches of aggregate material to provide the soil strength needed for heavier equipment.

The primary construction access and haul ingress/egress for the project site would be from Garnet Avenue. Two ingress/egress points are proposed along the northern boundary of the project site along Garnet Avenue. Minimal ground disturbance (0.18 acres) would be required within the public ROW to connect the project site access points to Garnet Avenue. Construction contractors would post signs on public roads alerting the public of increased heavy construction traffic. When possible, delivery times would be planned around local peak travel periods to avoid congestion. Proposed on-site access roads would be utilized during construction activities. During construction, a 17-foot-wide compacted subgrade shoulder would be developed on either side of the 16-foot-wide roadways, except for the access roads between WTGs 3 and 4, 4 and 7, and 7 and 8 (each of these road segments is within the WFCA, which would remain at 16 feet wide). Maximum width for temporary construction roads to support activities would not exceed 50 feet.

All permanent access roads outside of the WFCA would consist of 32-foot-wide aggregate dirt roads to accommodate crane transport during future O&M activities. Within the WFCA, permanent access roads would be limited to 16 feet in width to minimize impacts to biological resources and avoid impacts to jurisdictional features. The new, permanent access road layout would incorporate applicable federal and local standards regarding internal road design and circulation, particularly those provisions related to emergency vehicle access.

2.4.5 Laydown Yard and Parking

An approximate 17-acre laydown yard would be developed in the northern portion of the project site, approximately 550 feet south of the western access point to the project site. The proposed laydown yard would be utilized for parking and as a laydown yard to stage WTG components, construction equipment,

and construction materials. Steel construction containers would be used to securely store specialized equipment. This area is located strategically within the project site to optimize construction activities while minimizing off-site visual impacts to the extent feasible. After construction is completed, the laydown yard would be used as a staging and work area during project O&M activities.

Each WTG would require a temporary work area for WTG component deliveries and staging, a crane pad, and other construction-related needs. Within this temporary work area, a crane pad is required for supporting the large WTG erection crane. The 0.29-acre crane pad would consist of a compacted native soil or compacted aggregate base gravel area.

2.5 Project Construction

Project construction is anticipated to begin in August 2021. Construction of the proposed project is anticipated to be completed in 10 months. Proposed construction activities are detailed below for each phase of construction.

Construction of the proposed project would result in temporary disturbance of 98.73 acres of private land and 0.16 acres of land within the public ROW. The proposed project would result in permanent (operational) disturbance of 40.35 acres of private land and 0.02 acres of land within the public ROW. Disturbance within the public ROW is associated with connection of the proposed ingress/egress to Garnet Avenue. No temporary or permanent disturbance is proposed within BLM land.

The proposed project does not include revegetation or restoration of temporary impacts after project completion. However, natural vegetation will be allowed to regenerate in temporary disturbed areas from root systems left intact. Furthermore, if topsoil is removed during construction, the segregated topsoil will be replaced, and the native seed will be allowed to regenerate naturally.

The anticipated duration, number of daily worker trips, and amount and type of construction equipment required for each phase of construction is summarized in Table 2-4.

Table 2-4. Construction Worker Trips, Vendor Trips, and Equipment Use per Day

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
WTG Removal	30	4	2,268	Cranes	1	10
				Generator sets	1	10
				Rough terrain forklifts	1	10
				Rubber-tired loader	1	10
				Tractors/loaders/backhoes	1	10
				Rock Crusher	1	10
Grading and Road Upgrades	<u>30</u> 42	2	<u>960</u> 0	Graders	<u>4</u> 2	10
				Rollers	<u>3</u> 4	10
				Rubber-tired dozers	<u>2</u> 4	10
				<u>Scrapers</u>	<u>1</u>	<u>10</u>

Table 2-4. Construction Worker Trips, Vendor Trips, and Equipment Use per Day

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
WTG Foundation Installation	<u>2064</u>	<u>26</u>	<u>6604,820</u>	Excavators	2	10
				Graders Pumps	1	10
				Rollers	<u>1</u>	<u>10</u>
				Rubber-tired dozers	<u>24</u>	10
WTG / Met Tower Erection	<u>1068</u>	<u>28</u>	<u>7200</u>	Forklifts Aerial lifts	<u>34</u>	<u>125</u>
				Cranes	<u>42</u>	<u>1640</u>
				Generator sets	1	<u>105</u>
				Graders Rough terrain forklifts	<u>13</u>	10
Overhead Electrical Collection System Improvements	12	12	24	Crane	1	10
				Tractor/Loader/Backhoe	<u>34</u>	<u>105</u>
				Trenchers	<u>1</u>	<u>10</u>
Tower Wiring, Mechanical Completion	32	2	0	Generator sets	2	10
Commissioning	12	2	0	Generator sets	2	10
Restoration	<u>126</u>	2	<u>3500</u>	Skid steer loaders	<u>34</u>	10
				Graders	<u>1</u>	<u>10</u>
				Rubber-tired Dozers	<u>1</u>	<u>10</u>
				Tractor/Loader/Backhoe	<u>1</u>	<u>10</u>

Note: WTG = wind turbine generator.

2.5.1 Decommissioning of Existing Wind Turbine Generators and Meteorological Towers

The decommissioning stage of the proposed project would consist of dismantling and removal of 93 existing Mitsubishi WTGs, removal of existing met towers, and removal of ancillary equipment and access roads that would not be used for the proposed project. Decommissioning of existing WTGs is anticipated take 5 months to complete. The decommissioning phase would require an average of 30 daily workers and the use of one crane, one forklift, one generator, and a rock crusher. All WTGs would be decommissioned as part of project construction.

The decommissioning process for the 93 existing WTGs is expected to include the following steps:

- The contractor would mobilize staff and equipment to perform the work, including hiring personnel and locating utilities, along with other general decommissioning requirements.

- A Decommissioning Permit would be obtained and a Stormwater Pollution Prevention Plan (SWPPP), a spill prevention control and countermeasure plan, and other documents, as required by County regulations, would be submitted prior to the start of decommissioning field operations. These documents would include a proposed project health and safety plan, site reclamation and monitoring plan, construction notification plan, noxious weed and invasive species control plan, dust control plan, and traffic control plan for the decommissioning phase of the proposed project.
- Equipment sufficient to dismantle and remove the existing WTGs would be mobilized to the site.
- Gearboxes, transformers, and hydraulic systems would be drained of fluids, which would be put into appropriate containers and transported and disposed of in accordance with all state and federal environmental regulations.
- The contractor would dismantle and remove the rotor, nacelle, towers, and transformers and transport these components off site. It is anticipated that the towers and nacelle would be reduced to manageably sized pieces on site to facilitate movement off site to recycling facilities. Blades would be cut up into manageable and appropriately sized pieces to be hauled to an appropriate recycling facility or to an approved disposal site. If the resale market for used WTGs and components is viable, some of the WTGs and components, such as blades, may be transported off site intact for resale.
- All underground cables would be de-energized and abandoned in place.
- Existing access roads would be used for all decommissioning vehicle traffic, including the crane, and all decommissioning would occur in previously disturbed areas to avoid any new, temporary disturbance.
- The use of temporary staging areas during decommissioning would be kept to a minimum. If temporary staging areas are required, they would also likely be used for the construction phase of the proposed project.
- The project site would be cleaned, and any remaining debris would be removed and disposed of at an offsite location.

As part of the decommissioning process, some of the existing WTG foundations would be demolished up to 3 feet below the ground surface. Any exposed rebar would be cut at the base of the excavation, removed, and recycled at an off-site scrap metal facility. The concrete foundations would be crushed in place, and the broken concrete would be further crushed to create aggregate of a suitable size, which would then be used for new access road and crane pad construction. Each decommissioned WTG site would be recontoured using native soils from within the WTG foundation area or from native soil spoils created during construction of the new WTG foundations. All WTG decommissioning activities would occur within existing disturbed areas such that no new temporary disturbance would be required.

Those decommissioned WTGs not used by MVPP for spare parts or sold to third parties would be dismantled on site and disposed of at an off-site location. Scrap metal would be transported to a scrap metal facility, blades and other WTG waste would be hauled to a landfill, and transformers would be stored and resold.

2.5.2 Flagging/Staging

Environmentally sensitive areas would be staked, flagged, or fenced to display boundaries to ensure that sensitive ecological and archaeological resources would be avoided. The applicant would provide training

to construction personnel regarding environmentally sensitive areas, avoidance measures, and the importance of identified exclusion areas that should be avoided.

2.5.3 Clearing and Grading

The proposed project would require approximately 139.10 acres of ground disturbance. Each temporary construction work area would require an area to be cleared and graded depending on the project site topography, as shown on Figure 2-3. The required cut-and-fill for the proposed project is anticipated to be balanced, and no import or export of soil would be required.

Construction of the proposed project would rely on existing roads to the extent possible. New on-site construction and operation roads would be constructed to provide access to each WTG. On-site access roads would be temporarily widened to a maximum width of 50 feet (except for some portions of the project within the WFCA) during construction activities to accommodate large construction equipment. Clearing and grading activities would be completed in approximately 2 months.

2.5.4 Foundation Construction and Tower Erection

WTG foundations would be a spread-foot type design, below the ground surface, consisting of concrete and steel rebar, and would include scour protection provisions as necessary. WTG foundation design would be based on site-specific geotechnical investigations; soil borings would be collected at or near each WTG site to inform the appropriate WTG foundation design.

After the foundations are constructed, the WTGs would be erected and assembled using a combination of forklifts and construction cranes. Construction cranes would be located on the compacted earthen or gravel crane pad. WTG components would be transported to the project site by transport vehicles via the local highways and project access roads and assembled on site. Each WTG would require multiple deliveries for the WTG tower sections, blades, and nacelle. WTGs are anticipated to be transported from one or more of the following points of origin: the Mojave Rail Yard, Port of San Diego, and/or Pueblo, Colorado. Construction of the WTGs would require 32 to 34 daily workers, and WTG erection would be completed in approximately 5 months. Upon completion of WTG erection, a permanent 0.21-acre gravel apron would remain around each WTG for O&M activities and fire protection.

A temporary 0.06-acre crane pad and a temporary construction area up to 0.59 acres, would be installed adjacent to the proposed met tower location to provide adequate area for access, assembly, and erection of the proposed met tower.

2.5.5 Construction of Electrical Collection System

The proposed underground electrical collection infrastructure would be installed via excavation due to the presence of cobbles and boulders throughout the site. Excavation would be performed with the use of a CAT 336 or similar-sized excavator. Underground circuits would be direct buried between 36 and 48 inches below the ground surface, in accordance with applicable requirements, including the National Electrical Code. The trench itself would be 2 feet wide, but the larger, temporary disturbance area could be up to 34 feet wide, which would accommodate temporary soil spoils piles generated from trenching, the trenching machine, and other vehicular traffic traveling adjacent to the electrical collection system trenching activities. The width of this temporary disturbance area would include a 12-foot-wide area for trench excavation (for adequate slope stability of soil walls), a 5-foot-wide OSHA Clear Zone, a 12-

foot-wide area for the spoils pile, and a 5-foot-wide working area. There would also be 18 feet adjacent to the excavation zone for other vehicular traffic traveling adjacent to the electrical collection system trenching activities. The typical sections for collection system installation are illustrated on Figure 2-5. Fiber-optic cables for WTG generator management and control would be installed within these same electrical collection trenches, as would bare copper or copper-clad neutral ground wires. Vaults and splice boxes would be placed at selected underground locations within the proposed disturbance area.

On-site overhead electrical infrastructure would be improved as part of the proposed electrical collection system. Replacement of four existing utility poles would be required within the WFCA. These poles would be replaced in-kind using existing access roads, and disturbance will be limited to a temporary 25-square-foot area per pole. An additional 39 utility poles would be replaced along the remainder of the existing overhead electrical system outside of the WFCA. Installation of each of these new poles would require a temporary 100 square foot work area. A 10-foot wide spur road also would be built to access 14 pole replacement locations in the southeastern portion of the site. New electrical cables would be installed along the overhead electrical collection system.

2.5.6 Facility Testing and Commissioning

As facilities are constructed, commissioning would take place to ensure all facilities are operating per applicable specifications. Each WTG would be tested and commissioned individually along with associated equipment. Upon all inspections being completed and certifications being provided by third-party inspectors, the proposed project would be operational and able to deliver energy to the electric grid.

2.6 Project Operations

The proposed project is anticipated to achieve commercial operation by June 1, 2022. O&M activities for the proposed project would remain the same as the O&M activities conducted for the existing facility. The WTGs would operate on an automatic basis whenever sufficient wind is present at a maximum of 24 hours per day, 7 days per week. The proposed WTGs can produce power with wind speeds as low as 3 meters per second (6.7 mph), and the automatic braking system would be engaged at the cut-out wind speed of 25 meters per second (55.9 mph) to avoid damage to the WTGs.

Regularly scheduled maintenance of the proposed project would generally include lubrication of mechanical parts, cleaning of blades, and changing of fluids performed in conformity with the manufacturer's guidelines. Occasionally, major overhauls or component replacements would be required, necessitating use of cranes or other equipment similar to that used during construction. Maintenance personnel would be on site on a regular basis to service WTGs, replace parts, and perform other maintenance duties. The proposed project would require eight O&M personnel. As such, the proposed project would require a slightly reduced O&M workforce compared to the ten daily O&M personnel required for the existing wind energy facility.

2.6.1 Supervisory Control and Data Acquisition System

The supervisory control and data acquisition (SCADA) system would be installed at the project site to collect operating and performance data from each WTG and to enable remote operation of the WTGs. The WTGs would be connected to a central computer located on site by a fiber-optic network. The SCADA system's fiber-optic cables would be co-located with the proposed project's collection circuits to

the greatest extent possible. The SCADA system would be capable of sending notifications to a cell phone, tablet, computer, or other personal communication device to alert operations staff of any operational issues. The SCADA system would also be connected to SCE, as appropriately handled through the California Independent System Operator. Personnel located at an off-site O&M facility would monitor the WTGs with the SCADA system.

2.7 Final Decommissioning and Reclamation

Decommissioning would involve removal of the WTGs and removal of foundations to a depth of no greater than 3 feet below the ground surface. Decommissioning activities associated with the proposed WTGs (2053) would be similar to the decommissioning activities required for existing WTGs within the project site, described in Section 2.5.1. Generally, WTGs are reclaimed for spare parts, resold or recycled for scrap. All unsalvageable materials would be disposed of at authorized sites in accordance with federal, state, and local laws and regulations in effect at the time of final decommissioning.

Underground collection system cables would be cut to 3 feet below grade and abandoned in place. All unsalvageable materials would be disposed of at authorized off-site disposal sites in accordance with federal, state, and local laws and regulations in effect at the time of decommissioning.

The proposed project does not include revegetation or restoration of temporary impacts after project completion. However, natural vegetation will be allowed to regenerate in temporary disturbed areas from root systems left intact. Furthermore, if topsoil is removed during construction, the segregated topsoil will be replaced, and the native seed will be allowed to regenerate naturally.

2.8 Land Use Considerations and Approvals

The project applicant has submitted applications to the County for a WECS permit, Change of Zone, and Variance to support the proposed project, as identified in Section 3.1. Other permits, authorizations, and approvals for the project would include, but may not be limited to, the following: Building and Grading permits, FAA Determinations of No Hazard, State Water Resources Control Board Construction General Permit, Riverside County Airport Land Use Commission Review, and a Building Permit from the City of Palm Springs for the proposed underground electrical collection system replacement and storage of a spare transformer at the Mount Wind Substation. Based on the project location within the CVMSHCP WFCA, the project would also be subject to CVMSHCP requirements.

2.8.1 Land Use and Zoning Designations

The existing Riverside County General Plan land use designations on the project site include Rural Desert (RD) and Conservation Habitat (OS-CH). No ground disturbance is proposed within undisturbed land designated OS-CH. The existing zoning designations within the project site include Wind Energy Resource Zone (W-E), Rural Residential (R-R), and Controlled Development Area (W-2). The existing Mount Wind substation and a portion of the existing electrical collection system proposed for upgrades is located within the Energy Industrial zoning designation within City of Palm Springs jurisdiction. The proposed upgrades are permitted within the EI zone through issuance of a building permit by the City of Palm Springs. Existing zoning designations for the project site and vicinity are shown on Figure 2-6.

Change of Zone

The County's Official Zoning Map shows nine of the existing WTG's permitted by the WECS Permit No. 103 on lands zoned R-R, which is considered a non-conforming use. It appears that the EIR certified prior to approval of Permit No. 103 may have erroneously represented the boundary between the R-R and W-E zoned lands as following the 2/3-mile scenic setback from SR-111.

The proposed project has sited all the WTGs and permanent met tower north of the SR-111 2/3-mile scenic setback and even slightly north of the southernmost existing WTGs. Nevertheless, based on current county GIS data, three of the proposed WTGs, as well as the proposed met tower, are proposed within lands zoned R-R.

The project applicant is therefore requesting a Change of Zone (CZ2000032) for that southwest portion of the project site that is mapped as zoned R-R, to be rezoned to W-E. Upon approval of the Change of Zone, the proposed area of development within the R-R zone would be changed to W-E, and the proposed WTGs and met tower would be in conformance with the zoning designation. The proposed zoning designations are shown on Figure 2-7. The remainder of the proposed project would be permitted within the existing zoning designations.

The existing Riverside County zoning designations within the project site include Wind Energy Resource Zone (W-E) and Rural Residential (R-R). At the time that WECS Permits No. 103 was approved, no WTGs were proposed for the R-R zoned lands within the then-project site. Rather, only utility facilities were proposed on lands zoned R-R. The County therefore found the existing wind energy facilities to be consistent with R-R zoning. The proposed project includes three proposed WTGs and the proposed met tower on lands zoned R-R, which does not allow does not allow commercial WECs development. The project applicant is requesting a Change of Zone for that southwest portion of the project site that is currently zoned R-R, to be rezoned to the W-E zoning designation to allow for development of the proposed WTGs and met tower. Upon approval of the Change of Zone, the proposed area of development within the R-R zone would be changed to W-E. The applicant would convey a 248.12-acre parcel (hereafter referred to as the Set-aside Parcel) to the CVCC to ultimately become additional conserved land within the WFCA.

2.8.2 Coachella Valley Multiple Species Habitat Conservation Plan Joint Project Review

The project site is located within the CVMSHCP, of which approximately 383.39 acres in the western portion of the project site are located within the CVMSHCP WFCA. The WFCA provides Core Habitat for the Coachella Valley milkvetch (*Astragalus lentiginosus var. coachellae*), Coachella Valley giant sand-treader cricket (*Macrobaenetes valgum*), Coachella Valley fringe-toed lizard (*Uma inornata*), Palm Springs ground squirrel (*Spermophilus [Xerospermophilus] tereticaudus chlorus*) (also referred to as Coachella Valley ground squirrel and Palm Springs round-tailed ground squirrel), and Palm Springs pocket mouse (*Perognathus longimembris bangsi*). In addition, the WFCA serves as a sand transport corridor for movement of sand from the mountains to various conservation areas on the valley floor.

Development of the proposed project would result in 20.22 acres³ of new disturbance (permanent and temporary) within the WFCAs.

The County, which has jurisdiction over the subject property, is one of the CVMSHCP's local Permittees. Pursuant to the CVMSHCP, projects under local Permittees' jurisdiction that could result in disturbance to habitat, natural communities, Biological Corridors, or Essential Ecological Processes within a Conservation Area are subject to the Joint Project Review (JPR) process. This process is handled through the County and the Coachella Valley Association of Governments, specifically the CVCC. The project applicant initiated the JPR process on October 7, 2020, pursuant to Section 6.6.1.1 of the CVMSHCP. The CVCC issued its JPR findings for the project on January 22, 2021.

2.8.3 Federal Aviation Administration Obstruction Evaluation

Pursuant to Title 14 of the Code of Federal Regulations (CFR) Part 77.9, facilities that propose construction or alteration to any structure with a height of 200 feet above ground level or greater require notification to the FAA for obstruction evaluation (through the Form 7460-1 process). The project applicant submitted Form 7460-1 for all 16 new WTG locations, as well as the existing 7 WTGs, and has received Determinations of No Hazard for all 23 WTG locations (Aeronautical Study Numbers 2020-WTW-2225-OE through 2020-WTW-2231-OE, 2020-WTW-2207-OE through 2020-WTW-2231-OE, and 2020-WTW-8073-OE through 2020-WTW-8082-OE). The applicant also received a Determination of No Hazard for the proposed met tower (Aeronautical Study Number 2020-WTW-9038-OE).

2.8.4 Riverside Airport Land Use Consistency Review

Section 1.5.3.c of the Countywide Policies of the Riverside County Airport Land Use Compatibility Plan states that "any proposal for construction or alteration of a structure (including antennas) taller than 200 feet above the ground level at the site" requires referral to the Airport Land Use Commission (ALUC) for a determination of consistency with the Airport Land Use Compatibility Plan prior to approval by the local jurisdiction (ALUC 2005). The FAA Obstruction Determinations described above are pivotal in providing a basis for ALUC's consistency determination for proposed structures with a height above 200 feet. The project applicant applied for a Major Land Use Action Review to the ALUC, and the ALUC found the project consistent with the Airport Land Use Compatibility Plan at a public hearing on January 14, 2021.

2.9 Design Considerations

The project applicant is processing a commercial WECS Permit with the County for development and operation of the proposed project. Per Section 18.41(D), Standards and Development Criteria, of County Ordinance No. 348, all commercial WECS are required to meet certain development standard requirements; these requirements are intended to address issues relative to safety, security, scenic vistas, aesthetics, and fire protection for citizens and adjacent properties. Development standard requirements specific to height limits and setbacks are discussed below.

³ The proposed project would result in a total of 27.69 acres of impacts (permanent and temporary) within the WFCAs; however, this total includes previously authorized disturbance prior to implementation of the MSHCP. After deducting previously authorized disturbance acreage (7.47 acres), the total impact acreage is 20.22 acres.

2.9.1 Height Limits

Section 18.41.D(15) of County Ordinance No. 348 states, “a commercial WECS or WECS array shall conform to height limits of the zoning classification in which it is located. A lower height limit may be imposed as a condition of a commercial WECS permit.” Section 17.164.030 states, “no commercial WECS shall exceed five hundred (500) feet in height” within the W-E zone. Structures within the R-R zoning designation are only permitted to be 50 feet in height unless a greater height is approved pursuant to Section 5.2(A) of County Ordinance No. 348. Pursuant to Section 18.34(B) of the ordinance, “an application for a conditional use permit, public use permit, commercial WECS permit or accessory WECS permit may include a request for a greater height limit in accordance with the limitations of the zone classification.”

The applicant is proposing to install new, larger, and more energy efficient 492-foot-tall WTGs that exceed the 50-foot height allowed in the R-R zone. The project applicant has submitted a Change of Zone application to the County that would rezone the southwest portion of the project site currently zoned R-R to apply the W-E zoning designation. Upon approval of the proposed Change of Zone, the proposed area of development within the R-R zone would be changed to W-E to allow for development of the proposed WTGs and met tower up to 500 feet in height.

2.9.2 Setbacks

Safety Setbacks

According to Section 18.41.D.1(a) of County Ordinance No. 348, all commercial WECS shall meet certain safety setback requirements. Table 2-3 summarizes the project’s conformity to other safety related setback requirements including transmission lines, railroad right-of-way, internal lot lines, and boundaries setbacks are. As shown in Table 2-3, the proposed project would conform to the County’s safety setback requirements.

Table 2-3. Safety Setbacks

Required Setbacks	Development Standards*	Proposed Setback	Conformity (Yes or No)
Aboveground Electrical Transmission Line of more than 12 kilovolts	1.25 × Total WECS Height 1.25 × 492 = 615.0 feet	620 Feet	Yes
Public Road, Public Highway or Railroad**	1.25 × Total WECS Height 1.25 × 492 = 615.0 feet	625 Feet	Yes
Public Road or Public Highway Classed as an Arterial or Greater with ADT of 7,000 or More***	1.50 × Total WECS Height 1.50 × 492 = 738.0 feet	1,020 Feet	Yes
Lot Line Adjoins a Lot Zoned W-E or W-1	1.10 × Total WECS Height 1.10 × 492 = 541.2 feet	545 Feet	Yes
Lot Line of Any Lot Containing a "Habitable Dwelling"	3.00 × Total WECS Height 3.00 × 492 = 1,476.0 feet	3,400 Feet	Yes
Lot Line Setback; Eastern Project Boundary	1.10 × Total WECS Height 1.10 × 492 = 541.2 feet	1,600 Feet	Yes
Lot Line Setback; Northern Project Boundary	1.10 × Total WECS Height 1.10 × 492 = 541.2 feet	680 Feet	Yes

Table 2-3. Safety Setbacks

Required Setbacks	Development Standards*	Proposed Setback	Conformity (Yes or No)
Lot Line Setback; Southern Project Boundary	1.10 × Total WECS Height 1.10 × 492 = 541.2 feet	620 Feet	Yes
Lot Line Setback; Western Project Boundary	1.10 × Total WECS Height 1.10 × 492 = 541.2 feet	1,200 Feet	Yes

Notes:

* Source: Riverside County Ordinance No. 348, Section 18.41.D.1(a)

** Measured from the outer boundary of the public road/highway ROW or railroad ROW

*** "ADT" means average daily trips; based on traffic field measurements as determined by the director of the department of transportation (Information: in 1999, public roads or highways with ADT of 7,000 or more included 1-10, Hwy 62, Hwy 111 & Indian Avenue).

Wind Access Setbacks

Section 18.41.D.2(a) of County Ordinance No. 348, “no commercial WECS shall be located where the center of the tower is within a distance of five (5) rotor diameters from a lot line that is perpendicular to and downwind of, or within forty-five (45) degrees of perpendicular to and downwind of, the dominant wind direction.” The project layout is configured such that there are several properties within and to the south of the project area that are within 5 rotor diameters of proposed WTGs. As such, the project applicant will be required to obtain setback waivers to address this county setback requirement. The project applicant has secured several Wind Access Setback waivers and will have the remaining waivers in place before the Planning Commission Hearing. The project applicant has secured several Wind Access Setback waivers and will have a total of 23 waivers in place before the Planning Commission Hearing.

The applicant has also requested a Wind Access Setback Variance (VAR210001) for 4~~14~~ WTGs that are within five rotor diameters of six~~seven~~ parcels outside of the project area and for which MVPP does not possess setback waiver agreements. The affected parcels and justification for a variance are summarized in Table 2-5 and shown on Figure 2-8.

Table 2-5. Wind Access Setback Variances

Parcel #	Acreage	Project Turbine #	New / Existing Turbine	Justification
668-310-020	5	74-10 74-11 74-12 74-13 74-14 74-15	Existing	Parcel too small to support stand-alone wind farm; surrounded by parcels leased to MVPP
669-020-006	19.5	16	New	Parcel too narrow to support stand-alone wind farm
669-020-007	5.4	16	New	Parcel too narrow to support stand-alone wind farm
668-290-001	40.8	9	New	Parcel within 1,000-foot Interstate 10 Scenic Setback
668-290-002	29.4	12	New	Parcel within 1,000-foot Interstate 10 Scenic Setback
516-130-004	26.8	1	New	Parcel within 1,000-foot Interstate 10 Scenic Setback

Table 2-5. Wind Access Setback Variances

Parcel #	Acreage	Project Turbine #	New / Existing Turbine	Justification
516-130-011	214.6	1 & 5	New	Parcel within 1,000-foot Interstate 10 Scenic Setback

Scenic Setbacks

Section 18.41.C.3(g) of County Ordinance No. 348 states that all commercial WECS shall meet certain scenic setback requirements from designated and eligible scenic highways. The County’s General Plan (Figure C-8), and the Western Coachella Valley Area Plan (Figure 9, Scenic Highways) identify state and county designated and eligible scenic highways. SR-62, north of I-10, and a segment of SR-111, southwest of the site, are identified as designated state scenic highways. The segment of I-10 between Whitewater Canyon Road and SR-62 is identified as an eligible state scenic highway. However, Senate Bill 169, passed in 2013, removed the designation of “state scenic” for the segment of I-10 between Route 38 near Redlands and SR-62. As such, the segment of I-10 west of SR-62, identified as state-designated and state-eligible in Figure C-8 of the General Plan and in Figure 9 of the Area Plan, respectively, is no longer listed as a designated state scenic highway (Caltrans 2019).

The segment of I-10 east of SR-62 to the eastern boundary of the County is identified as a county-eligible scenic highway in both the County’s General and Area Plans. Section 18.41.D.3(c) of Ordinance No. 348 requires a one-quarter mile setback from state or county eligible or designated scenic highways. Two of the proposed 16 WTGs will be 1,000 feet from this County-eligible segment of I-10.

Pursuant to Section 18.41.C.3(e) of Ordinance No. 348, the established scenic setbacks may be reduced to 1.25 times the total WECS height if the Planning Commission determines that the characteristics of the surrounding property eliminate or substantially reduce considerations of scenic value. Specific to the proposed project, the Planning Commission could approve a reduced setback 1.25 times the total WECS 492-foot height, or 615 feet, subject to making findings in conformance with the ordinance.

The project site is within the San Gorgonio Pass Wind Energy Policy Area, which is developed with over 1,500 existing WTGs (U.S. Wind Turbine Database 2020). The project site has been operating 111 WTGs immediately south of the county-eligible scenic segment of I-10 since 2001. Specifically, 11 of these existing turbines are situated between 1,000 feet and one-quarter mile of the segment of I-10 identified as a county-eligible scenic highway. Several other wind energy facilities, comprising over 400 WTGs, border the project site to the east, west, and south, all south of I-10. The San Jacinto Mountains are the prominent backdrop south of I-10 as one travels westbound on I-10 and east of SR-62. The view southwest toward the San Jacinto Mountains currently contains many WTGs within the foreground, but the existing WTGs do not block views of the mountains.

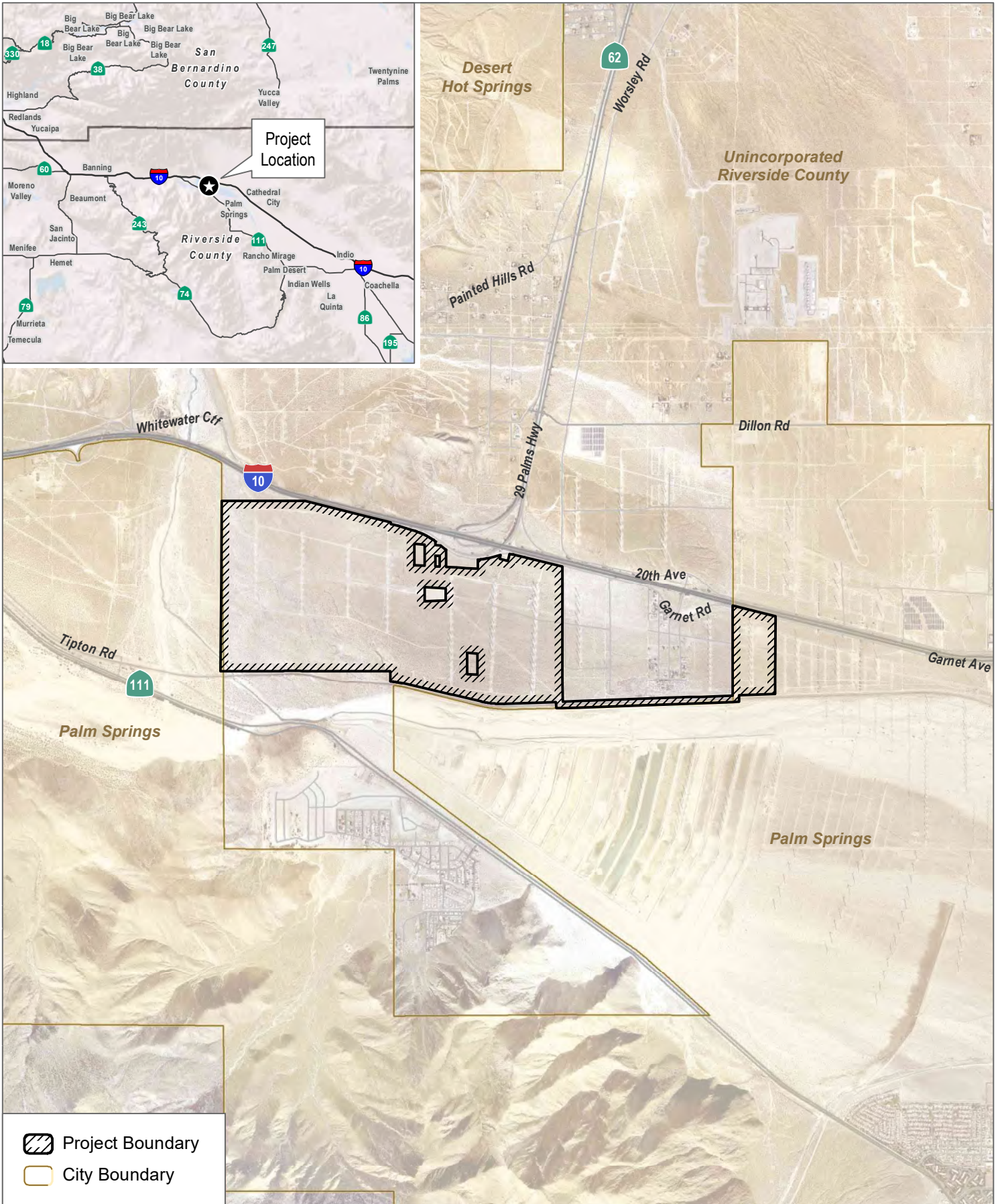
While the proposed WTGs would be taller and more prominent when compared to existing WTGs, the replacement of 93 existing turbines with 16 new, taller turbines would ultimately reduce the overall visual clutter, creating unobstructed visual corridors to the San Jacinto Mountain Range. As such, pursuant to Section 18.41.C.3(e) of Ordinance No. 348, the applicant is requesting a Scenic Setback reduction for two WTGs in the northeast portion of the project site to decrease the scenic setback from 1,320 feet to 1,000 feet from I-10, or approximately 2.03 times the total WECS height. The incremental setback reduction of two WTGs would not be easily perceptible by motorists traveling on I-10 due to presence of

other nearby WTGs that make up the primary viewshed along the San Gorgonio Pass corridor. Table 2-6 summarizes the project’s conformity to required scenic setback development standards.

Table 2-6. Scenic Setbacks

Required Setbacks	Development Standards*	Proposed Setback	Conformity (Yes/No)
I-10 east of SR-111	1,000 feet (WECS total height greater than 150 feet)	1,000 feet	Yes
State Highway 111 south of I-10 and north of the City of Palm Springs	0.66 miles (3,520 feet)	3,900 feet	Yes
All Other State or County Eligible Designated Scenic Highways			
SR-111 (State Eligible)	0.25 miles (1,320 feet)	3,432 feet	Yes
I-10 west of SR-62 (State Eligible)	0.25 miles (1,320 feet)	Not Applicable	Not Applicable
I-10 east of SR-62 (County Eligible))	0.25 miles (1,320 feet)	1,000 feet	No. Section 18.41.C.3(e) exception
SR-62 (State Designated)	0.25 miles (1,320 feet)	2,482 feet	Yes

Note: I = Interstate; SR = State Route; WECS = Wind Energy Conversion System.



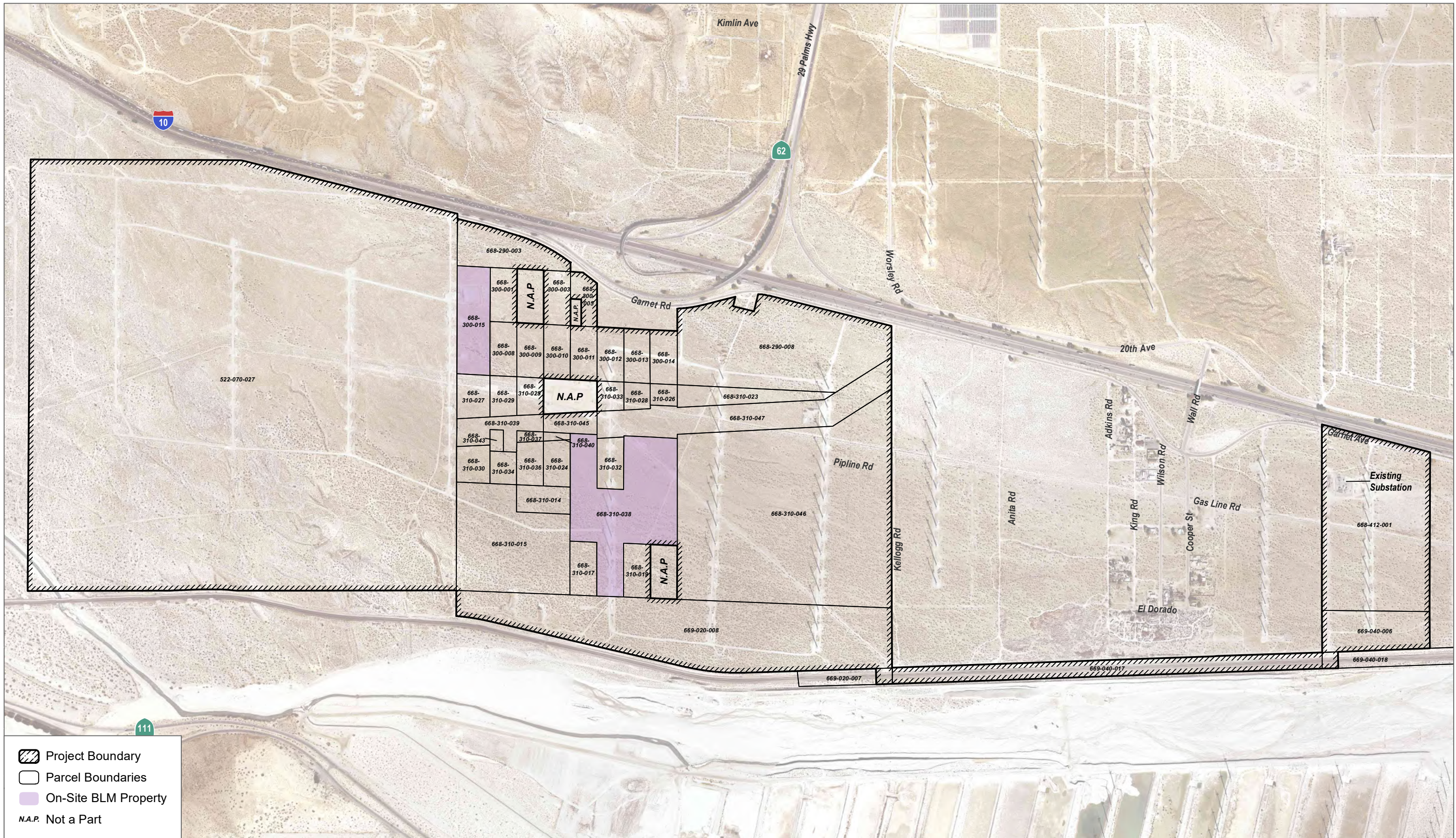
SOURCE: Aerials by Riverside County 2016, OpenStreetMap 2019

FIGURE 2-1

Project Location

Mountain View Power Partners Wind Repower Project

INTENTIONALLY LEFT BLANK



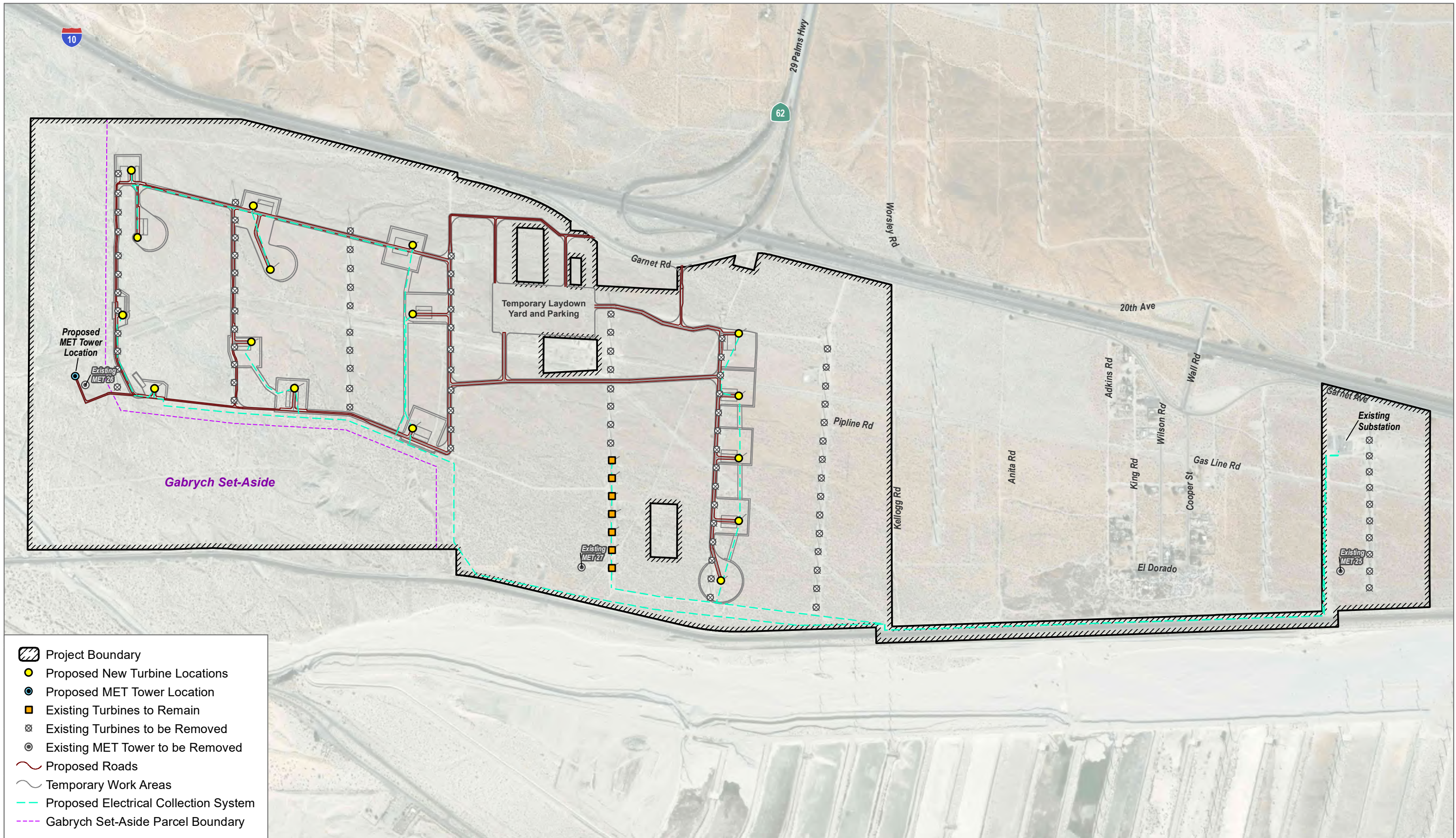
SOURCE: Aerials by Riverside County 2016, OpenStreetMap 2016













