

## EXECUTIVE SUMMARY

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This section provides a summary of the Draft Environmental Impact Report (EIR) for the proposed Gonzaga Ridge Wind Repowering Project (proposed Project). Included in this summary are areas of known controversy and issues to be resolved, a summary of project alternatives, a summary of all project impacts and associated mitigation measures, and a statement of the ultimate level of significance after mitigation is applied.

### ES.1 DOCUMENT PURPOSE

This EIR was prepared by the California Department of Parks and Recreation (CDPR), as lead agency, to inform decision makers and the public of the potential significant environmental effects associated with the proposed Project. This EIR has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970 (California Public Resources Code, Section 21000 et seq.) and the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines; 14 CCR 15000 et seq.) published by the Public Resources Agency of the State of California.

The purpose of this EIR is to focus the discussion on those potential effects on the environment resulting from implementation of the proposed Project which the lead agency has determined may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce significant environmental impacts or avoid significant environmental impacts.

### ES.2 PROJECT LOCATION

The Project site is located in western Merced County and includes land leased from CDPR located in the eastern portion of Pacheco State Park (Park) on approximately 1,766 acres. The Park is located on State Route 152 (SR-152), that connects two major north-south arteries—Interstate 5 (I-5), which is 16 miles to the east, and U.S. Highway 101 (US 101), which is approximately 30 miles to the west. The Park is generally equidistant between the cities of Gilroy and Los Banos and is an approximate two-hour drive from San Francisco (see Figures 2-1 and 2-2 in Chapter 2, Project Description).

### ES.3 PROJECT DESCRIPTION

#### Project Background

In 1992, 6,900-acres of former ranchland located along the south side of Pacheco Pass off SR-152 was bequeathed by the former owner, Paula Fatjo, to CDPR. Ms. Fatjo was a direct descendant of Francisco Pacheco, a holder of Mexican-period land grants in the area whose family held its lands through five generations. Fatjo's ranch was a portion of El Rancho San Luis Gonzaga, originally granted in 1843 to Francisco Pacheco's son, Juan Perez Pacheco. Pacheco State Park was opened to the public in 1997 and honors the wishes of Ms. Fatjo as described in her will to advance State

Parks goals for resource protection, quality visitor experience, and education in the form of various types of recreation.<sup>1</sup> Prior to her death in 1992, Ms. Fatjo agreed to a 25-year lease to allow up to 200 wind turbines to be installed across the ridgelines in the eastern portion of the current Park to harvest and transform wind funneled through the pass into electrical energy to be sold to Pacific Gas & Electric with an income generated to be used for development of the Park (166 turbines were installed and presently 162 remain).

The CDPR selected Gonzaga Ridge Wind Farm, LLC (GRWF or Applicant) through a Request for Proposal process to replace the existing wind energy facility with more modern and efficient wind turbines. The Project would consist of the decommissioning and removal of the existing wind turbines and overhead energy collection system and the installation of modern wind turbines and associated infrastructure, with a generating capacity of up to approximately 100 MW. In contrast to the originally permitted 166 turbines, the Project would consist of up to only 40 turbines (see Figure 2-4, Project Site and Facilities Map in Chapter 2). Project components would also include ancillary facilities such as construction laydown areas, access roads, underground and overhead collector lines and associated equipment, an operations and maintenance (O&M) facility, meteorological or MET tower(s), relocation of a communications tower, relocation of existing transmission line poles, upgrades to the existing Dinosaur Point Tap or existing switchyard, upgrades to the Los Banos Substation, storage sheds, battery storage facility, and an electrical substation and associated substation components. The Project would also include the continued use of a 70 kV transmission line that follows a path from the current wind farm that is located west and north of the San Luis Reservoir, to the existing switchyard located to the northwest. An additional 70 kV transmission line (New Transmission Line) would also be constructed on land owned by the Bureau of Reclamation (BOR), Merced County property, as well as some privately- owned property connecting to the Los Banos Substation. Figure 2-3 in Chapter 2 depicts the proposed location of the New Transmission Line alignment, within the Project site, that connects to the Los Banos Substation. The New Transmission Line would be approximately 16 miles long with power poles up to approximately 120-foot tall.

### **ES.3.2 Project Objectives**

Project objectives allow for the analysis of reasonable alternatives to the proposed Project. Reasonable alternatives must be analyzed in accordance with Section 15126.6 of the CEQA Guidelines.

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<sup>1</sup> Pacheco State Park General Plan and Environmental Impact Report SCH No. 2003121089. May 2006. Sacramento, California.

The project objectives are as follows:

- Assist California in meeting its target of 100 percent carbon-free electricity by 2045 (Senate Bill 100) and reducing greenhouse gas emissions to 1990 levels by 2020 (California Global Warming Solutions Act of 2006/Assembly Bill 32).
- Continue production of wind energy within Pacheco State Park to generate income to advance the goals of CDPR for resource protection, quality visitor experience, and education in the form of various types of recreation.
- Replace outdated wind turbine infrastructure and reduce the total number of turbines and overall Project footprint on CDPR lands with state-of-the-art facilities to achieve increased performance, lower cost, higher reliability, longer service life, and reduction in risk to avian species, especially raptors.
- Optimize the use of previously disturbed land within Pacheco State Park by replacing the existing wind turbines.

### **ES.3 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Table ES-1, Summary of Environmental Impacts and Mitigation Measures, provides a summary of the impact analysis and a summary of environmental impacts resulting from implementation of the Project pursuant to CEQA Guidelines Section 15123(b)(1). For a more detailed discussion of Project impacts, please see Chapter 2 of this EIR and the Initial Study included in Appendix B. Table ES-1 also lists the level of significance of an impact prior to mitigation and lists all applicable mitigation measures identified for significant impacts, as well as providing the level of significance after mitigation. The following topics were evaluated in the Initial Study and impacts were determined to be less than significant (or less than significant with mitigation): Air Quality, Agriculture and Forestry Resources, Cultural Resources, Land Use, Geology, Soils and Mineral Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise and Vibration, Population and Housing, Public Services and Recreation, Public Utilities, and Tribal Cultural Resources. Therefore, these topics are not addressed in the EIR and not summarized in Table ES-1. Please see Chapter 4, Effects Found not to be Significant for a summary of the topics determined to not result in any significant effects.

## **ES.4 AREAS OF CONTROVERSY / ISSUES TO BE RESOLVED**

Section 15123(b) (2) of the CEQA Guidelines requires that areas of controversy known to the lead agency must be stated in the executive summary prepared as part of the EIR. Issues of interest to the public and public agencies were identified during the 30-day public comment period for the Notice of Preparation (NOP).

Written comments in response to the NOP were received from the following agency and organizations:

- U.S. Fish and Wildlife Service
- Native American Heritage Commission

The NOP and comment letters received during the NOP review period are included in Appendix A of this EIR.

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR identify issues to be resolved; this includes the choice among alternatives and whether or how to mitigate significant impacts. The major issues to be resolved for the Project include concerns regarding impacts to avian species.