FIGURE 2-2

Project Site Assessor's Parcel Numbers
Mountain View Power Partners Wind Repower Project

INTENTIONALLY LEFT BLANK



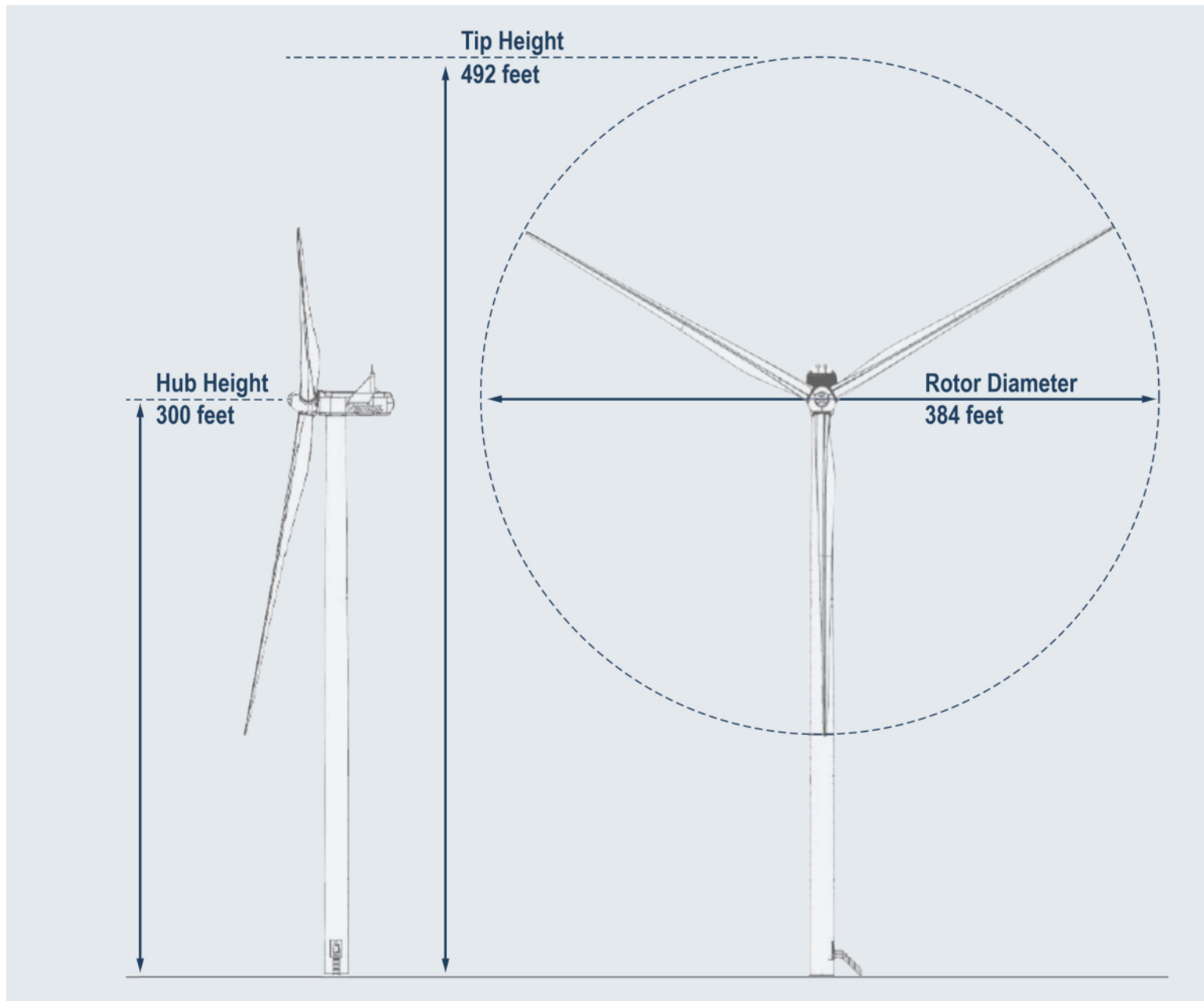
-  Project Boundary
-  Proposed New Turbine Locations
-  Proposed MET Tower Location
-  Existing Turbines to Remain
-  Existing Turbines to be Removed
-  Existing MET Tower to be Removed
-  Proposed Roads
-  Temporary Work Areas
-  Proposed Electrical Collection System
-  Gabrych Set-Aside Parcel Boundary

SOURCE: Aerials by Riverside County 2016

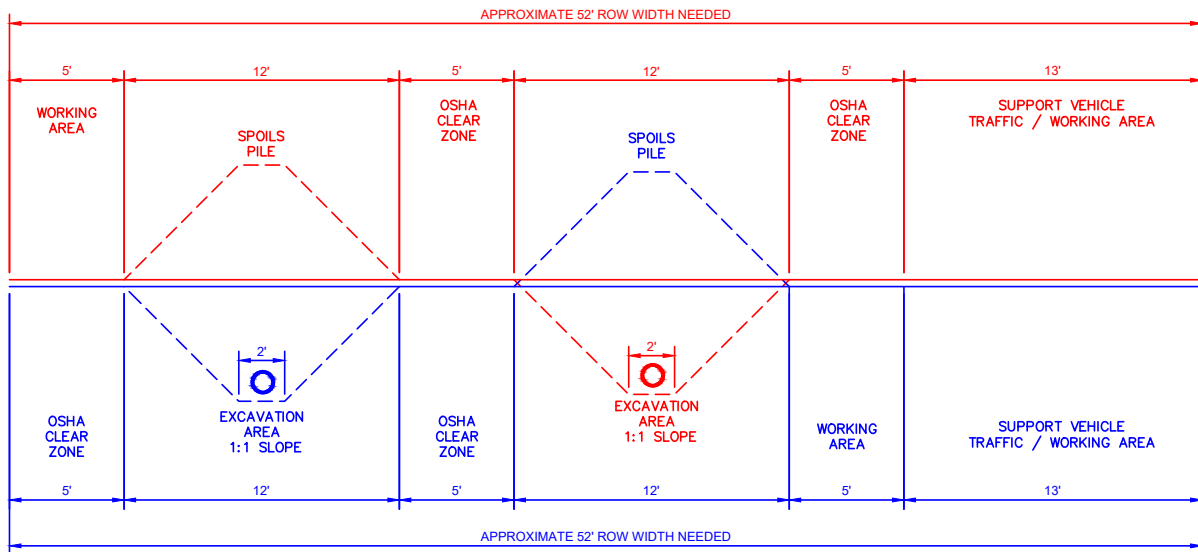


FIGURE 2-3
Site Plan

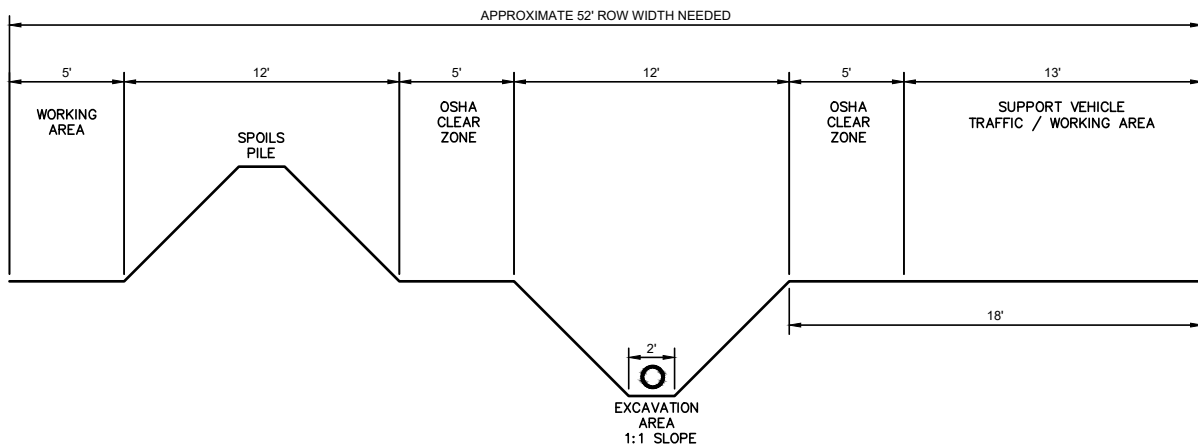
INTENTIONALLY LEFT BLANK



INTENTIONALLY LEFT BLANK



**COLLECTION SYSTEM INSTALLATION
(TURBINES 9, 10, 11)**
(N.T.S.)



**COLLECTION SYSTEM INSTALLATION
TYPICAL SECTION**
(N.T.S.)

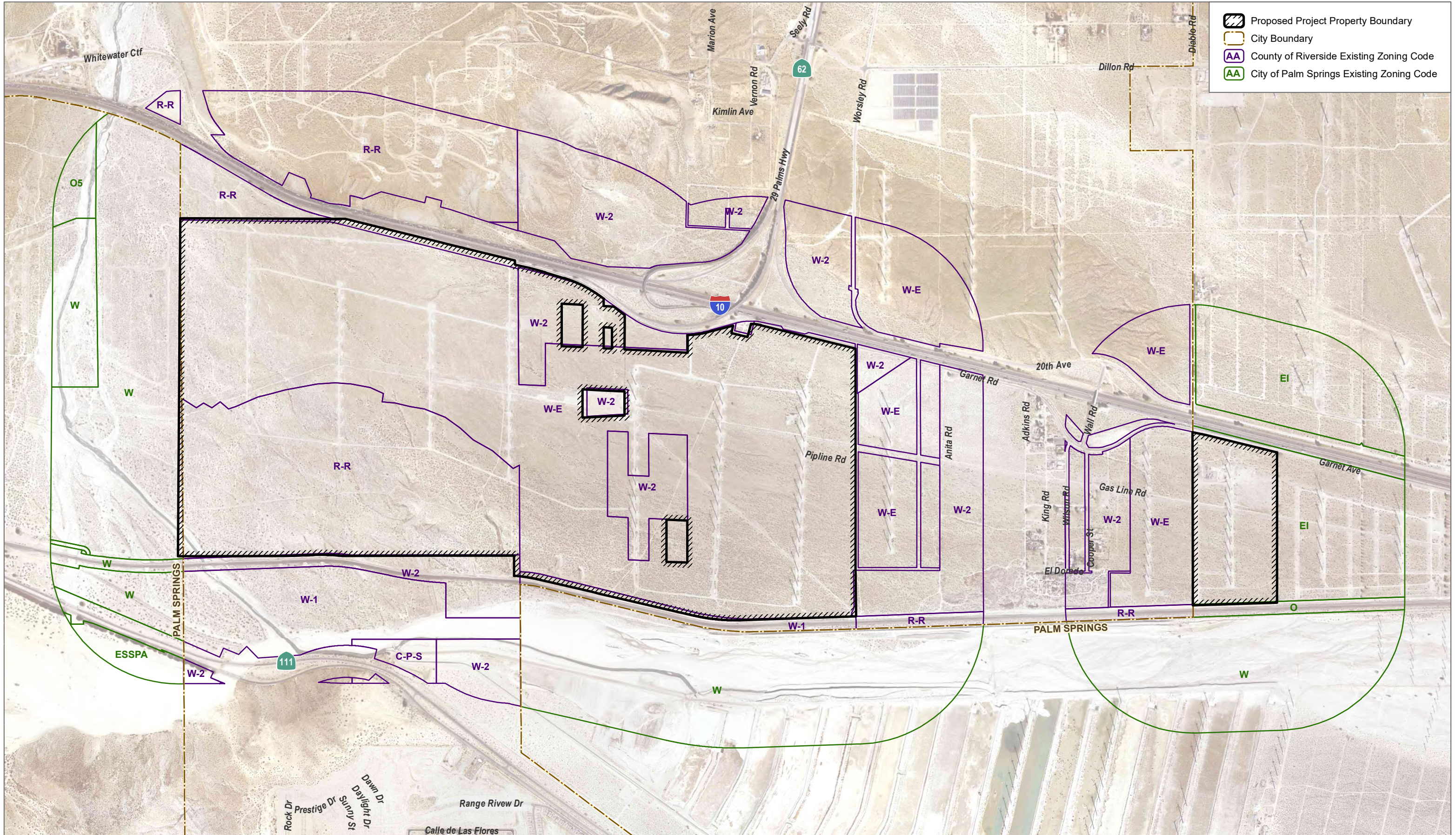
SOURCE: Kimley Horn 2020

FIGURE 2-5

Typical Sections for Electrical Collector System Installation

Mountain View Power Partners Wind Repower Project

INTENTIONALLY LEFT BLANK



SOURCE: SCAG, County of Riverside

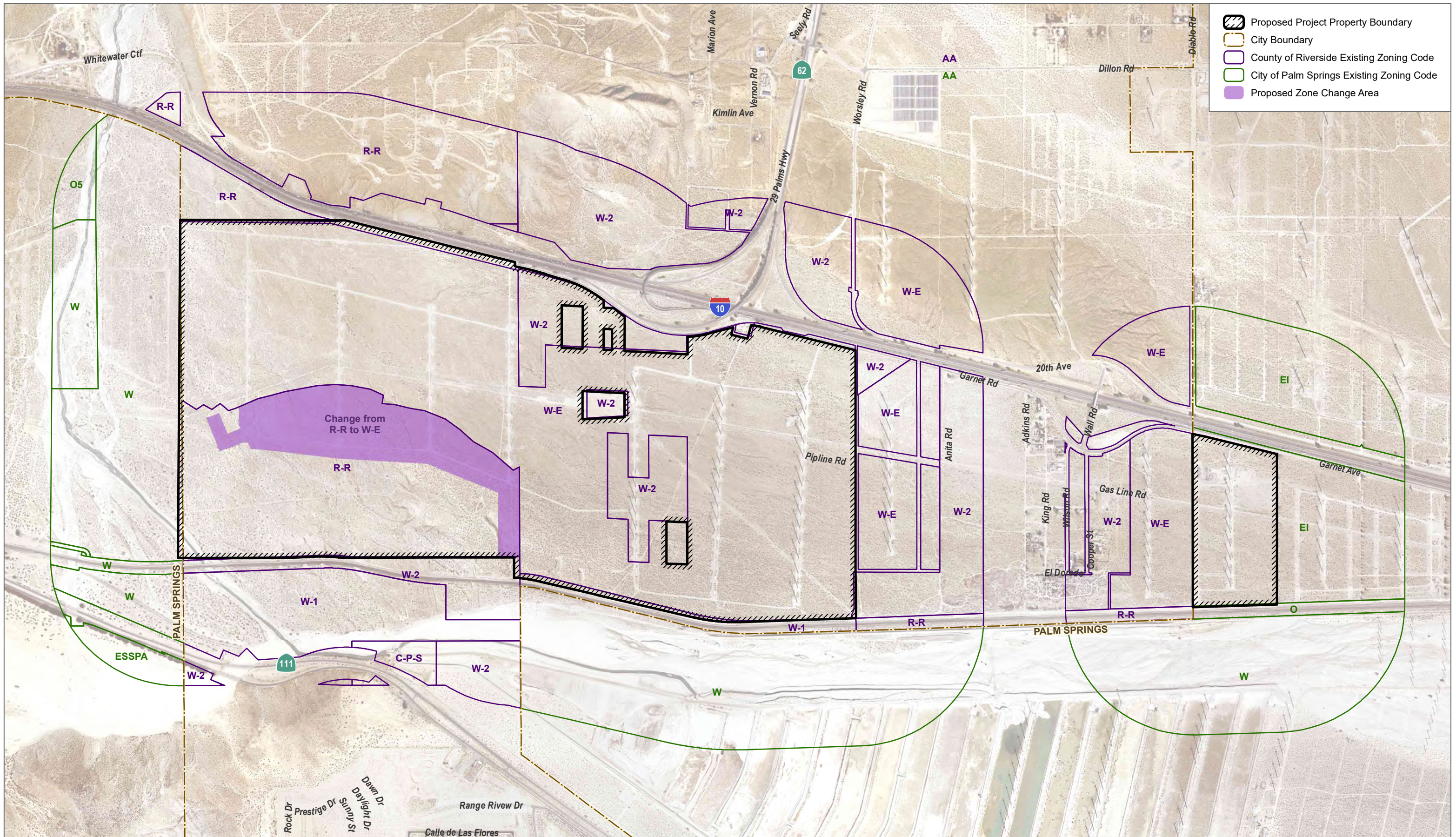


FIGURE 2-6

Existing Zoning Designations

Mountain View Power Partners Wind Repower Project

INTENTIONALLY LEFT BLANK



SOURCE: SCAG, County of Riverside

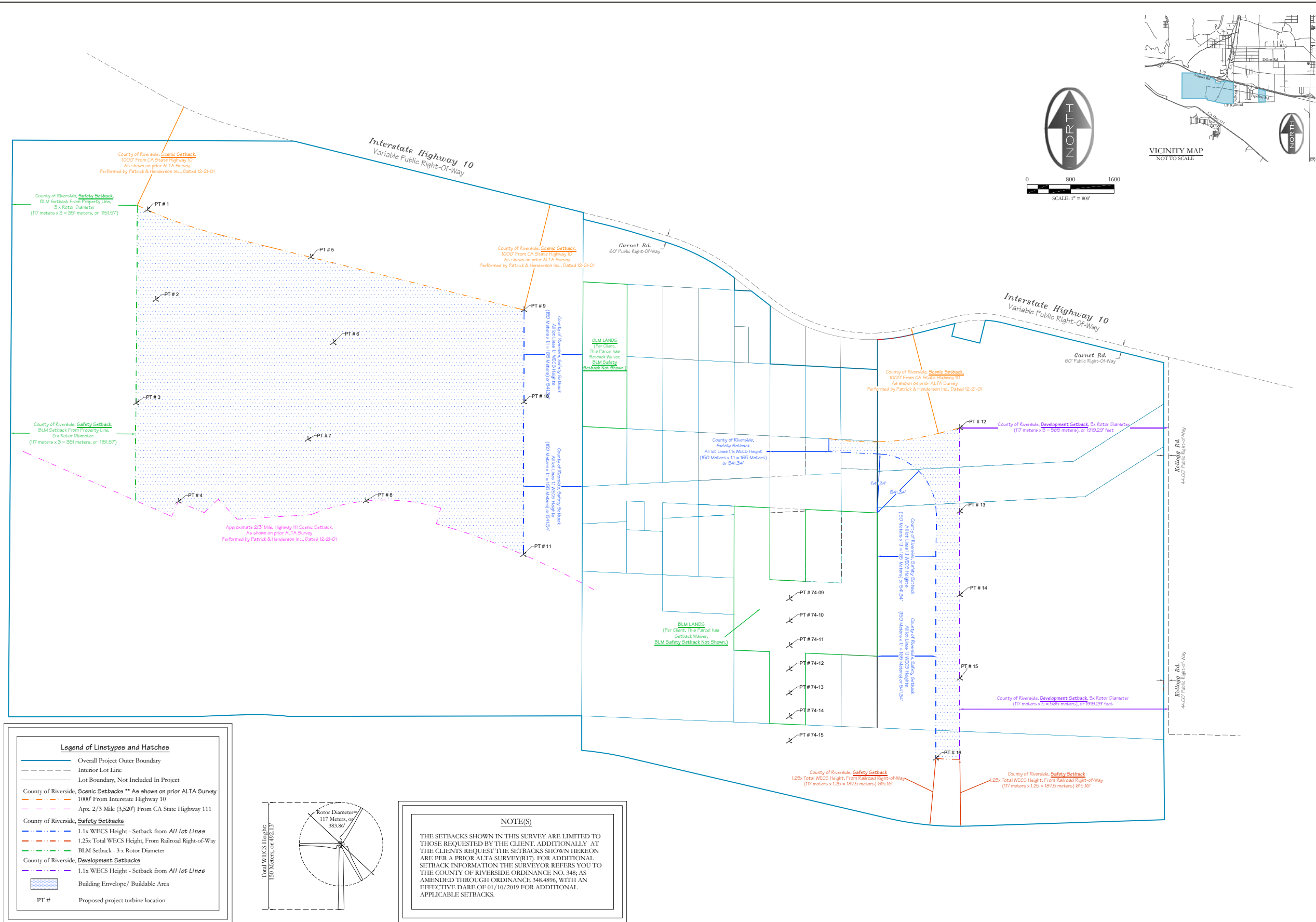


FIGURE 2-7

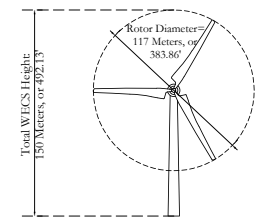
Proposed Zoning Designations

Mountain View Power Partners Wind Repower Project

INTENTIONALLY LEFT BLANK



Legend of Linetypes and Hatches	
	Overall Project Outer Boundary
	Interior Lot Line
	Lot Boundary, Not Included In Project
County of Riverside, Scenic Setbacks ** As shown on prior ALTA Survey	
	1000' From Interstate Highway 10
	Apx. 2/3 Mile (3,520') From CA State Highway 111
County of Riverside, Safety Setbacks	
	1.1x WECS Height - Setback from <i>All lot Lines</i>
	1.25x Total WECS Height, From Railroad Right-of-Way
	BLM Setback - 3 x Rotor Diameter
County of Riverside, Development Setbacks	
	1.1x WECS Height - Setback from <i>All lot Lines</i>
	Building Envelope/ Buildable Area
	Proposed project turbine location



NOTE(S)

THE SETBACKS SHOWN IN THIS SURVEY ARE LIMITED TO THOSE REQUESTED BY THE CLIENT. ADDITIONALLY AT THE CLIENTS REQUEST THE SETBACKS SHOWN HEREON ARE PER A PRIOR ALTA SURVEY (R17). FOR ADDITIONAL SETBACK INFORMATION THE SURVEYOR REFERS YOU TO THE COUNTY OF RIVERSIDE ORDINANCE NO. 348, AS AMENDED THROUGH ORDINANCE 348.4896, WITH AN EFFECTIVE DATE OF 01/10/2019 FOR ADDITIONAL APPLICABLE SETBACKS.

INTENTIONALLY LEFT BLANK

3 Environmental Assessment Form: Initial Study Checklist

INTENTIONALLY LEFT BLANK

COUNTY OF RIVERSIDE
ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (CEQA / EA) Number: CEQ210007
Project Case Type (s) and Number(s): CZ2000032; WCS 200003; ~~CZ2000032~~; VAR210001
Lead Agency Name: County of Riverside Planning Department
Address: 4080 Lemon Street 12th Floor, Riverside, CA 92501
Contact Person: Jay Olivas, Project Planner
Telephone Number: (760) 863-7050
Applicant's Name: Mountain View Power Partners, LLC
Applicant's Address: 690 North Studebaker Road, Long Beach, CA 90803

I. PROJECT INFORMATION

Project Description: Change of Zone No. 2000032 proposes to modify a 281.81-acre portion of an existing 600-acre parcel (APN 522-070-027) from Rural Residential (R-R) to Wind Energy (W-E). **Commercial WECS Permit No. 200003** proposes removal of 93 existing Mitsubishi 600-kilowatt (kW) WTGs and the subsequent installation of 16 Vestas 3.6 and 4.3 MW WTGs with a maximum height of 492 feet. Six (6) Seven (7) existing Mitsubishi 600 kW WTGs, located outside Riverside County jurisdiction, would remain during project operation. One additional existing WTG, originally permitted by the County under WECS 107, would remain operational, and is anticipated to be decommissioned after year 10 of this permit as part of the proposed project. The proposed project would be capable of producing approximately 229.90 gigawatt hours (GWh) of power per year for operational years 1 through 10. Beyond operational year 10, assuming decommissioning of the seven Mitsubishi 600 kW WTGs, the proposed project would produce approximately 215.90 GWh of power annually for the remainder of its operational life. The proposed project would repower the existing wind energy facilities with modern, higher capacity WTGs. The project is planned to be operational by December 2022. The project site is mostly located within the boundaries of the existing MVPP I & II wind energy facilities and covers 1,202.86 acres of private land ~~and 52.34 acres of BLM land.~~ **Change of Zone No. 2000032** proposes to modify a 281.81-acre portion of an existing 600-acre parcel (APN 522-070-027) from Rural Residential (R-R) to Wind Energy (W-E). Section 18.41.D.3(c) of Ordinance No. 348 allows the planning commission to reduce the established scenic setbacks to 1.25 times the total WECS 492' height, or 615 feet. The applicant has requested a setback reduction for two WTGs in the northeast portion of the project site to reduce the required scenic setback from 1,320 feet to 1,000 feet. **Variance Case No. 210001** proposes to reduce the five (5) times rotor diameter wind access setback for ~~seven (7) existing WTGs and four (4) new WTGs.~~ Five (5) times the rotor diameter ~~for the existing and new WTGs~~ would be ~~225 meters (738.19 feet) and 585 meters (1,919.29 feet), respectively.~~ The applicant proposes reducing the five (5) time rotor diameter wind access setback for the four (4) existing and new WTGs to a minimum of 110 meters (360.89 feet). A detailed project description is included in Section 2.3.

A. Type of Project: Site Specific ; Countywide ; Community ; Policy .

B. Total Project Area: 1,255.19 acres

Residential Acres: 0

Lots: 0

Units: 0

Projected No. of Residents: 0

Commercial Acres: 0 Lots: 0 Sq. Ft. of Bldg. Area: 0 Est. No. of Employees: 0
Industrial Acres: 0 Lots: 0 Sq. Ft. of Bldg. Area: 0 Est. No. of Employees: 0
Other: WECS Repower - 16 new, modern WTGs

C. Assessor's Parcel No(s):

522070027	668300013	668310027	668310040
668290003	668300014	668310028	668310043
668290008	668300015	668310029	668310045
668300001	668310014	668310030	668310046
668300003	668310015	668310032	668310047
668300005	668310017	668310033	668412001
668300008	668310019	668310034	669020007 (partial)
668300009	668310023	668310036	669020008
668300010	668310024	668310037	669040006
668300011	668310025	668310038	669040017
668300012	668310026	668310039	669040018 (partial)

D. Street References: South of I-10 and Garnet Street; approximately 3 miles west of North Indian Canyon Drive; approximately 0.5 miles north of SR-111 (Refer to Figure 2-1).

E. Section, Township & Range Description or reference/attach a Legal Description: Section 13 of Township 3 South, Range 3 East, and Sections 17 and 18 of Township 3 South, Range 4 East of the Desert Hot Springs and Whitewater USGS Quadrangles.

F. Brief description of the existing environmental setting of the project site and its surroundings: The project site is located in the northwestern portion of the Coachella Valley within unincorporated Riverside County and the City of Palm Springs. The Coachella Valley extends approximately 45 miles southeast of the San Bernardino Mountains and constitutes the westernmost portion of the Colorado Desert. The Coachella Valley connects with the greater Los Angeles region to the west via the San Gorgonio Pass.

The 1,255.19-acre project site is characterized as an active wind energy facility with associated development (i.e., concrete pads, WTGs, storage yard, and associated dirt roads) and a Southern California Gas pipeline easement and associated roads that bisect the site east to west, with the remaining portions containing native desert vegetation. The project site features 100 older WTGs spaced throughout the site in seven rows. Each row of WTGs is accessible from a parallel dirt access road. These existing WTGs range between 100 feet and 285 feet in height. An electrical collection system, consisting of aboveground and underground infrastructure, connects the existing WTGs to the Mount Wind Substation to the east, located within the City of Palm Springs.

The project site is located directly north of the Union Pacific Railroad corridor. The project site encompasses 42 parcels and a portion of two additional parcels within both private lands and public lands. Facilities on private lands would be within the jurisdiction of the County of Riverside and the City of Palm Springs, and the facilities on public lands would be within the jurisdiction of BLM.

The land uses within the vicinity of the project site can broadly be described as mixed wind energy resources, industrial and commercial properties, and rural residences. The Union Pacific

Railroad ROW runs east–west, south of the project site, and Coachella Valley Water District percolation ponds are located south of the ROW. I-10 runs northwest–southeast, north of the project site, and additional wind energy development, SR-62, and vacant desert land are located north of I-10. Existing wind energy development is also present southeast of the project site. Some commercial and industrial land uses are present east of the project site, adjacent to North Indian Canyon Drive. The area of land between the noncontiguous portions of the project site consists of wind energy development, rural residential, and undeveloped land. Wind energy development is located west of the project site.

The project site is located within the boundary of the CVMSHCP. A portion of the project site, approximately 383.39 acres, overlaps the WFCA of the CVMSHCP. The proposed project requires review by the County jointly with the CVCC to address consistency with the CVMSHCP, as discussed under Section 3.IV.4, Biological Resources.

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

1. **Land Use:** The proposed project would be consistent with the following policies related to wind energy resources within the County’s General Plan Land Use Element (County of Riverside 2020a):

LU 16.1 Prohibit commercial WTGs within the Rural Community Foundation Component areas and within the Rural Residential land use designation. Prohibit commercial WTGs within the Community Development Foundation Category, except within the areas designated Public Facilities (Edom Hill and the area around Devers Substation) within the mapped Policy Area providing for wind energy development in the Western Coachella Valley Area Plan.

*Consistency Analysis: **Consistent.*** A portion of the project site is located within the Rural Residential foundation component, but the project site has operated as a commercial WECS facility since 2000. Furthermore, the project applicant has submitted a Change of Zone application to the County to change the Rural Residential zoning to Wind Energy Resource Zone.

LU 16.2 Require WTGs to address through project design the alignments of multipurpose trails as designated on Figure C-6 of the Circulation Element.

*Consistency Analysis: **Consistent.*** The proposed project does not affect nearby trails and therefore complies with Policy LU 16.2.

LU 16.3 Require WTGs to address through project design Riverside County Regional Parks and sensitive environmental areas. Setbacks will be determined on a project-by-project basis.

*Consistency Analysis: **Consistent.*** The proposed project would conform to all County safety setbacks. The proposed project would conform to all required scenic setbacks with the exception of the quarter-mile scenic setback from I-10 east of SR-62. Pursuant to Section 18.41.C.3(e) of Ordinance No. 348, the applicant is requesting a Scenic Setback reduction for two WTGs in the northeast portion of the project site to decrease the scenic setback from 1,320 feet to 1,000

feet from I-10, or approximately 2.03 times the total WECS height. The requested setback reduction could be approved by Planning Commission, subject to making findings in conformance with the ordinance. The project applicant will have a total of 23 Wind Access Setback waivers in place before the Planning Commission Hearing in conformance with the County's wind access setback requirements. In addition, the applicant has requested a Wind Access Setback Variance (VAR2100001) for 444-WTGs that are within five rotor diameters of seven parcels outside the project site. The affected parcels and justification for a variance are summarized in Table 2-5. As such, the proposed project would comply with all setbacks required pursuant to Section 17.224.040(A) of the County's Zoning Code.

- LU 16.7 Geotechnical considerations, such as potential landslides and mudflows, shall be reviewed with all commercial wind energy developments. Geotechnical reports submitted for review shall adequately address avoidance of hazards and, if avoidance is not feasible, propose mitigation according to good engineering practices.

Consistency Analysis: **Consistent.** The project-specific Geotechnical Investigation (Appendix D) addresses geotechnical impacts to a level deemed appropriate by a licensed geotechnical engineer. Potential impacts associated with geology and soils are discussed in Section 3.IV.11 through Section 3.IV.19 of this document.

- LU 16.8 Wildlife and natural vegetation impacts of proposed commercial wind turbine development shall be considered, including endangered species avoidance and mitigation, bird migration flyways, and may include appropriate consultation with state and federal agencies.

Consistency Analysis: **Consistent.** The project applicant conducted numerous biological surveys and studies to assess potential impacts to biological resources, including an Avian Risk Assessment and Survey Report, Palm Springs Ground Squirrel Habitat Assessment, Bird and Bat Conservation Strategy, and Golden Eagle Morality Report. These studies are included as appendices to the Biological Technical Report (Appendix B). The proposed project was reviewed by Environmental Programs and CVCC to address biological impacts, which were determined to be less than significant with implementation of project design features, regulatory requirements and mitigation measures, as discussed in Section 3.IV.7 of this document.

- LU 16.9 Restrict placement of commercial wind turbine arrays within 2,000 feet of residential development for arrays with 10 or fewer WTGs and restrict placement of commercial wind turbine arrays within 3,000 feet or greater of residential development for arrays with more than 10 WTGs, unless the applicant supplies documentation that the machines are designed according to proven engineering practices and will not violate applicable County of Riverside noise standards including excessive low frequency or pure tone noise.

Consistency Analysis: **Consistent.** The nearest residence is approximately 3,400 feet east of the nearest proposed WTG location.

LU 16.10 Require WTGs to operate at less than 65 dBA [A-weighted decibels] and not more than 60 dBA when installed adjacent to noise-sensitive land uses.

*Consistency Analysis: **Consistent.*** The proposed project is not located near any noise-sensitive land uses.

LU 16.11 Ensure that site designs and operation provide for adequate security and safety to lessen the possibilities and impacts of accidents, vandalism, and environmental hazards.

*Consistency Analysis: **Consistent.*** The existing wind energy facility within the project site includes existing gates and signage, which will be maintained for the proposed project to minimize unauthorized public access.

LU 16.12 Require the design and location of commercial wind energy developments to mitigate visual impacts. Issues which may be included in the review may be, but are not necessarily limited to, the following list, depending on turbine types, densities, and siting:

- a. Color of WTGs
- b. Location and design of associated facilities such as roads, fencing, non-Public Utilities Commission regulated utility lines, substations and maintenance buildings to minimize intrusion or disruption of the landscape
- c. Minimizing of disturbed ground and roadway, and restoring of the surface to natural vegetation
- d. Prohibition of brand names or advertising associated with WTGs visible from any scenic highway or key viewpoints
- e. Need for interpretation and/or visitors center located at the end of the view shed of WTGs.

*Consistency Analysis: **Consistent.*** The proposed project was designed and located to mitigate visual impacts. The color of WTGs would be light grey, the location and design of associated facilities have been designed to minimize intrusion and disturbance, the proposed project would rely on existing roads to the extent possible, and the proposed project does not include brand names or advertising. A detailed discussion of aesthetic impacts associated with the proposed project is included in Section 3.IV.1 through Section 3.IV.3.

LU 16.13 Require design measures for commercial wind energy development on sites near official or eligible State or County Scenic Highways designated (Figure C-9, Circulation Element) by Riverside County, and sites within those areas identified as “critical” and “very critical” by Environment Impact Report No. 158. Issues which may be included in the review may be, but are not necessarily limited to, the following list, depending on turbine types, densities, and siting:

- a. Except in unusual circumstances, no wind turbine will be sited on slopes in excess of 25%; the purpose of this standard is to prevent disturbance and degradation of landforms, and visual scarring by cut and fill, side casting, retaining walls, trenching, and vegetation removal; avoid skyline and ridgeline location.

- b. WTGs should be set back from scenic highways and viewpoints; set back individual WTGs far enough from scenic highways and key viewpoints so they do not obscure or overwhelm distinctive skylines; set back large WTGs from small important landmarks so that they do not overwhelm the landform.
- c. Coordinate color schemes for all developments; avoid mixing colors within a particular array unless to subordinate a particular turbine type or to provide safety markings; limit use of color patterns as accent for key clusters or individual WTGs; consider aviation safety coloration and lighting as may be required by the FAA.

*Consistency Analysis: **Consistent.*** The proposed project would not interrupt or obstruct the existing long views of the Coachella Valley available to the southeast and east. Due to the location of the project site and setbacks of new WTGs from SR-62, new WTGs would not be viewed in line with San Jacinto Peak, a prominent visual resource in the project region. Additionally, as viewed from SR-111, new WTGs on the project site would be comparable with existing wind energy facilities in the San Gorgonio Pass area. In addition, the applicant would install obstruction lighting on the proposed WTGs consistent with the Advisory Circular 70/7460-1L, Change 2 (FAA 2018).

2. Circulation: The proposed project would be consistent with the following applicable policies included within the County’s General Plan Circulation Element (County of Riverside 2015a):

- C2.4 The direct project related traffic impacts of new development proposals shall be mitigated via conditions of approval requiring the construction of any improvements identified as necessary to meet level of service targets.

*Consistency Analysis: **Consistent.*** Primary ingress/egress for the project site would be from the very western end of Garnet Road, which dead-ends at the project site. Project operations are anticipated to generate daily trips similar to the existing wind energy facility. As such, the existing configuration of Garnet Road could accommodate the proposed project.

3. Multipurpose Open Space: The proposed project would be consistent with the following policies related to wind energy resources within the County’s General Plan Multipurpose Open Space Element (County of Riverside 2015b):

- OS 10.1 Provide for orderly and efficient wind energy development in a manner that maximizes beneficial uses of wind resources and minimizes detrimental effects to the residents and the environment of the county.

*Consistency Analysis: **Consistent.*** The proposed project would improve the overall efficiency of energy production on the project site by deploying new, modern, and high-efficiency WTGs. Because state-of-the-art turbine technology would be used, the proposed project would be capable of generating similar electricity output more reliably and with fewer WTGs, reducing the visual clutter that currently affects the site.

- OS 10.2 Continue the County’s Wind Implementation Monitoring Program (WIMP) in order to study the evolution of wind energy technology, identify means to solve

environmental and community impacts, and provide for an ability to respond with changes in the County's regulatory structure.

Consistency Analysis: **Consistent.** The proposed project would be conditioned to pay WIMP fees.

4. Safety: The proposed project would be consistent with the following applicable policies included within the County's General Plan Safety Element (County of Riverside 2019b):

S 2.1 Minimize fault rupture hazards through enforcement of Alquist-Priolo Earthquake Fault Zoning Act provisions and the following policies:

- a. Require geologic studies or analyses for critical structures, and lifeline, high-occupancy, schools, and high-risk structures, within 0.5 miles of all Quaternary to historic faults shown on the Earthquake Fault Studies Zones map.
- b. Require geologic trenching studies within all designated Earthquake Fault Studies Zones, unless adequate evidence, as determined and accepted by the Riverside County Engineering Geologist, is presented. The County of Riverside may require geologic trenching of non-zoned faults for especially critical or vulnerable structures or lifelines.

Consistency Analysis: **Consistent.** No project structures would be within an Alquist-Priolo Earthquake Fault Zone. The County of Riverside Fault Zone Maps indicate that the WTG proposed near the northeast corner of the project site lies within a Riverside County Fault Zone established for the Garnet Hill Fault. Based on the geologic evaluation of the County Fault Zone included in Appendix D, no active fault trace projecting to the ground surface was identified within the project site.

S 2.2 Require geological and geotechnical investigations in areas with potential for earthquake-induced liquefaction, landsliding or settlement, for any building proposed for human occupancy and any structure whose damage would cause harm, except for accessory buildings.

Consistency Analysis: **Consistent.** Consistent with **Mitigation Measure (MM) GEO-1**, the site design and engineering shall be conducted in conformance with all recommendations as specified in the Geotechnical Design Report (Appendix D). Recent field surveys conducted in August 2020 by a geotechnical professional confirmed that, with the incorporation of project-specific engineering considerations, the proposed project could be constructed and operated on site without posing a risk to life or property.

5. Noise: The proposed project would be consistent with the following policies related to wind energy resources and included within the County's General Plan Noise Element (County of Riverside 2015c):

N 5.1 Enforce the Wind Implementation Monitoring Program (WIMP).

Consistency Analysis: **Consistent.** The proposed project would be conditioned to pay WIMP fees.

N 5.2 Encourage the replacement of outdated technology with more efficient technology with less noise impacts.

*Consistency Analysis: **Consistent.*** The proposed WTGs would be the newest technology available.

- 6. Housing:** The County's General Plan Housing Element does not contain any policies related to wind energy resources or the proposed project.

Consistency Analysis: While no policies outlined in the Housing Element apply, the proposed project would not conflict with the County's General Plan Housing policies.

- 7. Air Quality:** The proposed project would be consistent with the following policies related to wind energy resources within the County's General Plan Air Quality Element (County of Riverside 2018):

AQ 20.19 Facilitate development and siting of renewable energy facilities and transmission lines in appropriate locations.

*Consistency Analysis: **Consistent.*** The proposed project would repower an existing commercial wind energy facility within the Wind Energy Resource Zone. The nearest residence is approximately 3,400 feet east of the nearest proposed WTG location.

AQ 26.1 The County shall implement programs and requirements to achieve the following objectives related to reducing greenhouse gas emissions derived from energy generation:

- a. Encourage the installation of solar panels and other energy-efficient improvements.
- b. Facilitate residential and commercial renewable energy facilities (solar array installations, individual wind energy generators, etc.).
- c. Facilitate development of renewable energy facilities and transmission lines in appropriate locations.
- d. Facilitate renewable energy facilities and transmission line siting.
- e. Provide incentives for development of local green technology businesses and locally produced green products.
- f. Provide incentives for investment in residential and commercial energy efficiency improvements.
- g. Identify lands suitable for wind power generation or geothermal production and encourage development of these alternative energy sources.

*Consistency Analysis: **Consistent.*** The proposed project would improve the overall efficiency of energy production on the project site by deploying new, modern, and high-efficiency WTGs. Because state-of-the-art turbine technology would be used, the proposed project would be capable of more-efficiently generating renewable electric energy and thereby reducing greenhouse gas emissions.

- 8. Healthy Communities:** The County's General Plan Healthy Communities Element does not contain any policies related to wind energy resources or the proposed project.