**Table ES-1  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
<i>3.1 Aesthetics</i>			
3.1-1: Implementation of the proposed Project may adversely affect a scenic vista.	LTS	None required.	LTS
3.1-2: Implementation of the proposed Project may damage scenic resources within a state scenic highway.	LTS	None required.	LTS
3.1-3: Implementation of the proposed Project may degrade the existing visual character or quality of the site and the surrounding area.	LTS	None required.	LTS
3.1-4: Implementation of the proposed Project may create a new source of substantial light or glare that could adversely affect day or nighttime views in the area.	LTS	None required.	LTS
3.1-5: The proposed Project could contribute to cumulative changes affecting a scenic resource, or to an existing viewshed and visual character of the area.	LTS	None required.	LTS
<i>3.2 Biological Resources</i>			
3.2-1: Implementation of the proposed Project may have a substantial adverse effect, either directly or through habitat modifications, on 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 Game or U.S. Fish and Wildlife Service.	PS	<p><b>Special-status plant species</b></p> <p><b>BIO-1: Special-status plant surveys.</b> In those areas where ground disturbance activities associated with Phase II of the Project, including the New Transmission Line, will occur within habitat potentially supporting special-status plant species, focused surveys for special-status plant species shall be conducted by a qualified CDPR approved botanist according to the CNPS Botanical Survey Guidelines (CNPS 2001); and shall follow the Protocols for Surveying and Evaluating Impacts to Special Status Native Populations and Natural Communities (CDFG 2009); and the U.S. Fish and Wildlife Services General Rare Plant Survey Guidelines (Cypher 2002) prior to the commencement of grading/construction-related activities wherever areas that are suitable for occupation could be affected by direct or indirect impacts. The surveys shall be conducted in the blooming season prior to commencement of construction-related activities within suitable habitat areas, and the surveys shall be conducted at a time of year when the plants can be located and identified.</p> <p><b>BIO-2: Habitat and plant avoidance.</b> Should special-status plant species be documented within proposed grading or other ground-disturbance areas associated with the New Transmission Line, avoidance measures shall be implemented to minimize indirect impacts to individual plants, wherever feasible. These measures can include the following:</p> <ul style="list-style-type: none"> <li>a. Adjustments to the limits of grading boundaries to confine work to avoid populations of special-status plants by at least 50 feet or as otherwise determined by a qualified botanist and in consideration of the type and extent of ground disturbance, potential for indirect impacts following ground disturbance activities, topography, and other factors.</li> <li>b. Prior to construction activities, a qualified botanist shall flag the location of special-status plant populations and the corresponding avoidance special-status plant setback. This flagging shall be in addition to, and distinguished apart from, any required construction boundary fencing.</li> </ul> <p><b>BIO-3: Biological Awareness Training.</b> Prior to the initiation of construction activities associated with both phases of development within the Project site, a qualified CDPR approved biologist shall conduct an onsite biological awareness training session, as part of an overall project orientation program, with construction personnel to inform them of the special-status resources in the Project Area. As new construction personnel join the construction crews throughout the project construction phase, additional biological awareness training sessions shall be conducted by the biologist. The initial and subsequent training sessions shall include, at a minimum, the following:</p> <ul style="list-style-type: none"> <li>a. A discussion of the special-status species and resources potentially occurring within and adjacent to ground-disturbance areas;</li> <li>b. Dissemination of short handouts (including photos/depictions as appropriate) describing these species and resources, including protective status and penalties for violation of state and/or federal laws and regulations protecting certain species;</li> <li>c. Information regarding the types of microtrash that could be ingested by condors and the need to keep work areas free of microtrash.</li> <li>d. Avoidance measures being implemented on the Project site to avoid/minimize potential impacts to various species and biological resources.</li> <li>e. Steps to take should such special-status plant or wildlife species be observed by onsite construction personnel and contact information for communicating sightings or issues.</li> </ul> <p>All attendees shall fill out a sign-in sheet. The training program shall also be recorded and subsequently shown to any construction personnel who are not able to attend the initial or subsequent training programs.</p>	LTS

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		<p><b>Special-Status Wildlife Species</b>  <b>Western pond turtle, California tiger salamander, California red-legged frog, western spadefoot</b></p> <p><b>BIO-4: Species avoidance plan.</b> Prior to ground disturbance associated with Phase I of the Project within or immediately adjacent to where each of these species could occur, a qualified biologist shall prepare a Species Avoidance Plan that addresses each of these four species. The plan shall include appropriate measures, activities, and best management practices to be implemented prior to and during construction and ground-disturbance activities that, when implemented, shall ensure that no direct or indirect impacts to these species will occur. The plan, which will also apply to Phase II of the Project, shall be submitted to the California Department of Fish and Wildlife and California State Parks and Recreation for review. Measures in the plan shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> <li>a. Conducting ground-disturbance activities as great a distance from breeding habitat as feasible.</li> <li>b. Conducting pre-construction surveys in upland habitat likely to support burrow habitat potentially utilized by these species. The surveys shall be conducted by a qualified biologist and all potential burrows shall be flagged and/or fenced to note areas to be avoided, at a setback distance determined by the biologist, during ground-disturbance activities.</li> <li>c. Conducting onsite monitoring by a qualified biologist during Project construction, maintenance, and decommissioning activities that disturb surface soils within upland habitat/burrows that could potentially be used by these species as determined by the biologist.</li> <li>d. Establishing exclusion fencing around construction sites to exclude individual animals within suitable upland habitat from entering active construction zones.</li> <li>e. Restricting vehicle traffic to established roads, staging areas, and parking areas.</li> <li>f. Capping construction pipes, culverts, conduits and similar structures stored onsite to prevent entrapment of any animals seeking shelter and covering trenches at night to prevent animals from being trapped in the trench.</li> <li>g. The use of Best Management Practices to prevent sediment, pollutants/chemicals, and erosion from construction activities from entering suitable aquatic habitats on the Project site. These can include, but are not limited to, silt fencing, sterile hay bales, and temporary sediment disposal.</li> </ol> <p><b>Northern California legless lizard, San Joaquin coachwhip, Blainville's horned lizard</b></p> <p><b>BIO-5: Pre-construction surveys.</b> Within 14 days of ground disturbance that will occur within suitable habitat for these species for both phases of Project development, pre-construction surveys shall be conducted by a qualified biologist to search for individuals within and immediately adjacent to the proposed disturbance area. Visual searches shall include overturning rocks, bark, and other debris. If more than 14 days lapse between the time of the pre-construction survey and the start of ground-disturbing activities, another pre-construction survey must be completed.</p> <p>If individual animals are found in the disturbance zone, individuals shall be captured and relocated to nearby suitable areas, as determined by the qualified biologist. If the animals cannot be captured, all trenches, bores, and other excavations shall be sloped at a 3:1 ratio at the ends to provide wildlife escape ramps, or covered completely at the end of each work day, or if not in use, to prevent wildlife access.</p> <p>Onsite monitoring by a qualified biologist shall be conducted during Project construction and ground disturbance activities that occur within upland habitat areas determined by the biologist to potentially support these species. If individuals of these species are observed by construction personnel within a trench or elsewhere within the construction area, the biologist shall be contacted and no vehicles or equipment shall be moved until the animal has left voluntarily or is removed by the biologist.</p> <p><b>Golden and bald eagles</b></p> <p><b>BIO-6: Golden eagle nest surveys and setbacks.</b> The following measures associated with pre-construction surveys shall be implemented by a qualified eagle biologist with expertise in the identification and life history of eagles and the construction contractor.</p> <ol style="list-style-type: none"> <li>1. Before construction-related activities begin on the Project site and during the golden eagle breeding season (January 15 through August 31), pre-construction surveys (ground, aerial, or both) shall be conducted within 0.50-mile of the disturbance area perimeter to ascertain the status of all known breeding territories and, through March 31, to search for potential new nesting activities within the relevant survey area. Such surveys shall be conducted by a qualified eagle biologist no more than 30 days before construction-related activity is scheduled to begin. As egg-laying occurs in the region in February and March (see, e.g., Dixon 1937; Hunt et al. 1995, 1999), after March 31, it can be assumed that no new nesting will occur, and no further pre-construction surveys shall be required, if the status of nesting activities in a relevant area has already been confidently ascertained to that point in time.</li> <li>2. If pre-construction surveys reveal adult golden eagles actively tending a nest site between January 15 and March 31, or an active nest (eggs or young present) any time between January 15 and August 31, the following shall occur:             <ol style="list-style-type: none"> <li>a. A 0.25-mile no-activity setback shall be established around the nest site if the construction activity is within the viewshed of the nest. If the work area is not within direct view of the nest, the no-disturbance buffer can be closer, as determined by the biologist in consideration of existing conditions including ambient noise, topography, type and extent of the activity, and time of year. Nest buffer boundaries within the Project site shall be identified by the use of orange construction fencing or similar highly visible fencing/flagging material as approved by the eagle biologist. Once the no disturbance buffer is established, no further construction-related activity shall be allowed within that buffer area until the biologist determines that either no</li> </ol> </li> </ol>	