*Consistency Analysis: **Consistent.*** While no policies outlined in the Healthy Communities Element apply, the proposed project would not conflict with the County's General Plan Health Community policies.

9. Environmental Justice (After Element is Adopted): Environmental Justice Element not adopted to date.

B. General Plan Area Plan(s): Western Coachella Valley Area Plan

C. Foundation Component(s): Rural; Open Space

D. Land Use Designation(s):

Riverside County: Rural Desert (RD), Open-Space - Conservation Habitat (OS-CH), Open-Space Water (OS-W)

City of Palm Springs: Industrial, Open Space – Water, Wind Energy Overlay

E. Overlay(s), if any: None

F. Policy Area(s), if any: San Gorgonio Pass Wind Energy Policy Area

G. Adjacent and Surrounding:

General Plan Area Plan(s): Western Coachella Valley Area Plan; Pass Area Plan

Foundation Component(s): Rural, Open Space, Community Development

Land Use Designation(s): RD, OS-CH, Low Density Residential (LDR), Rural Residential

Overlay(s), if any: None

Policy Area(s), if any: San Gorgonio Pass Wind Energy Policy Area

H. Adopted Specific Plan Information

Name and Number of Specific Plan, if any: N/A

Specific Plan Planning Area, and Policies, if any: N/A

I. Existing Zoning: Wind Energy Resource Zone (W-E), Rural Residential (R-R), Controlled Development Area (W-2)

J. Proposed Zoning, if any: Wind Energy Resource Zone (W-E) (CX2000032)

K. Adjacent and Surrounding Zoning:

Riverside County: W-E; W-2; W-2-M; R-R; Watercourse, Watershed and Conservation Areas (W-1); Industrial Park (I-P); Scenic Highway Commercial (C-P-S)

City of Palm Springs: Energy Industrial (EI), Environmentally Sensitive Area Specific Plan Zone (ESA-SP), Watercourse (W)

INTENTIONALLY LEFT BLANK

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (x) would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” or “Less-Than-Significant Impact with Mitigation Incorporated” as indicated by the checklist on the following pages.

- | | | |
|----------------------------------------------------------|-------------------------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Agriculture & Forest Resources | <input type="checkbox"/> Hydrology / Water Quality | <input checked="" type="checkbox"/> Transportation |
| <input type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Land Use / Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities / Service Systems |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Energy | <input checked="" type="checkbox"/> Paleontological Resources | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input checked="" type="checkbox"/> Geology / Soils | <input type="checkbox"/> Population / Housing | |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services | |

DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED
<input type="checkbox"/> I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/> I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project, described in this document, have been made or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/> I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED
<input type="checkbox"/> I find that although the proposed project could have a significant effect on the environment, NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.
<input type="checkbox"/> I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An ADDENDUM to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.

I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.

I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a **SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following:(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or,(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

Signature

Jay Olivas
Project Planner

Printed Name

Date

For: John Hildebrand
Planning Director

IV. ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000-21178.1), this Initial Study has been prepared to analyze the proposed project to determine any potential significant impacts upon the environment that would result from construction, O&M, and decommissioning of the proposed project. In accordance with California Code of Regulations, Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the County of Riverside, in consultation with other jurisdictional agencies, to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report is required for the proposed project. The purpose of this Initial Study is to inform the decision makers, affected agencies, and the public of potential environmental impacts associated with the implementation of the proposed project.

Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS Would the project:				
1. Scenic Resources				
a) Have a substantial effect upon a scenic highway corridor within which it is located?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Caltrans 2019; County of Riverside 2015a, 2019a; Figures 3-1 through 3-7B.

Findings of Fact:

- a) **Less-Than-Significant Impact:** The project site is located adjacent to SR-62 and I-10 and is within 0.70 miles of SR-111. According to the California Department of Transportation, SR-62 is an officially designated state scenic highway from I-10 north to the San Bernardino County line, and the nearby segment of SR-111 is an eligible state scenic highway (Caltrans 2019). Riverside County General Plan Figure C-8, Scenic Highways, includes similar designations for SR-62 and SR-111. However, between Whitewater Canyon Road and SR-62, Figure C-8 identifies I-10 as an eligible state scenic highway (east of SR-62, I-10 is identified as a County-eligible scenic

highway) (County of Riverside 2015a). Senate Bill 169, passed in 2013, deleted the portion of I-10 between Route 38 near Redlands to SR-62. As such, the segment of I-10 west of SR-62 is no longer identified as an eligible state scenic highway (Caltrans 2019). Dillon Road is also listed as a scenic corridor in Policy 15.4 of the Western Coachella Valley Area Plan but is not identified as a County-eligible scenic highway (County of Riverside 2019a). While Riverside County General Plan Figure C-8 identifies a nearby segment of I-10 as a state- and County-eligible scenic highway, no segments of I-10 in the state are included in the scenic highway program. Section 17.224.040(C) establishes WECS scenic setback requirements. As identified in Table 2-6 (Section 2, Project Overview), the proposed project would conform to all required scenic setbacks with the exception of the quarter-mile scenic setback from I-10 west of SR-62. The proposed project would observe a minimum scenic setback of 1,000 feet from I-10, consistent with the permitted I-10 scenic setback for the existing wind energy facility within the project site.

During construction, the presence of cranes; sections of new WTG towers, hubs, and blades being hoisted into place; the removal of existing WTGs; and more generally, an increase of activity on the project site would be visible from I-10, SR-62, and SR-111. Despite the visibility of these features, cranes would be temporary elements in the landscape and turbine components would resemble more modern WTGs visible throughout the western Coachella Valley via the I-10 corridor. Further, from I-10, SR-62, and SR-111, views of these construction features would be available for a relatively brief duration and would be consistent with the prevailing development theme of the corridor (i.e., WTGs adjacent to the interstate). As such, views of construction and in-progress project components would not have a substantial effect on a scenic corridor.

Three-dimensional photosimulations of the proposed project have been prepared to illustrate the anticipated visual change associated with removal of 93 existing WTGs and installation of 16 modern WTGs on the project site. Specifically, photo simulations of the proposed project were prepared from six publicly accessible vantage points in the surrounding area including SR-62, I-10, and local roads (e.g., Garnet Road, Adkins Road and Oreana Way). The locations of photo simulation vantage points in relation to the project site and project components are depicted on Figure 3-1, photo simulation Vantage Points. While a photo simulation of the proposed project was not prepared from SR-111, effects to views from the scenic corridor are anticipated to be less than described below for SR-62 and I-10 due to greater distance between the state route and the project site that would reduce the apparent scale of new WTGs. In addition, because the project site is located no closer than 0.70 miles from SR-111, views from the state route are wider than those available from more proximate vantage points and provide a greater ability to accommodate anticipated visual change.

Figure 3-2A, Vantage Point 1: Southbound SR-62 – Existing Conditions, provides a representative westerly view towards the project site from southbound SR-62. In the existing conditions photograph, the state route, its sloped shoulder featuring low dry grasses and scattered mounded shrubs, and a simple bridge spanning I-10 comprise most of the foreground view. Beyond the bridge, the distinct form and line of approximately 38 existing WTGs are visible against a backdrop of generally tan mountainous terrain. The rugged San Jacinto Mountains are prominent from this vantage point and, while visible due to their height and color, existing WTGs do not block or substantially interrupt views of the background terrain.

Upon implementation of the proposed project, the slightly busy visual pattern of 38 WTGs (some of which overlap visually with one another) would be replaced with 10 taller modern WTGs. In

addition, a new self-supporting lattice met tower on the project site would also be visible from this vantage point. Refer to Figure 3-2B, Vantage Point 1: Southbound SR-62 – Proposed Conditions (visual simulation). While new WTGs would be noticeably taller and more prominent when compared to existing WTGs, the existing visual clutter associated with the aged WTGs would be removed and there would be unencumbered corridors to background mountain terrain. The blades of several new WTGs would regularly rise above the rugged ridgeline of the San Jacinto Mountains to be silhouetted against the sky but overall effects to the SR-62 corridor would be somewhat subdued due to the existing presence of WTGs in the area. As such, impacts would be less than significant.

Figure 3-3A, Vantage Point 2: Westbound I-10 – Existing Conditions, provides a representative southwesterly view from westbound I-10 near the northeastern corner of the project site. As shown in the photograph, north–south rows of existing WTGs are commonplace in the western Coachella Valley landscape and cannot be overlooked. Existing WTGs are viewed against a backdrop of tan to green to grey mountainous terrain including the visually prominent San Jacinto Peak. With implementation of the proposed project, existing clutter associated with overlapping rows of WTGs would be removed and views to background terrain would be opened and improved. Refer to Figure 3-3B, Vantage Point 2: Westbound I-10 – Proposed Conditions. From this vantage point, the increased length of turbine blades would be noticeable, yet the increased height of turbine towers would be muted (new WTGs would be located further to the west compared to the closest row of existing WTGs). Because the project would simplify the visual landscape and improve the southwesterly view towards the San Jacinto Mountains from the westbound I-10 vantage point, impacts to the I-10 corridor would be less than significant.

As demonstrated in Figures 3-2A through 3-3B and described above, implementation of the proposed project would not have a substantial effect on a scenic highway corridor and impacts would be less than significant.

- b) Less-Than-Significant Impact.** As the project site is currently developed with WTGs and related infrastructure, implementation of the repowering project would not result in substantial damage to scenic resources such as trees, rock outcroppings, and unique or landmark features. Trees, rock outcroppings, and unique or landmark features are not present on site. As demonstrated in Section 3.1(a), the project would not obstruct public views available from SR-62, I-10 and SR-111. In addition, and as illustrated in photosimulations prepared from east and westbound Garnet Road, Adkins Road and Oreana Way (Figures 3-4B, 3-5B, 3-6B and 3-7B), the removal of existing WTGs and installation of taller modern WTGs would not result in view obstruction from views open to the public or result in an aesthetically offensive site.

While the increased scale of turbine towers and length of blades would indeed be noticeable from the east and westbound Garnet Road viewpoints (refer to Figures 3-4A and 3-4B, Eastbound Garnet Road near Northwestern Corner of Project Site, and Figures 3-5A and 3-5B, Westbound Garnet Road West of SR-62), new WTGs would not result in view obstruction or the substantial blockage of prominent landscape features (including background mountain terrain). Similar effects are also anticipated at Oreana Way located south of the Project Site (Figures 3-7A and 3-7B, Vantage Point 6: Oreana Way). Rather, due to the removal of existing WTGs (which are more closely spaced) and layout of 16 new WTGs (which are less densely spaced), the project site would appear less visually cluttered and busy as compared to existing conditions. Refer to Figures 3-2A through 3-4B, 3-7A, and 3-7B. Lastly, as viewed from Viewpoint 5 (Adkins Road), the removal of existing WTGs would result in the removal of a busy collection of layered,

overlapping lines scattered across the western Coachella Valley floor. In addition to one row of existing WTGs closest to the vantage point (not within the project site), several new WTGs would be experienced as layered vertical lines; however, overall impacts to views from Adkins Road would be less than significant as new WTGs would not result in view obstruction or an aesthetically offensive site. Refer to Figures 3-6A through 3-7B.

The project also includes upgrades to 43 utility poles along the overhead electrical collection system in the southern portion of the site. Due to distance and the volume of existing WTGs in the landscape, the existing 45-foot utility poles are not visible from southbound SR-62, westbound I-10, eastbound Garnet Road, westbound Garnet Road, or Oreana Way (Figures 3-2A, 3-3A, 3-4BA, 3-5A, and 3-7A). On close inspection, the existing utility poles are faintly visible from Adkins Road (Figure 3-6A). The new taller utility poles would look similar to the existing utility poles from Adkins Road due to distance and minimal increase in size of the poles. The replacement of 43 existing utility poles with new wooden poles up to 65 feet tall would not result in view obstruction or blockage of prominent landscape features. Refer to Figures 3-2B through 3-7B.

As described above and illustrated in Figures 3-4A through Figure 3-6B, the proposed project would not substantially damage scenic resources, obstruct any prominent scenic vista or view open to the public, or result in the creation of an aesthetically offensive site open to public view. Impacts would be less than significant.

- c) **Less-Than-Significant Impact.** The proposed project consists of the removal of 93 existing WTGs and installation of up to 16 modern (and taller) WTGs along the I-10 corridor. Located in western Coachella Valley, the project site is within a landscape marked by existing WTGs, limited solar installations, dispersed residences (including homes in the community of Garnet), and local and regional distribution and transmission infrastructure. While the 16 new WTGs (approximately 492 feet tall from base to extended blade tip) would be more than 200 feet taller than the existing WTGs that would be removed, new WTGs would be installed in linear north-south rows and would create a similar pattern of rows of tall, vertical lines and rotating blades as existing WTGs in the surrounding area. Further, because the total number of WTGs on the project site would be substantially reduced, the layout of WTGs would result in greater spacing and less visual clutter. Despite the increased scale and blade length, the new WTG towers and blades would display similar vertical lines and light gray colors as existing on-site WTGs and modern WTGs on nearby parcels. As such, the existing visual character of the site and views would not be substantially affected by the proposed project.

Construction and operation of the proposed project would be visible to motorists on local and regional roads, local residents, and recreationists in the surrounding area including from San Jacinto Peak, higher elevation terrain in the Sand to Snow National Monument (located north of I-10 and west of Whitewater Canyon), and, potentially, the San Bernardino National Forest. However, new WTGs would be viewed in the context of existing WTG development and would result in relatively weak to moderate visual contrast in existing views (Figures 3-2A through 3-6B). In addition, in views from the distant recreational facilities referenced above, the removal of existing WTGs and installation of 16 new WTGs on the floor of the western Coachella Valley would not be visually prominent or particularly striking due to distance and the volume of existing WTGs in the landscape. In addition, due to current development of the site with WTGs and associated infrastructure, the project site displays relatively low visual quality and lacks scenic

resources. Additional information regarding the existing scenic quality of the project site is discussed in Section 3.1(b).

As demonstrated above, construction and operation of the wind repower project would not substantially degrade the existing visual character or quality of public views of the site. Impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
2. Mt. Palomar Observatory	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County Ordinance No. 655 (Regulating Light Pollution); County of Riverside 2015b, 2019a.

Findings of Fact:

a) **Less-Than-Significant Impact.** The project site is located approximately 40 miles from the Mt. Palomar Observatory. As shown in Western Coachella Valley Area Plan Figure 6, Mt. Palomar Nighttime Lighting Policy Area, the project site is located within Zone B of the Mt. Palomar Nighttime Lighting Policy Area. All projects within Zone B are required to adhere to the general and Zone B lamp type and shielding requirements of Riverside County Ordinance No. 655, which regulates light pollution from outdoor lighting fixtures. More specifically, Riverside County Ordinance No. 655 regulates artificial illumination for buildings and structures, recreational facilities, parking lots, landscape, outdoor advertisements and other signs, private street lighting, and walkway lighting. Riverside County Ordinance No. 655 does not regulate WTG obstruction lighting (the necessity of obstruction lighting is regulated at the federal level by the FAA).

The existing wind energy facility within the project site contains FAA-required obstruction lighting atop 20 WTGs. FAA-required obstruction lighting required for the proposed project would likely consist of slowly pulsing red lights installed atop the 16 new WTGs and met tower on the project site, resulting in less obstruction lighting overall than existing conditions. As discussed in Section 2.8.3, the FAA issued a determination of No Hazard to Air Navigation for all the 16 proposed and 7 existing WTGs and the proposed met tower. Except for WTG obstruction lights, the proposed project would not install new outdoor light fixtures at the project site. If new outdoor lighting fixtures were to be installed on site, lighting fixtures would comply with the general and Zone B lamp type and shielding requirements of Riverside County Ordinance No. 655.

Due to the presence of intervening natural topography, the project site is not within the immediate viewshed of the observatory. Further, a direct line of sight from the observatory to proposed WTGs on the project site is not available due to the presence of the San Jacinto Mountain range (including San Jacinto Peak; elevation 10,804 feet above mean sea level) to the immediate south. Therefore, based on the distance and the presence of intervening features

between the project site and Mt. Palomar Observatory, and because Riverside County Ordinance No. 655 does not expressly apply to FAA-required obstruction lighting, no adverse effects on the observatory are expected. Therefore, impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3. Other Lighting Issues	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Expose residential property to unacceptable light levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Kimley Horn 2020; FAA 2018.

Findings of Fact:

a) **Less-Than-Significant Impact.** The existing wind energy facility within the project site contains FAA-required obstruction lighting atop 20 WTGs. FAA-required obstruction lighting required for the proposed project would likely consist of slowly pulsing red lights installed atop the 16 new WTGs and met tower on the project site, resulting in less obstruction lighting overall than existing conditions. Except for required WTG obstruction lighting that would be installed on the 16 new WTGs and the proposed met tower, no new lighting sources are proposed within the project site. Substantial glare is not anticipated from obstruction lighting due to the mounting height (approximately 300 feet high) and the synchronized pulsing nature of the light source. The pulsing red of obstruction lights would be visible throughout western Coachella Valley, including from I-10, SR-62, SR-111, local roads, and residences, including those in the nearby communities of Garnet and North Palm Springs. Despite the addition of new obstruction lights to the nighttime environment, the generation of substantial light that would adversely affect nighttime views is not anticipated.

As proposed, the new WTGs would be setback from the nearest residential and recreational viewers. For example, the nearest homes in the communities of Garnet and North Palm Springs are located approximately 0.85 miles east and 1.6 miles northeast, respectively. The WTGs would be viewed in the context of surrounding WTG development, which includes some operational obstruction lighting installed atop existing WTGs. For example, approximately 14 of the existing WTGs on the project site feature pulsing obstruction lighting. Therefore, due to existing WTGs that contribute pulsing obstruction lighting to the nighttime environment and the presence of additional WTGs featuring obstruction lighting along the I-10 corridor, obstruction lighting installed atop new WTGs within the project site would not adversely affect nighttime views in the area. Pulsing lighting may be considered an annoyance or nuisance by neighbors in the nearby community of Garnet; however, as existing obstruction lighting contributes to the nighttime environment, such lighting would not be considered a “new” lighting source for purposes of this analysis. As such, impacts would be less than significant.

- b) **Less-Than-Significant Impact.** Refer to response to Section 3.3(a). Red obstruction lighting would pulse (as opposed to burn steadily) during evening and nighttime hours. According to the FAA, red lights provide the most conspicuity to pilots (FAA 2018) to act as a deterrent for aircraft.

The County of Riverside Code of Ordinances regulates outdoor lighting and specifically inadequately shielded outdoor lighting for purposes of reducing light trespass (refer to Title 8, Chapter 8.80, Outdoor Lighting). The general standard established in Chapter 8.80 requires all outdoor luminaires be “located, adequately shielded, and directed such that no direct light falls outside the parcel of origin.” Further, Chapter 8.80 states that outdoor luminaries shall not “blink, flash, or rotate.” Regarding light trespass, the County has not established a numerical light trespass value for parcels adjacent to the parcel of origin that would indicate when direct lighting is considered unacceptable. Rather, determination of light trespass is made on a case by case basis and is triggered by a property owner’s complaint.

While obstruction lighting seemingly conflicts with the general standard of Chapter 8.80, the County expressly exempts outdoor luminaries authorized by a provision of federal law. Refer to Section 8.80.060 Exemptions (D). Federal standards for marking and lighting are set forth in Advisory Circular 70/7460-1L, Change 2 (FAA 2018). Therefore, WTG obstruction lighting is exempt from applicable County regulations and is not subject to the shielding, direct light trespass, and blinking/flushing restriction codified in the County’s Code of Ordinances. As proposed, all 16 new WTGs may include obstruction lighting, but it is likely that only a subset of the total will require obstruction lighting. Nearby residents and other viewers would experience the synchronized red lights installed atop WTGs; however, under existing conditions, approximately 20 existing WTGs feature obstruction lighting. For example, two WTGs in the north–south row located approximately 0.65 miles west of Adkins Road feature obstruction lighting. Because the new WTGs nearest to Adkins Road and residences off Adkins Road would be further than under existing conditions (approximately 0.20 miles further away from residences), light levels generated by obstruction lighting are not anticipated to be “unacceptable.” Furthermore, due to the presence of existing obstruction lighting in the immediate area, the nighttime environment and quality of views is not anticipated to change substantially upon implementation of the proposed project. As such, impacts associated with light levels on occupied residential properties in the surrounding area would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Agriculture & Forest Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AGRICULTURE & FOREST RESOURCES Would the project:				
4. Agriculture	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AGRICULTURE & FOREST RESOURCES Would the project:				
b) Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2015b, 2016 n.d.; DOC n.d.

Findings of Fact:

No Impact. As illustrated in General Plan Figure OS-2, Agricultural Resources, the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project would therefore not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and would have no impact in this regard. The General Plan Land Use designations of the project site are Rural Desert (RD), Conservation Habitat (CH), and Water (W), indicating the County does not intend the project site to be utilized for agricultural uses. Based on the preceding, the proposed project would have no impact related to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

No Impact. The project site is not located in an area zoned for agricultural use, within land subject to a Williamson Act contract, or within land within a Riverside County Agricultural Preserve (County of Riverside 2016). The project would have no impact related to conflict with existing agricultural zoning, agricultural use, or with land subject to a Williamson Act contract or within a Riverside County Agricultural Preserve.

- a) No Impact.** The project is not located within 300 feet of agriculturally zoned property. The surrounding vicinity of the project site can broadly be described as an area of mixed wind energy resources, industrial and commercial properties, and rural residences. The Union Pacific Railroad track runs east–west south of the project site and Coachella Valley Water District percolation ponds are located south of the railroad tracks. I-10 runs northwest–southeast north of the project site and additional wind energy development, SR-62, and vacant desert land are located north of I-10. Existing wind energy development is also present southeast of the project site. Some commercial and industrial land uses are developed east of the project site, adjacent to North Indian Canyon Drive. The area of land between the noncontiguous portions of the project site consists of wind energy development, rural residential, and undeveloped land. As such, the proposed project would not result in development of non-agricultural uses within 300 feet of agriculturally zoned property.

- b) **No. Impact** The proposed project does not include uses or facilities that would result in changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use. Additional information regarding farmland impacts is discussed in Sections 3.IV.4(a) and 3.IV.4(b).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. Forest	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2015b.

Findings of Fact:

- a) **No Impact.** The project site is currently used as a commercial wind energy facility. The properties within the project site and vicinity are not zoned for forest land, timberland, or timberland zoned Timberland Production. The proposed project does not propose or require uses or facilities that would otherwise potentially affect properties zoned for forest land, timberland, or timberland zoned Timberland Production. On this basis, the proposed project would have no potential to conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.
- b) **No Impact.** The project site is currently used as a commercial wind energy facility. As shown on General Plan Figure OS-3a, Forestry Resources Western Riverside County Parks, Forests, and Recreation Areas, neither the project site nor vicinity properties are designated forest land. The proposed project does not include uses or facilities that would otherwise potentially result in the loss of forest land or conversion of forest land to non-forest use. On this basis, the proposed project would have no potential to result in the loss of forest land or conversion of forest land to non-forest use.
- c) **No Impact.** The project site is currently used as a commercial wind energy facility. The proposed project does not include uses or facilities that would involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to

non-forest use. Additional information regarding forest land impacts is discussed in Sections 3.IV.5(a) and 3.IV.5(b).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Air Quality Would the project:				
6. Air Quality Impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 2019c; SCAQMD 1993, 2017; SCAG 2016; Air Quality and Greenhouse Gas Emissions Technical Report (Appendix A of this Initial Study).

Findings of Fact:

a) **Less-Than-Significant Impact.** The project site is located within the Salton Sea Air Basin (SSAB) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD), which is the local agency responsible for administration and enforcement of air quality regulations for the area. The SCAQMD has established criteria for determining consistency with the Air Quality Management Plan (AQMP), currently the 2016 AQMP, in Chapter 12, Sections 12.2 and 12.3, of the SCAQMD CEQA Air Quality Handbook. The criteria are as follows (SCAQMD 1993):

- **Consistency Criterion No. 1:** The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 Findings: Section 3.IV.6(b) evaluates the project's potential impacts per CEQA Guidelines Appendix G Threshold 2 (the project's potential to violate any air quality standard or contribute substantially to an existing or projected

air quality violation impact analysis). As discussed in Section 3.IV.6(b), the proposed project would not result in an exceedance of SCAQMD thresholds during construction for any criteria air pollutant. Therefore, the proposed project would not result in an increase in the frequency or severity of existing air quality violations and would not conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook.

- **Consistency Criterion No. 2:** The project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Consistency Criterion No. 2 Findings: While striving to achieve the National Ambient Air Quality Standards (NAAQS) for ozone (O₃) and particulate matter less than or equal to 2.5 microns in diameter (PM_{2.5}) and the California Ambient Air Quality Standards (CAAQS) for O₃, particulate matter less than or equal to 10 microns in diameter (PM₁₀), and PM_{2.5} through a variety of air quality control measures, the 2016 AQMP also accommodates planned growth in the SSAB (SCAQMD 2017). Proposed projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors (e.g., population and employment) would be consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook).

The proposed WTGs are proposed primarily within the W-E (Wind Energy Resource) Zone. Four new WTGs, a portion of the project access roads, collection system and met tower in the southwestern portion of the project site are within the R-R (Rural Residential) Zone. Riverside County Code of Ordinances Title 17, Chapter 17.164, specifies the uses permitted in the W-E Zone as follows: "D. Commercial WECS and WECS arrays with no limit as to rated power output are permitted provided a commercial WECS permit has been granted pursuant to the provisions of Chapter 17.224." The Riverside County Zoning Ordinance, Section 18.41, codifies requirements for Commercial WECS. As described in Ordinance 18.41(a)(2), commercial WECS or WECS arrays having a total power output of more than 100 kW are permitted in the W-E Zone and in the W-1 Zone, provided a commercial WECS permit is granted pursuant to Ordinance Section 18.41. The Applicant has requested a Change of Zone to W-E for the development area within the R-R zone, as described in Section 2.8.1. With approval of the Change of Zone, the proposed project would be consistent with the zoning of the project site.

The proposed project would be considered consistent with the existing land uses, which were considered for development of the assumptions in the 2016 AQMP. Additionally, the project would not directly or indirectly promote population growth or increase trips in the region. Therefore, the proposed project would not exceed the assumptions of the 2016 AQMP. Accordingly, the project would meet Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook.

Summary

As described previously, the proposed project would not result in an increase in the frequency and severity of existing air quality violations and would not conflict with Consistency Criterion No. 1. Also, implementation of the proposed project would not exceed the demographic growth forecasts in the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016); therefore, the proposed project would also be consistent with the SCAQMD 2016 AQMP, which based future

emission estimates on the SCAG 2016 RTP/SCS and the Coachella Valley Association of Governments 2017 Transportation Project Prioritization Study (CVAG 2017a). Thus, the proposed project would not conflict with Consistency Criterion No. 2. Based on these considerations, impacts related to the project's potential to conflict with or obstruct implementation of the applicable air quality plan would be less than significant.

- b) Less-Than-Significant Impact.** Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, proposed project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a proposed project's individual emissions would have a cumulatively significant impact on air quality.

Construction Emissions

Construction of the proposed project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment and soil disturbance) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Therefore, such emissions levels can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts.

Criteria air pollutant emissions associated with temporary construction activity were quantified using the California Emissions Estimator Model (CalEEMod). Construction emissions were calculated for the estimated worst-case day over the construction period associated with each phase and reported as the maximum daily emissions estimated during each year of construction (2021 and 2022). Construction schedule assumptions, including phase type, duration, and sequencing, were based on information provided by the project applicant and are intended to represent a reasonable scenario based on the best information available. Default values provided in CalEEMod were used where detailed project information was not available. Construction assumptions were based on those presented in Section 2.5.

Implementation of the proposed project would generate air pollutant emissions from entrained dust, off-road equipment, and vehicle emissions. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM₁₀ and PM_{2.5} emissions. The proposed project would be required to comply with SCAQMD Rules 403 and 403.1 to control dust emissions generated during the grading activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites three times per day depending on weather conditions. The proposed project would also employ an off-road speed limit of 15 miles per hour. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of volatile organic compounds (VOCs), oxides of nitrogen (NO_x), carbon monoxide (CO), PM₁₀, and PM_{2.5}.

Table 3-1 presents the estimated maximum daily construction emissions generated during construction of the proposed project. The values shown are the maximum summer or winter daily emissions results from CalEEMod.

Table 3-1. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>					
2021	<u>4.535.79</u>	<u>92.7470.89</u>	<u>95.5845.12</u>	<u>0.260.18</u>	<u>21.9220.34</u>	<u>8.475.50</u>
2022	<u>2.482.55</u>	<u>43.2126.59</u>	<u>53.0523.10</u>	<u>0.100.05</u>	<u>7.989.26</u>	<u>3.791.92</u>
Maximum Daily Emissions	<u>4.535.79</u>	<u>92.7470.89</u>	<u>95.5845.12</u>	<u>0.260.18</u>	<u>21.9220.34</u>	<u>8.475.50</u>
<i>SCAQMD Threshold</i>	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: Air Quality and Greenhouse Gas Emissions Technical Report (Appendix A of this Initial Study)

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

Refer to Appendix A for complete results.

The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect CalEEMod “mitigated” output, which accounts for compliance with SCAQMD Rules 403 and 403.1 (Fugitive Dust), including watering of the project site and unpaved roads three times per day and restricting vehicle speed on unpaved roads to 15 miles per hour.

As shown in Table 3-1, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, sulfur oxides (SO_x), PM₁₀, or PM_{2.5} during construction in all construction years. Construction-generated emissions would be temporary and would not represent a long-term source of criteria air pollutant emissions. As such, impacts related to construction would be less than significant. Based on the project description information provided in Section 2.3 of this Initial Study, the proposed project would not create any new impacts during operation.

Decommissioning Emissions

Decommissioning of the proposed project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment and soil disturbance) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips).

Criteria air pollutant emissions associated with temporary decommissioning activity were quantified using CalEEMod. Construction emissions were calculated for the estimated worst-case day over the decommissioning period associated with each phase and reported as the maximum daily emissions estimated during each year of construction (2053). Emissions were estimated based on assumptions shown in Section 2.5 of this Initial Study.

Table 3-2 presents the estimated maximum daily emissions generated during decommissioning of the proposed project. The values shown are the maximum summer or winter daily emissions results from CalEEMod.

Table 3-2. Estimated Maximum Daily Decommissioning Criteria Air Pollutant Emissions

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>					
2053	<u>2,431.51</u>	<u>7,855.98</u>	<u>21,164.94</u>	<u>0,070.05</u>	<u>7,559.68</u>	<u>2,134.54</u>
<i>SCAQMD Threshold</i>	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: Air Quality and Greenhouse Gas Emissions Technical Report (Appendix A of this Initial Study)

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

Refer to Appendix A for complete results.

The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect CalEEMod “mitigated” output, which accounts for compliance with SCAQMD Rules 403 and 403.1 (Fugitive Dust), including watering of the project site and unpaved roads three times per day and restricting vehicle speed on unpaved roads to 15 miles per hour.

As shown in Table 3-2, daily decommissioning emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Emissions generated during decommissioning would be temporary and would not represent a long-term source of criteria air pollutant emissions. As such, impacts related to construction would be less than significant. As discussed in Section 2.6, the proposed project would not create any new impacts during operation.

If a project’s emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

The SSAB has been designated as a federal and state nonattainment area for O₃ and PM₁₀. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SSAB including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction of the proposed project would generate VOC and NO_x emissions (which are precursors to O₃) and emissions of PM₁₀. As indicated in Tables 3-1 and 3-2, project-generated construction and decommissioning emissions would not exceed the SCAQMD emission-based significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Similarly, the proposed project would not generate an increase in emissions during operation.

Regarding potential cumulative localized impacts, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation if the proposed project would exceed SCAQMD thresholds. Criteria air pollutant emissions associated with construction activity of future proposed projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM₁₀ emissions would be reduced because all future proposed projects would be subject to SCAQMD Rules 403 and 403.1 (Fugitive Dust), which set forth general and specific requirements for all construction sites in the SCAQMD.

Based on the previous considerations, the proposed project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants. Impacts would be considered less than significant.

c) **Less-Than-Significant Impact.**

Localized Significance Thresholds Analysis

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The nearest sensitive-receptor land use (existing residence) is located approximately 690 feet from the closest area of disturbance. As such, the localized significance threshold (LST) receptor distance was assumed to be 656 feet (200 meters).

An LST analysis has been prepared to determine potential impacts to nearby sensitive receptors during construction of the proposed project. The SCAQMD also recommends the evaluation of localized nitrogen dioxide (NO₂), CO, PM₁₀, and PM_{2.5} impacts as a result of construction activities to sensitive receptors in the immediate vicinity of the project site. The impacts were analyzed using methods consistent with those in the SCAQMD’s Final Localized Significance Threshold Methodology (2009). According to the Final Localized Significance Threshold Methodology, “off-site mobile emissions from the proposed project should not be included in the emissions compared to the LSTs.” Hauling of soils and construction materials associated with project construction are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways. Emissions from the trucks would be relatively brief in nature and would cease once the trucks pass through the main streets.

Construction activities associated with the project would result in temporary sources of on-site fugitive dust and construction equipment emissions. Off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis. The maximum allowable daily emissions that would satisfy the SCAQMD localized significance criteria for source receptor area 30 are presented in Table 3-3 and compared to the maximum daily on-site emissions estimated to be generated during project construction.

Table 3-3. Localized Significance Thresholds Analysis for Project Construction

Maximum On-Site Emissions	NO ₂	CO	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>			
Construction Emissions ¹	<u>77.0249.53</u>	<u>94.5738.10</u>	<u>11.897.46</u>	<u>7.234.26</u>
SCAQMD LST ²	376	6,021	80	24
LST Exceeded?	No	No	No	No

Source: Air Quality and Greenhouse Gas Emissions Technical Report (Appendix A of this Initial Study).

Notes: NO₂ = nitrogen dioxide; CO = carbon monoxide; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.

Refer to Appendix A for detailed results.

2. These estimates reflect control of fugitive dust required by SCAQMD Rules 403 and 403.1, including watering of the project site and unpaved roads three times per day, and restricting vehicle speed on unpaved roads to 15 miles per hour.
1. Localized significance thresholds are shown for 1-acre project sites corresponding to a distance to a sensitive receptor of 200 meters.

As shown in Table 3-3, construction activities would not generate emissions in excess of site-specific LSTs; therefore, site-specific impacts during construction of the proposed project would be less than significant.

Health Impacts of Toxic Air Contaminants

In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the state and federal government as toxic air contaminants (TACs) or hazardous air pollutants. State law has established the framework for California's TAC identification and control program, which is generally more stringent than the federal program and aimed at TACs that are a problem in California. The state has formally identified more than 200 substances as TACs, including the federal hazardous air pollutants, and is adopting appropriate control measures for sources of these TACs. The following measures are required by state law to reduce diesel particulate emissions:

- Fleet owners of mobile construction equipment are subject to the California Air Resources Board (CARB) Regulation for In-Use Off-Road Diesel Vehicles (13 CCR 2449), the purpose of which is to reduce diesel particulate matter (DPM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.
- All commercial diesel vehicles are subject to Title 13, Section 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to 5 minutes; electric auxiliary power units should be used whenever possible.

The greatest potential for TAC emissions impacts during construction would be DPM emissions from heavy equipment operations and heavy-duty trucks during construction of the proposed project and the associated health impacts to sensitive receptors. The closest sensitive receptors would be residents approximately 690 feet from the closest area of disturbance. As shown in Table 3-1, maximum daily particulate matter (PM₁₀ or PM_{2.5}) emissions generated by construction equipment operation and from hauling of soil during grading (exhaust particulate matter, or DPM), combined with fugitive dust generated by equipment operation, would be well below the SCAQMD significance thresholds. The proposed project would also not emit any new TAC emissions during operation. Therefore, the impact would be less than significant.

Health Impacts of Carbon Monoxide

Mobile source impacts occur on two scales of motion. Regionally, project-related travel would add to regional trip generation and increase the vehicle miles traveled within the local airshed and the SSAB. Locally, project-generated traffic would be added to the County's roadway system near the project site during construction. If such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles "cold-started" and operating at pollution-inefficient speeds, and operates on roadways already crowded with non-project traffic, there is a potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SSAB is steadily decreasing.

The proposed project would have trip generation associated with construction worker vehicles and vendor trucks. Title 40 of the California Code of Regulations, Section 93.123(c)(5), Procedures for Determining Localized CO, PM₁₀, and PM_{2.5} Concentrations (hot-spot analysis), states that "CO, PM₁₀, and PM_{2.5} hot-spot analyses are not required to consider construction-related activities, which cause

temporary increases in emissions. Each site which is affected by construction-related activities shall be considered separately, using established 'Guideline' methods. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site." While project construction would involve on-road vehicle trips from trucks and workers during construction, construction activities would last approximately 8 months and would not require a project-level construction hotspot analysis. Because the proposed project would not result in long-term operational vehicular trips, an operational CO hotspot evaluation is also not required. As such, potential project-generated impacts associated with CO hotspots would be less than significant.

Health Impacts of Other Criteria Air Pollutants

Construction and operation of the proposed project would result in emissions that would not exceed the SCAQMD thresholds for criteria air pollutants including VOC, CO, SO_x, PM₁₀, or PM_{2.5}. VOCs would be associated with motor vehicles and construction equipment; however, project-generated VOC emissions would not result in the exceedances of the SCAQMD thresholds, as shown in Table 3-1.

VOCs and NO_x are precursors to O₃, for which the SSAB is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O₃ are generally associated with reduced lung function. The contribution of VOCs and NO_x to regional ambient O₃ concentrations is the result of complex photochemistry. The increases in O₃ concentrations in the SSAB due to O₃ precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O₃ concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O₃ ambient air quality standards tend to occur between April and October when solar radiation is highest. The holistic effect of a single proposed project's emissions of O₃ precursors is speculative due to the lack of quantitative methods to assess this impact. Nonetheless, the VOC and NO_x emissions associated with project construction could minimally contribute to regional O₃ concentrations and the associated health impacts. However, as emissions thresholds were not exceeded for either VOC or NO_x, pollutant health effects would be less than significant.

Construction of the proposed project would also not exceed thresholds for PM₁₀ and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter or obstruct the SSAB from coming into attainment for these pollutants. The proposed project would also not result in substantial DPM emissions during construction, and therefore, would not result in significant health effects related to DPM exposure. Additionally, the proposed project would be required to comply with SCAQMD Rules 403 and 403.1, which limit the amount of fugitive dust generated during construction. Due to the minimal contribution of particulate matter during construction, health impacts would be less than significant.

Construction of the proposed project would not contribute to exceedances of the NAAQS and CAAQS for NO₂. Health impacts that result from NO₂ and NO_x include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the alignment and would not be concentrated in one portion of the site at any one time. In addition, existing NO₂ concentrations in the area are well below the NAAQS and CAAQS standards. Construction of the proposed project would not require use of any stationary sources that would create substantial, localized NO_x impacts. Therefore, potential health impacts associated with NO₂ and NO_x would be less than significant.

CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots were discussed previously and are determined to be a less-than-significant impact. Thus, the project's CO emissions would not contribute to significant health effects associated with this pollutant. In summary, construction of the proposed project would not result in exceedances of the SCAQMD significance thresholds for all criteria pollutants. Therefore, the potential health impacts associated with criteria air pollutants would be less than significant.

Exposure to Valley Fever

Valley Fever is not highly endemic to Riverside County; the latest report from the California Department of Public Health listed Riverside County as having 5.6 cases per 100,000 people (California Department of Public Health 2018). According to the County of Riverside Epidemiology Department, there were no reported incidents of Valley Fever within the project site's zip code from 2016 through 2019 (Curlee, pers. comm. 2020). The proposed project would also employ dust mitigation measures, by watering three times per day and limiting speed on unpaved roads to 15 miles per hour. The proposed project would also be constructed in accordance with SCAQMD Rules 403 and 403.1, which limit the amount of fugitive dust generated during construction. As previously mentioned, the nearest sensitive-receptor land use (existing residence) is located approximately 690 feet west of the closest area of disturbance. Therefore, the proposed project would have a less than significant impact with respect to Valley Fever exposure for sensitive receptors.

- d) Less-Than-Significant Impact.** The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would potentially be generated from vehicles and equipment exhaust emissions during construction of the proposed project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project would not create any new sources of odor from these types of operations. Therefore, project operations would result in an odor impact that is less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
BIOLOGICAL RESOURCES Would the project:				
7. Wildlife & Vegetation				
a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): SCAG 2016; CDFW 2020d; CNPS 2020; County of Riverside 2015b; CVAG 2016; USFWS 2008, 2014, 2015, 2016, 2019; Hallingstad et al. 2018; Pagel et al. 2013; USGS 2014; APLIC 2012; Biological Technical Report (Appendix B of this Initial Study).

Findings of Fact:

- a) **Less-Than-Significant Impact with Mitigation Incorporated.** The project site is located on approximately 1,255.19 acres of existing energy facilities within the County and the entire project site is located within the CVMSHCP. The proposed project is considered a Covered Activity under Section 7.3 of the CVMSHCP. Approximately 383.39 acres of the project site overlap the CVMSHCP WFCAs, and the project would permanently and temporarily impact a total of 20.22 acres⁴ within the CVMSHCP WFCAs. Therefore, the project is required to complete a JPR process through the County, with concurrence by CVCC, the California Department of Fish and Wildlife (CDFW), and the U.S. Fish and Wildlife Service (USFWS). A pre-JPR meeting with CVCC, the County, CDFW, USFWS, and the project applicant was conducted on September 28, 2020. A formal JPR application package was submitted on October 7, 2020. CVCC issued its JPR findings for the project on January 22, 2021. The JPR findings determined that with the donation of the Set-aside Parcel, and with implementation of CVMSHCP Section 4.4 Required Avoidance, Minimization, and Mitigation Measures, and adherence to CVMSHCP Section 4.5 Land Use Adjacency Guidelines, the project is consistent with the CVMSHCP (refer to Appendix E of the BTR for details).

To the greatest extent feasible, the project applicant has avoided and minimized impacts to sensitive resources within the WFCAs, including modeled species habitat (Core Habitat and Other Conserved Habitat), fluvial and aeolian sand transport, and biological corridors. As shown on Figure 3-7, the proposed project would result in approximately 20.22 acres of disturbance (permanent and temporary) within the WFCAs, which includes the deduction of previously authorized disturbance acreage (7.47 acres) and only accounts for total impacts of new disturbances as a result of project implementation.

The proposed project would impact CVMSHCP modeled Core Habitat for Palm Springs pocket mouse and modeled Other Conserved Habitat for triple-ribbed milkvetch (*Astragalus tricarinatus*), desert tortoise (*Gopherus agassizii*), Palm Springs ground squirrel,⁵ and Le Conte's thrasher (*Toxostoma lecontei*). The project would also result in impacts to CVMSHCP fluvial and aeolian sand transport and biological corridors. The project would result in impacts to 4.48 acres (0.38 acres of permanent and 4.09 acres of temporary) of modeled Other Conserved Habitat for triple-ribbed milkvetch, 20.22 acres (1.48 acres of permanent and 18.74 acres of temporary) of modeled Other Conserved Habitat for desert tortoise, 2.01 acres (0.10 acres of permanent and 1.91 acres of temporary) of modeled Other Conserved Habitat for Palm Springs ground squirrel, 20.17 acres (1.43 acres of permanent and 18.73 acres of temporary) of modeled Core Habitat for Palm Springs pocket mouse, 20.22 acres (1.48 acres of permanent and 18.74 acres of temporary) of modeled Other Conserved Habitat for Le Conte's thrasher, 20.22 acres (1.48 acres of permanent and 18.74 acres of temporary) of modeled habitat of fluvial and aeolian sand

⁴ The proposed project would result in a total of 27.69 acres of impacts (permanent and temporary) within the WFCAs; however, this total includes previously authorized disturbance prior to implementation of the CVMSHCP. After deducting previously authorized disturbance acreage (7.47 acres), the total impact acreage is 20.22 acres.

⁵ Also referred to as Coachella Valley round-tailed ground squirrel or Palm Springs round-tailed ground squirrel.

transport, and 20.22 acres (1.48 acres of permanent and 18.74 acres of temporary) of modeled habitat of biological corridors within the WFCFA.

Note that temporary impacts are discussed in the context of being permanent and are offset with donation of the 248.12-acre Set-aside Parcel, of which 247.48 acres would be conserved, within the WFCFA. Revegetation or restoration of temporary impacts is not proposed after project completion. However, natural vegetation will be allowed to regenerate in temporary disturbance areas from root systems left intact. Furthermore, if topsoil is removed during construction, the segregated topsoil will be replaced, and the native seed will be allowed to regenerate naturally.

As part of the JPR process, the CVMSHCP establishes a mechanism for mitigating the effects of development within CVMSHCP Conservation Areas, which ensures that specific Conservation Objectives for Core Habitats, Essential Ecological Process areas, Biological Corridors and Linkages, and conserved natural communities for each Conservation Area remain in rough step⁶ balance (CVAG 2016). Impacts within the CVMSHCP WFCFA would be reduced to less-than-significant through implementation of **MM-BIO-1**, which would include the donation of the 248.12-acre Set-aside Parcel, of which 247.48 acres would be conserved (omitting area of disturbance for the met tower and associated access road) Set-aside Parcel. The Set-aside Parcel contains a surplus of modeled species habitats, fluvial and aeolian sand transport, and biological corridors acreage (refer to Table 7 of Appendix B, Biological Technical Report [BTR]). Based on the impact acreages listed above and as outlined in detail in Table 7 of Appendix B, with the exception of the Palm Springs ground squirrel, all project impacts to modeled species habitat are offset by at least a 12.2:1 ratio of conservation to proposed impacts as a result of donating the Set-aside Parcel to the CVMSHCP.

Impacts to modeled habitat for Palm Springs ground squirrel would be offset by the addition of 33.49 acres of suitable habitat for Palm Springs ground squirrel, not included in the original CVMSHCP modeled habitat, located within the Set-aside Parcel and within the CVMSHCP WFCFA. This additional 33.49 acres of suitable habitat were identified during the 2020 habitat assessment conducted specifically for this species (refer to Appendix C of the BTR for details). Furthermore, three individuals of Palm Springs ground squirrel were observed within the Set-aside Parcel, thereby affirming that suitable habitat exists and is occupied outside of the designated CVMSHCP modeled habitat for this species. The field assessment also concluded that only 3.16 acres of the 4.19 acres of CVMSHCP modeled Other Conserved Habitat is suitable for this species. Therefore, there is a total of 36.65 acres of suitable habitat for Palm Springs ground squirrel within the Set-aside Parcel and within the WFCFA, which would result in a conservation to impact ratio of 18.2:1 for Palm Springs ground squirrel. Typically, the applicant would be required to pay a per acre mitigation fee to Coachella Valley Association of Governments; however, as noted within the CVCC JPR findings, the Set-aside Parcel donation would offset impacts in lieu of payment of CVMSHCP mitigation fees (refer to Appendix E of the BTR for details).

With implementation of **MM-BIO-1** and project design features, as well as compliance with regulatory requirements addressed below in Sections 3.IV.7(b) through 3.IV.7(g), the proposed project is consistent with the conservation objectives for the WFCFA outlined in Sections 4.3 through 4.5 of the CVMSHCP. Section 5.9.3 of Appendix B includes a detailed consistency analysis for each conservation objective.

⁶ Rough Step analysis ensures, on an annual basis, that Conservation of Additional Conserved Lands is within 10% of the level needed to stay in balance with the level of Development (CVAG 2016).

The proposed project would also impact 111.41 acres (40.37 acres of permanent and 98.72 acres of temporary) outside of the CVMSHCP WFCAs. Revegetation or restoration of temporary impacts is not proposed after project completion outside of the WFCAs. However, natural vegetation will be allowed to regenerate in temporary disturbance areas from root systems left intact. Furthermore, if topsoil is removed during construction, the segregated topsoil will be replaced, and the native seed will be allowed to regenerate naturally. This area is not subject to the JPR process nor additional mitigation. The project would still be required to adhere to CVMSHCP Section 4.5, Land Use Adjacency Guidelines, regardless of these areas being outside of the WFCAs. In addition, the Set-aside Parcel donation would provide an overall benefit to this entire area and provide value in excess of what is required to offset all potential impacts to CVMSHCP Covered Species whether inside or outside of the WFCAs.

Based on the discussion above and the analysis throughout this section, there would be no conflict with provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan. Any potential impacts to the CVMSHCP will be mitigated to less-than-significant levels. In addition, by addressing potential impacts in Sections 3.IV.7(b) through 3.IV.7(g), the analysis is further considering and addressing impacts to, and consistency with, the CVMSHCP, including modeled species habitat, fluvial and aeolian sand transport, and biological corridors. Implementation of other mitigation measures, project design features, and regulatory requirements as proposed below, even if not specific to the CVMSHCP, benefit Covered Species and the habitats they rely on.

Mitigation:

MM-BIO-1 Set-aside Parcel Mitigation. The 248.12-acre Set-aside Parcel, of which 247.48 acres would be conserved (omitting area of disturbance for the met tower and associated access road), shall be donated to the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), through conveyance to the Coachella Valley Conservation Commission, to offset project impacts within the CVMSHCP Whitewater Floodplain Conservation Area prior to any ground disturbance associated with the proposed project. Set-aside Parcel

Monitoring: No monitoring required.

b) Less-Than-Significant Impact with Mitigation Incorporated.

Plants

No endangered or threatened plant species were observed within the project site during the focused special-status plant surveys conducted in April and May 2020. There are two CVMSHCP-covered plant species, Coachella Valley milk-vetch (a federally endangered and California Rare Plant Rank 1B.2 species) and triple-ribbed milkvetch (a federally endangered and California Rare Plant Rank 1B.2 species), known to occur within the immediate vicinity of the project site (i.e., within the White Water and/or Desert Hot Springs USGS Quadrangles [CDFW 2020d, CNPS 2020]). Therefore, the proposed project could result in short-term indirect impacts to federally listed plant species potentially present in off-site areas during construction activities due to generation of fugitive dust, the release of chemical pollutants, and the adverse effect of invasive plant species. Consistency with the CVMSHCP, including implementation of the Land Use Adjacency Guidelines, as well as **Project Design Feature (PDF) BIO-1** and

Regulatory Requirement (RR) BIO-1, would reduce indirect impacts to endangered or threatened plant species to less than significant.

The project site contains 291.73 acres of CVMSHCP modeled Other Conserved Habitat for triple-ribbed milkvetch, of which a total of 4.48 acres would be directly impacted by project implementation (Figure 3-7). Direct impacts to CVMSHCP modeled Other Conserved Habitat would be reduced to less than significant through mitigation measure **MM-BIO-1**, which would conserve 229.38 acres of modeled Other Conserved Habitat for this species within the Set-aside Parcel. As required by Section 4.4 of the CVMSHCP and in accordance with **RR-BIO-2**, pre-construction surveys for triple-ribbed milkvetch would be conducted within the WFCAs portion of the project site where project impacts could occur, which would reduce impacts to this species to less than significant.

Wildlife

Three listed wildlife species have a potential to be impacted by the proposed project: desert tortoise, Swainson's hawk (*Buteo swainsoni*), and bald eagle (*Haliaeetus leucocephalus*).

Desert Tortoise

Protocol-level surveys conducted within the project site for desert tortoise, a federally and state threatened and CVMSHCP Covered Species, did not detect live desert tortoise or recent desert tortoise sign (i.e., scat, tracks, recent burrows). However, potential Class 4 burrows do occur within the project site. Therefore, there is potential, albeit low, for desert tortoise to occur on the site.

Direct impacts to desert tortoise within the WFCAs would be reduced to less than significant through **RR-BIO-3a**, which would require pre-construction surveys for this species within the impact areas of the WFCAs. Additionally, the project site contains 383.39 acres of CVMSHCP modeled Other Conserved Habitat for desert tortoise, of which a total of 20.22 acres (1.48 acres of permanent and 18.74 acres of temporary) would be directly impacted by project implementation (Figure 3-7). Direct impacts to CVMSHCP modeled Other Conserved Habitat would be reduced to less than significant through **MM-BIO-1**, which would conserve 247.48 acres of modeled Other Conserved Habitat for this species within the Set-aside Parcel. Consistency with the CVMSHCP, including implementing Section 4.4 Required Avoidance, Minimization, and Mitigation Measures, and Section 4.5

Direct impacts to desert tortoise outside of the WFCAs would be reduced to less than significant through **RR-BIO-3b**, which would require either a 45-day notification to USFWS prior to issuance of the grading permit or a pre-construction clearance survey within the impact areas of the project site located outside of the WFCAs. Consistency with the CVMSHCP, including implementing Section 4.5 Land Use Adjacency Guidelines, as well as implementing **PDF-BIO-1** and **RR-BIO-1**, would ensure that indirect impacts to desert tortoise outside of the WFCAs remain less than significant throughout the project area. Furthermore, as discussed below, implementation of **PDF-BIO-2** would minimize indirect impacts to desert tortoise by discouraging raven nesting.

On September 28, 2020, the applicant attended a video meeting with staff from the County, CVCC, CDFW, and USFWS. The purpose of this meeting was to introduce the proposed project, discuss the project relative to the CVMSHCP and WFCAs, modeled species habitat, the value of the Set-aside Parcel donation, and any other concerns prior to submitting a JPR application. One potential concern related to the type of structure (lattice or monopole) proposed for the new met tower

located just inside of the WFCAs. This question was relevant to the tower's potential to facilitate increased perching and nesting opportunities for ravens that could then potentially prey on existing and/or future desert tortoise in the WFCAs. The applicant has made every effort to pursue incorporating a monopole-type met tower into the project design instead of utilizing a lattice tower structure. However, due to high winds in the area and the reduced stability of a monopole, the data generated from a monopole-type met tower would not be as accurate compared to the data generated from a more stable lattice-type met tower structure. The existing lattice met tower is located within the WFCAs approximately 165 feet from the proposed new met tower location. The existing lattice met tower will be removed shortly after the new met tower is installed. As such, there would be no change in perching and nesting opportunities for ravens between existing conditions and proposed development.

According to the Environmental Assessment to Implement a Desert Tortoise Recover Plan Task: Reduce Common Raven Predation on the Desert Tortoise (USFWS 2008b), proposed modifications to all utility poles and towers to preclude raven perching or nesting were researched and analyzed, but dismissed by the USFWS from further consideration. Specifically, it was found that ravens are efficient hunters and scavengers and do not rely on perch sites for hunting like some raptors. Furthermore, perch availability does not likely limit raven population size; therefore, the USFWS dismissed this alternative (i.e., proposed modifications to utility poles and towers) to reduce raven predation on hatchling and juvenile desert tortoise survivorship (USFWS 2008). Instead, USFWS recommends reducing or eliminating the likelihood of these structures being used as nest sites by ravens, which typically require high locations along with adequate food and water within their nesting territory (USFWS 2008). Specific to potential impacts to desert tortoise, as presented in **PDF-BIO-2**, the applicant has proposed measures to reduce raven nesting opportunities on the met tower with the intent of discouraging raven presence and thus reducing the potential for desert tortoise predation. In addition, the applicant will implement standard best management practices through **PDF-BIO-1** during construction and operation activities. These practices will include keeping the area free of trash to prevent attraction of prey and predators, including removing any road-killed animals and carcasses.

Swainson's Hawk

One Swainson's hawk, a state-listed threatened species, not covered under the CVMSHCP, was observed within the project site (refer to Appendix A of the BTR for details). This species is not expected to nest on or in the vicinity of the site; however, it has a moderate potential to fly over the project site. Based on the project design, the project represents only a slight (3.7%) increase in total rotor-swept area relative to the existing wind farm. Furthermore, based on year-long avian surveys and a subsequent avian risk assessment conducted specifically for the project, the project's diurnal raptor use level was determined comparable to that reported for other facilities in Southern California. Other Southern California projects (e.g., within the Tehachapi Pass Wind Resource Area) generally have reported raptor fatality estimates of less than 0.2 diurnal raptor/MW/year. Therefore, the project is not anticipated to have a significant effect on this species. Due to removal of numerous existing WTGs and their replacement with fewer new WTGs, impacts to Swainson's hawk are expected to be less than significant. However, as part of the project's due diligence, **PDF-BIO-3**, which requires fatality monitoring to estimate bird and bat mortality adaptive management strategies during operation of the

proposed project, will be implemented in accordance with the Post-Construction Avian and Bat Fatality Monitoring Plan developed for the project (refer to Appendix D of BTR).

Bald Eagle

Three bald eagles, a state-listed endangered species and not covered under the CVMSHCP, were observed foraging over the recharge ponds located outside of the project site (refer to Appendix A of the BTR for details). Given the proximity of the observation to typical bald eagle foraging resources, and the lack of observations within the project site, it is assumed that these observations were directly correlated with the presence of the recharge ponds and the large numbers of prey resources (e.g., ducks and coots) that the recharge ponds attract. This species is not expected to nest on or in the vicinity of the project site; however, it could occur infrequently during the non-breeding season within the project vicinity. Project-specific avian surveys were specifically aimed to document use of bald eagles following survey recommendations in the Eagle Conservation Plan Guidance and Eagle Rule (USFWS 2013, 2016). During the year of surveys, three bald eagles were observed, resulting in 18 total eagle risk minutes. However, the project has been designed to minimize impacts to bald eagle to the greatest extent feasible, including elimination of the recharge pond parcel to reduce eagle risk. The applicant chose to remove and not replace the 11 WTGs located within the recharge pond parcel, once the existing BLM ROW grant expires, knowing that removal without replacement would minimize impacts to eagles and other bird and bat species. Therefore, with the removal of the recharge pond parcel from the project site, bald eagle minutes were reduced to zero. Based on the assumption that eagle use is positively associated with risk (USFWS 2016), this revision to the project layout should substantially reduce the risk to eagles posed by the project. Additionally, the project represents only a slight (3.7%) increase in total rotor-swept area relative to the existing wind farm.

In summary, due to the removal of existing WTGs and their replacement with fewer WTGs, in conjunction with the fact that bald eagle observations were only documented outside of the project site and were directly correlated with the presence of the recharge ponds, the project is not anticipated to have a significant effect on this species. However, as part of the project's due diligence, **PDF-BIO-3**, which requires fatality monitoring to estimate bird and bat mortality and adaptive management strategies during operation of the proposed project, would be implemented in accordance with the Post-Construction Avian and Bat Fatality Monitoring Plan (refer to Appendix D of the BTR).

Mitigation and Other Measures:

MM-BIO-1 (full text in Section 3.IV.7[a])

PDF-BIO-1 **Best Management Practices.** As directed by the Draft Mountain View Wind Repower Project Bird and Bat Conservation Strategy (Appendix D of the BTR), the project will implement applicable Best Management Practices, including the following:

- Vehicle speed limits of 25 miles per hour will be enforced along all access roads during and after construction to avoid wildlife collisions. Construction vehicles will be restricted to pre-designated access routes.
- Appropriate erosion control methods will be used during construction to eliminate or minimize runoff and avoid impacts to hydrology.
- Rocks unearthed during excavation will be used during construction or removed from the site rather than left in piles near the WTGs. Such rock piles attract and create habitat for small mammals that are prey for many raptor species. Additionally, parts and

equipment that may be used as cover for prey will not be stored at the base of WTGs while a turbine is operational and spinning.

- Gravel will be placed at least 5 feet around each WTG foundation to discourage small mammals and reptiles from burrowing under or near WTG bases.
- An environmental consulting firm will be retained as an on-call service provider throughout construction of the project to ensure compliance with environmental construction measures (e.g., spill prevention, control, and countermeasures plan).
- Prior to any grading or other ground-disturbing activities, a CDFW-approved Qualified Biologist⁷ will complete pre-construction surveys within ground-disturbance areas for all special-status wildlife and plant species with potential to occur in the project.
- Sensitive resources (e.g., nests) identified during pre-construction surveys will be flagged; all site personnel will be notified of their presence; and the necessary avoidance buffers will be established.
- If an injured or dead federally or state-protected species is encountered during construction, all work within the immediate vicinity will stop, and the CDFW-approved Qualified Biologist and appropriate agencies will be notified before construction is allowed to proceed (refer to Appendix D of the BTR).
- Employees and contractors will be instructed to look under vehicles and equipment for the presence of wildlife, including desert tortoise, before movement of vehicle or equipment.
- All employees and contractors working on the project during construction and operation will be required to participate in the Wildlife Incident Reporting Program (WIRP). The WIRP will include training for identifying and responding to encounters with sensitive biological resources, including but not limited to desert tortoise and golden eagles (reporting form included in Appendix D of the BTR).
- Wildfire potential will be minimized by implementing safety measures in accordance with the applicable requirements of the California Fire Code (California Code of Regulations, Title 24, Chapter 4, Emergency Planning and Preparedness).
- Outdoor lighting during construction will be minimized. The project will reduce outdoor lighting impacts by ensuring that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project, vicinity, and nighttime sky is minimized. Outdoor lighting during operations will be limited to that necessary for project safety and security. All internal turbine nacelle and tower lighting will be extinguished when unoccupied. The proposed lattice tower would be equipped with applicable Federal Aviation Administration-compliant marking or lighting for aviation safety. Preferred lighting color has not yet been finalized, but in order to lower increased predation risk on small mammals, the lighting color is anticipated to be warm tones (e.g., reds or oranges) versus LED or bright lighting. Lighting would be emitted as a flashing display versus being a solid display.
- During construction and operations, the entire project site will be kept free of trash to prevent attraction of prey and predators, including removing any road-killed animals and carcasses. Nuisance animals will be brought to the attention of the California Department of Fish and Wildlife for control or relocation.

⁷ Also referred to as Acceptable Biologist in the CVMSHCP.

- Noise impact minimization measures will be implemented at the project during operation: alarms, equipment, and O&M activities will be implemented without interfering with worker safety and effectiveness.

PDF-BIO-2 Raven and Raptor Nest Management. At a minimum, and specific to the meteorological (met) tower, the applicant will remove nesting material suitable for raven and raptor use. Nests previously constructed in the prior nesting season, if any, will be removed after nesting season is over to discourage their use in subsequent nesting seasons. In addition, during the typical nest season (February 15 to August 15), material associated with nest building where nests are not yet complete will be removed from the met tower. During the nesting season, raven and raptor nest material will not be removed if any eggs have been laid. If eggs are observed, no further disturbance to the active nest will occur until the juveniles have successfully fledged or the nest has otherwise been determined to be inactive. While this practice of removing nest material will not fully address all opportunities for raven and raptor use of the met tower, it will discourage perching to some extent.

RR-BIO-1 County of Riverside Required Plans. The project applicant will prepare the following plans, to be implemented during construction, as required by the County of Riverside regulations to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes: a stormwater pollution prevention plan and a spill prevention control and countermeasure plan.

RR-BIO-2 Triple-Ribbed Milkvetch Pre-construction Survey within the Whitewater Floodplain Conservation Area. If project activities are conducted during the growing and flowering period for this species from February 1 to May 15, focused surveys for the species will be conducted by a Qualified Biologist prior to initiation of activities. Any occurrences of the species will be flagged, and project activities shall avoid impacts to the plants to the maximum extent feasible.

RR-BIO-3a Desert Tortoise Pre-construction Survey within Whitewater Floodplain Conservation Area. A pre-construction presence/absence survey within the impact portion of the Whitewater Floodplain Conservation Area (WFCA) and within a 200-foot radius around these impact areas, will be conducted no more than 90 days prior to construction to ensure that no desert tortoises are present, consistent with the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) Section 4.4. The survey results are valid for 90 days or indefinitely if tortoise-proof fencing is installed around the WFCA impacts. The presence/absence survey shall be conducted by a Qualified Biologist and shall include a search for fresh sign of desert tortoise, including live tortoises, tortoise remains, burrows, tracks, scat, or eggshells. The presence/absence survey must be conducted between February 15 and October 31. Presence/absence surveys require 100% coverage of the survey area. If no sign is found, a clearance survey is not required.

If fresh sign is located, the impact area must be fenced with tortoise-proof fencing and a clearance survey conducted during the clearance window. Consistent with CVMSHCP Section 4.4, desert tortoise clearance surveys shall be conducted during the clearance window from February 15 to June 15 and September 1 to October 31 or in accordance with the most recent Wildlife Agency protocols. Clearance surveys must cover 100% of

the impact area. A clearance survey must be conducted during different tortoise activity periods (morning and afternoon). All tortoises encountered will be moved from the impact area to a specified location. Prior to issuance of the Permits, the Coachella Valley Conservation Commission will either use the Permit Statement Pertaining to High Temperatures for Handling Desert Tortoises and Guidelines for Handling Desert Tortoises During Construction Projects, revised July 1999, or develop a similar protocol for relocation and monitoring of desert tortoise, to be reviewed and approved by the Wildlife Agencies. Thereafter, the protocol will be revised as needed based on the results of monitoring and other information that becomes available.

Personnel conducting O&M activities will be instructed to be alert for the presence of desert tortoise. If a tortoise is spotted, activities adjacent to the tortoise's location will be halted, and the tortoise will be allowed to move away from the activity area. If the tortoise is not moving, it will be relocated by a Qualified Biologist to nearby suitable habitat and placed in the shade of a shrub.

Upon locating dead, injured, or sick desert tortoises under any utility or road project, initial notification by the contact representative or Qualified Biologist must be made to the U.S. Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW) within 3 working days of its finding. Written notification must be made within 5 calendar days with the following information: date; time; location of the carcass; photograph of the carcass; and any other pertinent information. Care must be taken in handling sick or injured animals to ensure effective treatment and care. Injured animals shall be taken care of by the Qualified Biologist or an appropriately trained veterinarian. Should any treated tortoises survive, USFWS or CDFW should be contacted regarding the health conditions and next steps specific to the surviving tortoises.

RR-BIO-3b Desert Tortoise Notification or Clearance Survey within the portion of the Project site outside the Whitewater Floodplain Conservation Area

Per the USFWS CVMSHCP Amended Permit (2015), for projects outside of the proposed Conservation Areas within the 50,272 acres of naturally occurring desert tortoise habitat within the CVMSHCP Plan area anticipated to be impacted, the Permittee shall either: 1) notify the Service 45 days prior to the issuance of a grading permit to allow for the potential salvage of adult tortoises within this notification time period; or 2) condition such projects to conduct desert tortoise clearance surveys per the Service's protocol.

If the applicant decides to implement option 2, as described above, a Qualified Biologist shall conduct a desert tortoise clearance survey within all impact areas located outside of the Whitewater Floodplain Conservation Area consistent with the amended take permit for the CVMSHCP (USFWS 2015). Desert tortoise clearance surveys shall be conducted immediately prior to surface disturbance when desert tortoises are most active (April through May or September through October) and in accordance with the most recent Wildlife Agency protocols (USFWS protocol dated December 2009). Clearance surveys must cover 100% of the impact area, with a focus on locating all desert tortoises above and below ground. A clearance survey must be conducted during different tortoise activity periods (morning and afternoon). Surveys involve walking transects 10-meters wide. At least one 10-meter-wide belt transect must be completed

for every 100 meters of the width of the action area or portion thereof. All evidence that indicates desert tortoises may be present (e.g., scat, burrows, carcasses, courtship rings, drinking depressions, etc., in addition to live tortoises) will be recorded on the datasheet provided in the guidance.

Monitoring:

PDF-BIO-3 **Post-Construction Fatality Monitoring and Adaptive Management.** As part of the project design, a Bird and Bat Conservation Strategy (BBCS) was prepared (BTR Appendix D) and shall be implemented, including post-construction fatality monitoring, will be conducted for two consecutive years to estimate bird and bat mortality at the project site. Should higher than anticipated mortality to bird and bat species occur, preparation of an adaptive management strategy, with the potential for adaptive mitigation requirements, shall be prepared in coordination with California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) concurrence.

The BBCS was developed in collaboration with CDFW and USFWS and is consistent with protocols presented in the California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development (CEC & CDFG 2007), Land-based Wind Energy Guidelines (WEG; USFWS 2012) and Eagle Conservation Plan Guidance (ECPG; USFWS 2013). Post-construction fatality monitoring shall consist of baseline and long-term monitoring for birds and bats in accordance with the methods outlined in the BBCS (BTR Appendix D).

Surveys ~~shall~~ will commence upon the start of operations ~~after the repowering work is complete~~ (anticipated early 2022), and the first year of monitoring will assess impacts to all birds and bats, while the second year of monitoring will focus on impacts to eagles specifically, unless results of the first year of the study indicate a need for additional monitoring for other bird and bat species. Estimated annual fatality rates on the project site for both birds and bats will be calculated to determine whether the estimated rates are lower, similar to, or higher than reported at nearby projects, and specific to birds, whether it differs from the level anticipated based on the avian risk assessment.

The project applicant shall prepare annual reports on avian and bat fatalities at the project for each of the two years, including a summary of the number and type of fatalities, estimated annual fatality rates, results of bias correction and detection probability, and a summary of adaptive management actions that may be undertaken should the need to study or mitigate effects be deemed necessary. As appropriate, the project applicant shall periodically review and update the master BBCS document to ensure the document is consistent and up to date with the most current information collected at the project site, as well as add updated scientific research information and regulatory requirements. The BBCS annual reports shall be submitted to CDFW and USFWS within three months of completion of the monitoring year.

The project applicant, CDFW, and USFWS shall review results of the BBCS-required annual reports to determine whether adaptive management measures using the following thresholds:

- Unexpected mortality of an eagle or a species listed as endangered or threatened under the federal Endangered Species Act and/or California Endangered Species Act; or
- Unexpected significant levels of mortality of unlisted species of birds or bats. Significance will be determined by Qualified Biologists and will be based on the latest information available, including the most recent data on species' population sizes and trends and current meta-analyses of wind energy impacts on birds and bats.

If a threshold is exceeded, the applicant shall coordinate with CDFW and USFWS to develop adaptive avoidance, minimization, or mitigation measures. Some of these actions/measures may extend for the life of the project, if required by CDFW and USFWS. Post-construction fatality monitoring will consist of baseline and long term monitoring for birds and bats in accordance with the methods outlined in Appendix D of the BTR.

c) Less-Than-Significant Impact with Mitigation Incorporated.

Plants

No special-status plant species were observed within the project site during the focused special-status plant surveys conducted in April and May 2020. Additionally, there are no special-status plant species with a moderate or high potential to occur within the project impact area. The project would not result in direct impacts (permanent or temporary) to special-status plant species. As such, impacts to special-status plant species would be less than significant.

Consistency with the CVMSHCP, including implementation of the Land Use Adjacency Guidelines, as well as **PDF-BIO-1** and **RR-BIO-1**, would reduce indirect impacts to special-status plant species covered by the CVMSHCP to less-than-significant levels.

Wildlife

The following special-status wildlife species were observed during the 2017, 2018, and 2020 field surveys, have a moderate potential to occur within the project site, or have CVMSHCP modeled species habitat within the project site: red diamond rattlesnake (*Crotalus ruber*), California glossy snake (*Arizona elegans occidentalis*), burrowing owl (*Athene cunicularia*), loggerhead shrike (*Lanius ludovicianus*), LeConte's thrasher, golden eagle (*Aquila chrysaetos*), Palm Springs ground squirrel, Palm Springs pocket mouse, pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and pocketed free-tailed bat (*Nyctinomops femorosaccus*). Of these species, burrowing owl, LeConte's thrasher, Palm Springs ground squirrel, and Palm Springs pocket mouse are covered under the CVMSHCP. In addition to these 11 special-status species, nesting birds could also occur within the project site

California Glossy Snake and Red Diamond Rattlesnake

California glossy snake and red diamond rattlesnake are both CDFW Species of Special Concern. These species are not covered by the CVMSHCP. Direct impacts could occur to these snake species through crushing of individuals during grading, entombment of burrowing species, and removal of habitat. Most wildlife species exhibit a "flight" response to disturbance, resulting in temporary displacement, or if disturbance is constant, permanent displacement. Ground disturbance is proposed on a relatively small portion (139.09 acres or 11%) of the entire

1,255.19-acre project site; therefore, suitable habitat for wildlife species would be available outside the impacted areas, and individuals of the special-status species would be expected to move away from construction activities. The impact totals do not include deductions for the pre-authorized disturbance, since these species are not Covered Species under the CVMSHCP. Entombment or direct impacts to individuals during construction would be reduced to less than significant through implementation of **PDF-BIO-1**, which includes flushing of species from the disturbance area by a Qualified Biologist and speed limits of 25 mph to avoid collisions with wildlife species along roads. The project site would continue to support suitable habitat for these species; therefore, direct impacts to the habitat for these species would be less than significant.

Potential short-term indirect impacts to special-status wildlife species or nesting birds could occur from construction activities. Consistency with the CVMSHCP, including implementation of the Land Use Adjacency Guidelines, as well as **PDF-BIO-1** and **RR-BIO-1**, would reduce indirect impacts to special-status wildlife species to less-than-significant levels.

Palm Springs Pocket Mouse

Palm Springs pocket mouse is a CDFW Species of Special Concern and a CVMSHCP Covered Species. The project site contains 380.22 acres of CVMSHCP modeled Core Habitat for Palm Springs pocket mouse, of which a total of 20.17 acres would be directly impacted by project implementation (Figure 3-7). Direct impacts to CVMSHCP modeled Core Habitat would be reduced to less than significant through implementation of **MM-BIO-1**, which would conserve 245.76 acres of modeled Core Habitat for Palm Springs pocket mouse within the Set-aside Parcel.

Palm Springs Ground Squirrel

Palm Springs ground squirrel is a CDFW Species of Special Concern and a CVMSHCP Covered Species. The project site contains 30.24 acres of CVMSHCP modeled Other Conserved Habitat for Palm Springs ground squirrel, of which a total of 2.01 acres would be directly impacted by project implementation (Figure 3-7). Direct impacts to CVMSHCP modeled Other Conserved Habitat would be reduced to less than significant through implementation of **MM-BIO-1**, which would conserve 4.16 acres of modeled Other Conserved Habitat for Palm Springs ground squirrel within the Set-aside Parcel. The Set-aside Parcel, which includes 4.16 acres of CVMSHCP modeled habitat for Palm Springs ground squirrel would result in a conservation to impact ratio of 2.1:1 for Palm Springs ground squirrel based solely on CVMSHCP modeled habitat.

In August 2020, a field assessment of Palm Springs ground squirrel habitat was conducted within the Set-aside Parcel by small mammal biologist Phil Brylski PhD, who holds a CDFW Scientific Collecting Permit that includes authorization to carry out presence/absence surveys for the Palm Springs ground squirrel. The field survey determined that of the 248.12 acres within the Set-aside Parcel, a total of 36.65 acres are potentially suitable habitat for the Palm Springs ground squirrel. Furthermore, three Palm Springs ground squirrel individuals were observed during the habitat assessment within the Set-aside Parcel, but outside of the CVMSHCP existing modeled habitat, thereby affirming the value added by contributing the Set-aside Parcel to the CVMSHCP. The field assessment also concluded that only 3.16 acres of the 4.16 acres of modeled habitat are suitable for this species.

Based on this habitat assessment, there is an additional 33.49 acres of suitable habitat for Palm Springs ground squirrel, not included in the original CVMSHCP modeled Other Conserved Habitat, within the Set-aside Parcel. Including both the suitable CVMSHCP

modeled habitat (3.16 acres) and suitable habitat identified during the habitat assessment (33.49 acres), there is a total of 36.65 acres of suitable habitat for Palm Springs ground squirrel within the Set-aside Parcel and within the WFCA, which will be donated to CVMSHCP to offset project impacts to this species. Using this additional suitable habitat acreage, the project would result in a conservation to impact ratio of 18.2:1 for Palm Springs ground squirrel.

Golden Eagle

Potential direct impacts could occur to golden eagles (CDFW Fully Protected Species) during project operation. This species is not covered by the CVMSHCP. This species is not expected to nest on or in the vicinity of the site but has a high potential to fly through the project site.

The USFWS recommends using pre-construction eagle use data to predict post-construction fatalities. However, the project being evaluated herein is an operational project consisting of older WTGs that have been in operation since September 2001, far preceding the 2009 Eagle Rule (50 CFR Parts 13 and 22), and there is limited pre-construction eagle use data available to inform the collision risk model. Instead, site-specific eagle use data (i.e., risk minutes) were collected from October 2017 through October 2018 to provide information on seasonal avian use patterns in and around the project site. Because the data were collected consistent with the Eagle Conservation Plan Guidance (other than being during existing operations), the site-specific eagle use data were used to update the exposure priors in the Collision Risk Model and presented along with the 'priors only' model to provide a range of outcomes given the two sets of data inputs available for use in the Collision Risk Model. One juvenile golden eagle was observed within the project site for 1 minute out of 102 hours of survey effort, resulting in a total of 0.0098 risk minutes per survey hour. It should be noted that another golden eagle was observed outside the project site during the avian surveys for a total of 3 minutes. The individual was observed flying over the recharge ponds, located southeast of the project site. The applicant chose to remove and not replace the 11 WTGs located within the recharge pond parcel knowing that removal without replacement would minimize impacts to eagles. With the exclusion of the recharge pond area from the project site, golden eagle observations recorded during the study were reduced from 4 minutes to 1 minute. Assuming that golden eagle use is positively associated with risk, this modification to the final project site should reduce risk posed by the project to golden eagles.

To date, two eagle fatalities have been documented at the project since it began operations in 2001 (approximately 19 years of operations). While formal fatality monitoring studies have not been conducted at the project site, eagle carcasses tend to persist longer and are relatively easy to find compared to other smaller bird and bat species (Hallingstad et al. 2018). Furthermore, many, if not most golden eagle fatalities are documented incidentally and reported by project personnel (Pagel et al. 2013), which was the case with the two golden eagle fatalities reported at the project site. In fact, assuming that site personnel have an overall probability of detecting eagle fatalities of 0.12 or higher (readily achievable given turbine specifications, sparse vegetation allowing for good visibility, and monthly visits by site personnel to each turbine pad and access road), the Evidence of Absence statistical estimator (USGS 2014) would suggest mortality rates of less than one per year are reasonable (refer Appendix A of the BTR).

The existing project was developed prior to the 2009 Eagle Rule and was therefore part of the baseline take evaluated under the 2009 Eagle Rule. As such, the amount of take associated with the existing project would not have to be mitigated per the Eagle Rule. For the priors only model, the difference between the existing project and the repowered project is 0.045 eagles per year, or 1.34 over 30 years. For the model with updated priors, based on site-specific eagle use data, the difference between the existing project (i.e., baseline) and the repowered project is only 0.001 per year, or 0.039 eagles over 30 years. Based on the project design, the project represents only a small (3.7%) increase in total rotor-swept area relative to the existing wind farm. The difference in predicted take of golden eagles as a result of project implementation is small, as discussed above and detailed in Appendix A of the BTR. Regardless of the level of risk predicted, the incremental increase in risk to eagles for the project compared to the existing project is minimal, with predicted changes in risk ranging from essentially zero to about two eagles over 30 years. The project is not anticipated to have a significant effect on golden eagles due to removal of numerous existing WTGs and their replacement with fewer, new WTGs. In addition, to reduce potential collision and electrocution risks to golden eagle, the applicant would construct the overhead electrical collection system in compliance with current APLIC guidelines (APLIC 2012). These guidelines ensure a minimum separation between electrical components to prevent simultaneous contact and/or covering electrical components with protective materials to prevent simultaneous contact between electrical phases and/or electrical phases and grounds. Therefore, impacts to golden eagle are expected to be less than significant. Nevertheless, as part of the project's due diligence, **PDF-BIO-3**, which requires fatality monitoring to estimate bird and bat mortality and adaptive management during operation of the proposed project, would be implemented in accordance with the Post-Construction Avian and Bat Fatality Monitoring Plan (refer to Appendix D of the BTR).

Bats

Potential direct impacts could occur to special-status species, including bats, during project operation. Based on the relatively low levels of bat mortality observed at nearby projects and for the Pacific Southwest Region in general (refer to Appendix D of the BTR for details), significant project-related impacts to bat populations are not anticipated. Nevertheless, as part of the project's due diligence, the Mountain View Wind Repower Project Bird and Bat Conservation Strategy (Appendix D of the BTR) has been prepared to assess potential impacts to birds and bats from the construction and operation of the repowered project, and to act as a framework for identifying and implementing actions to avoid such impacts. Appendix D of the BTR includes the Post-Construction Avian and Bat Fatality Monitoring Plan, which outlines the fatality monitoring plan and adaptive management for the project. **PDF-BIO-3** requires fatality monitoring to estimate bird and bat mortality and adaptive management during operation of the proposed project.

Burrowing Owl

Burrowing owls, a CDFW Species of Special Concern and a CVMSHCP Covered Species, were observed during the 2020 field surveys. One occupied burrow (i.e., burrow B3 located within the WFCA) and one unoccupied burrow (i.e., burrow B7 located outside the WFCA) are located in temporary impact areas within the project site (Figure 3-8, Impacts to Biological Resources within the Project Site). Potential construction-related direct impacts to burrowing owl could result from destruction of burrowing owl dens; destruction of nests, eggs, and young; and entombment of adults. Therefore, measures consistent with CVMSHCP Section 4.4 for avoiding

impacts to burrowing owl in the project site would be implemented as directed by **RR-BIO-5** (burrowing owl pre-construction surveys, and if needed, preparation and implementation of a Protection and Relocation Plan). Indirect impacts could also occur to nearby nesting burrowing owls, which would be reduced to less than significant through consistency with the CVMSHCP, including Section 4.4 Required Avoidance, Minimization, and Mitigation, Measures, and Section 4.5 Land Use Adjacency Guidelines, as well as **PDF-BIO-1** and **RR-BIO-1**.

LeConte's Thrasher

LeConte's thrasher, a CDFW Species of Special Concern and a CVMSHCP Covered Species, has low potential to occur based on field surveys conducted within the project site. However, the project site contains 383.39 acres of CVMSHCP modeled Other Conserved Habitat for LeConte's thrasher, of which a total of 20.22 acres (1.48 acres of permanent and 18.74 acres of temporary) would be directly impacted by project implementation (Figure 3-7). Direct impacts to CVMSHCP modeled Other Conserved Habitat would be reduced to less than significant through **MM-BIO-1**, which would conserve 247.48 acres of modeled habitat for this species within the Set-aside Parcel. Furthermore, consistency with CVMSHCP Section 4.4, requires a pre-construction survey for LeConte's thrasher in the WFCA (**RR-BIO-6** -Pre-construction Survey for LeConte's thrasher).

Other Nesting Birds

If construction activities occur during nesting bird season (typically, but limited to, the period of January 15 through August 31), direct impacts to nesting birds could occur with project implementation. This typical nesting period noted here does not fully capture all potentially nesting raptors, but other than burrowing owl, other nesting raptors would not be expected to nest on the proposed project site, or would be discouraged from doing so by removal of nest material (e.g., **PDF-BIO-2**). Direct impacts to nesting birds would be reduced to less than significant through **RR-BIO-4**, which would require a pre-construction nesting bird survey.

Other Measures:

RR-BIO-4 Nesting Bird Pre-Construction Surveys within Project Site. To ensure compliance with the Migratory Bird Treaty Act and Fish and Game Code Sections 3503 and 3513, and to avoid potential impacts to nesting birds, vegetation removal activities will be conducted outside the general avian breeding season (January 15 through August 31) with the understanding that depending on temperature and climatic conditions, nesting may sometimes occur outside of the typical breeding season.

If construction and vegetation trimming/removal activities are undertaken during the avian breeding season (generally January 15 through August 31), pre-construction surveys for nesting birds will be conducted by a Qualified Biologist no more than 7 days prior to any on-site construction activities within a 500-foot buffer around work areas. The Qualified Biologist will consult with appropriate resource agencies to establish adequate construction buffers around nests until the young have fledged.

Active nests identified during pre-construction surveys will be flagged and all site personnel will be notified of their presence and the necessary avoidance buffers will be established.

RR-BIO-5 Burrowing Owl Pre-construction Survey and Protection/Relocation Plan. A pre-construction survey will be performed by a Qualified Biologist between 14 and 30 days

of ground disturbance or vegetation removal. The following will apply if occupied burrowing owl burrows are found, consistent with Coachella Valley Multiple Species Habitat Conservation Plan Section 4.4. The burrow will be flagged to include a 160-foot buffer during the non-breeding season (September 1 to January 31), a 250-foot buffer during the breeding season (February 1 to August 31), or a buffer to the edge of the property boundary, if less than 500 feet, will be established around the burrow. The buffer will be staked and flagged. No development or O&M activities will be permitted within the buffer until the young are no longer dependent on the burrow, as determined by a Qualified Biologist.

If occupied burrowing owl burrows cannot be avoided within the established exclusion buffers, a burrowing owl Protection and Relocation Plan (Plan) for the proposed project will be implemented prior to any ground disturbance or vegetation removal. This Plan shall include, but shall not be limited to, the following elements: (1) burrowing owls shall be relocated to suitable habitat areas within the Set-aside Parcel pursuant to accepted California Department of Fish and Wildlife (CDFW) protocols; (2) determination of the appropriate method of relocation, such as eviction/passive relocation or active relocation, shall be based on the specific site conditions (e.g., distance to nearest suitable habitat and presence of burrows within that habitat) of the Set-aside Parcel; (3) active relocation and eviction/passive relocation will require the preservation and maintenance of suitable burrowing owl habitat occurring within the Set-aside Parcel; and (4) some level of monitoring for success of the relocation may be required. This Plan, if needed, is subject to review and approval by the Coachella Valley Conservation Commission, CDFW, and U.S. Fish and Wildlife prior to any ground disturbance or vegetation clearing within the exclusion buffer.

RR-BIO-6 LeConte's Thrasher Preconstruction Survey within the Whitewater Floodplain Conservation Area. During the nesting season, January 15 through June 15, prior to the start of construction activities, a Qualified Biologist will conduct surveys within the Whitewater Floodplain Conservation Area, within 500 feet of the impact area, or to the property boundary if less than 500 feet. If nesting Le Conte's thrashers are found, an exclusion buffer will be established around the nest site in any location where work may occur within 500 feet of the active nest. The exclusion buffer will be staked and flagged. No construction will be permitted within the buffer during the breeding season of January 15 through June 15 or until the young have fledged.

d) Less-Than-Significant Impact with Mitigation Incorporated. The project site is the location of an existing energy facility and is bounded by I-10 and SR-111. The project site could be considered a part of a larger habitat linkage because it supports a natural habitat mosaic occupied by populations of smaller terrestrial species, such as rodents, smaller carnivores, passerine birds, amphibians, reptiles, and invertebrates; and contains 383.39 acres of CVMSHCP modeled biological corridors, which allow for wildlife movement between major open space areas. Therefore, construction within the project site could have both a direct and indirect impact on wildlife movement. Wildlife may be deterred from the construction area due to increased human presence, loud noises, and physical disruptions of habitat. However, construction would be temporary at any location, and wildlife would be able to use the project site freely after work crews have left.

In addition, project implementation would result in the removal of 93 existing WTGs, greatly reducing the total number of WTGs within the project site. This would provide more habitat for wildlife movement, resulting in a long-term net benefit to wildlife species using this area. However, the project would result in 20.22 acres of impacts (1.48 acres of permanent and 18.74 acres of temporary) to CVMSHCP biological corridors. Therefore, impacts to wildlife movement occurring within the WFCAs would be considered significant absent mitigation. Donation of the Set-aside Parcel to the CVCC (**MM-BIO-1**) would provide 247.48 acres of designated conservation land (per the CVMSHCP) as biological corridors along the Whitewater River between Snow Creek/Windy Point Conservation Area and the Core Habitat portion of the WFCAs for use by wildlife species. Therefore, impacts to wildlife movement would be reduced to less than significant.

Mitigation:

MM-BIO-1 (full text in Section 3.IV.7[a] above)

Monitoring: No monitoring is required.

- e) **Less-Than-Significant Impact.** As shown on Figure 3-8, the project site is comprised of the following nine vegetation communities and land cover types: cheesebush–sweetbush scrub, disturbed cheesebush–sweetbush scrub, creosote bush–white bursage scrub, creosote bush scrub, Sonoran creosote bush scrub, white bursage scrub, disturbed white bursage scrub, disturbed, and developed (refer to Table 2 of Appendix B for existing acreages for each vegetation community).

Project impacts would total 139.09 acres (permanent and temporary), including 20.22 acres⁸ within the CVMSHCP WFCAs and 111.40 acres outside the WFCAs (refer to Table 10 of Appendix B for impact acreage for each vegetation community). None of the vegetation communities, whether inside or outside of the WFCAs, are considered sensitive by CDFW or USFWS. However, the project does contain vegetation communities identified as natural communities covered under the CVMSHCP, including Sonoran creosote bush scrub (which also includes the creosote bush scrub and Creosote bush–white bursage scrub communities). These communities are not subject to any specific conservation objectives required under the CVMSHCP. Therefore, impacts to natural communities occurring outside the WFCAs would be less than significant. For impacts occurring within the WFCAs, to comply with the CVMSHCP, donation of the Set-aside Parcel will be required to mitigate habitat loss. Therefore, with CVMSHCP consistency (**MM-BIO-1**), there would be no significant impacts to sensitive vegetation communities from project implementation.

In addition, there are no riparian habitats within the project site. Therefore, impacts to riparian habitat or other natural communities considered sensitive by CDFW, USFWS, or the CVMSHCP are not anticipated.

Mitigation:

MM-BIO-1 (full text in Section 3.IV.7[a])

Monitoring: No monitoring is required.

⁸ The proposed project would result in a total of 27.69-acre of impacts (permanent and temporary) within the WFCAs; however, this total includes previously authorized disturbance prior to implementation of the CVMSHCP. After deducting previously authorized disturbance acreage (7.47 acres), the total impact acreage is 20.22 acres.

f) Less Than Significant Impact.

There are no wetlands within the proposed project; therefore, there would be no impacts to wetlands. However, there are other jurisdictional, non-wetland waters on the project site.

The results of the jurisdictional delineation conducted in 2020 and 2021 concluded there are approximately 7.24 acres (6,274 linear feet) of non-wetland waters of the state under the jurisdiction of the Regional Water Quality Control Board and streambed under CDFW jurisdiction within the jurisdictional delineation review area (Appendix F of the BTR). The proposed project was designed to avoid impacts to jurisdictional waters. However, due to the close proximity of proposed work areas near jurisdictional, non-wetland waters, **RR-BIO-7** would be implemented to avoid/minimize direct and indirect impacts to waters during construction-related ground disturbance. Therefore, construction of the project, as well as O&M activities, would not result in any impacts to jurisdictional waters.

Other Measures:

RR-BIO-7 Avoidance and Minimization to Jurisdictional Waters. The following avoidance and minimization measures would be implemented when ground-disturbing activities occur within 50 feet of waters of the state and/or jurisdictional streambeds:

- All jurisdictional waters within 50 feet of project activities shall be fenced or flagged as environmentally sensitive areas prior to any ground disturbance.
- A Qualified Biological monitor shall be present during construction activities within 50 feet of project activities to ensure avoidance of jurisdictional waters.
- Best Management Practices shall be implemented to avoid indirect impacts to jurisdictional waters, including:
 - Water containing mud, silt, or other pollutants from grading or other activities shall not be allowed to enter jurisdictional waters or be placed in locations that may be subjected to high storm flows.
 - Spoil sites shall not be located within jurisdictional waters or in locations that may be subject to high storm flows, where spoils might be washed into drainages.
 - Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous, resulting from project-related activities, shall be prevented from entering jurisdictional waters.
 - Equipment maintenance shall occur outside of jurisdictional waters and in such a manner that no petroleum products or other pollutants from the equipment enters on- or off-site state-jurisdictional waters either directly or indirectly.

Should impacts, modifications, or improvements to jurisdictional waters be required as part of project construction, consultation will be undertaken with the applicable resource agencies to determine if permits and/or mitigation would be required. A Waste Discharge Requirement from the Regional Water Quality Control Board would be required if waters of the state are impacted, as there is no federal action (such as a 404 permit) for the project. A notification of a Streambed Alteration Agreement to the California Department of Fish and Wildlife would also be required prior to any

modification of jurisdictional streambeds. Applications for any of these permits, if required, would need to demonstrate avoidance and minimization of aquatic resources to the maximum extent practicable, and compensatory mitigation would be required for permanent loss of waters or loss of functions and values. Equipment maintenance shall occur outside of jurisdictional waters and in such a manner that no petroleum products or other pollutants from the equipment enters on- or off-site state-jurisdictional waters either directly or indirectly.

- g) Less-Than-Significant Impact.** The proposed project is located primarily on land zoned as W-E (Wind Energy Resource Zone) by the County General Plan (County of Riverside 2015b) and currently serves as a Riverside County WECS site. The proposed project has been designed to limit the impacts to those necessary to construct the facility, thereby reducing adverse environmental effects to the maximum extent feasible. Decommissioning activities would also be consistent with the County requirements set forth at the time of decommissioning.

The project site is located within the CVMSHCP, of which 383.39 acres is located within the WFCAs. As mentioned above, and carried throughout the analysis, with the Set-aside Parcel donation (**MM-BIO-1**), the project would be consistent with the CVMSHCP. The project would also be consistent with the goals and policies of the County General Plan (County of Riverside 2015b) and the project's WECS permit. There are no other local ordinances applicable to the proposed project, and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
CULTURAL RESOURCES Would the project:				
8. Historic Resources				
a) Alter or destroy a historic site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Class III Cultural Resources Inventory and Evaluation Report (Appendix C of this Initial Study).

Findings of Fact:

- a-b) No Impact.** On April 13, 2020, Dudek requested a search of the California Historical Resources Information System at the Eastern Information Center, located on the campus of University of California, Riverside. Results from the records search were returned to Dudek on August 28, 2020. The Eastern Information Center records indicate that 69 previous cultural resources technical investigations have been conducted within 1.0 mile of the project site, 13 of which overlap portions of the 127.1-acre area of potential effect (APE) within the project site. The

Eastern Information Center records also indicate that 53 cultural resources have been recorded within 1.0 mile of the project site, but only two of these are located within the APE:

- P-33-009496 consists of a historic-era subsurface pipeline that intersects the APE where fiber-optic cable is proposed. The project applicant has committed to avoiding P-33-009496 by installing fiber-optic cable beneath the pipeline using subsurface boring. This method would not alter the integrity, location, or aesthetic of the pipeline and, thus, would not result in an impact or adverse effect to P-33-009496. The project has been designed to avoid impacts to P-33-009496.
- COA-S-005 is a historical-period refuse deposit situated along a dirt access road, containing food and beverage cans. This resource has previously been recommended not eligible for listing on the National Register of Historic Places (NRHP), and no further archaeological review or avoidance measures are necessary. This resource is outside of the proposed area of disturbance and would not be affected by project development.

In addition to the records search, archaeologists conducted an intensive-level pedestrian survey of the APE and an additional 100-foot buffer area on August 18, 19, and 20, 2020, September 9 and 18, 2020, and January 12, 2021. These areas include grading limits associated with the proposed WTGs, electrical collection system, the temporary laydown yard, and access roads. The survey team revisited known cultural resources P-33-009496 and COA-S-005, which intersect the APE. The survey also identified the following four previously unrecorded archaeological sites:

- MVPP-S-01 consists of a historical-period refuse scatter, including eight bimetal pull-top beverage cans, three church key-opened beverage cans, five rotary-opened sanitary cans, two church key-opened oil cans, two cans with friction seal lids, one paint can, one handled paint thinner can, one solder-top can, and a rubber boot heel. The scatter is located in an open desert terrain and appears to have eroded west to east with the gently sloping terrain. The survey team lightly prodded the soil around the cluster of cans and determined that no subsurface deposits are present. This resource is outside of the proposed area of disturbance and would not be affected by project development.
- MV-S-01 was identified 65 feet outside of the project APE and would not be impacted by the proposed project. MVPP-S-02 is a foundation from a historic-era structure within the project APE. The remains consist of a single concrete foundation, building remnants, and minimal residential refuse. The foundation measures 16 feet × 12 feet and has no evidence of utilities such as pipes or drains. A second feature, a half-buried steel barrel that could have served as a fire pit, is located 50 feet southeast of the foundation. Review of topographic maps do not show the structure, but historic aerial photographs show that the building was present in 1972. This resource is outside of the proposed area of disturbance and would not be affected by project development.
- MVPP-S-03 consists of foundations from a historic-era structure within the project APE. The remains consist of three touching concrete foundation, building remnants, and minimal residential refuse. One of the foundations is fed by a water pipe, and broken pipes extending into the floor of the foundation appear to be for drains, possibly a toilet. Residential refuse includes a spring frame from a small bed or cot and a wire clothes hanger. Review of topographic maps do not show the structure in 1972, but it is shown on the 1973 photo-revised maps; historic aerial photographs show that the building was

present in 1972. This resource is outside of the proposed area of disturbance and would not be affected by project development.

- MVPP S-04 consists of the remains of a historic-era mining site within the project APE. Features include an excavated pit, a supporting concrete curb located at the base of the pit, and concrete footings located uphill from the pit which likely supported excavation equipment, i.e. a crane. Because the over structure that was once supported by the concrete footings has been removed, MVPP S-04 lacks integrity. A concentration of historical refuse was also identified north of the excavated pit, largely containing beverage bottles, the earliest dating to the late 1940's. Light prodding of the refuse concentration indicates that the scatter is confined to the surface with no buried deposits. This resource is outside of the proposed area of disturbance and would not be affected by project development.

Based on the site evaluation, the archaeologist determined the newly identified resources within the project APE and buffer did not meet the following NRHP criteria:

- The sites are not associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States (Criterion 1/A).
- The sites are not associated with the lives of persons important to local, California, or national history (Criterion 2/B).
- The sites do not embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possesses high artistic values (Criterion 3/C).
- The sites do not contain any data potential that could provide information regarding the history of the area (Criterion 4/D).

Therefore, the newly identified resources are recommended as not eligible for listing in the California Register for Historical Resources and are not significant under CEQA. Likewise, the resources are not eligible for listing in the NRHP, do not qualify as a historic property, and are not significant under Section 106 of the National Historic Preservation Act. As such, the proposed project would have no impact on significant historic resources under CEQA and no adverse effect to historical properties under Section 106 of the National Historic Preservation Act.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
9. Archaeological Resources				
a) Alter or destroy an archaeological site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

-
- c) Disturb any human remains, including those interred outside of formal cemeteries?
-

Source(s): Class III Cultural Resources Inventory and Evaluation Report (Appendix C of this Initial Study).

Findings of Fact:

a-b) Less-Than-Significant Impact with Mitigation Incorporated. As previously addressed, the records search for the project site identified 53 cultural resources recorded within 1 mile of the project site. Of these 53 cultural resources, five were identified within the project site, but only 2 are located within the project APE: P-33-009496 and COA-S-005. In addition, the pedestrian survey conducted within the project APE and 100-foot buffer area identified four previously unrecorded archaeological sites that were determined ineligible for listing in the CRHR and NRHP. The project has been designed to avoid impacts to P-33-009496. The remainder of the known resources within the APE are outside of the proposed area of disturbance and would not be affected by project development.

On April 13, 2020, Dudek requested a search of the Sacred Lands Files from the Native American Heritage Commission (NAHC). A response letter was received via email from the NAHC on April 16, 2020, stating that the results of the Sacred Lands File search failed to indicate the presence of Native American cultural resources in the immediate project APE. The archaeologist sent outreach letters to 22 Native American groups and individuals on May 20, 2020. To date, three responses have been received from the Cabazon Band of Mission Indians, Quechan Indian Tribe, and San Manuel Band of Mission Indians. No additional cultural resources were identified by the NAHC Sacred Lands File search or informal tribal outreach.

Although the likelihood of the proposed project unearthing previously unknown archaeological deposits is low, it is possible that archaeological resources would be encountered at subsurface levels during ground-disturbing construction activities. To reduce potential adverse effects to unknown archaeological deposits during project implementation, the County has determined conditions of approval are required, through implementation of **MM-CUL-1 through MM-CUL-3**. As such, impacts to archaeological resources would be less than significant with mitigation incorporated.

c) Less-Than-Significant Impact. No formal or informal cemeteries or burial grounds are known to be located on the project site. However, there is always potential to encounter subsurface, unrecorded cultural resources and remains during ground-disturbing construction activities. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the Riverside County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, they shall notify the NAHC in Sacramento within 48 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant of the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

In accordance with the Native American Graves Protection and Repatriation Act of 1990 (25 USC 3001 et seq.), if human remains are found within BLM administered lands, the BLM must be notified immediately. Excavation or disturbance in the area of the discovery must cease and a reasonable effort must be made to protect the human remains and other cultural items. The BLM must certify receipt of the notification within 3 working days and take immediate steps, if necessary, to further secure and protect the human remains and other cultural items. The BLM must notify by telephone with written confirmation, and initiate consultation with, any known lineal descendant and the Indian Tribes who are or are likely to be culturally affiliated with the human remains and other cultural items. If the human remains and other cultural items are to be left in place, the BLM shall secure the site of discovery and the disposition process ends there. However, if the decision involves excavation or removal of the human remains and cultural items, excavation and removal must follow the requirements of the Archaeological Resources Protection Act (16 USC 470aa et seq.) and its implementing regulations.

With the implementation of existing federal and state regulations, impacts associated with human remains would be less than significant.

Mitigation:

MM CUL 1 Cultural Resource Monitoring Program. Prior to issuance of grading permits the applicant shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A CRMP shall be developed in coordination with the consulting Tribe(s) that addresses the details of all activities and provides procedures that must be followed in order to reduce any impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. This document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit.

The CRMP shall contain at a minimum the following:

- Archaeological Monitor - An adequate number of qualified archaeological monitors shall be onsite to ensure all earth moving activities are observed for areas being monitored. This includes all grubbing, grading and trenching onsite and for all offsite improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined and directed by the Project Archaeologist.
- Native American Monitoring - An adequate number of Native American monitors representing their individual consulting Native American tribe, shall be onsite to ensure all initial ground disturbing activities are observed for presence of tribal cultural resources. This includes, but is not limited to all grubbing, grading and trenching onsite and for all offsite improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined on a case by case basis.
- Cultural Sensitivity Training - The Project Archaeologist and a representative designated by the consulting Tribes shall attend the pre-construction meeting

with the contractors to provide Cultural Sensitivity Training for all construction personnel. Training will include a brief review of the cultural sensitivity of the project site and the surrounding area; the areas to be avoided during grading activities; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training and all construction personnel must attend prior to beginning work on the project site. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

- Unanticipated Resources - In the event that previously unidentified potentially significant cultural resources are discovered, the Archaeological and/or Tribal Monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The Project Archaeologist, in consultation with the Tribal Monitor(s) of each consulting tribe, shall determine the significance of the discovered resources. The County Archaeologist must concur with the evaluation before construction activities will be allowed to resume in the affected area. Further, before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Project Archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits shall be minimally documented in the field and the monitored grading can proceed.
- Artifact Disposition- the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project site during any ground-disturbing activities, including previous investigations and/or Phase III data recovery.
- The Professional Archaeologist may submit a detailed letter to the County of Riverside during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for monitoring.

MM CUL 2 Historic Artifact Disposition. Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the project site during any ground-disturbing activities, including previous investigations and/or Phase III data recovery.

All historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines.

MM CUL 3 Phase IV Cultural Monitoring Report. Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground

disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance to procedures stipulated in the Cultural Resources Monitoring Plan.

Monitoring: Archaeological monitoring is required all initial ground disturbing activities, as detailed in **MM-CUL-1**.

Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ENERGY Would the project:				
10. Energy Impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 2019c; EIA 2019; The Climate Registry 2020; Air Quality and Greenhouse Gas Emissions Technical Report (Appendix A of this Initial Study).

Findings of Fact:

a) **Less-Than-Significant Impact.**

Energy Consumption

Electricity

Construction Use: Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers and heating, ventilation, and air conditioning) would be provided by SCE. The amount of electricity used during construction would be minimal; typical demand would stem from the use of electrically powered hand tools and several construction trailers by managerial staff during the hours of construction activities. The majority of the energy used during construction would be from petroleum. The electricity used for construction activities would be temporary and minimal; therefore, impacts would be less than significant.

Operational Use: The proposed project would not use additional electricity during operation. The current site produces approximately 194,773 megawatt-hours (MWh) of electricity per year. The project is expected to produce an estimated 220,567 MWh of electricity per year. Therefore, the project could produce an additional 25,794 MWh per year compared to the existing WTGs. As such, the project would be a net generator of electricity, and impacts would be less than significant.

Natural Gas

Construction Use: Natural gas is not anticipated to be required during construction of the proposed project. Fuels used for construction would primarily consist of diesel and gasoline. Any minor amounts of natural gas that may be consumed as a result of proposed project construction would be temporary and negligible and would not have an adverse effect; therefore, impacts would be less than significant.

Operational Use: The project would not use natural gas during operation. Impacts would be less than significant.

Petroleum

Construction Use: Petroleum would be consumed throughout construction of the proposed project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and vehicle miles traveled associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities, vendor trucks, and haul trucks would rely on diesel fuel. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed that construction workers would travel to and from the project site in gasoline-powered vehicles.

Heavy-duty construction equipment of various types would be used during construction. CalEEMod was used to estimate construction equipment usage. Based on that analysis, diesel-fueled construction equipment would operate for an estimated 28,18015,750 hours.

Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO₂) emissions from each construction phase to gallons using conversion factors for CO₂ to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton (MT) CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per MT CO₂ per gallon (The Climate Registry 2020). The estimated diesel fuel use from construction equipment is shown in Table 3-4.

Table 3-4. Construction Equipment Fuel Demand

Phase	Pieces of Equipment	Equipment CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
WTG Removal	6	<u>236.29</u> 166.24	10.21	<u>23,142.89</u> 16,281.60
Restoration	4	2.84	10.21	278.21
Grading and Road Upgrades	<u>104</u>	<u>144.13</u> 44.84	10.21	<u>14,116.83</u> 278.21
WTG Foundation Installation	<u>64</u>	<u>104.34</u> 69.48	10.21	<u>10,219.43</u> 6,804.92
WTG/Met Tower Erection	<u>97</u>	<u>234.84</u> 71.21	10.21	<u>23,000.70</u> 6,974.12
Overhead Electrical Collection System Improvements	<u>52</u>	<u>51.76</u> 8.05	10.21	<u>5,069.53</u> 787.95
Tower Wiring, Mechanical Completion	2	<u>13.88</u> 17.66	10.21	<u>1,359.25</u> 1,729.94
Commissioning	2	<u>13.88</u> 17.66	10.21	<u>1,359.25</u> 1,729.94
Future WTG Removal	6	<u>257.12</u> 127.48	10.21	<u>25,183.13</u> 12,485.96
Restoration	<u>64</u>	<u>77.03</u> 3.01	10.21	<u>7,545.00</u> 294.51
Total				<u>117,268.80</u>1,759.17

Source: Appendix A.

Notes: CO₂ = carbon dioxide; MT = metric ton; kg = kilogram; WTG = wind turbine generator.

Fuel consumption from worker, vendor, and haul truck trips was estimated by converting the total CO₂ emissions from the construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline fueled, whereas vendor and haul trucks are assumed to be diesel fueled. The estimated fuel use for worker vehicles, vendor trucks, and haul trucks is presented in Table 3-5.

Table 3-5. Construction Vehicle Fuel Demand

Phase	Trips	Vehicle CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
Construction Worker Vehicle Gasoline Demand				
WTG Removal	2,850	12.58	8.78	1,433.01
Restoration	240	0.640	8.78	72.67
Grading and Road Upgrades	<u>360600</u>	<u>1,592.42</u>	8.78	<u>181,012.41</u>
WTG Foundation Installation	<u>1,9201,600</u>	<u>8,4814.13</u>	8.78	<u>965,401,608.99</u>
WTG/Met Tower Erection	<u>4,0803,400</u>	<u>17,7914.63</u>	8.78	<u>2,026,511,665.89</u>
Overhead Electrical Collection System Improvements	<u>360300</u>	<u>1,531.02</u>	8.78	<u>174,411.62</u>
Tower Wiring, Mechanical Completion	<u>800640</u>	3.40	8.78	387.57
Commissioning	300	1.28	8.78	145.34
<u>Restoration</u>	<u>150</u>	<u>0.64</u>	<u>8.78</u>	<u>0.00</u>
Future WTG Removal	<u>2,8501,950</u>	0.00	8.78	0.00
Restoration	<u>150132</u>	0.00	8.78	0.00
<i>Subtotal</i>				<u>5,385,925,671.08</u>
Construction Vendor Truck Diesel Demand				
WTG Removal	380	4.30	10.21	421.08
Restoration	80	0.56	10.21	54.93
Grading and Road Upgrades	<u>60400</u>	<u>0,680.94</u>	10.21	<u>66,488.65</u>
WTG Foundation Installation	<u>180150</u>	<u>2,043.39</u>	10.21	<u>199,463.24</u>
WTG/Met Tower Erection	<u>480400</u>	<u>5,424.50</u>	10.21	<u>530,364.40</u>
Overhead Electrical Collection System Improvements	<u>360300</u>	<u>4,042.69</u>	10.21	<u>395,482.65</u>
Tower Wiring, Mechanical Completion	<u>5040</u>	0.56	10.21	54.93
Commissioning	50	0.56	10.21	54.93
<u>Restoration</u>	<u>50</u>	<u>0.56</u>	<u>10.21</u>	<u>54.93</u>
Future WTG Removal	<u>380260</u>	0.00	10.21	0.00
Restoration	<u>5044</u>	0.00	10.21	0.00
<i>Subtotal</i>				<u>1,711.15</u>
Construction Haul Truck Diesel Demand				
WTG Removal	2,268	<u>313.46166.</u> 24	10.21	<u>30,701.11</u> <u>146,281.62</u>
Restoration	0	0.00	10.21	0.00
Grading and Road Upgrades	0	0.00	10.21	0.00
WTG Foundation Installation	1,820	65.29	10.21	6,394.89
WTG/Met Tower Erection	0	0.00	10.21	0.00
Overhead Electrical Collection System Improvements	<u>242</u>	0.85	10.21	83.36

Table 3-5. Construction Vehicle Fuel Demand

Phase	Trips	Vehicle CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
Tower Wiring, Mechanical Completion	0	0.00	10.21	0.00
Commissioning	0	0.00	10.21	0.00
Restoration	0	0.00	10.21	0.00
WTG Removal	2,232	0.00	10.21	0.00
Restoration	0	0.00	10.21	0.00
<i>Subtotal</i>				37,179.35
Petroleum Total				<u>161,611.71</u>

Source: Appendix A.

Notes: CO₂ = carbon dioxide; MT = metric ton; kg = kilogram; WTG = wind turbine generator.

As shown in Table 3-4 and Table 3-5, the proposed project is estimated to consume approximately ~~161,612,904~~ 161,611,711 gallons of petroleum during the construction phase. By comparison, approximately 22.5 billion gallons of petroleum would be consumed in California over the course of the project’s construction phase based on the California daily petroleum consumption estimate of approximately 78.6 million gallons per day (EIA 2019). The proposed project would be required to comply with the CARB’s Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to 5 minutes. Overall, because petroleum use during construction would be temporary and relatively minimal and would not be wasteful or inefficient, impacts would be less than significant.

Operational Use: The proposed project would not increase operational petroleum use beyond what is currently needed for O&M of the WTGs. Therefore, operational impacts would be less than significant.

In summary, although the proposed project would increase petroleum use during construction, the use would be a small fraction of the statewide use, and due to efficiency increases, would diminish over time. Given these considerations, petroleum consumption associated with the proposed project would not be considered inefficient or wasteful and would result in a less-than-significant impact.

b) Less-Than-Significant Impact. The County adopted Board of Supervisors Policy H-4 (Conservation of Energy in County Facilities) in 1975, and the most recent revision occurred in 2010. The policy states that all County departments are responsible for conserving energy and extensively outlines action to be taken by the County Economic Development Agency in its role of managing and operating County facilities. The project would not interfere with the ability of County departments to conserve energy.

Under another County program, WIMP, the WTGs used to generate electricity are monitored from the planning process through installation and operation to ensure environmental compliance. The project would be subject to applicable County regulations and thus would not conflict with any adopted energy conservation plans.

Conversely, the project would have a positive effect on energy conservation. The project would improve the overall efficiency of energy production on the project site by deploying new, modern, and high-efficiency WTGs. Because state-of-the-art turbine technology would be used, the project would be capable of generating more electric energy more reliably and with fewer WTGs,

reducing the existing visual clutter. Therefore, no impacts associated with energy conservation would occur.

The project would also support the County’s Climate Action Plan (CAP) measure numbers R2-CE1 and R2-CE2 through the generation of local renewable energy (County of Riverside 2019c). This would help the County meet its greenhouse gas (GHG) reduction goals within the CAP. Therefore, the project would not conflict with renewable energy or energy efficiency plans and would have a less-than-significant impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
GEOLOGY AND SOILS Would the project directly or indirectly:				
11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?				

Source(s): County of Riverside 2019b; DOC 2019; County Geotechnical Design Report No. 200044 (Appendix D of this Initial Study).

Findings of Fact:

a) **Less-Than-Significant Impact.** The project site is located in a seismically active region of Southern California dominated by activity on the San Andreas and related faults. Based on a review of the Earthquake Fault Zone Map for the Desert Hot Springs Quadrangle, the subject project is not located within a state-designated Earthquake Fault Zone for fault surface rupture hazard. The closest faults to the site that have been zoned as “Holocene active” by the State of California include the Banning and Mission Creek strands of the San Andres Fault zone, located approximately 1.7 and 6.5 miles northeast of the subject site. The County of Riverside Fault Zone Maps indicate that the WTG proposed near the northeast corner of the project site lies within a Riverside County Fault Zone established for the Garnet Hill Fault. Based on the geologic evaluation of the County Fault Zone included in Appendix D, which included review of historic aerial photographs, literature review, and communication with the County reviewing geologist, no active fault trace projecting to the ground surface was identified within the project site. Therefore, the potential for rupture of a known fault during the design life of the proposed project is considered low, and the impact would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------	----------------------------------------------------	------------------------------	-----------

12. Liquefaction Potential Zone	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Be subject to seismic-related ground failure, including liquefaction?				

Source(s): County of Riverside 2019b; County Geotechnical Design Report No. 200044 (Appendix D of this Initial Study).

Findings of Fact:

- a) **Less-Than-Significant Impact.** Riverside County General Plan Figure S-3 identifies the project site as having moderate potential for liquefaction. Liquefaction is generally known to occur in saturated or near-saturated cohesionless soils at depths shallower than about 50 feet. During the field investigation, groundwater was found at depths greater than 150 feet below ground surface. In addition, subsurface materials within the project site are very dense. As such, the potential for liquefaction is considered minimal. Nevertheless, project design and construction would be implemented in conformance with the Uniform Building Code and County building standards to reduce the likelihood of seismic-related ground failure. Impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------	----------------------------------------------------	------------------------------	-----------

13. Ground-shaking Zone	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Be subject to strong seismic ground shaking?				

Source(s): County of Riverside 2019b; County Geotechnical Design Report No. 200044 (Appendix D of this Initial Study).

Findings of Fact:

- a) **Less-Than-Significant Impact with Mitigation Incorporated.** The Southern California region is known to be seismically active. Earthquakes occurring within approximately 60 miles of the site are generally capable of generating ground shaking of engineering significance. The project site is located within 60 miles of 15 active faults. Based on the ground motion parameters obtained for the project site, the San Andreas (San Gorgonio Pass-Garnet Hill) Fault was the largest contributor to the seismic hazard at the project site. Although the project site is expected to experience moderate to severe ground shaking, the proposed project would be designed and constructed in a manner that reduces the risk of seismic hazards (24 CCR). In addition, through implementation of **MM-GEO-1**, the proposed project would be required to be designed and constructed in conformance with all recommendations specified in the County Geotechnical Design Report No. 200044 (Appendix D) to ensure the proposed WTGs and met tower can

withstand strong seismic ground shaking likely to occur within the design life of the project. Thus, impacts would be less than significant with mitigation incorporated.

Mitigation:

MM-GEO-1 Site design and engineering shall be conducted in conformance with all recommendations as specified in the County Geotechnical Design Report No. 200044 and applicable recommendations specified in any subsequently prepared geotechnical/soils reports for the proposed project.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
14. Landslide Risk	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2019b; County Geotechnical Design Report No. 200044 (Appendix D of this Initial Study).

Findings of Fact:

a) **No Impact.** The project site encompasses desert terrain that ranges in elevation from 975 to 1,260 feet above mean sea level. In addition, the project site is not adjacent to any steep slopes. Due to the relatively flat topography and the absence of significant slopes the potential for landslides or rockfalls is not considered a hazard for the site, and there would be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
15. Ground Subsidence	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 2019b; County Geotechnical Design Report No. 200044 (Appendix D of this Initial Study).

Findings of Fact:

- a) **Less-Than-Significant Impact with Mitigation Incorporated.** Riverside County General Plan Figure S-7 identifies the project site as being within an area that is potentially susceptible to subsidence but shows no areas with documented subsidence in the vicinity of the project site. However, significant land subsidence has been recorded by the USGS in the southern portions of the Coachella Valley.

Recent studies conducted by the USGS have determined that portions of the northern part of the Coachella Valley have been undergoing ground surface uplift in areas associated with groundwater replenishment facilities. The most notable uplift was found at the Whitewater Groundwater Replenishment Facility established in the 1970s, which is located south of the project site. Due to the lack of evidence of prior ground subsidence in the area and presence of groundwater replenishment facilities south of the project site, potential for ground subsidence at the project site is considered low. In addition, consistent with **MM-GEO-1**, the site design and engineering shall be conducted in conformance with all recommendations as specified in the County Geotechnical Design Report No. 200044 (Appendix D) to further reduce potential impacts associated with subsidence within the project site. Thus, impacts would be less than significant with mitigation incorporated.

Mitigation: Implementation of **MM-GEO-1** is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
16. Other Geologic Hazards				
a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2019b; County Geotechnical Design Report No. 200044 (Appendix D of this Initial Study).

Findings of Fact:

- a) **No Impact.** The Whitewater River is located approximately 900 feet west and south of the project site. Intense rainfall or thunderstorms would result in increased flows within the Whitewater River. Due to the distance of the project site from steep slopes, mudflows are not expected within the Whitewater River. In addition, project construction would be conducted outside of major drainage features in the project vicinity. The proposed project would not be affected by other geological hazards such as seiche, tsunami, or volcanic hazard, given that the project site is not located near any source that could create these hazards. Therefore, there would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. Slopes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Change topography or ground surface relief features?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in grading that affects or negates subsurface sewage disposal systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Kimley Horn 2020.

Findings of Fact:

a-c) No Impact. The project site is generally flat with elevations gradually sloping from 1,260 feet above mean sea level in the northwest to approximately 975 feet above mean sea level in the southeast. Based on the current design of the project, mass grading of the site would not be required. Grading activities would be limited to proposed WTG sites, access roads, the met tower site, and temporary construction areas. As such, no major changes would be made to existing topography or ground surface relief; cut or fill slopes greater than 2:1 or higher than 10 feet would not be required. Therefore, there would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. Soils	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: USDA Soil Conservation Service Soil Surveys; County Geotechnical Design Report No. 200044 (Appendix D of this Initial Study).

Findings of Fact:

a) Less-Than-Significant Impact with Mitigation Incorporated. The Coachella Valley is subjected to frequent wind events throughout each year. One of the windiest locations coincides

with the confluence of the San Gorgonio Pass and Whitewater River Valley, which directly affects the project site. Much of the project site positioned within this windy zone is covered by thick accumulations of coarse-grained alluvial fan deposits that are generally comprised of dense, sandy gravel with abundant cobbles and boulders. This coarse-grained mantle provides an effective surface armor for much of the site to naturally mitigate significant wind erosion. However, seasonal rainfall events fill intermittent stream channels and gullies bring in finer-grained sediments that are subject to wind erosion upon drying. Since the proposed WTGs, met tower, access roads, work areas, and utility poles would be installed outside of major drainage features within the project site, the potential for adverse impacts related to wind erosion is considered low.

Project construction would be subject to local and state codes and requirements for erosion control and grading. Because construction activities would disturb one or more acres, the proposed project must adhere to the provisions of the National Pollution Discharge Elimination System (NPDES) Construction General Permit, implemented through **RR-GEO-1**. Construction activities subject to this permit include clearing, grading, and disturbances to the ground such as stockpiling and excavating. The NPDES Construction General Permit requires implementation of a SWPPP, which would include project construction features (i.e., BMPs) designed to prevent erosion and protect the quality of stormwater runoff, implemented through **RR-GEO-2**. The proposed project must also comply with SCAQMD Rule 402 (Nuisance) and Rule 403 (Fugitive Dust), which would reduce construction erosion impacts. In addition, consistent with **MM-GEO-1**, the site design and engineering shall be conducted in conformance with all recommendations as specified in the County Geotechnical Design Report No. 200044 (Appendix D) to further reduce potential impacts associated with substantial soil erosion. Thus, impacts would be less than significant with mitigation incorporated.

- b) Less-Than-Significant Impact.** The general soil series found at the project site consists primarily of the Carsitas, Carrizo, and Pit family series. According to the U.S. Department of Agriculture Soil Survey of Riverside County, California Coachella Valley Area, the Carsitas series consists of excessively drained soils formed in predominantly coarse textured gravelly or cobbly granitic alluvium, which is rapidly permeable. The Carrizo series consists of very deep, excessively drained soils that are formed in mixed igneous alluvium. The Pit series consists of very deep, poorly drained soils that are formed in areas with fine-textured alluvium weathered from extrusive and igneous rocks. These soils exhibit low plasticity and, thus, are not expansive. In addition, observation and laboratory tests conducted for the County Geotechnical Design Report No. 200044 (Appendix D) indicated that on-site soils have a very low expansion potential. Thus, impacts would be less than significant.
- c) No Impact.** The use of septic tanks or other alternative wastewater disposal systems would not be a part of the proposed project, so there would be no impacts.

Mitigation and Other Measures: Implementation of **MM-GEO-1** is required.

RR-GEO-1 Prior to issuance of a grading permit, the project applicant is required to obtain coverage under a National Pollutant Discharge Elimination System Construction General Permit from the State Water Resources Control Board.

RR-GEO-2 Prior to issuance of a grading permit, the project applicant is required to prepare a Stormwater Pollution Prevention Plan in accordance with Riverside County Municipal Code Chapter 15.12.020, to be implemented during project construction.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
19. Wind Erosion and Blowsand from project either on or off site.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?				

Source(s): County of Riverside 2019b; Riverside County Ordinance No. 460, Article XV, and Ordinance No. 484; County Geotechnical Design Report No. 200044 (Appendix D of this Initial Study).

Findings of Fact:

a) **Less-Than-Significant Impact with Mitigation Incorporated.** The project site is located at the eastern end of the Banning Pass, which funnels the coastal flow into the Coachella Valley. Wind erosion is common within the project site due to the presence of sandy soils. The proposed project would be influenced by wind erosion and blowsand issues during project construction, primarily associated with earth moving activities during the grading phase. Project operations, when compared with the existing O&M activities that already occur on the project site, would not result in additional workers being located on site for additional durations of time. Thus, the safety and quality of life issues associated with blowsand are not relevant to the proposed project.

Implementation of **RR-GEO-3**, which requires preparation of a Dust Control Plan for the proposed project and adherence with the County’s Fugitive Dust and Erosion Control Ordinance, would serve to reduce the effects of wind erosion. In addition, Riverside County Ordinance No. 484 requires protective actions from landowners disturbing sandy or sandy loam soils to prevent substantial quantities of soil from being deposited on public roads and private property. The project applicant would adhere to Ordinance No. 484, implementing protection actions described herein to prevent soil deposition as a result of excavating, leveling, or removing natural or planted vegetation or root crops; by depositing or spreading a substantial quantity of similar soil on said land; by any other act likely to cause or contribute to wind erosion of said land; or to aggravate an existing wind erosion condition.

As previously addressed, the proposed project would be required to comply with SCAQMD Rules 403 and 403.1 to control dust emissions generated during the grading activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites three times per day depending on weather conditions. In addition, the project is required to comply with a project-specific Dust Control Plan prepared by the project applicant and approved by the County. In addition, consistent with **MM-GEO-1**, the site design and engineering shall be conducted in conformance with all recommendations as specified in the County Geotechnical Design Report No. 200044 (Appendix D). such, impacts associated with wind erosion and blowsand would be less than significant with mitigation incorporated.

Mitigation and Other Measures: Implementation of **MM-GEO-1** is required.

RR-GEO-3 Prior to issuance of a grading permit, the project applicant is required to prepare a Dust Control Plan pursuant to Riverside County Dust Control Ordinance 742 and the Air Quality Management District Coachella Valley Fugitive Dust Control Handbook.

Monitoring: No monitoring is required.

Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
GREENHOUSE GAS EMISSIONS Would the project:				
20. Greenhouse Gas Emissions				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): CARB 2008, 2014, 2017; County of Riverside 2019c; SCAG 2016, 2020; SCE 2019; Air Quality and Greenhouse Gas Emissions Technical Report (Appendix A of this Initial Study).

Findings of Fact:

a) **Less-Than-Significant Impact.**

Construction Emissions

Construction of the proposed project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 2.5. Construction of the proposed project is anticipated to commence in September 2021 and would last approximately 8 months, ending in April 2022. On-site sources of GHG emissions include off-road equipment and off-site sources, including trucks and worker vehicles. Table 3-6 presents construction emissions for the proposed project from on-site and off-site emission sources.

Table 3-6. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
	Metric Tons per Year			
2021	<u>1,065.38723.95</u>	<u>0.180.09</u>	0.00	<u>1,069.95726.20</u>
2022	<u>242.82420.88</u>	<u>0.060.02</u>	0.00	<u>244.41421.40</u>
Total				<u>1,314.36847.60</u>
<i>30-Year Amortization of Construction Emissions</i>				<u>43.8128.25</u>

Source: Air Quality and Greenhouse Gas Emissions Technical Report (Appendix A of this Initial Study)

Table 3-6. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
	<i>Metric Tons per Year</i>			

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent.
Refer to Appendix A for complete results.

As shown in Table 3-6, the estimated total GHG emissions during construction of would be approximately 1,314,848 MT carbon dioxide equivalent (CO₂e) over the construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 44,28 MT CO₂e per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the proposed project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Decommissioning Emissions

Decommissioning of the proposed project would result in GHG emissions, which are primarily associated with use of off-road equipment, on-road vendor trucks, and worker vehicles.

CalEEMod was used to calculate the annual GHG emissions based on the decommissioning scenario described in Section 2.7. Decommissioning of the proposed project is anticipated to commence in January 2053 and would last approximately 5 months. On-site sources of GHG emissions include off-road equipment and off-site sources, including trucks and worker vehicles. Table 3-7 presents decommissioning emissions for on-site and off-site emission sources associated with the proposed project.

Table 3-7. Estimated Annual Decommissioning Greenhouse Gas Emissions

Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
	<i>Metric Tons per Year</i>			
2053	<u>334.15</u> 430.49	<u>0.01</u> 0.00	0.00	<u>334.40</u> 430.59
<i>30-Year Amortization of Construction Emissions</i>				<u>11.15</u> 4.35

Source: Air Quality and Greenhouse Gas Emissions Technical Report (Appendix A of this Initial Study)
Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent.
Refer to Appendix A for complete results.

As shown in Table 3-7, the estimated total GHG emissions during decommissioning of the proposed project would be approximately 334,131 MT CO₂e over the decommissioning period. Estimated project-generated decommissioning emissions amortized over 30 years would be approximately 114 MT CO₂e per year.

The combined amortized construction and decommissioning GHG emissions would be approximately 55,30 MT CO₂e per year. Therefore, the total annual emissions would not exceed the County’s GHG significance threshold of 3,000 MT CO₂e per year. As such, the GHG emissions generated by the proposed project would be considered less than significant.

GHG Emissions Benefits

In keeping with the renewable energy target under the Scoping Plan and as required by Senate Bill (SB) 100, the proposed project would provide a source of renewable energy to achieve the Renewables Portfolio Standard of 100% by 2045. Renewable energy, in turn, potentially offsets GHG emissions generated by fossil-fuel power plants. The current site produces

approximately 194,773 MWh of electricity per year. The proposed project is expected to produce an estimated 220,567 MWh of electricity per year. Therefore, the proposed project could produce an additional 25,794 MWh per year compared to the existing WTGs. The latest published GHG emission factor for SCE is 534 pounds of CO₂e/MWh (SCE 2019). Assuming that SCE would meet the Executive Order (EO) B-55-18 carbon neutrality target in 2045, a linear regression of the SCE GHG emission factor was calculated from 2019 to 2044. This would mean that the proposed project would avoid less GHG emissions over time. Assuming this, the project would avoid a net 59,14659,817 MT CO₂e from 2023 through 2044. In contrast, including amortized construction and decommissioning emissions, the proposed project would emit 1,649978 MT CO₂e over a 30-year lifetime. It should be noted that the proposed project is expected to be operational through 2052 and thus it would not avoid GHG emissions from 2045 through 2052.

Less-Than-Significant Impact.

Consistency with the County of Riverside Climate Action Plan

The County’s CAP is a qualified GHG reduction plan according to CEQA Guidelines Section 15183.5 and thus can be used in a cumulative impacts analysis to determine significance. As shown in Section 3.IV.20(a), the proposed project would not exceed the 3,000 MT CO₂e threshold established by the CAP. Table 3-8 provides an overview of the measures and goals within the CAP that are applicable to the proposed project and the project’s consistency with them.

Table 3-8. Project Consistency with the County Climate Action Plan Greenhouse Gas Emission Reduction Strategies

Measure Number	Measure Description	Project Consistency
R2-CE1	Clean Energy	Consistent. The proposed project would produce up to 56 MW of renewable electricity through new WTGs.
R2-CE2	Community Choice Aggregation Program	Consistent. The proposed project would produce up to 56 MW of renewable electricity through new WTGs and the support the use of a community choice aggregation program.
R2-W1	Water Efficiency through Enhanced Implementation of Senate Bill X7-7	Consistent. The proposed project would not use water during operation.
R2-S1	Reduce Waste to Landfills	Consistent. The proposed project would dismantle and recycle as much of the existing WTGs as possible to reduce any waste going to the landfills. Further, the proposed project would crush all foundation concrete and reuse it on site.

Source: County of Riverside 2019c.

Note: MW = megawatt; WTG = wind turbine generator.

As shown in Table 3-8, the proposed project does not conflict with any of the GHG-reducing measures or goals within the CAP and thus is consistent with the plan. It should also be noted that the proposed project would not inhibit the County from implementing any of the measures

not listed in Table 3-8 as they do not apply to the proposed project. Therefore, impacts would be less than significant.

Consistency with the Southern California Association of Governments’ 2016–2040 RTP/SCS

SCAG’s 2016 RTP/SCS is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2016 RTP/SCS incorporates local land use proposed projections and circulation networks in city and county General Plans (SCAG 2016). The 2016 RTP/SCS is not directly applicable to the proposed project because the underlying purpose of the 2016 RTP/SCS is to provide direction and guidance by making the best transportation and land use choices for future development. As the proposed project does not alter the current use of the property and does not induce growth during operation, development of the proposed project would not conflict with the critical goals of the 2016 RTP/SCS.

On September 3, 2020, SCAG’s Regional Council adopted Connect SoCal (2020–2045 RTP/SCS) and the addendum to the Connect SoCal Program Environmental Impact Report. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern (SCAG 2020). It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, planning strategies, and the people whose collaboration can improve the quality of life for Southern Californians. Because the proposed project is not growth inducing, this type of consistency analysis does not apply. However, the major goals of Connect SoCal are outlined in Table 3-9, along with the project’s consistency with them.

Table 3-9. Project Consistency with the 2020 SCAG RTP/SCS – Connect SoCal

RTP/SCS Measure	Project Consistency
Reduce greenhouse gas emissions and improve air quality.	Consistent. The proposed project would result in criteria air pollutant and GHG emissions during construction and operation. However, emissions would not exceed the SCAQMD significance thresholds. The proposed project would also generate renewable energy.
Adapt to a changing climate and support an integrated regional development pattern and transportation network.	Consistent. The proposed project would generate additional renewable energy, supporting the adaptation to a changing climate.
Promote conservation of natural and agricultural lands and restoration of habitats.	Consistent. The proposed project would not impact natural lands during construction or operation.

Source: SCAG 2020.

Notes: SCAG = Southern California Association of Governments; RTP/SCS = Regional Transportation Plan/Sustainable Communities Strategy; GHG = greenhouse gas; SCAQMD = South Coast Air Quality Management District.

As shown in Table 3-9, the proposed project would be consistent with all applicable measures within the SCAG Connect SoCal RTP/SCS.

Consistency with the California Air Resources Board’s Scoping Plan

The CARB Scoping Plan (approved by CARB in 2008 and updated in 2014 and 2017) provides a framework for actions to reduce California’s GHG emissions and requires CARB and other

state agencies to adopt regulations and other initiatives to reduce GHGs (CARB 2008, 2014, 2017). The Scoping Plan is not directly applicable to specific proposed projects, nor is it intended to be used for proposed project-level evaluations.⁹ Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-global warming potential GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of Assembly Bill (AB) 32 and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. Table 3-10 highlights measures that have been, or will be, developed under the Scoping Plan and the project's consistency with Scoping Plan measures. To the extent that these regulations are applicable to the proposed project, its inhabitants, or uses, the proposed project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law.

Table 3-10. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure	Project Consistency
<i>Transportation Sector</i>		
Advanced Clean Cars	T-1	Consistent. The proposed project's employees would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase.
Low-Carbon Fuel Standard	T-2	Consistent. Motor vehicles driven by the proposed project's employees would use compliant fuels.
Regional Transportation-Related GHG Targets	T-3	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Advanced Clean Transit	Proposed	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Last-Mile Delivery	N/A	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Reduction in Vehicle Miles Traveled	N/A	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Vehicle Efficiency Measures 1. Tire Pressure 2. Fuel Efficiency Tire Program 3. Low-Friction Oil 4. Solar-Reflective Automotive Paint and Window Glazing	T-4	Not applicable. The proposed project would not prevent CARB from implementing this measure.

⁹ The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

Table 3-10. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure	Project Consistency
Ship Electrification at Ports (Shore Power)	T-5	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Goods Movement Efficiency Measures 1. Port Drayage Trucks 2. Transport Refrigeration Units Cold Storage Prohibition 3. Cargo Handling Equipment, Anti-Idling, Hybrid, Electrification 4. Goods Movement Systemwide Efficiency Improvements 5. Commercial Harbor Craft Maintenance and Design Efficiency 6. Clean Ships 7. Vessel Speed Reduction	T-6	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Heavy-Duty Vehicle GHG Emission Reduction 1. Tractor-Trailer GHG Regulation 2. Heavy-Duty Greenhouse Gas Standards for New Vehicle and Engines (Phase I)	T-7	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Medium- and Heavy-Duty Vehicle Hybridization Voucher Incentive Proposed Project	T-8	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Medium and Heavy-Duty GHG Phase 2	N/A	Not applicable. The proposed project would not prevent CARB from implementing this measure.
High-Speed Rail	T-9	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Electricity and Natural Gas Sector		
Energy Efficiency Measures (Electricity)	E-1	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Energy Efficiency (Natural Gas)	CR-1	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Solar Water Heating (California Solar Initiative Thermal Program)	CR-2	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Combined Heat and Power	E-2	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Renewables Portfolio Standard (33% by 2020)	E-3	Consistent. The proposed project would replace existing aged WTGs with new WTGs to support the Renewables Portfolio Standard.
Renewables Portfolio Standard (50% by 2050)	N/A	Consistent. The proposed project would replace existing aged WTGs with new WTGs to support the Renewables Portfolio Standard.
SB 1 Million Solar Roofs (California Solar Initiative, New Solar Home Partnership, Public Utility Programs) and Earlier Solar Programs	E-4	Not applicable. The proposed project would not prevent CARB from implementing this measure.

Table 3-10. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure	Project Consistency
Water Sector		
Water Use Efficiency	W-1	Consistent. The proposed project would use water for dust suppression during construction. No water use is associated with operation of the proposed project.
Water Recycling	W-2	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Water System Energy Efficiency	W-3	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Reuse Urban Runoff	W-4	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Renewable Energy Production	W-5	Not applicable. This measure applies to renewable energy within the water sector. The proposed project would not prevent CARB from implementing this measure.
Green Buildings		
1. State Green Building Initiative: Leading the Way with State Buildings (Greening New and Existing State Buildings)	GB-1	Not applicable. The proposed project would not prevent CARB from implementing this measure.
2. Green Building Standards Code (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	Not applicable. The proposed project would not prevent CARB from implementing this measure.
3. Beyond Code: Voluntary Programs at the Local Level (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	Not applicable. The proposed project would not prevent CARB from implementing this measure.
4. Greening Existing Buildings (Greening Existing Homes and Commercial Buildings)	GB-1	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Industry Sector		
Energy Efficiency and Co-Benefits Audits for Large Industrial Sources	I-1	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Oil and Gas Extraction GHG Emission Reduction	I-2	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Reduce GHG Emissions by 20% in Oil Refinery Sector	N/A	Not applicable. The proposed project would not prevent CARB from implementing this measure.
GHG Emissions Reduction from Natural Gas Transmission and Distribution	I-3	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Refinery Flare Recovery Process Improvements	I-4	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Work with the local air districts to evaluate amendments to their existing leak detection and repair rules for industrial facilities to include methane leaks	I-5	Not applicable. The proposed project would not prevent CARB from implementing this measure.

Table 3-10. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure	Project Consistency
Recycling and Waste Management Sector		
Landfill Methane Control Measure	RW-1	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Increasing the Efficiency of Landfill Methane Capture	RW-2	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Mandatory Commercial Recycling	RW-3	Consistent. The proposed project would recycle the maximum extent that is feasible in accordance with state and local regulations.
Increase Production and Markets for Compost and Other Organics	RW-3	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Anaerobic/Aerobic Digestion	RW-3	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Extended Producer Responsibility	RW-3	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Environmentally Preferable Purchasing	RW-3	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Forests Sector		
Sustainable Forest Target	F-1	Not applicable. The proposed project would not prevent CARB from implementing this measure.
High GWP Gases Sector		
Motor Vehicle Air Conditioning Systems: Reduction of Refrigerant Emissions from Non-Professional Servicing	H-1	Not applicable. The proposed project would not prevent CARB from implementing this measure.
SF ₆ Limits in Non-Utility and Non-Semiconductor Applications	H-2	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Reduction of Perfluorocarbons (PFCs) in Semiconductor Manufacturing	H-3	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Limit High GWP Use in Consumer Products	H-4	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Air Conditioning Refrigerant Leak Test During Vehicle Smog Check	H-5	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Stationary Equipment Refrigerant Management Program – Refrigerant Tracking/Reporting/Repair Program	H-6	Not applicable. The proposed project would not prevent CARB from implementing this measure.
Stationary Equipment Refrigerant Management Program – Specifications for Commercial and Industrial Refrigeration	H-6	Not applicable. The proposed project would not prevent CARB from implementing this measure.
SF ₆ Leak Reduction Gas Insulated Switchgear	H-6	Not applicable. The proposed project would not prevent CARB from implementing this measure.
40% reduction in methane and hydrofluorocarbon (HFC) emissions	N/A	Not applicable. The proposed project would not prevent CARB from implementing this measure.
50% reduction in black carbon emissions	N/A	Not applicable. The proposed project would not prevent CARB from implementing this measure.

Table 3-10. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure	Project Consistency
Agriculture Sector		
Methane Capture at Large Dairies	A-1	Not applicable. The proposed project would not prevent CARB from implementing this measure.

Sources: CARB 2008 and CARB 2017.

Notes: CARB = California Air Resources Board; GHG = greenhouse gas; WTG = wind turbine generator; GWP = global warming potential; SF₆ = sulfur hexafluoride.

Based on the analysis in Table 3-10, the proposed project would be consistent with the applicable strategies and measures in the Scoping Plan.

The proposed project would not impede and may help the attainment of the GHG reduction goals for 2030 or 2050 identified in EO S-3-05 and SB 32. EO S-3-05 establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050. SB 32 establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030. While there are no established protocols or thresholds of significance for that future year analysis, CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014).

To begin, CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that “California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32” (CARB 2014). The First Update to the Climate Change Scoping Plan states the following about the 2050 target for reducing GHG emissions to 80% below 1990 levels (CARB 2014):

This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and EO S-3-05. This is confirmed in the Second Update, which states (CARB 2017):

The Proposed Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while also identifying new, technologically feasibility and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Proposed Plan is developed to be consistent with requirements set forth in AB 32, SB 32, and AB 197.

The proposed project would not interfere with implementation of any of the previously described GHG reduction goals for 2030 or 2050 because the proposed project would not exceed the County's threshold of 3,000 MT CO₂e per year. This threshold was established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. Because the proposed project would not exceed the threshold, this analysis provides support for the conclusion that the proposed project would not impede the state's trajectory toward the previously described statewide GHG reduction goals for 2030 or 2050.

In addition, as discussed previously, the proposed project is consistent with the GHG emission reduction measures in the Scoping Plan and would not conflict with the state's trajectory toward future GHG reductions. In addition, given that the specific path to compliance for the state regarding the long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the proposed project would be speculative and cannot be identified at this time. The project's consistency would assist in meeting the County's contribution to GHG emission reduction targets in California. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation is that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet SB 32's 40% reduction target by 2030 and EO S-3-05's 80% reduction target by 2050; this legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets. The proposed project would increase renewable energy production compared to the existing WTGs and thus would support the goals in SB 32 and EO S-3-05. Based on the considerations previously outlined, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and no mitigation is required. This impact would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS Would the project:				
21. Hazards and Hazardous Materials	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS Would the project:				
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): SWRCB 2010; County of Riverside 2020b; California Government Code, Section 65962.5; DTSC 2020; SWRCB 2020; EPA 2020; Phase I Environmental Site Assessment (Appendix E of this Initial Study).

Findings of Fact:

a) **Less-Than-Significant Impact.** During construction of the proposed project, hazardous and potentially hazardous materials typically associated with construction activities would be routinely transported to/from and used on the project site. These hazardous materials could include gasoline, diesel fuel, lubricants, and other products used to operate and maintain construction equipment. During construction of the new WTGs, standard operating procedures would be followed to ensure that lubricants do not escape the surrounding area. The transport, use, and handling of these materials would be a temporary activity coinciding with short-term proposed project construction activities.

WECS land uses, as proposed, do not typically involve the routine transport, use, or disposal of hazardous materials in quantities or a manner that would pose a threat to the public. Operation of the proposed project would involve the handling and application of gearboxes, transformers, and hydraulic systems, which shall be drained of fluids, put into appropriate containers, and transported and disposed of in accordance with all state and federal environmental regulations. These potentially hazardous materials would not be present in sufficient quantities to pose a significant hazard to public health and safety or the environment.

Any handling, transport, use, or disposal would comply with all applicable federal, state, and local agencies and regulations, including the U.S. Environmental Protection Agency (42 United States Code §6901 et seq.), the California Department of Toxic Substances Control (SWRCB 2020), and the Riverside County Department of Environmental Health (the Certified Unified Program Agency for Riverside County). As mandated by the OSHA Hazard Communication Standard (29 CFR 1910.1200(g) and Appendix D of 29 CFR 1910.1200), all hazardous materials stored on site would be accompanied by a Material Safety Data Sheet, which would inform on-site personnel about the necessary remediation procedures in the

case of accidental release. As such, impacts associated with handling of hazardous materials would be less than significant.

b) No Impact. A Phase I Environmental Site Assessment (ESA) was completed for the project site in January 2021 and updated in April 2021 (Appendix E). ~~Three~~ One recognized environmental concerns (REC) ~~were~~ was noted during the site reconnaissance:

- ~~• A historic dump site was observed in the southern portion of the site, west of the existing overhead electrical collector system. Various construction materials including scrap wood, scrap metal, concrete blocks, rubber tires, bricks, and metal canisters of unknown contents were observed. No ground disturbance is proposed near the historic dump site.~~
- An automobile junk yard containing concrete debris and with evidence of a previous fire was observed on the adjacent property, north of the overhead electrical collection system, between the western and eastern portions of the project site. The proposed project would affect the junk yard.

The Phase I ESA also identified one Historical REC during the site reconnaissance:

- The substation located in the northeast portion of the site was listed as a on the Emergency Response Notification System database with a spill of approximately 218 gallons of non-polychlorinated biphenyl transformer fluid on January 11, 2005 due to a pad mounted transformer being involved in a flash flood causing a release into the soil and the Whitewater River. The California Office of Emergency Services documented the spill as contained (Cal OES 2005).

In addition, the Phase I ESA identified the following ~~two~~ three Business Environmental Risks within the project site:

- Cement/concrete foundation pads and footings: Thirteen concrete pads were observed throughout the project site. The pads range in size from 192 to 490 square feet. Two of the pads had pipes of unknown origin sticking out of them which may or may not be suggestive of an underlying structure. The project improvements would not affect the subject two pads. The remainder of the existing pads are not considered business environmental risks.
- Vacant concrete block structures: Three vacant concrete structures were observed onsite. Two of the structures, located west of the proposed laydown yard, were single room 17 feet by 13 feet concrete tilt-up structures. The third vacant structure, located west of the existing WTGs that will remain as part of the project, appeared to be approximately five rooms, was constructed out of concrete block with footings, and was possibly used as a residence. Various piping was observed in and around the multiroom structure. The project improvements would not affect any of the identified structures onsite.
- A historic dump site was observed in the southern portion of the site, west of the existing overhead electrical collector system. Various construction materials including scrap wood, scrap metal, concrete blocks, rubber tires, bricks, and metal canisters of unknown contents were observed. Incremental shallow soil sampling was within the entire historic dump site and seven discrete soil samples were taken in areas of high concern. All soil results were below the U.S. Environmental Protection Agency's regional screening level for industrial/commercial soil except for arsenic taken at sample location Tt-DS-3, west

of the proposed overhead electrical alignment, at a concentration of 7.69 milligrams per kilograms. This higher result for arsenic may be attributed to naturally occurring background arsenic concentrations for soils in the area which was found to have a higher Upper Bound background of 12 milligrams per kilograms (Chernoff 2018). Given the proximity of the San Bernardino Mountains (San Jacinto Mountain), it is possible that higher concentrations could be the result of granitic rock and associated minerals. Nevertheless, the soils within the historic dump site would not be affected because no ground disturbance is proposed near the area.

Although the Phase I ESA identified ~~onethree~~ REC~~s~~, one Historical REC, and ~~threetwo~~ Business Environmental Risks within or adjacent to the project site, the project improvements would not impact any of these features. As such, implementation of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, no impact would occur.

- c) **Less-Than-Significant Impact.** The proposed project design incorporates modern turbine design, which includes a safety system ensuring that the WTG is shut down immediately at the onset of mechanical disorders, and turbine towers incorporate structural elements capable of withstanding large seismic events, high winds, and flooding.

To avoid contact or damage to buried wet and dry utilities, the construction contractor is required to contact Dig Alert (Underground Service Alert of Southern California) prior to the issuance of grading permits to ensure that pipelines are properly located. The project applicant would also be required to secure all appropriate amendments to ROW or corresponding instruments from the Southern California Gas Company, Coachella Valley Water District, SCE, and other utilities. Utility easements of record would be observed, and unauthorized disturbance would be prohibited by law.

Furthermore, the proposed project would not add a substantial number of vehicle trips onto local and regional roadways. As such, the proposed project would not interfere with emergency responders traveling along roadways during an emergency, nor would the proposed project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

- d) **No Impact.** No schools are located within the vicinity of the project site. The nearest school, Vista Del Monte Elementary School, is located approximately 4.4 miles southeast of the project site at 2744 North Via Miraleste, Palm Springs. Therefore, no impact would occur.
- e) **No Impact.** Pursuant to Government Code 65962.5 and its subsections, record searches on the project property were performed within multiple database platforms. The resources consulted included GeoTracker, EnviroStor, and the U.S. Environmental Protection Agency Enforcement and Compliance History Online (ECHO).

No Leaking Underground Storage Tank Cleanup Sites, Land Disposal Sites, Military Sites, Department of Toxic Substances Control Hazardous Waste Permits, Department of Toxic Substances Control Cleanup Sites, or Permitted Underground Storage Tanks were identified within or adjacent to the project site. The nearest registered GeoTracker database site is located approximately 2 miles east of the project site. The Pilot Travel Center #307, at 6605 North Indian Avenue, was listed twice within the GeoTracker database as a Leaking Underground Storage

Tank Cleanup Site. The status of the site is “completed -- case closed” as of March 2004 and October 2007. This site does not pose a threat to the project site due to its distance and case closed status.

No indication of the project site was found when consulting the ECHO database; however, the registry did list three sites within 1 mile of the project site. The results of the ECHO database search are listed as follows:

- California Department of Transportation District 8 Palm Springs, 59871 Route 111. Approximately 0.60 miles southwest of the project site, this site is listed in Resource Conservation and Recovery Act as a Small Quantity Generator.
- Whitewater Rock & Supply Co., 58645 Old Highway 60. Approximately 0.47 miles northwest of the project site, this site is listed in Resource Conservation and Recovery Act as a Miscellaneous Store Retailer (other).
- Conditional Use Permit No. 2885 R4, 58500 Old Highway 60. Approximately 0.59 miles northwest of the project site, this site is listed under the Clean Water Act as a general permit covered facility. The general permit expired in 2014.

Each of these sites registered within the ECHO database currently hold the status of “no violation.” Although the ECHO registry listed six sites within 1 mile of the project site, the distance of each site and their status as no violation signifies that there would be less-than-significant impacts related to the project site.

The EnviroStor database did not register a federal Superfund, a State Response, Voluntary Cleanup, School Cleanup, Evaluation, School Investigation, Military Evaluation, Tiered Permit, or Corrective Action Site within close proximity to the project site. The closest site is the Torney General Hospital, at 555 East Tachevah Drive, approximately 5.7 miles southeast of the project site; therefore, this is not a threat to the project property.

As a result of the database searches, it was concluded that the project property is not listed within the three search registries pursuant to Government Code Section 65962.5. The registries listed multiple sites within 1 mile of the project site; however, their distance and current status as either “completed-case closed” or “no violation” do not render them a threat to the proposed project. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
22. Airports				
a) Result in an inconsistency with an Airport Master Plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require review by the Airport Land Use Commission?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within an airport land use plan or, where such a plan has not been	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2019b, n.d.; ALUC 2005.

Findings of Fact:

a-c) Less-Than-Significant Impact with Mitigation Incorporated. The Palm Springs International Airport is located approximately 8 miles southeast of the project site and is the closest public airport to the project site. The project site is not identified by Map PS-1, Compatibility Map (ALUC 2005). However, the proposed project still requires review by the ALUC because the proposed WTGs would exceed 200 feet in height. The project applicant applied for Major Land Use Action Review to the ALUC, and the ALUC found the project consistent with the Airport Land Use Compatibility Plan at a hearing on January 14, 2021, subject to the following conditions:

- The proposed wind turbine generators (WTG) shall not generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
- Rotor blades shall utilize a flat or matte (non-glossy) finish so as to minimize the reflection of sunlight towards the aircraft engaged in an initial straight climb during takeoff or towards an aircraft engaged in a straight final approach toward a landing at an airport.
- The WTGs and any accessory uses shall not generate smoke or water vapor and shall be designed so as to not attract large concentrations of birds.
- The combined height of each WTG and its foundation shall not exceed 492 feet above ground level.
- Any increase in number, height, or change in location of the WTGs or meteorological tower, or any proposal for new structures taller than 200 feet above ground level, must be submitted to the Federal Aviation Administration (FAA) and Airport Land Use Commission (ALUC) for review.
- Each WTG structure shall be marked/lighted as specified in the FAA aeronautical studies in accordance with FAA Advisory circular 70/7460-1 L Change 2, Obstruction Marking and Lighting, white paint/synchronized red lights – Chapters 4, 12 and 13 (Turbines), unless superseded by subsequent FAA determination(s) in writing.
- The met tower structure shall be marked/lighted as specified in the FAA aeronautical studies in accordance with FAA Advisory circular 70/7460-1 L Change 2, Obstruction Marking and Lighting, a med-dual system Chapters 4, 8 (M-Dual), and 15, unless superseded by subsequent FAA determination(s) in writing.

- In order to ensure proper conspicuity of WTGs at night during construction, all WTGs must be lit with temporary lighting once they reach a height of 200 feet or greater until such a time the permanent lighting configuration is turned on. As the height of the structure continues to increase, the temporary lighting must be relocated to the uppermost part of the structure. The temporary lighting must be turned off for periods when they would interfere with construction personnel. If practical, permanent obstruction lights should be installed and operated at each level as construction progresses. An FAA Type L-810 steady red light fixture shall be used to light the structure during the construction phase. If power is not available, WTGs shall be lit with self-contained, solar powered LED steady red light fixture that meets the photometric requirements of an FAA Type L-810 lighting system. The lights should be positioned to ensure that a pilot has an unobstructed view of at least one light at each level. The use of Notice to Airmen NOTAM (D) to not light WTGs within a project until the entire project has been completed is prohibited.
- Any failure or malfunction that lasts more than thirty minutes and affects a top light or flashing obstruction light, regardless of its position, must be reported immediately to (877) 487-6867 so a NOTAM can be issued. As soon as normal operation is restored, the same number must be notified.
- The maximum top point elevations shall not be amended without further review by the ALUC and FAA; provided, however, that reduction in structure height or elevation shall not require further review by the ALUC.
- Temporary Construction equipment used during actual construction of the structures shall not exceed 492 feet in height and a maximum elevation (amsl) not to exceed the maximum elevation reviewed, unless separate notice is provided to the FAA through the Form 7460-1 process.
- Within 5 days after construction reaches its greatest height, FAA Form 7460-2 (Part II), Notice of Actual Construction or Alteration, shall be completed by the applicant and e-filed with the FAA. This requirement is also applicable in the event the project is abandoned or a decision is made not to construct the structure.
- To the maximum extent possible, in compliance with FAA guidelines regarding lighting, mitigation measures shall be incorporated into the project that would minimize light pollution to the people on the ground.

The project applicant would be required to implement the above conditions through implementation of MM-HAZ-1. As such, impacts associated with airport hazards would be less than significant with mitigation incorporated.

The FAA uses level and sloping imaginary surfaces to determine if a proposed structure is an obstruction to air navigation. Structures that are identified as obstructions are then subject to a full aeronautical study and increased scrutiny. However, exceeding a Part 77 imaginary surface does not automatically result in the issuance of a determination of hazard. Proposed structures must have airspace impacts that constitute a substantial adverse effect in order to warrant the issuance of a determination of hazard (14 CFR Part 77.17[a][2] and 77.19/21/23). As discussed in Section 2.8.3, the FAA issued Determinations of No Hazard to Air Navigation for all proposed and existing WTGs and proposed met tower.

Installation of the WTGs and met tower would require compliance with all applicable requirements set forth in FAA Advisory Circular 70/7460-1L Change 2. These requirements include marking and lighting standards for WTGs and met towers intended to provide day and night conspicuity and to assist pilots in identifying and avoiding these obstacles. FAA-required obstruction lighting would consist of white painted markings and/or synchronized red lights installed atop the 16 new WTGs and met tower on the project site.

Based on the discussion above, including the required FAA coordination and determination and compliance with conditions required by ALUC (MM-HAZ-1), airport-related hazards associated with the proposed project would be less than significant with mitigation incorporated.

- d) **No Impact.** No private airstrips are located within the vicinity of the project site. Thus, no impact would occur.

Mitigation:

MM-HAZ-1 Airport Land Use Commission Conditions. The applicant shall comply with the conditions required by the Airport Land Use Commission based on their review of the project, to ensure consistency with the Airport Land Use Compatibility Plan.

Monitoring: No monitoring is required.

Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY Would the project:				
23. Water Quality Impacts				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in substantial erosion or siltation on-site or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY Would the project:				
f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 2019b, n.d.; FEMA 2008a, 2008b.

Findings of Fact:

a) **Less-Than-Significant Impact.** Construction of the proposed project would be subject to local and state requirements for erosion control and grading. Because construction activities would disturb 1 or more acres, the project applicant would be required to adhere to the provisions of the NPDES Construction General Permit, implemented through **RR-GEO-1**. Construction activities subject to this permit include clearing, grading, and disturbances to the ground, such as stockpiling and excavating. The NPDES Construction General Permit requires implementation of a SWPPP, implemented through **RR-GEO-2**, which would include BMPs designed to prevent erosion and protect the quality of stormwater runoff. Collectively, these construction BMPs would help retain stormwater and any constituents, pollutants, and sediment contained therein, on the project site, which, in turn, would help prevent water quality impacts to downstream receiving waters during project construction.

During the life of the project, facility operations will primarily involve routine maintenance activities, which are not expected to result in waste discharge nor water quality violations. Thus, impacts would be less than significant.

b) **Less-Than-Significant Impact.** Water usage would be minimal and primarily take place during the construction phase of the project. Water would be brought on site using water trucks for dust control and other on-site construction-related uses. In addition, the proposed project would remove more WTGs than would be constructed and would not include the addition of any buildings or parking lots. Therefore, there would not be an increase in impervious surfaces or any activity that would interfere with groundwater recharge, and impacts would be less than significant.

c) **Less-Than-Significant Impact.** Project construction would only minimally alter existing topography and impede existing drainage flows. The proposed project would involve construction of new WTGs, permanent access roads, collection lines, and other improvements, any of which could potentially impede drainage flows through the project area compared with existing conditions. However, the

proposed project would ultimately remove 93 existing WTGs from the project site, replacing them with 16 new WTGs. Although the new WTGs would have a larger footprint, the reduction in the number of old WTGs would have a positive effect on surface drainage, given that there would be fewer aboveground structures to potentially impede stormwater flows.

In addition, while new or altered access roads would be required, these roads would be comprised of only pervious materials (e.g., compacted soil, gravel), so the amount of impervious surfaces found on the project site would not be expected to increase substantially. Overall, the use of the project site would remain consistent with existing conditions, and the amount of on-site impervious surfaces would not be substantially altered. Thus, impacts would be less than significant.

d) Less-Than-Significant Impact. The proposed project would not substantially alter the existing drainage pattern of the project site or area in a manner which would result in substantial erosion or siltation on or off site. As previously discussed, the existing project site includes 100 existing WTGs. The proposed project would include decommissioning of 93 existing WTGs and construction of 16 new WTGs with supporting infrastructure. The proposed construction activities will be implemented according to BMPs identified in the required SWPPP, implemented through **RR-GEO-2**. Existing human-made and natural conveyances are not expected to be re-routed or altered for the proposed project. Moreover, the proposed project would not introduce substantial amounts of impervious surfaces (concrete, hardscape, paved roads) that could result in an increase in the rate or amount of surface runoff. Thus, impacts would be less than significant.

e-g) Less-Than-Significant Impact. The majority of the project site is located in Zone X, outside of the 100-year flood plain area per Federal Emergency Management Agency Flood Insurance Rate Maps 06065C0890G and 06065C0870G (FEMA 2008a, 2008b). Six new WTGs in the western portion of the project site are proposed within a 100-year floodplain, designated Zone A (FEMA 2008a, 2008b). Properties under this designation are subject to inundation by the 1%-annual-chance (100-year) flood. The remaining WTGs proposed within the project site are outside a 100-year floodplain, designated Zone X (FEMA 2008a, 2008b).

Since 2000, the project site has operated as a WECS site, with 100 WTGs on site. The proposed project intends to replace 93 WTGS with 16 new WTGS. The proposed project would result in a considerable reduction in the number of turbine towers. For efficiency, the new towers would be situated near the current turbine footprints, allowing the existing roads to be utilized, to the extent possible, for the new construction and maintenance operations.

Although the new WTGs would have a larger footprint, the reduction in the number of old WTGs would have a positive effect on surface drainage, given that there would be fewer aboveground structures to potentially impede stormwater flows. Thus, impacts would be less than significant.

h) No Impact. There are no water bodies in the project vicinity that would be subject to seiche due to their shallow nature and quick absorption of water into the sandy underlying surfaces. The project site is not susceptible to mud flows due to its generally flat elevation and distance from elevated surfaces.

i) Less-Than-Significant Impact. Refer to responses to Sections 3.IV.23(a) and 3.IV.23(b).

Mitigation and Other Measures: The project applicant would implement **RR-GEO-1** and **RR-GEO-2**.

Monitoring: No monitoring is required.

Land Use/Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
LAND USE/PLANNING Would the project:				
24. Land Use				
a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2020a, n.d.; ALUC 2005; CVAG 2016.

Findings of Fact:

a) **Less-Than-Significant Impact with Mitigation Incorporated.**

General Plan Land Use and Zoning Ordinance

Under existing conditions, the project site operates as a commercial wind energy facility. The existing zoning designations within the project site include Wind Energy Resource Zone (W-E), Rural Residential (R-R), and Controlled Development Area (W-2). The project site is within a wind energy corridor, surrounded by existing wind energy development. The proposed project includes decommissioning and removal of 93 existing WTGs and installation of 16 new WTGs up to 492 feet in height. Seven existing WTGs would remain on site.

Change of Zone

A portion of the proposed development area is within the R-R zoning designation, which does not allow development of commercial WTGs. The County's Official Zoning Map shows nine of the existing WTG's permitted by the WECS Permit No. 103 on lands zoned R-R. It appears that the EIR certified prior to approval of Permit No. 103 may have erroneously represented the boundary between the R-R and W-E zoned lands as following the 2/3-mile scenic setback from SR-111.

The proposed project has sited all the WTGs and permanent met tower north of the SR-111 2/3-mile scenic setback and even slightly north of the southernmost existing WTGs. Nevertheless, based on current county GIS data, three of the proposed WTGs, as well as the proposed met tower, are proposed within lands zoned R-R.

The project applicant is therefore requesting a Change of Zone (CZ2000032) for that southwest portion of the project site that is mapped as zoned R-R, to be rezoned to W-E, as shown on Figure 2-7. Upon approval of the Change of Zone, the proposed area of development within the

R-R zone would be changed to W-E, and the proposed WTGs and met tower would be in conformance with the zoning designation.

Variance

Section 18.41.D.2(a) of County Ordinance No. 348 states, “no commercial WECS shall be located where the center of the tower is within a distance of five (5) rotor diameters from a lot line that is perpendicular to and downwind of, or within forty-five (45) degrees of perpendicular to and downwind of, the dominant wind direction.” The project layout is configured such that there are several properties within and to the south of the project area that are within 5 rotor diameters of proposed WTGs. As such, the project applicant will be required to obtain setback waivers to address this county setback requirement. The project applicant has secured several Wind Access Setback waivers and will have the remaining waivers in place before the Planning Commission Hearing. The project applicant has secured several Wind Access Setback waivers and will have a total of 23 waivers in place before the Planning Commission Hearing.

The applicant has also requested a Wind Access Setback Variance (VAR210001) for 4~~11~~ WTGs that are within five rotor diameters of six~~seven~~ parcels outside of the project area and for which MVPP does not possess setback waiver agreements.

Scenic Setback Reduction

As discussed in Section 2.9.2, two of the proposed 16 WTGs in the northeast portion of the project site would be 1,000 feet from I-10, which is designated as a County-eligible scenic highway east of SR-62 on Figure C-8 of the General Plan and in Figure 9 of the Western Coachella Valley Area Plan. Section 18.41.D.3(c) of Ordinance No. 348 requires a one-quarter mile setback from state or county eligible or designated scenic highways.

Pursuant to Section 18.41.C.3(e) of Ordinance No. 348, the established scenic setbacks may be reduced to 1.25 times the total WECS height if the Planning Commission determines that the characteristics of the surrounding property eliminate or substantially reduce considerations of scenic value. Specific to the proposed project, the Planning Commission could approve a reduced setback 1.25 times the total WECS 492-foot height, or 615 feet, subject to making findings in conformance with the ordinance.

The project site is within the San Gorgonio Pass Wind Energy Policy Area, which is developed with over 1,500 existing WTGs (U.S. Wind Turbine Database 2020). The project site has been operating 111 WTGs immediately south of the county-eligible scenic segment of I-10 since 2001. Specifically, 11 of these existing turbines are situated between 1,000 feet and one-quarter mile of the segment of I-10 identified as a county-eligible scenic highway. Several other wind energy facilities, comprising over 400 WTGs, border the project site to the east, west, and south, all south of I-10. The San Jacinto Mountains are the prominent backdrop south of I-10 as one travels westbound on I-10 and east of SR-62. The view southwest toward the San Jacinto Mountains currently contains many WTGs within the foreground, but the existing WTGs do not block views of the mountains.

While the proposed WTGs would be taller and more prominent when compared to existing WTGs, the replacement of 93 existing turbines with 16 new, taller turbines would ultimately reduce the overall visual clutter, creating unobstructed visual corridors to the San Jacinto Mountain Range. As such, pursuant to Section 18.41.C.3(e) of Ordinance No. 348, the applicant is requesting a Scenic Setback reduction for two WTGs in the northeast portion of the project

site to decrease the scenic setback from 1,320 feet to 1,000 feet from I-10, or approximately 2.03 times the total WECS height. The incremental setback reduction of two WTGs would not be easily perceptible by motorists traveling on I-10 due to presence of other nearby WTGs that make up the primary viewshed along the San Geronio Pass corridor.

The WECS, Change of Zone, and Variance applications and the proposed scenic setback reduction would be subject to County plan check review in order to ensure compatibility with on-site and surrounding zoning designations. The process would ensure compliance with all applicable regulations pertaining to height limits, setbacks, design standards, and other specifics.

Public Outreach

The project is located within the Sphere of Influence of both the City of Desert Hot Springs and City of Palm Springs. The project applicant will host three virtual public outreach meetings via Zoom for the proposed project. The first two meetings were held on March 30 and April 13, 2021. Hard copy notices for the first public outreach meeting were mailed to stakeholders, including property owners within 2 miles of the project site, on March 10 and March 16, 2021. An additional hard copy notice was mailed to stakeholders for the two April virtual meetings. In addition, six quarter-page ads will be published in the Desert Sun to advertise the planned virtual meetings to the public.

Coachella Valley Multiple Species Habitat Conservation Plan

The project site is located within the CVMSHCP; 383.39 acres are located within a CVMSHCP Conservation Area, specially the WFCA. The proposed project would result in approximately 20.22 acres of disturbance (permanent and temporary) within the WFCA. As discussed in Section 3.IV.7(a), impacts to biological resources associated with ground disturbance within the CVMSHCP WFCA would be reduced to less-than-significant through implementation of mitigation (**MM-BIO-1**) and project design features as well as compliance with standard regulatory requirements. Furthermore, the project is required to complete a JPR process through the County, with review and concurrence by CVCC, CDFW, and USFWS. A pre-JPR meeting with CVCC, the County, CDFW, USFWS, and the project applicant was held on September 28, 2020. The formal JPR application package was submitted on October 7, 2020. CVCC issued its JPR findings for the project on January 22, 2021 and determined the project is consistent with the CVMSHCP.

Riverside County Airport Land Use Compatibility Plan

As discussed in Section 3.IV.22, the proposed project requires review by the ALUC because the proposed WTGs would exceed 200 feet in height. The FAA Obstruction Determinations are pivotal in providing a basis for ALUC's consistency determination for proposed structures with a height above 200 feet. The project applicant has received FAA Determinations of No Hazard to Air Navigation for all existing and proposed WTGs and the proposed met tower. The project applicant applied for Major Land Use Action Review to the ALUC, and the ALUC found the project consistent with the Airport Land Use Compatibility Plan at a hearing on January 14, 2021, subject to the conditions outlined in Section 3.IV.22(a-c), required to be implemented by **MM-HAZ-1**. Therefore, potential conflicts with the Airport Land Use Compatibility Plan would be avoided through implementation of **MM-HAZ-1**.

Based on the foregoing discussion, with incorporation of mitigation, any environmental impacts due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less-than-significant.

- b) No Impact.** As discussed previously, the project site is currently identified as desert land, with scattered vegetation and rows of existing WECS. The project site does not traverse an established community. The surrounding uses to the east, west, and south boundary lines include vacant desert land and existing wind energy facilities, similar to that found within the project site. A scattered residential community and an automotive scrap site located outside the project site, east of the proposed WTGs and west of the existing Mount Wind substation, would not be affected by the proposed project. As such, the proposed WTG repower within the project site would not divide an established community.

Mitigation: Implementation of **MM-BIO-1** and **MM-HAZ-1** are required.

Monitoring: No monitoring is required.

Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MINERAL RESOURCES Would the project:				
25. Mineral Resources				
a) Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2015b, 2019a.

Findings of Fact:

- a-b) No Impact.** Under existing conditions, the project site operates as a commercial wind energy facility and would continue to operate as such upon implementation of the proposed project. Therefore, the proposed project would not result in the loss of availability of a known mineral resource. According to Figure OS-6 in the County General Plan Multipurpose Open Space Element, the project site is located in the vicinity of known or inferred significant mineral resources (MRZ-2 Zones) and a state-designated Significant Aggregate Mineral Resource area. However, because the project site is already developed with wind energy facilities, the proposed project would not result in substantial impacts associated with the loss of availability of a known mineral resource. No impact would occur.

In addition, according to Figure 3 of the Western Coachella Valley Area Plan Land Use Plan, the project site is not identified as a mineral extraction and processing facility, nor an area reserved for future mineral extraction and processing. The project site is approximately 25 miles west of a mineral resource designation identified within the Western Coachella Valley Area Plan. Therefore, no impacts associated with mineral resources would occur.

- c) **No Impact.** A historic era mining site was identified within the project site during the reconnaissance level survey conducted for the Cultural Resources Report (Appendix C). The mining site is very small, encompassing an area of approximately 175 square feet. The historic mining site is an isolated occurrence and there is no evidence that mining site was part of a larger mining operation or quarry. As such, the proposed project would not expose people or property to hazards from a quarry or mine. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
NOISE Would the project result in:				
26. Airport Noise				
a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): ALUC 2005.

Findings of Fact:

- a) **No Impact.** The project site is not within a designated Noise Compatibility Contour for the Palm Springs International Airport (ALUC 2005). The project site is located approximately 6.1 miles northwest of the airport. As such, the proposed project would not expose people residing or working in the area to excessive airport noise levels.
- b) **No Impact.** The project site is not within the vicinity of a private airstrip.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
27. Noise Effects by the Project				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 2015c; Riverside County Code of Ordinances; FHWA 2006.

Findings of Fact:

a) Less-Than-Significant Impact.

Short-Term Construction Noise

Regarding decommissioning and construction noise, the activities associated with decommissioning of the existing WTGs would be similar to construction of the new WTGs in terms of the equipment used and activities conducted; thus, potential decommissioning noise impacts are addressed here along with possible construction noise impacts.

The construction activities for the proposed project are expected to generate short-term noise increases compared to the existing levels. Two types of noise impacts are anticipated during future construction activities. First, the transport of workers and equipment to the site would incrementally increase noise levels along the local roadways leading to and from the site. Second, noise would be generated by the actual on-site construction activities. The loudest construction noise is generally the grading phase when more heavy equipment is used more consistently on a site. Noise levels are periodic and decrease significantly with distance, having less impact on sensitive receptors at greater distances.

The closest area of disturbance associated with decommissioning of the existing WTGs would be located approximately 1,900 feet east of the nearest sensitive land use (a residence), near the existing Mount Wind Substation. The closest area of disturbance associated with construction of the new WTGs would be located approximately 3,400 feet west of the nearest sensitive land use (a residence). Pursuant to Section 9.52.020 of the Riverside County Municipal Code, sound emanating from a construction project located 0.25 miles (1,320 feet) or more from an inhabited dwelling is exempt from the County's Noise Regulations.

In addition to the on-site construction noise, there would be intermittent truck deliveries occurring throughout the workday on off-site access roads (e.g., Garnet Road), delivering turbine components. This temporary off-site noise would not constitute a significant noise impact, though it may be intermittently audible at the nearest residences located adjacent to Garnet Road.

Overall, due to the distance of the project site from the nearest sensitive receptor, temporary noise generated during construction and decommissioning is exempt from the County's noise regulations (Section 9.52.020). Therefore, short-term construction impacts associated with the exposure of persons to or generation of noise levels in excess of standards established in the

local general plan or noise ordinance or applicable standards of other agencies would be less than significant.

Long-Term Operational Noise

Pursuant to Section D.12 of Riverside County Ordinance No. 348, a project-specific acoustical study is not required for the proposed project because the nearest habitable structure is greater than 3,000 feet from the nearest proposed WTG. The proposed project is not expected to result in a substantial permanent increase in ambient noise levels in the project vicinity, in comparison to operational noise levels generated by the existing wind energy facility within the project site. WTGs currently operating within the project site would be replaced with new technology that is anticipated to generate less noise. Noise generated during operation of the proposed project is anticipated to be primarily attributed to mobile sources along the public off-site access roadways and on-site access roads. The vehicle mix would be comparable with vehicles that access the current operational wind energy facility within the project site. Therefore, no substantial increase in noise generated during O&M of the proposed project is anticipated. As such, long-term operational impacts associated a substantial permanent increase in ambient noise levels in the project vicinity would be less than significant.

- b) Less-Than-Significant Impact.** Groundborne vibration, also referred to as earthborne vibration, can be described as perceptible rumbling, movement, shaking or rattling of structures and items within a structure. Although groundborne vibration is sometimes perceptible in an outdoor environment, it is not generally deemed a problem unless this form of disturbance is experienced inside a building.

The proposed project is not anticipated to include equipment or activities capable of producing substantial long-term groundborne vibration or groundborne noise levels. The only groundborne vibration potential that would be associated with the proposed project would be with the short-term decommissioning and construction phase. Groundborne vibration from construction and decommissioning activities is typically felt over short distances. The heavier pieces of construction equipment used on site could include cranes, excavators, bulldozers, graders, loaded trucks, and rollers. Additionally, backhoe-mounted impact hammers (hoe rams) or jackhammers may be utilized to remove existing turbine foundations during decommissioning of the existing WTGs. Based on published vibration data, the anticipated construction equipment would generate a maximum root mean square vibration level of approximately 94 vibration decibels at 25 feet from the source (DOT 2006). The closest existing residences are approximately 3,400 feet east of the nearest proposed WTG. For reference, the root mean vibration level for a property over 1,600 feet away resulting from the use of the anticipated construction equipment would be approximately 39.8 vibration decibels. This would be far less than the recommended threshold of 80 vibration decibels for human response within residential structures. Thus, impacts related to groundborne vibration would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Paleontological Resources

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------	----------------------------------------------------	------------------------------	-----------

PALEONTOLOGICAL RESOURCES:

28. Paleontological Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 2015b; Paleontological Resources Inventory Report (Appendix F of this Initial Study).

Findings of Fact:

a) **Less-Than-Significant Impact with Mitigation Incorporated.** Riverside County General Plan Figure OS-8 identifies the project site as having low paleontological sensitivity due to the young age and course-grained nature of surficial sediments within the project site. However, the young alluvial sediments are likely underlain by older Pleistocene alluvial sediments with a high paleontological potential sensitivity.

A paleontological records search of the Natural History Museum of Los Angeles fossil collections was conducted in August 2020. No fossil localities were identified within the project site, but five fossil localities were identified nearby from the same sedimentary deposits that occur within the project site.

A pedestrian survey was conducted within the project site in August and September 2020. The areas surveyed included grading limits associated with the proposed WTGs, electrical collection system, the temporary laydown yard, and access roads. The existing WTGs that would be decommissioned would be dismantled from existing access road and areas that are continuously disturbed as a result of ongoing O&M activities. A fossil pinecone was recovered from alluvial deposits during the pedestrian survey, which was curated at the Western Science Center in Hemet.

Due to the likelihood of Pleistocene sediments at depth, the proposed project has the potential to impact buried paleontological resources during ground-disturbing construction activities. As such, prior to initiation of construction activities, a Paleontological Resources Impact Mitigation Program must be prepared to outline requirements for monitoring locations, procedures, reporting, and collection management, implemented through **MM-PAL-1**. Excavations greater than 10 feet below the original ground surface must be monitored by a qualified paleontological monitor, as outlined by the Society of Vertebrate Paleontology (SVP 2010) and detailed in **MM-PAL-2**. In addition, implementation of **MM-PAL-3** requires all construction workers to attend a Worker Environmental Awareness Program prior to initiation of construction activities. With the incorporation of mitigation measures, impacts to paleontological resources would be less than significant.

Mitigation:

MM-PAL-1 A Paleontological Resources Impact Mitigation Program (PRIMP) shall be prepared and implemented to reduce any potential impacts to significant paleontological resources. The PRIMP shall outline where monitoring is required within the project site based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring (below a depth of 10 feet below the original ground surface) and discoveries treatment, and paleontological methods, reporting, and collections management.

MM-PAL-2 If excavations below a depth of 10 feet below the original ground surface (i.e., 10 feet below the depth of documented artificial fill) are planned for the project, a qualified paleontologist or a qualified paleontological monitor meeting the Society of Vertebrate Paleontology standards must be present to monitor the excavations for paleontological resources. The qualified paleontologist shall determine if the sediments are old enough and fine-grained enough to warrant continued monitoring. If the qualified paleontologist determines paleontological monitoring is not necessary at the 10-foot depth due to subsurface geological conditions, then paleontological spot-checking shall occur at 5-foot increments below 10 feet to determine the suitability for fossil preservation. The qualified paleontologist must produce a final paleontological monitoring report that discusses the paleontological monitoring program, any paleontological discoveries, and the preparation, curation, and accessioning of any fossils into a suitable paleontological repository.

MM-PAL-3 Prior to construction-related excavations, a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP 2010) standards should be retained, attend the pre-construction meeting, and present a worker environmental awareness program (WEAP) to the construction crew. The WEAP should discuss the types of fossils that may potentially be uncovered during project excavations, regulations protecting paleontological resources, and appropriate actions to be taken when fossils are discovered.

Monitoring: Paleontological monitoring is required for ground disturbance greater than 10 feet below the original ground surface, as detailed in **MM-PAL-2**.

Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
POPULATION AND HOUSING Would the project:				
29. Housing				
a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------	----------------------------------------------------	------------------------------	-----------

POPULATION AND HOUSING Would the project:

- | | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

Source(s): Kimley Horn 2020; County of Riverside n.d.

Findings of Fact:

- a) **No Impact.** The project site currently operates as a commercial wind energy facility and does not contain existing housing.
- b) **No Impact.** The proposed project does not include land uses that would result in substantial population growth, creating a demand for additional housing. The existing wind energy facility is maintained by 10 personnel for inspection and maintenance of the 111 WTGs. The proposed project would require 8 personnel for O&M activities, which would be a slight reduction compared to the existing wind energy facility. As such, implementation of the proposed project would not affect the population or the demand for housing within the project area.
- c) **No Impact.** The proposed project does not include residential development, nor would the proposed project otherwise induce substantial population growth in the area, either directly or indirectly. Growth resulting from buildout of the proposed project is consistent with, and reflected in, the growth projections assumed by the County, based on existing land use designations. Further, the project site would be accessed by existing public roads and all required utility infrastructure is available within the project site. Therefore, the proposed project would not directly or indirectly induce substantial population growth in the area.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Public Services

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------	----------------------------------------------------	------------------------------	-----------

PUBLIC SERVICES Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

- | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 30. Fire Services | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

Source(s): County of Riverside 2019b; Riverside County Code of Ordinances.

Findings of Fact:

- a) **No Impact.** The Riverside County Fire Department provides fire protection services to the existing wind energy facility within the project site. The fire station nearest the project site is the Riverside County/Desert Hot Springs Station 36, approximately 4.5 miles to the northeast. The proposed project would neither directly nor indirectly induce population growth in the project area. In addition, the project site is already served by the Riverside County Fire Department and the proposed land use would be the same as the existing land use. For these reasons, calls for service originating from the project site are not expected to increase following implementation of the proposed project. Nevertheless, the proposed project would be required to pay applicable development impact fees in compliance with County Ordinance No. 659.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
31. Sheriff Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2019b; Riverside County Code of Ordinances.

Findings of Fact:

- a) **No Impact.** The Riverside County Sheriff's Department provides law enforcement services to the existing wind energy facility within the project site. The nearest patrol station to the project site is the Cabazon Station, located at 50290 Main Street, Cabazon, approximately 8.5 miles to the west. The proposed project would neither directly nor indirectly induce population growth in the project area. In addition, the project site is already served by the Riverside County Sheriff's Department and the proposed land use would be the same as the existing land use. As such, calls for service originating from the project site are not expected to increase following implementation of the proposed project. Nevertheless, the proposed project would be required to pay applicable development impact fees in compliance with County Ordinance No. 659.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
32. Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside n.d.; Riverside County Code of Ordinances.

Findings of Fact:

- a) **No Impact.** The Banning Valley Unified School District provides public education services for the project area. As previously discussed, the proposed project would not directly or indirectly induce any population growth in the area, and thus, an increase in school-age children requiring public education is not expected to occur as a result of the proposed project.

Similar to other development projects in the County, the proposed project may be subject to SB 50, which requires the payment of mandatory impact fees to offset any impact to school services or facilities. In accordance with SB 50, the project applicant may be required to pay its fair share of impact fees based on the square footage of new WECS development. These impact fees are required of most residential, commercial, and industrial development projects in the County. As such, no impacts associated with school facilities would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
33. Libraries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside n.d.; Riverside County Code of Ordinances.

Findings of Fact:

- a) **No Impact.** The proposed project would neither directly nor indirectly induce population growth in the project area. As such, implementation of the proposed project would not result in an increased use of the County’s libraries.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
34. Health Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2019b, n.d.

Findings of Fact:

- a) **No Impact.** The proposed project would neither directly nor indirectly induce population growth in the project area. In addition, the proposed land use would be the same as the existing land use. As such, the proposed project would not result in an increased use of health services facilities.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
RECREATION Would the project:				
35. Parks and Recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2019a; Riverside County Ordinance No. 460.

Findings of Fact:

- a-b) **No Impact.** The proposed project would include decommissioning of 93 existing WTGs within the project site and installation of 16 new WTGs. No recreational facilities are required or proposed within the project site. In addition, the proposed project would not result in an increase in population that would increase the use of existing recreational facilities or generate a need for new recreational services.
- c) **No Impact.** The project site is not within the boundaries of any public agency designated to receive land dedication or fees pursuant to Section 10.35 of Ordinance No. 460.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
36. Recreational Trails	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Include the construction or expansion of a trail system?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2019a.

Findings of Fact:

- a) **No Impact.** The Western Coachella Valley Area Plan, Figure 8, identifies a historic trail south of the project site that runs northwest–southeast. The nearby historic trail is located off site and

would not be affected by the proposed project. In addition, a Class I bike path is planned along Garnet Street north of the project site (County of Riverside 2019a). Garnet Street terminates approximately 1,800 feet west of the western project site access. The proposed project would not introduce any new residents or population to the project area that would create demand for such facilities. The nearest proposed project structure is approximately 860 feet south of the alignment of Garnet Street. As such, the planned bike path along Garnet Street would not be constructed, but construction of the proposed project would not preclude the future construction of the bike path along Garnet Street. No other trails or bike paths are located within the project site or vicinity. As such, the proposed project would not include construction of a trail system or conflict with future expansion of planned railways or bikeway system. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
TRANSPORTATION Would the project:				
37. Transportation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Cause an effect upon, or a need for new or altered maintenance of roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Cause an effect upon circulation during the project's construction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate emergency access or access to nearby uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 2015a; Kimley Horn 2020; CVAG 2017b.

Findings of Fact:

- a) **Less Than Significant Impact.** The proposed project would primarily utilize North Indian Canyon Drive and Garnet Road for access. According to the Coachella Valley Association of Governments 2017 Traffic Census Report, approximately 15,467 daily trips were attributed to North Indian Canyon south of I-10.

The existing wind energy facility within the project site is maintained by 10 employees for inspection and maintenance of the 100 WTGs. The reduction of WTGs from 100 to 23 would result in reduced frequency of trips to the project site for maintenance purposes. As such, the proposed project would not result in a permanent increase in traffic numbers on nearby local roadways, such as North Indian Canyon Drive.

Ultimately, the proposed project has potential to reduce impacts to the existing roadway system. In addition, the project applicant would be required to pay Transportation Uniform Mitigation Fees prior to issuance of any future building permits. Therefore, the proposed project would not conflict with an applicable plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant.

- b) Less Than Significant Impact.** As discussed in CEQA Guidelines Section 15064.3(b.3), a qualitative analysis of construction traffic VMT was determined to be the appropriate approach for the proposed project. Implementation of the project would result in temporary traffic trips during construction. The majority of truck trips associated with materials and equipment deliveries would likely come from within the Palm Springs and/or Riverside–San Bernardino area because materials and equipment are readily available in the region and acquiring them locally would be more cost-effective than purchasing from more distant locations. Some materials trips would potentially originate from the Ports of Long Beach and Los Angeles, or potentially from other states, due to the specialized nature of the WTG equipment and the limited number of providers. Many temporary workers needed for construction of the project would reside within a 60- to 90-minute drive of the project site. This assumption is based on observations regarding worker commuting habits during construction monitoring efforts for other renewable energy and transmission projects in the California desert. However, it is likely that some specialized construction workers would come from outside a reasonable commute area and would therefore seek temporary housing near the work area.

While some construction truck trips may require high VMT to reach the project site, such trips would be necessary to deliver specialized equipment and materials that are not available locally. Due to the availability of rail lines from the ports and from out of state to the general project area, VMT during construction may be reduced by equipment and materials being hauled via rail to closer locations before being trucked to work sites. Upon completion of construction, all worker commuter trips and truck trips would cease. O&M of the project is expected to generate minimal daily traffic volumes, and VMT is anticipated to be similar to, or less than, that occurring under O&M of the existing wind energy facility. At this time, there are no known applicable VMT thresholds of significance for temporary construction trips that may indicate a significant impact. Project-related construction trips are not considered to require a substantial or sustained increase in VMT compared to regional averages for rural construction projects, nor would they result in temporary emissions increases that could impact plans and policies related to the reduction of GHG emissions by reducing VMT. Therefore, while the project may generate temporary construction trips with VMT from outside the immediate project area, these trips would not affect existing transit uses or corridors and would result in a less-than-significant transportation impact.

Once operational, the proposed project would generate approximately 16 trips per day (8 roundtrips from employees), which would be slightly reduced compared to the existing wind energy facility. Because these trips would be permanent worker trips, it is assumed they would come from within the local area. As such, this nominal number of operational trips would not

significantly increase total VMT for the region, nor would these trips generate higher levels of VMT than existing conditions. Therefore, project operations would not affect existing VMT levels, transit uses, or transit corridors. As such, operational VMT impacts would be less than significant.

- c) **Less-Than-Significant Impact with Mitigation Incorporated.** To the greatest extent possible, existing access roads within the project site would be retained and reused for the construction and operation of the proposed WTGs. In addition, new access roads would be constructed to accommodate the updated WTG layout. All permanent access roads outside of the WFCA would consist of 32-foot-wide aggregate dirt roads to accommodate crane transport during future O&M activities. Within the WFCA, permanent access roads would be limited to 16 feet. Maximum width for temporary roads to support construction activities would not exceed 50 feet, except for access roads within the WFCA, which would remain 16 feet. In addition, permanent 10-foot wide spur roads would be constructed along the overhead electrical collection system to provide access for replacement and maintenance of 14 utility poles that are not accessible from current roads. Access roads would incorporate applicable federal and local standards regarding internal road design and circulation.

For all locations along the truck route where the blade tips would extend beyond the public right-of-way boundaries due to roadway turning radii, encroachment agreements will be executed with the affected property owners (blade tips would only traverse airspace and not come into contact with the ground). **MM-TRA-1** requires preparation of a Traffic Management Plan prior to project construction that would include a detailed review of all local roads to ensure that the project does not result in temporary incompatible uses and to ensure that the roads maintain the same or better level of service after construction. In addition, any oversized trucks would require permits through Caltrans and would follow all safety requirements, such as CHP escorts, flaggers, and flashing lights. Furthermore, the Riverside County Transportation Department would issue an encroachment permit for use of County roadways during construction. As such, the construction of the access and maintenance roads would not increase hazards due to design features, and impacts would be less than significant.

- d) **Less-Than-Significant Impact.** The proposed project would result in removal of 93 existing WTGs and construction of 16 new WTGs on the project site. As discussed in Section 3.IV.37(a) above, due to a reduction in WTGs on site and reduced maintenance required for updated WTGs, the number of employees required for O&M activities for the proposed project would not increase. As such, the proposed project would not result in a permanent increase in traffic numbers on nearby local roadways. Nonetheless, the project applicant is required to pay applicable Transportation Uniform Mitigation Fees to ensure regional traffic impacts associated with new development are addressed. Therefore, the proposed project would not cause a need for new or altered maintenance of public roads, and impacts would be less than significant.
- e) **Less-Than-Significant Impact with Mitigation Incorporated.** A short-term increase in traffic to and from the project site during the construction phase of the project would occur. The total haul vehicle annual average daily trips (AADT) is estimated to be 14 vehicles per day when averaged over the 10-month schedule. Total average AADT for the proposed project during construction is estimated to be 52 vehicles per day at its peak. This AADT represents only a nominal percentage of the AADT on nearby roadways, including Indian Canyon Drive, which supported an AADT of 15,467 in 2017.

Based on the rural nature of Garnet Road, the current average daily trips along the project access route is likely low, and any short-term increase in average daily trips along the access route due to construction traffic would have little impact on the ability of the access road system to handle the traffic load.

Consistent with **MM-TRA-1**, prior to issuance of grading permits, a Traffic Control Plan to minimize traffic flow interference from construction activities would be submitted by the project applicant for review and approval by the County. This Traffic Management Plan would include measures designed to reduce the impact of temporary construction traffic and any necessary lane or street closures. Such measures may include, but are not limited to, providing early notification of closures to the fire and police services, residents, and nearby businesses; the use of signage before and during construction activities that clearly delineates detour routes around the lane and street closures; and use of flaggers to direct traffic in the vicinity of the closure. With the incorporation of mitigation, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.

- f) **Less-Than-Significant Impact.** The proposed project would not alter emergency access to, from, or in the vicinity of the project site. Where feasible, the existing network of permanent access roads would be retained and reused for the proposed project. In addition to the existing roads, new segments of permanent access roads would be constructed to accommodate the updated WTG layout. The new permanent access road layout would incorporate applicable federal and local standards regarding internal road design and circulation, particularly those provisions related to emergency vehicle access. In addition, the proposed circulation plan will be reviewed by the Riverside County Fire Department and Riverside County Sheriff's Department as a standard part of the County's review process. Review and approval of the proposed project by these agencies will ensure that the project site has adequate emergency access and that impacts would be less than significant.

Mitigation:

MM-TRA-1 Prior to finalization of plans and specifications, a Traffic Control Plan shall be prepared by the County of Riverside and/or their construction contractor with the purpose of addressing any construction activities that encroach into the public right-of-way. The Traffic Control Plan shall include measures designed to reduce the impact of temporary construction traffic and any necessary lane or street closure. Such measures may include, but are not limited to, providing early notification of closures to the Riverside County Fire Department and Sherriff's Departments, residents, and nearby businesses; the use of signage before and during construction activities that clearly delineates detour routes around the lane and street closures; and use of flaggers to direct traffic in the vicinity of the closure.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
38. Bike Trails	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------	----------------------------------------------------	------------------------------	-----------

a) Include the construction or expansion of a bike system or bike lanes?

Source(s): County of Riverside 2019a.

Findings of Fact:

a) **No Impact.** There are no existing or proposed bicycle facilities in the project area. Implementation of the proposed project would not require construction or expansion of bicycle facilities.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Tribal Cultural Resources

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------	----------------------------------------------------	------------------------------	-----------

TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

39. Tribal Cultural Resources

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)

Source(s): Native American Consultation.

Findings of Fact:

a-b) **Less Than Significant with Mitigation Incorporated.** Changes in the California Environmental Quality Act, effective July 2015, require that the County address a new category of cultural resources – Tribal Cultural Resources – not previously included within the law’s purview. Tribal

Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places. The appropriate treatment of tribal cultural resources is determined through consultation with tribes. Under existing law, environmental documents must not include information about the location of an archeological site or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act. (Cal. Code Regs. § 15120[d]; *Clover Valley Foundation v. City of Rocklin* [2011] 197 Cal.App.4th 200, 220). Further, cemeteries, and sacred places and records of Native American places, features, and objects are also exempt from disclosure. (Pub. Resources Code, §5097.9, §5097.993.)

In compliance with Assembly Bill 52 (AB 52), notices regarding the proposed project were mailed to all requesting tribes on December 08, 2020. No response was received from the Colorado River Indian Tribes (CRIT), Morongo Band of Mission Indians, San Manuel, Twenty-Nine Palms, the Cabazon Band or the Torres Martinez Desert Cahuilla Indians. The Quechan deferred to tribes closer to the project area.

Consultations were requested by the Agua Caliente Band of Cahuilla Indians and the Soboba Band of Luiseño Indians. Both Soboba and Agua Caliente were provided with the cultural report. During a meeting held on January 27, 2021 Soboba provided the County Planning Department specific information that the project is situated within a Cultural Landscape which may be considered a Tribal Cultural Resource. In addition, Agua Caliente identified TCR's within and adjacent to the project site.

Both consulting tribes expressed concern that the project area is sensitive for cultural resources and there is the possibility that previously unidentified resources might be discovered during ground disturbing activities. Recommendations were made that would require a Tribal Monitor from the consulting Tribe(s) to be present during grading activities so that any potential Tribal Cultural Resources found during project construction activities will be handled in a culturally appropriate manner. The project will also be required to adhere to State Health and Safety Code Section 7050.5 in the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made.

CEQA requires the Lead Agency to address any unanticipated cultural resources discoveries during Project construction. Therefore, a condition of approval/mitigation measure that dictates the procedures to be followed should any unanticipated cultural resources be identified during ground disturbing activities has been placed on this project. Implementation of **MM-TCR-1 through MM-TCR-4** would ensure that any potential impacts to any previously unidentified Tribal Cultural Resources are reduced to less-than significant levels.

Mitigation:

MM TCR 1 Unanticipated Resources. The project applicant or any successor in interest shall comply with the following for the life of the permit. If during ground disturbance activities,

unanticipated cultural resources are discovered, the following procedures shall be implemented:

- All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource.
- A meeting shall be convened between the developer, the project archaeologist, the Native American tribal representatives from the consulting tribes, and the County Archaeologist to discuss the significance of the find. At the meeting with the parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis.
- Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

Note: A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other. Tribal Cultural Resources are also considered cultural resources.

MM TCR 2 Native American Monitors. Prior to the issuance of grading permits, the project applicant shall enter into agreements with the consulting tribes for Native American Monitors. In conjunction with the Archaeological Monitor(s), the Native American Monitors shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, an adequate number of Native American Monitors representing the Soboba Band of Luiseno Indians and the Agua Caliente Band of Cahuilla Indians shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The project applicant shall submit a fully executed copy of the agreements with the Soboba Band of Luiseno Indians and the Agua Caliente Band of Cahuilla Indians. to the County Archaeologist to ensure compliance with this measure. Upon verification, the County Archaeologist shall clear this condition.

The agreement(s) shall not modify any condition of approval or mitigation measure.

MM TCR 3 Artifact Disposition of Prehistoric and/or Tribal Cultural Resources. In the event cultural resources are identified during ground disturbing activities, the landowner(s) shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), have been handled through the following methods.

One of the following treatments shall be applied:

1. Preservation–in-place, if feasible is the preferred option. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.
2. Reburial of the resources on the project property. The measures for reburial shall be culturally appropriate as determined through consultation with the consulting Tribe(s) and include, at least, the following measures to protect the reburial area from any future impacts in perpetuity:
 - Reburial shall not occur until all required cataloguing (including a complete photographic record) and analysis have been completed on the cultural resources, with the exception that sacred and ceremonial items, burial goods, and Native American human remains are excluded.
 - No cataloguing, analysis, or other studies may occur on human remains grave goods, and sacred and ceremonial items.
 - Any reburial processes shall be culturally appropriate and approved by the consulting Tribe(s).
 - Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.

MM TCR 4 Human Remains. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the “Most Likely Descendant”. The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains and any associated items as provided in Public Resources Code Section 5097.98.

Monitoring: Native American monitoring is required all initial ground disturbing activities, as detailed in **MM-TCR-2**.

Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS Would the project:				
40. Water	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Require or result in the relocation or construction of new or expanded water, wastewater				

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------	----------------------------------------------------	------------------------------	-----------

UTILITIES AND SERVICE SYSTEMS Would the project:

treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?

- | | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

Source(s): Kimley Horn 2020.

Findings of Fact:

a-b) No Impact. Project operations would not involve regular or continuous water use. With respect to the construction and decommissioning phases, water usage would include periodic application of water for site compaction and dust control purposes, consistent with SCAQMD regulations. Because dust control is necessary during windy and dry periods to prevent wind erosion and dust plumes, water would be applied in sufficient quantities to wet the soil, but not excessively. Water used on the project site would be brought in by truck, and thus would not require the construction of new or relocated water infrastructure.

Since 2000, the existing wind energy facility has operated 111 WTGs on a portion of the project site.¹⁰ The proposed project intends to replace 93 WTGS with 16 new WTGS. The proposed project would result in a considerable reduction in the number of turbine towers. For efficiency, the new towers would be situated near the current turbine footprints, allowing the existing roads to be utilized, to the extent possible, for the new construction and maintenance operations. As such, the proposed project would not require construction of new or expanded storm water drainage systems.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------	----------------------------------------------------	------------------------------	-----------

41. Sewer

- | | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

¹⁰ The 11 WTGs authorized by ROW Grant CACA-40057 are located on land that is not contiguous with the proposed project site, no changes to them are proposed by the project, and they are not part of the proposed project.

- | | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

Source(s): Kimley Horn 2020.

Findings of Fact:

a-b) No Impact. The proposed project would not generate wastewater that would require treatment at public wastewater treatment facilities. Portable restroom facilities would be used during construction and operation of the project in accordance with County regulations. The proposed project would not necessitate connection to the municipal sewer system, and no on- or off-site wastewater treatment would be required. Therefore, no impacts associated with the wastewater treatment capacity or facilities would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
42. Solid Waste				
a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): CalRecycle 2016, 2018.

Findings of Fact:

a-b) Less-Than-Significant Impact. As part of project construction activities, 93 existing WTGs would be decommissioned, and 43 existing utility poles would be replaced along the proposed overhead electrical collection system. As a result, some solid waste, such as metal, fiberglass, and concrete, would be generated. Consistent with applicable County regulations, a portion of construction waste would be recovered and salvaged as designated recyclable and reusable materials. As such, some demolition debris would be diverted from the landfill.

Solid waste that cannot be diverted would likely be taken to the landfills operated by the County. Based on proximity to the project site, the solid waste generated by the proposed project may be disposed of at the Edom Hill Transfer Station, located approximately 9.5 miles east of the project site. Solid waste deposited at the Edom Hill Transfer Station would ultimately be disposed of at the Lamb Canyon Landfill or the Badlands Landfill, located approximately 22

miles and 29 miles east of the project site, respectively. The Lamb Canyon Landfill has a maximum permitted throughput of 5,000 tons/day and is anticipated to operate until 2029 (CalRecycle 2018). The Badlands Landfill has a maximum permitted throughput of 4,800 tons/day and is anticipated to operate until 2022 (CalRecycle 2016). In addition, any hazardous materials requiring disposal would be removed, transported, and disposed of according to all applicable laws and regulations.

The proposed project would comply with all applicable federal, state, and local agency regulations related to solid waste. In conjunction with applicable County requirements, the project applicant would submit a construction waste plan prior to demolition activities. Thus, the County would evaluate the proposed project for compliance with all applicable provisions, ensuring that any inconsistencies are satisfactorily resolved. Once operational, the proposed project would not result in any substantial solid waste disposal needs. Therefore, impacts associated with solid waste disposal and regulations would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------	----------------------------------------------------	------------------------------	-----------

43. Utilities

Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

a) Electricity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Natural gas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Communications systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Street lighting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Maintenance of public facilities, including roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Other governmental services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Section 18.41(d) of County WECS Ordinance 348.

Findings of Fact:

a-f) No Impact. The project involves decommissioning and removal of approximately 93 existing commercial WTGs and installation of 16 new commercial WTGs. No increase in the number of fulltime O&M personnel would be required as a result of the proposed project, and no new facilities would be constructed that would increase the existing demand on utilities.

To avoid contact or damage to buried wet and dry utilities, the construction contractor is required to contact Dig Alert (Underground Service Alert of Southern California) prior to the issuance of grading permits to ensure that pipelines are properly located. The project applicant would also be required to secure all appropriate amendments to ROWs or corresponding instruments from the Southern California Gas Company, SCE, Coachella Valley Water District, and other utilities.

Utility easements of record would be reviewed, and unauthorized disturbance would be prohibited by law.

The proposed project would not result in increased demand for electricity, natural gas, communication systems, street lighting, or other government services, nor physically impact utility infrastructure to a level that construction of new or expansion of existing facilities and services are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
WILDFIRE If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:				
44. Wildfire Impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside 2019b; CAL FIRE 2007.

Findings of Fact:

- a) **Less-Than-Significant Impact.** The proposed project would not alter emergency access in or out of the project site, nor within the surrounding vicinity. The majority of the vehicle and truck transports would be standard sized and would not result in blockages of local roadways. Construction could require temporary detours or blockages of local roadways during the

transportation of the oversized equipment for the 16 new WTGs. Any oversized trucks would require permits through Caltrans and would follow all safety requirements, such as CHP escorts, flaggers, and flashing lights.

Where feasible, the existing network of permanent on-site access roads would be retained and reused for the proposed project. In addition to the existing roads, new segments of permanent access roads would be constructed to accommodate the updated WTG layout. The new permanent access road layout would incorporate applicable federal and local standards regarding internal road design and circulation, particularly those provisions related to emergency vehicle access. In addition, the proposed circulation plan will be reviewed by the Riverside County Fire Department and Riverside County Sheriff's Department as a standard part of the County's review process.

Local roadways used by the project are not known to be part of an adopted or designated emergency evacuation route or plan. The Riverside County Emergency Operations Plan addresses wildfire as one of the most common hazard incidents faced by the County of Riverside. In the event of a wildfire emergency requiring evacuation and emergency vehicle access, the Riverside County Sheriff's Department would establish evacuation routes (County of Riverside 2019b). Project operation is expected to generate minimal daily traffic volumes and would not result in an increase in traffic volumes compared to existing conditions. Therefore, project operations are not anticipated to result in any temporary disruptions to travel lanes. Due to the temporary nature of construction activities and given that O&M activities would be similar to existing conditions, the proposed project is not anticipated to impair an adopted emergency response plan or evacuation plan, and impacts would be less than significant.

b-e) No Impact. The project site is located in State Responsibility Area lands classified as a Non-Very High Fire Hazard Severity Zone (CAL FIRE 2007). The project site is located in a relatively flat area adjacent to the San Jacinto Mountain range, with elevations ranging between 975 and 1,260 feet AMSL. The prevailing wind rose is from the west. Surrounding vegetation, another factor that contributes to the fire environment, consists of desert scrub habitats, disturbed habitat and developed land. As such, the project site and vicinity to not exhibit vegetation with presence of dense, dry fuels, that exacerbate wildfire risks.

Although the project site is within a Non-Very High Fire Hazard Severity Zone, a discussion of common public concerns associated with WTGs and wildfire has been included for informational purposes. Public concerns related to fire from wind energy facilities are often associated with the potential for tower collapse or rotor failure and blade throw (separation of the blade from the rotor). Excessive static stress, material fatigue, seismic activity, or ground settling can cause tower failure, collapse, or both. The likelihood of tower failure from excessive stress or material fatigue is very low, and tower collapse is uncommon (Uadiale 2014). If a WTG experiences excess speed, material fatigue, excessive stresses, or vibration from seismic ground shaking, there is the potential for a rotor blade to crack or dislocate from the WTG tower. Blade failures may occur due to extremely high winds and excess rotor speed. Commercial WTGs are equipped with safety and engineering features to prevent excess rotor speed. Routine inspection and maintenance of the project WTGs would greatly reduce the risk of mechanical failure.

The project would not alter wind patterns or fire behavior, nor would it result in vegetation that could exacerbate pollutant concentrations compared to existing conditions. Due to the project site's location outside of a High Fire Hazard Severity Zone and the safety equipment proposed

on all WTGs within the project site, the project would not increase wildfire risk over existing conditions. Therefore, implementation of the proposed project would not exacerbate wildfire risks in the project area.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:				
45. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): All sources previously identified in Section 3.IV.1 through Section 3.IV.44.

Findings of Fact:

- a) **Less-Than-Significant Impact with Mitigation Incorporated.** As concluded in Sections 3.IV.7 and 3.IV.8 of this document, all potential impacts discussed can be mitigated to a less-than-significant level for these resources.

As described in Section 3.IV.7(a), the proposed project would require ground disturbance within the CVMSHCP WFCA. To reduce impacts to modeled habitat in the WFCA, the project applicant will convey a 248.12-acre parcel, identified herein as the Set-aside Parcel, to the CVCC as a contribution to the CVMSHCP through implementation of **MM-BIO-1** for conservation of modeled species habitats, fluvial and aeolian sand transport, and biological corridors acreage. Furthermore, as described in this same section, the project is subject to a number of regulatory requirements and will implement other project design features to avoid or reduce potential impacts to biological resources.

As described in Section 3.IV.8, the proposed project would not result in impacts to any known historic or archaeological resources. Nonetheless, it is possible that archaeological resources would be encountered at subsurface levels during ground-disturbing construction activities. To reduce potential adverse effects to unknown archaeological deposits during project implementation, the County has determined conditions of approval are required, through implementation of **MM-CUL-1 through MM-CUL-3**.

The County determined the project has potential to affect Tribal Cultural Resources based on information provided to the County during Native American consultation, pursuant to AB 52.

Implementation of **MM-TCR-1 through MM-TCR-4** would ensure that any potential impacts to any previously unidentified Tribal Cultural Resources are reduced to less-than significant levels.

Implementation of the proposed project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

Mitigation and Other Measures: Implementation of **MM-BIO-1, PDF-BIO-1 through PDF-BIO-3, RR-BIO-1 through RR-BIO-7, MM-CUL-1 through MM-CUL-3, and MM-TCR-1 through MM-TCR-4** are required.

Monitoring: Implementation of **PDF-BIO-3, MM-CUL-1, and MM-TCR-2** are required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
46. Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): All sources previously identified in Section 3.IV.1 through Section 3.IV.44.

Findings of Fact:

a) **Less-Than-Significant Impact with Mitigation Incorporated.** The proposed project is a repowering of an existing wind energy facility, with minimal to no change in existing conditions, other than temporary impacts associated with construction activities and potential impacts associated with ground disturbance outside the disturbed area of the existing wind energy facility. As described in Section 2, the project site is located within the San Gorgonio Pass Wind Energy Policy Area, which is developed with over 1,500 existing WTGs (U.S. Wind Turbine Database 2020). Other wind repower projects proposed or approved within the San Gorgonio Pass area considered here include the Mesa Wind Repower Project (Mesa Wind), Alta Mesa Wind Project (Alta Mesa), Painted Hills Wind Energy Repowering Project (Painted Hills), and Coachella Wind Holdings Repower Project (Coachella Wind). Furthermore, cumulative information from a range of studies/projects was provided in the Bird and Bat Conservation Strategy (BTR Appendix D), and include San Gorgonio Wind Resource Area, Coachella Flats, Smoke Tree, Dillon, Painted Hills, and Mountain View IV.

At build-out, the proposed project plus the past, present and reasonably foreseeable future wind repower projects may result in decommissioning of approximately 1,300 WTGs and installation of 69 new taller, more efficient WTGs. As analyzed throughout Section 3, the proposed project would have no impact on agriculture and forestry, mineral resources, population and housing, public services, and recreation. The proposed project would result in less-than-significant impacts or no impact to aesthetics, agriculture and forestry resources, air quality, energy, GHG emissions, hydrology and water quality, mineral resources, noise, population and housing,

~~public services, recreation, utilities and service systems, and wildfire. Impacts would be minimized or avoided through project design and compliance with existing policies or regulations. Mitigation would be required to reduce potentially significant impacts related~~ Specific to biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, paleontological resources, and transportation, and Tribal Cultural Resources, implementation of project design features, compliance with regulatory requirements, and mitigation would be required to reduce potentially significant impacts to less than significant levels. The information and analysis below includes cumulative impacts for projects whose impacts have potential to combine or overlap within those of the project, including wind projects within the already established San Gorgonio Pass Wind Energy Policy Area. The cumulative information is also provided with the understanding that for repower projects, the reasonable metric used includes a comparison of the change between existing baseline conditions (existing wind energy projects) and the proposed repowering of these existing projects, and where information, if any, is known or can be assumed.

Aesthetics. As discussed in Section 3.IV.1 of the Draft IS/MND, project impacts associated with scenic vistas, scenic resources, and visual character were determined to be less than significant. Recently constructed and proposed wind energy projects within the San Gorgonio Pass area are wind repower projects that would replace existing legacy WTGs with modern energy-efficient WTGs. While larger WTGs would replace existing WTGs, each would require their own assessment to determine significance as compared to the baseline (existing conditions). The established San Gorgonio Pass is intended to be developed with wind energy projects, but the total number of WTGs would be substantially reduced with repower projects and the layout of WTGs would result in greater spacing and less visual clutter. In addition, despite the increased scale and blade length, operation of the new WTGs and blades would display similar vertical lines and light gray colors as the existing WTGs and modern WTGs on nearby parcels. All construction/decommissioning activities for the proposed project would be of short duration, if observed from any one viewpoint. As such, In the context of, and in combination with, past, present, and reasonably foreseeable future projects, the proposed project would not incrementally contribute to a cumulatively considerable visual impact during construction, operation, or decommissioning.

Air Quality. As discussed in Section 3.IV.6(b) of the Draft IS/MND, project emissions associated with construction, operation, and future decommissioning would not exceed applicable SCAQMD regional thresholds for daily or annual pollutant emissions and would be less than significant. Potential fugitive dust impacts associated with other projects in the area would also be minimized through compliance with SCAQMD regulatory requirements. Per SCAQMD criteria, less-than-significant impacts at the project level are not cumulatively considerable (SCAQMD 2003) in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Biological Resources. The cumulative analysis for biological resources used the CVMSHCP coverage area as the geographic scope. The project site is within the CVMSHCP boundaries, and the species and associated habitats affected by construction of new WTGs (and decommissioning of existing WTGs) would be similar to those considered for all projects within the CVMSHCP boundaries. Specific to the CVMSHCP, projects cannot conflict with CVMSHCP as determined through the CEQA review process, and if located within a designated conservation area, projects such as the proposed project, are also subject to the JPR process.

Refer to Draft IS/MND Section 3.IV.7(a) for a discussion of the proposed project's consistency with the CVMSHCP as well as how project-specific potential impacts to biological resources are addressed. All other projects are subject to similar reviews for impacts to sensitive biological resources through compliance CEQA and CESA, or, if on BLM-administered lands, subject to the federal regulations. For projects subject to the CVMSHCP, note that this is an approved regional plan that, during this plan's approval and initiation, inherently considered cumulative impacts to the species and habitats it covers.

Specific to special status bird and bat species, construction and decommissioning activities of the existing WTGs within the project site would not be expected to contribute to bird and bat mortality. Similarly, other repower projects would not be expected to contribute to mortality during construction and decommissioning. Bird and bat impacts from operations were cumulatively considered within the proposed project's BBCS (BTR Appendix D). Biological resource data was compiled from several wind energy facilities with similar site characteristics in the vicinity (i.e. within 2 miles of the project site) of the project and conducted over the past 20 years in conjunction with the data obtained during the project's 2017-2018 fixed-point avian use surveys. The pre- and post-construction studies compiled from these wind energy facilities were reviewed and are summarized Table 2 and presented in Figure 3 of the BBCS.

Based on the relatively low levels of bat mortality observed at nearby projects and for the Pacific Southwest Region in general (BTR, Appendix D), significant project-related impacts to bat populations are not anticipated. Furthermore, based on the data available for the region, removal of 11 WTGs from the percolation ponds (with no replacement), and project-specific BBCS implementation, it is reasonable to assume that the project would not contribute to significant adverse impacts to any of special-status bat or bird species potentially present in the area. Nevertheless, as described in the proposed project BBCS, and consistent with recommendations in the Land-based Wind Energy Guidelines (WEG; USFWS 2012) and Eagle Conservation Plan Guidance (USFWS 2013), the BBCS was developed to address birds and bats through adaptive management. Although the WEG specifically focuses on greenfield site wind energy developments rather than repowering existing operational wind projects, guidance within the WEG provides a framework for risk assessment that can be adopted by repower projects. The BBCS uses that framework to assess risk to species. The WEG includes a tiered system (i.e., Tiers 1 through 4) that is used to evaluate and address potential impacts of wind energy developments on bird and bat species. Comprehensively applying the tiered approach embodies the adaptive management process as described in the WEG.

Implementation of the requirements set forth in the BBCS, including post-construction fatality monitoring and adaptive management (PDF-BIO-3) appropriately addresses potential impacts from proposed project operations. Similarly, other new wind and wind repower projects have been, and will continue to follow the same acceptable WEG framework or a similar framework, where required. For repower projects, such as the proposed project, that are implementing a BBCS, there are opportunities to use this data from operational wind energy facilities within the vicinity as well as project-specific data to predict potential impacts for this and other future projects. Furthermore, the current project's BBCS includes requirements for bird and bat mortality monitoring and adaptive management strategies that will continue to contribute to improving the understanding of bird and bat mortality during project operations.

Specific to jurisdictional waters, the proposed project will directly and indirectly avoid all state waters. Furthermore, all projects with impacts to state waters would be subject to permitting and would be required to mitigate impacts accordingly.

The proposed project would avoid, minimize, and/or mitigate all impacts to sensitive biological resources, including CVMSHCP-covered and non-CVMSHCP-covered species and habitats, through incorporation of PDF-BIO-1 through PDF-BIO-3, compliance with RR-BIO-1 through RR-BIO-7, as well as implementation of MM-BIO-1 (dedication of the Set-aside Parcel to conservation). With implementation of applicable PDFs, RRs, and MMs during decommissioning, construction, and operations, the project's incremental contribution to impacts on biological resources would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Cultural Resources. The majority of ground disturbance associated with the proposed project and other wind repower projects would occur within already disturbed areas. Ultimately, these wind repower projects include decommissioning of existing legacy WTGs and installation of fewer energy-efficient WTGs, which would result in an overall reduction in ground disturbance. As discussed in Section 3.IV.9, no known cultural resources were identified within the proposed area of disturbance. Potential inadvertent impacts to cultural resources would be avoided/minimized through preparation of a Cultural Resource Monitoring Program (CRMP) prior to ground disturbance; implementation of the CRMP, including construction monitoring; and, if necessary, artifact disposition prior to Grading Permit Final Inspection. Other wind repower projects in the vicinity include similar measures to avoid/minimize inadvertent impacts to cultural resources during ground-disturbing construction activities. Given that any recorded (known) cultural resources on other project sites are generally confidential, it's not possible to fully evaluate cumulative impacts in the area. Nevertheless, based on standard requirements for all projects to address these resources, known or unknown, the project's incremental contribution to impacts on cultural resources would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Energy. As discussed in Section 3.IV.10 of the Draft IS/MND, the proposed project would not result in wasteful consumption of energy during construction/decommissioning activities, and would generate an additional 25,794 MWh of energy per year during operations compared to the existing conditions. All cumulative wind repower projects in the area would result in energy efficient generation due to replacement of legacy turbines with modern energy-efficient WTGs. As such, the project would not contribute to a cumulatively considerable impact to energy resources.

Geology and Soils. Seismic hazards are rarely project-related. Implementation of the proposed project would not increase the likelihood of seismic events within the project area. Nevertheless, as discussed in Section 3.IV.11 through 3.IV.19 of the Draft IS/MND, the proposed project would minimize potential for seismic hazards to affect the proposed WTGs through compliance with the recommendations in the project-specific geotechnical design report. In addition, potential impacts associated with soil erosion would be minimized through compliance with applicable regulations, including the Construction General Permit. Other wind repower projects in the San Geronio Pass would be assumed to include similar measures and engineering/design, thus reducing the effects of any potential impacts associated with seismic hazards and soils. The proposed project, in combination with other past, present or reasonably foreseeable future projects, would not result in a cumulatively significant impact associated with geology and soils.

Hazards and Hazardous Materials. As discussed in Section 3.IV.21 of the Draft IS/MND, the proposed project would result in less-than-significant impacts associated with hazards and hazardous materials through compliance with various federal, state, and local laws, regulations, and policies. Other projects would also be required to implement and comply with standard hazardous materials laws, regulations, and policies. In addition, the proposed project would not interfere with emergency responders on local roadways because no additional vehicle trips would be generated during project operation compared to existing conditions. Furthermore, during project decommissioning and construction, interference with emergency responders would be avoided through implementation of a Traffic Control Plan, as approved by the County. Therefore, the project's contribution to impacts associated with hazards and hazardous materials would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Hydrology and Water Quality. As discussed in Section 3.IV.23 of the Draft IS/MND, a portion of the proposed project is located in the 100-year floodplain, but the proposed project would not alter drainage patterns in a way that would incrementally contribute to a cumulative increase in off-site drainage or impacts to designated flood zones because overall ground disturbance would be reduced as compared to existing conditions. The proposed project would also result in less-than-significant impacts associated with water quality through compliance with federal, state, and local laws, regulations, and policies. Furthermore, as discussed in Section 3.IV.7(f), the proposed project would directly and indirectly avoid all state and federal jurisdictional waters. Other projects would also be expected to comply with applicable laws, regulations, and policies. The project's contribution to impacts associated with water quality would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Land Use and Planning. The project site and the other cumulative wind energy projects are located within the San Geronio Pass Wind Energy Policy Area, established by Riverside County, attributable to favorable conditions for wind energy generation. As discussed in Section 4.IV.24(a), Land Use/Planning, the proposed project would comply with all applicable land use plan, policy, or regulations. Similar to the proposed project, all projects in the area must comply with applicable land use plans during the permitting phase or mitigate potential environmental impacts due to conflicts with a land use plan. As such, the proposed project would not incrementally contribute to a cumulative environmental impact through required consistency with all applicable land use plans, policies, and regulations adopted for the purpose of avoiding, minimizing, or mitigating an environmental effect.

Noise. As discussed in Section 3.IV.27, due to the distance of the disturbance area from the closest receptor, the proposed project would not generate noise or vibrations in exceedance of County noise thresholds during construction, operation or decommissioning activities that could negatively affect sensitive receptors. As such, the proposed project would not incrementally contribute to a cumulatively considerable impact.

Paleontological Resources. The proposed project and other wind energy projects in the area are repower projects that generally reduce ground disturbance by removing more turbines than are subsequently replaced. As discussed in Section 3.IV.28 of the Draft IS/MND, the proposed project would minimize impacts to unknown buried paleontological resources with preparation of a Paleontological Resources Impact Mitigation Program (PRIMP) prior to ground disturbance and implementation of this PRIMP, including monitoring during construction. Other projects in

the vicinity are similarly required to analyze the specific site conditions and implement measures to minimize impacts to paleontological resources. Therefore, the project's contribution to impacts on paleontological resources would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Transportation. As discussed in Section 3.IV.37, project operations would not generate new vehicle trips during operation. During project construction, temporary transportation impacts would be mitigated through implementation of a Traffic Control Plan approved by the County. In addition, other wind energy projects in the vicinity generally do not generate traffic during operation but must adhere to similar measures to avoid transportation impacts during construction activities. As such, the proposed project would not incrementally contribute to a cumulatively considerable impact.

Tribal Cultural Resources. The proposed project and other wind energy projects in the area, considered in the cumulative analysis are repower projects that generally reduce ground disturbance by removing more WTGs than are subsequently replaced. As discussed in Section 3.IV.39 of the Draft IS/MND, the proposed project would minimize impacts to unknown buried TCRs with implementation of Native American construction monitoring; compliance with procedures for inadvertent discovery of TCRs; appropriate artifact disposition; and correct handling of human remains pursuant to PRC Section 5097.98. All of these types of discretionary projects are subject to AB 52 Tribal consultation. Therefore, the project's incremental contribution to impacts on TCRs would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Utilities and Service Systems. The proposed project would have no impact on water, wastewater and stormwater infrastructure. As discussed in Section 3.IV.42 of the Draft IS/MND, solid waste generated during decommissioning of existing WTGs and construction activities would be minimized through implementation of a Recycling Plan approved by the County. The proposed project and other cumulative projects would be required to comply with applicable federal, state and local regulations pertaining to solid waste. Therefore, the project's contribution to impacts on solid waste resources would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Wildfire. As discussed in Section 3.IV.42 of the Draft IS/MND, the project site is not within a fire hazard severity zone. As such, the project's short-term contribution to wildfire risk during construction activities would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Summary. Based on the analysis in this document, the project's contribution to environmental impacts would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects. As such, cumulatively considerable impacts associated with the proposed project would be less than significant with mitigation incorporated.

Mitigation and Other Measures: Implementation of **MM-BIO-1, PDF-BIO-1 through PDF-BIO-3, RR-BIO-1 through RR-BIO-7, MM-CUL-1 through MM-CUL-3, MM-GEO-1, RR-GEO-1, RR-GEO-2, MM-HAZ-1, MM-PAL-1 through MM-PAL-3, and MM-TRA-1, and MM-TCR-1 through MM-TCR-4** are required.

Monitoring: Implementation of **PDF-BIO-3, MM-CUL-1, MM-PAL-2, and MM-TCR-2** are required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
47. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): All sources previously identified in Section 3.IV.1 through Section 3.IV.44.

Findings of Fact:

- a) **Less-Than-Significant Impact with Mitigation Incorporated.** Direct and indirect environmental effects on human beings were analyzed in numerous sections of this Initial Study. As analyzed throughout Section 3, the proposed project would result in less-than-significant impacts or no impact to aesthetics, air quality, energy, greenhouse gas emissions, hydrology and water quality, noise, population and housing, and wildfires. Effects on human beings would be minimized or avoided through project design and compliance with applicable federal, state, and local policies and regulations. For example, the County would require the project applicant to comply with the CAP and SCAQMD rules and regulations, as applicable. Mitigation would be required to reduce potentially significant impacts on human beings associated with geology and soils, hazards and hazardous materials, land use and planning, and transportation. With implementation of **MM-GEO-1**, the project would be designed and constructed in conformance with all recommendations as specified in the County Geotechnical Investigation Design Report No. 200044 and any subsequently prepared geotechnical/soils reports prepared for the proposed project. As discussed in Section 3.IV.22, the Riverside County ALUC determined that the proposed project would not affect aircraft operations in the area with incorporation of multiple conditions, through compliance with **MM-HAZ-1**. To avoid impacts to the circulation system during construction activities, the applicant would be required to prepare and implement a Traffic Management Plan, through implementation of **MM-TRA-1**. As such, the proposed project would not result in environmental effects that would cause substantial adverse effects on human beings, and impacts would be less than significant.

Mitigation: Implementation of **MM-GEO-1**; **MM-HAZ-1**, and **MM-TRA-1** are required.

Monitoring: No monitoring is required.

V. EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

Earlier Analyses Used, if any: Commercial WECS Permit Nos. 103 and 107

Location Where Earlier Analyses, if used, are available for review:

County of Riverside Planning Department
4080 Lemon Street 12th Floor
Riverside, California 92501

VI. AUTHORITIES CITED

- APLIC (Avian Power Line Interaction Committee). 2012. "Reducing Avian Collisions with Power Lines. The State of the Art in 2012." October 2012. Accessed March 15, 2021. https://www.aplic.org/uploads/files/11218/Reducing_Avian_Collisions_2012watermarkLR.pdf.
- ALUC (Riverside County Airport Land Use Commission). 2005. *Riverside County Airport Land Use Compatibility Plan*. March 2005.
- California Department of Public Health. 2018. *Epidemiologic Summary of Coccidioidomycosis in California, 2018*. Accessed October 2020. <https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/CocciEpiSummary2018.pdf>.
- CAL FIRE (California Department of Forestry and Fire Protection). 2007. "Fire Hazard Severity Zones in SRA. Western Riverside County." Adopted November 7, 2007.
- Cal OES (California Office of Emergency Services). 2005. 2005 – HazMat Spill Report Data.
- CalRecycle (California Department of Resources Recycling and Recovery). 2016. "Badlands Sanitary Landfill Solid Waste Facilities Permit." May 10, 2016.
- CalRecycle. 2018. "Lamb Canyon Sanitary Landfill Solid Waste Facilities Permit." July 31, 2018.
- Caltrans (California Department of Transportation). 2019. "List of eligible and officially designated State Scenic Highways." Accessed September 28, 2020.
- CARB (California Air Resources Board). 2008. *Climate Change Scoping Plan: A Framework for Change*. December 2008. Accessed October 2020. <http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm>.
- CARB. 2014. *First Update to the Climate Change Scoping Plan Building on the Framework Pursuant to AB 32 – The California Global Warming Solutions Act of 2006*. May 2014. Accessed August 2017. http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.
- CARB. 2017. *The 2017 Climate Change Scoping Plan Update*. November 2017. Accessed June 2018. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.
- CDFW (California Department of Fish and Wildlife). 2020. "California Natural Diversity Database (CNDDDB)." RareFind, Version 5.2.14 (Commercial Subscription). Sacramento, California: CDFW, Biogeographic Data Branch. Accessed August 2020. <http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>.
- CNPS (California Native Plant Society). 2020. "Inventory of Rare, Threatened, and Endangered Plants of California (online edition, version 8-03 0.39)." Sacramento, California: CNPS, Rare Plant Program. Accessed August 2020. <http://www.rareplants.cnps.org/>.
- CNRA (California Natural Resources Agency). 2009. *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97*. December 2009.

- County of Riverside. n.d. "Map My County GIS Database." Accessed November 2020.
- County of Riverside. 2015a. *Riverside County General Plan. Circulation Element*. December 8, 2020.
- County of Riverside. 2015b. *Riverside County General Plan. Multipurpose Open Space Element*. December 8, 2015.
- County of Riverside. 2015c. *Riverside County General Plan. Noise Element*. December 8, 2015.
- County of Riverside. 2016. "Riverside County Williamson Act FY 2015/2016 (Sheet 1 of 3) Map" [map].
- County of Riverside. 2018. *Riverside County General Plan. Air Quality Element*. July 17, 2018.
- County of Riverside. 2019a. *Western Coachella Valley Area Plan*. December 2019.
- County of Riverside. 2019b. *Riverside County General Plan. Safety Element*. August 6, 2019.
- County of Riverside. 2019c. *Climate Action Plan Update*. November 2019. Accessed October 2020. https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf.
- County of Riverside. 2020. *Riverside County General Plan. Land Use Element*. August 4, 2020.
- County of Riverside. 2020b. Business Plans. Accessed November 11, 2020. <https://www.rivcoeh.org/OurServices/HazardousMaterials/HazardousMaterialsDisclosure> .
- County of Riverside. n.d. Map My County. Accessed November 2020.
- Curlee, E. 2020. "Valley Fever." Email between E. Curlee (County of Riversides) and A. Poll (Dudek). October 29, 2020.
- CVAG (Coachella Valley Association of Governments). 2016. *Coachella Valley Multiple Species Habit Conservation Plan*. As amended August 2016. Accessed August 2020. http://www.cvmshcp.org/Plan_Documents_old.htm#plan.
- CVAG. 2017a. *Transportation Project Prioritization Study*. Prepared by Michael Baker International. https://www.cvag.org/library/pdf_files/trans/Transportation_Documents/CVAG%20TPPS%202017-04-27%20rev2017-06-26.pdf.
- CVAG. 2017b. *2017 Traffic Census Report*. 2017.
- DOC (Department of Conservation). n.d. "Department of Conservation Farmland Mapping and Monitoring Program Important Farmland Finder." Accessed October 6, 2020.
- DOC. 2019. "EQ Zapp: California Earthquake Hazards Zone Application." Updated April 4, 2019. Accessed October 8, 2020. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.
- DOT (U.S. Department of Transportation). 2006. *FHWA Highway Construction Noise Handbook*. Final Report. FHWA-HEP-06-015. DOT-VNTSC-FHWA-06-02. Cambridge, Massachusetts: DOT, Research and Innovative Technology Administration. August 2006.

- DTSC (Department of Toxic Substance Control). 2020. "Envirostor Database." Accessed October 13, 2020. <https://www.envirostor.dtsc.ca.gov/public/>.
- EIA (U.S. Energy Information Administration). 2019. "California, State Profile and Energy Estimates. Total Petroleum Consumption Estimates, 2017." Accessed May 17, 2019. https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US&sid=CA.
- EPA (U.S. Environmental Protection Agency). 2020. "Enforcement and Compliance History Online." Accessed October 13, 2020. <https://echo.epa.gov/>.
- FAA (Federal Aviation Administration). 2018. "Advisory Circular. Obstruction Marking and Lighting." August 17, 2018.
- FEMA (Federal Emergency Management Agency). 2008a. "Flood Insurance Rate Map. Panel 06065C0890G." Effective August 28, 2008.
- FEMA. 2008b. "Flood Insurance Rate Map. Panel 06065C0870G." Effective August 28, 2008.
- FHWA (Federal Highway Administration). 2006. Construction Noise Handbook. August 2006.
- Hallingstad E.C., P.A. Rabie, A.C. Telander, J.A. Roppe, and L.R. Nagy. 2018. "Developing an Efficient Protocol for Monitoring Eagle Fatalities at Wind Energy Facilities." *PLoS ONE* 13(12): e0208700. <https://doi.org/10.1371/journal.pone.0208700>.
- Hein et al. 2013. Hein, C.D., J. Gruver, and E.B. Arnett. (2013) Relating pre-construction bat activity and post-construction bat fatality to predict risk at wind energy facilities: a synthesis. A report submitted to the National Renewable energy Laboratory. Bat Conservation International, Austin, TX, USA.
- Huso M, T. Conkling, D. Dalthorp, et al. (2020). Relative energy production determines effect of repowering on wildlife mortality at wind energy facilities. *J Appl Ecol.* 2021;00:1– 7. <https://doi.org/10.1111/1365-2664.13853>
- Kimley Horn. 2020. 30% Civil Engineering Plans for Access Roads, Drainage, Erosion Control, and Wind Turbines. Mountain View I & II. October 2, 2020.
- Kunz et al. 2007. Kunz, T. H., E. B. Arnett, W. P. Erickson, A. R. Hoar, G. D. Johnson, R. P. Larkin, M. D. Strickland, R. W. Thresher, and M. D. Tuttle. 2007. Ecological Impacts of Wind Energy Development on Bats: Questions, Research Needs, and Hypotheses. *Frontiers in Ecology and the Environment* 5(6): 315–324.
- Liguori, J. 2005. Hawks from Every Angle: How to Identify Raptors in Flight. Princeton University Press, Princeton, New Jersey.
- Lintott et al. 2016. Lintott, P., S. Richardson, D. Hosken, S. Fensome, and F. Mathews. (2016). Ecological impact assessments fail to reduce risk of bat casualties at wind farms. *Current Biology*, 26, R1135– R1136.

- McCary et al. 1983. McCrary, M. D., R. L. McKernan, R. E. Landry, W. D. Wagner, and R. W. Schreiber. 1983. Nocturnal avian migration assessment of the San Gorgonio wind resource study area, spring 1982. Report prepared for Research and Development, Southern California Edison Company. 121 pp.
- McCary et al. 1984. McCrary, M. D., R. L. McKernan, R. E. Landry, W. D. Wagner, and R. W. Schreiber. 1984. (As cited in Anderson et al. 2005.) Nocturnal avian migration assessment of the San Gorgonio wind resource study area, fall 1982. Report prepared for Research and Development, Southern California Edison Company.
- McCary et al. 1986. McCrary, M. D., R. L. McKernan, and R. W. Schreiber. 1986. (As cited in Anderson et al. 2005.) San Gorgonio wind resource area: Impacts of commercial wind turbine generators on birds, 1985 data report. Prepared for Southern California Edison Company. 33 pp.
- Pagel, J., K. Kritz, B. Millsap, R. Murphy, E. Kershner, and S. Covington, Scott. 2013. "Bald Eagle and Golden Eagle Mortalities at Wind Energy Facilities in the Contiguous United States." *Journal of Raptor Research* 47:311–315.
- SCAG (Southern California Association of Governments). 2016. *The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. April 2016. <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>.
- SCAG. 2020. *Connect SoCal*. Adopted September 3, 2020. Accessed October 2020. <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>.
- SCAQMD (South Coast Air Quality Management District). 1993. *CEQA Air Quality Handbook*.
- SCAQMD. 2009. *Final Localized Significance Threshold Methodology*. Revised July 2009.
- SCAQMD. 2017. *Final 2016 Air Quality Management Plan*. March 2017. <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>.
- SCE (Southern California Edison). 2019. *Sustainability Report 2019*. April 2019. Accessed October 2020. <https://www.edison.com/content/dam/eix/documents/sustainability/eix-2019-sustainability-report.pdf>.
- Solick et al. 2020. Solick, D., D. Pham, K. Nasman, and K. Bay. Bat activity rates do not predict bat fatality rates at wind energy facilities. 2020. *Acta Chiropterologica*, 22(135– 146), 112.
- Stantec Consulting, Inc. (Stantec). 2017. Comparison of Pre-construction Bird/Bat Activity and Post-construction Mortality at Commercial Wind Projects in Maine. Prepared for Maine Renewable Energy Association. March 2017.
- SVP (Society of Vertebrate Paleontology). 2010. "Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources." <http://vertpaleo.org/PDFS/68/68c554bb-86f1-442f-a0dc-25299762d36c.pdf>.

SWRCB (State Water Resources Control Board). 2010. 2009-000—DWQ Construction Stormwater General Permit. July 1, 2010.

SWRCB. 2020. "GeoTracker Database." Accessed October 13, 2020. <https://geotracker.waterboards.ca.gov/>.

The Climate Registry. 2020. "Default Emission Factors." April 2020. Accessed October 2020. <https://www.theclimateregistry.org/wp-content/uploads/2020/04/The-Climate-Registry-2020-Default-Emission-Factor-Document.pdf>.

Tidhar et al. 2010. Tidhar, D., C. Nations, and D.P. Young. What Have We Learned from Pre-Construction Radar Studies? Presented at the National Wind Coordinating Collaborative (NWCC) Wildlife and Wind Research Meeting VIII. October 19-21, 2010. Lakewood, Colorado.

Uadiale, S., E. Urbán, R. Carvel, D. Lange, and G. Rein. 2014. "Overview of Problems and Solutions in Fire Protection Engineering of Wind Turbines." In *Fire Safety Science: Proceedings of the Eleventh International Symposium*, edited by D. Nilsson, P. van Hees, and R. Jansson, 983–995. Christchurch, New Zealand: International Association for Fire Safety Science and the University of Canterbury. <https://doi.org/10.3801/IAFSS.FSS.11-983>.

U.S. Wind Turbine Database. July 2020. Accessed August 2020. <https://eerscmap.usgs.gov/uswtdb/viewer/#3/37.25/-96.25>

USFWS. 2008. "Environmental Assessment to Implement a Desert Tortoise Recovery Plan Task: Reduce Common Raven Predation on the Desert Tortoise." March 2008. Accessed November 2020. <https://www.fws.gov/carlsbad/PalmSprings/DesertTortoise/Raven%20EA%20Final%203-08.pdf>

USFWS. 2013. *Eagle Conservation Plan Guidance. Module 1 - Land-Based Wind Energy*. Version 2. Division of Migratory Bird Management, USFWS. April 2013. http://www.fws.gov/migratorybirds/Eagle_Conservation_Plan_Guidance-Module%201.pdf

USFWS. 2015. Federal Fish and Wildlife Take Permit for the Coachella Valley MSHCP Permittees. Amendment effective December 8, 2015.

USFWS. 2016. Eagle Permits; Revisions to Regulations for Eagle Incidental Take and Take of Eagle Nests; Final Rule. 50 CFR 13 and 22. Department of the Interior Fish and Wildlife Service. 81 Federal Register (FR) 242: 91494-91554. December 16, 2016. USGS (U.S. Geological Survey). 2014. Evidence of Absence Software. Data Series 881. Prepared by D. Dalthorp, M.M.P. Huso, D. Dail, and J. Kenyon. <https://pubs.er.usgs.gov/publication/ds881>.

Revised: 6/24/2021 2:50 PM
Y:\Planning Master Forms\Templates\CEQA Forms\EA-IS_Template.docx

INTENTIONALLY LEFT BLANK

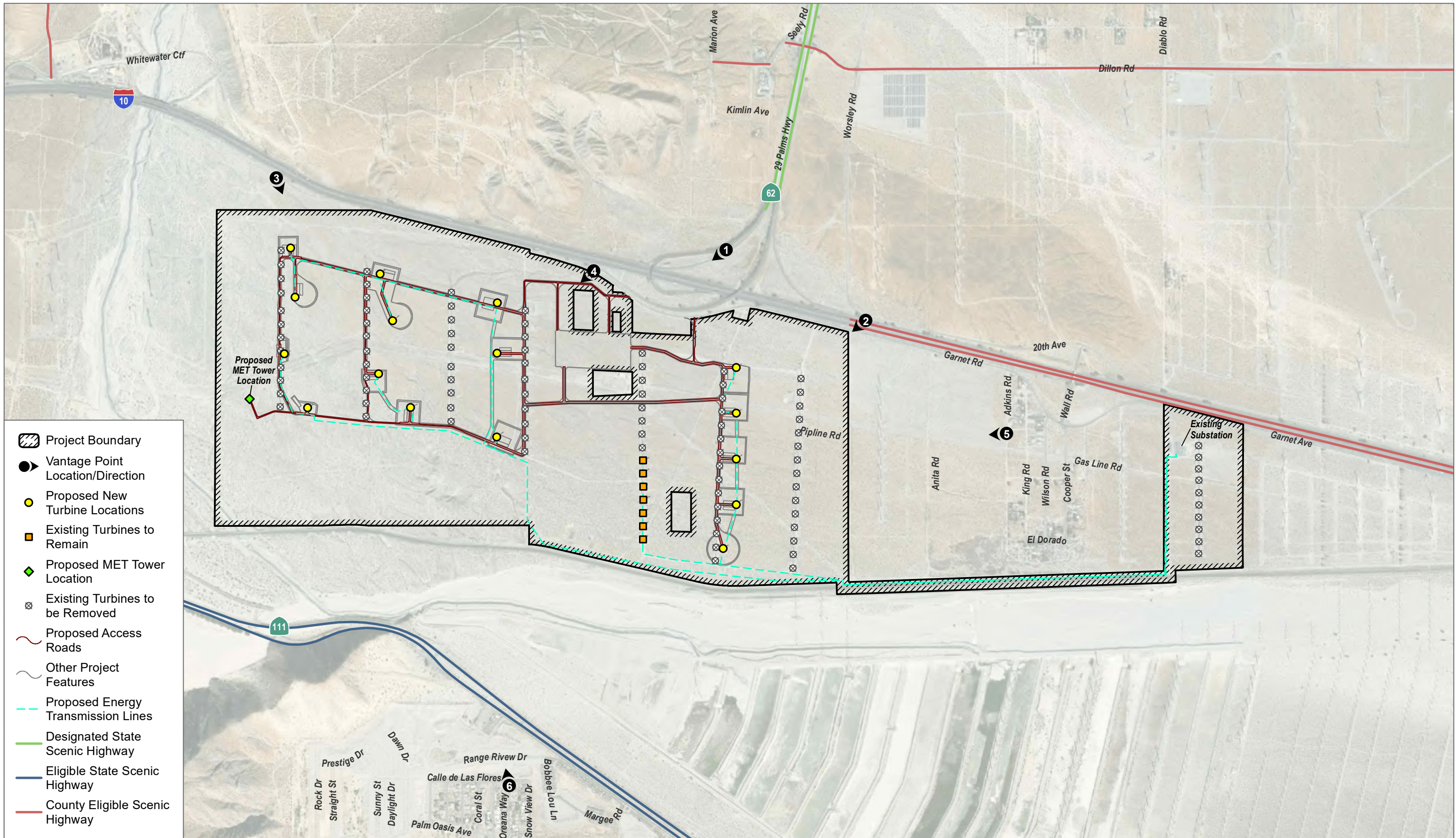


FIGURE3-1

Photosimulation Vantage Points

Mountain View Power Partners Wind Repower Project

INTENTIONALLY LEFT BLANK



View southeast from southbound SR-62 towards Project Site (existing conditions)

Note: Portions of approximately 38 existing wind turbines are visible beyond the southbound SR-62 to eastbound I-10 access ramp/bridge.

Z:\Project\15166001\MapDocs\DOCUMENT\WIND

INTENTIONALLY LEFT BLANK



View southeast from southbound SR-62 towards Project Site (proposed conditions)

Note: Portions of 10 new wind turbines are visible. All existing wind turbines in view at VP1 would be removed.

Z:\Project\15166001\MapDocs\DOCUMENT\WIND

INTENTIONALLY LEFT BLANK



View southwest from I-10 towards Project Site and San Jacinto Peak (existing conditions)

Note: Portions of approximately 47 existing wind turbines are visible to the south of I-10.

Z:\Project\156500\MAP\DOC\DOCUMENT\WIND

INTENTIONALLY LEFT BLANK



View southwest from I-10 towards Project Site and San Jacinto Peak (proposed conditions)

Note: Six new wind turbines are visible. All but seven existing wind turbines in the VP2 view would be removed.

Z:\Project\156500\MAP\DOC\DOCUMENT\WIND

INTENTIONLLY LEFT BLANK



View southeast from dirt segment of Gamet Road towards Project Site and western Coachella Valley (existing conditions)

Note: Numerous wind turbines are visible from VP3 and are scattered across the valley floor.

Z:\Project\15166001\MapDocs\DOCUMENT\WIND

INTENTIONALLY LEFT BLANK



View southeast from dirt segment of Garnet Road towards Project Site and western Coachella Valley (proposed conditions)

Note: Most existing wind turbines on Project Site removed. Twelve new wind turbines are visible.

Z:\Project\15166001\MapDocs\DOCUMENT\WIND

INTENTIONALLY LEFT BLANK



View southwest from Garnet Road towards Project Site (existing conditions)

Note: Portions of 31 existing wind turbines are visible. Most do not rise above the ridge line of background mountains.

Z:\Project\1706000\MAP\DOC\DOCUMENT\WIND

INTENTIONALLY LEFT BLANK

INTENTIONALLY LEFT BLANK

INTENTIONALLY LEFT BLANK



View west from Adkins Road to Project Site (proposed conditions)

Note: All but 7 existing wind turbines on the Project Site visible from VP 5 under existing conditions are removed. All 16 new wind turbines are visible.

Z:\Project\15166001\Map\DOC\DOCUMENT\WIND

INTENTIONALLY LEFT BLANK



View north from Oreana Way towards Project Site (located approximately 0.9 mile away)



Existing Turbines Visible from Vantage Point 6

Z:\Project\1046000\MAP\DOC\DOCUMENT\IND

INTENTIONALLY LEFT BLANK



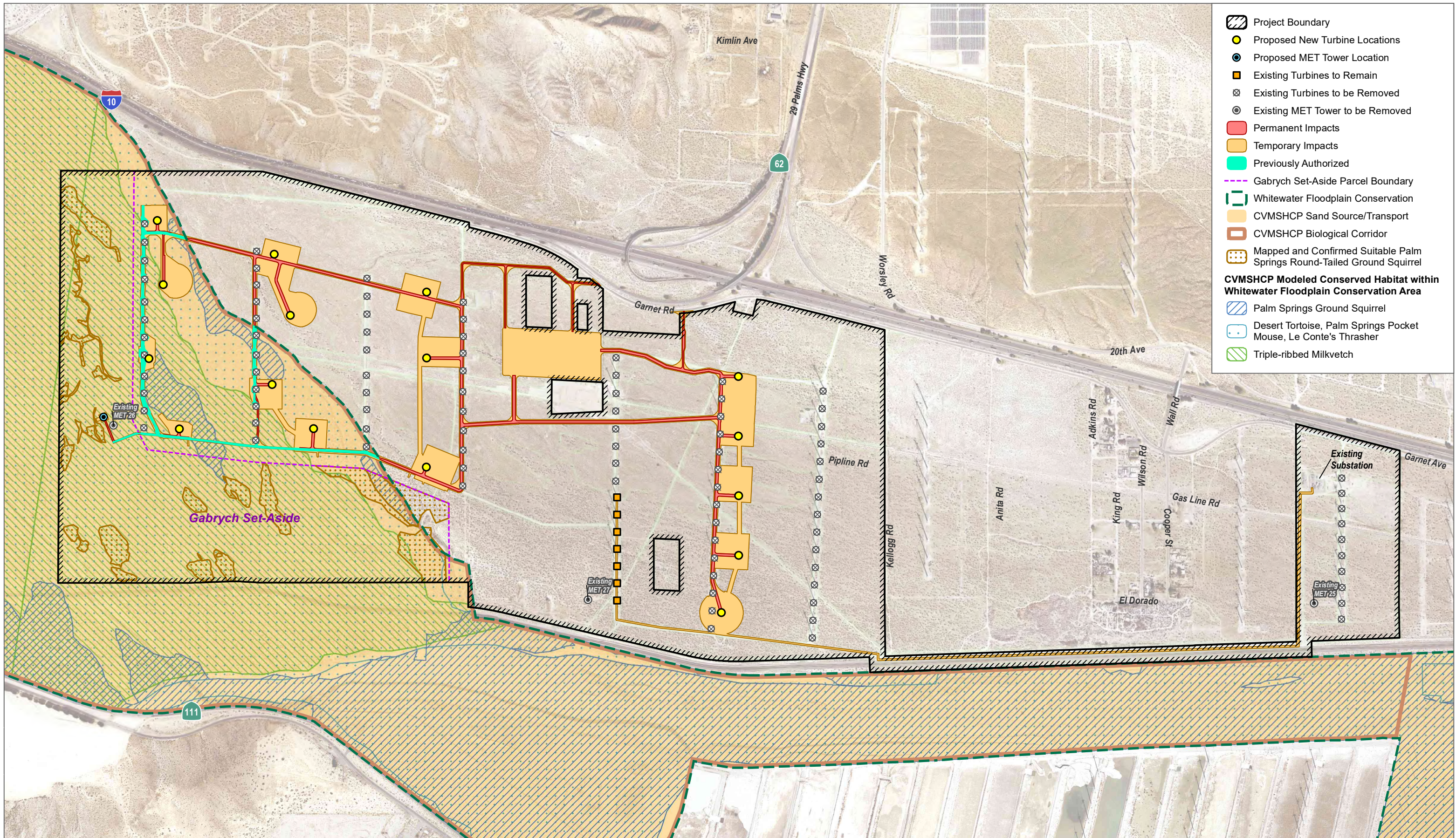
View north from Oreana Way towards Project Site (proposed conditions)



Proposed Turbines Visible from Vantage Point 6

Z:\Project\15166001\MAP\DOC\DOCUMENT\IND

INTENTIONALLY LEFT BLANK

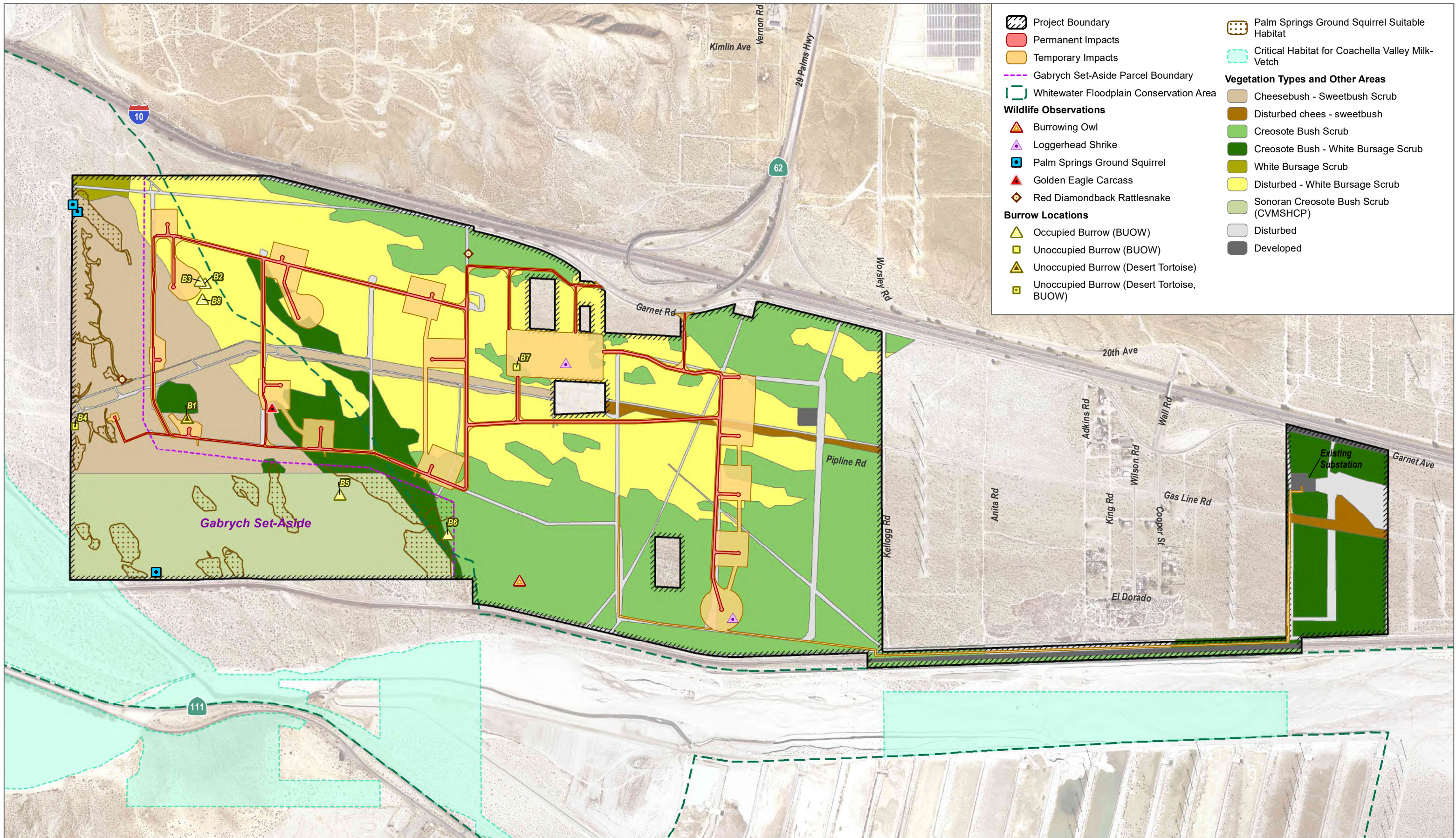


- Project Boundary
- Proposed New Turbine Locations
- Proposed MET Tower Location
- Existing Turbines to Remain
- Existing Turbines to be Removed
- Existing MET Tower to be Removed
- Permanent Impacts
- Temporary Impacts
- Previously Authorized
- Gabrych Set-Aside Parcel Boundary
- Whitewater Floodplain Conservation
- CVMSHCP Sand Source/Transport
- CVMSHCP Biological Corridor
- Mapped and Confirmed Suitable Palm Springs Round-Tailed Ground Squirrel
- CVMSHCP Modeled Conserved Habitat within Whitewater Floodplain Conservation Area**
- Palm Springs Ground Squirrel
- Desert Tortoise, Palm Springs Pocket Mouse, Le Conte's Thrasher
- Triple-ribbed Milkvetch

SOURCE: Aerials by Riverside County 2016

FIGURE 3-8
Project Impacts - CVMSHCP
 Mountain View Power Partners Wind Repower Project

INTENTIONALLY LEFT BLANK



SOURCE: Aerials by Riverside County 2016

FIGURE 3-9

INTENTIONALLY LEFT BLANK