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		<p>nestlings will occur (i.e., no eggs laid as of March 31), the nest has failed, or the nesting cycle is complete and all fledglings have dispersed and no longer dependent upon the nest. If golden eagles decide to re-nest at the site in subsequent years, despite the proximity of the Project, they shall be allowed to do so and no additional mitigation shall be required.</p> <p>b. Construction-related activities that involve major landscape alterations (e.g., excavation, grading, or tree removal activities that encompass more than 5 acres), operation of heavy equipment (e.g., large excavators and dump trucks), or activities that otherwise result in frequent or repetitive loud noises (e.g., pile driving or use of chain saws) should preferentially occur outside of the breeding season (September 1 through January 14), if within visible range (up to 0.25 mile) of an occupied breeding territory.</p> <p>c. Following site-specific reviews by a qualified golden eagle biologist, the prescribed no-disturbance setbacks may be adjusted to reflect existing conditions, including ambient noise, topography and landscape screening, and the nature of disturbance. Such evaluations may, for example, support allowance of light construction-related activity closer than 0.25 mile out of the viewshed range of a nest.</p> <p><b>BIO-7: Management practices and measures to minimize onsite impacts and attractants to the site.</b> The following practices and design measures shall be implemented to minimize elements that could serve to attract eagles (and condors and other raptors) to the Project site and to minimize the potential for turbine collisions:</p> <p>a. Turbine construction shall minimize cutting into hill slopes to achieve smooth rounded terrain, rather than sudden berms or cuts, to reduce prey abundance.</p> <p>b. Rocks unearthed during the excavation process shall be used during construction of foundations or hauled off site and disposed of properly, and not be left in piles near turbines to avoid providing cover for prey.</p> <p>c. Discourage small mammals and reptiles from burrowing under or near turbine bases by placing gravel at least 5 feet around each tower foundation.</p> <p>d. To avoid collisions with support wires, all meteorological towers shall be un-guyed, unless evidence is provided that topography, safety, access and/or climate conditions prohibit free standing towers. If guyed towers are necessary, appropriate bird deterrents on the wires shall be installed.</p> <p>e. Alter or reduce vegetative cover within 50 m (164 feet) of active turbines to reduce eagle/raptor predation near each turbine. Such vegetation alteration shall only occur where appropriate and feasible and with concurrence of a qualified biologist in order that such alteration/reduction shall not adversely affect other special-status species or resources.</p> <p>f. Remove any medium to large mammal carcasses (e.g., wild pig, domestic cattle, deer, elk) within the Project site, within 24 hours of discovery, to a designated burial location (or to the nearest County landfill site that accepts dead livestock) far enough from wind turbines so as not to present a risk to eagles and condors foraging on the carcasses. If the carcass is in a deteriorated condition or otherwise cannot be moved, it can be covered with soil or buried at the observed location.</p> <p>g. Immediately clean up all spills of ethylene glycol which can attract California condors.</p> <p>h. Ensure regular efforts are made to eliminate all microtrash (i.e., broken glass, paper and plastic waste, small pieces of metal such as screws, nuts, and bolts, bottle caps, pop-tops, PVC pipe fragments, etc.) at and near all construction as well as operations/maintenance work sites.</p> <p>i. Minimize night lighting during construction by using shielded directional lighting that is pointed downward thereby avoiding illumination to adjacent natural areas and the night sky.</p> <p><b>BIO-8: Post-construction mortality monitoring.</b> After Phase I of the Project is operational, GRWF shall retain a qualified wildlife biologist to perform monthly mortality monitoring for one year to determine the level of incidental injury and mortality to populations of avian or bat species, particularly eagles and other raptors, associated with turbine collisions on the Project site. Based on a review of the monitoring data, GRWF shall consult with USFWS and CDFW to determine whether or not additional monitoring shall be necessary for Phase 1 and/or Phase II once those turbines become operational. The monitoring shall also include the following:</p> <p>a. A qualified wildlife biologist shall conduct mortality monitoring using a statistically significant sample size of operational turbines within the Project site.</p> <p>b. The mortality monitoring shall follow standardized guidelines outlined by the California Energy Commission and California Department of Fish and Wildlife (CEC and CDFG, 2007) and the United States Fish and Wildlife Service (USFWS 2016).</p> <p>c. At a minimum, the mortality monitoring shall include but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• species number, location, and distance from the turbine for each recovered bird or bat, availability of prey for raptor species found, and apparent cause of mortality;</li> <li>• number of annual avian and bat mortalities per turbine sampled; and</li> <li>• removal of dead carcasses to prevent carrion-consuming birds of prey from being attracted to the Project site.</li> </ul> <p>d. If a state- or federally-listed Threatened or Endangered species is found during any of the mortality monitoring periods, all appropriate information shall be collected, including photographs of the carcass, and the CDFW or USFWS shall be contacted as soon as possible to determine the appropriate course of action.</p> <p>e. An annual mortality monitoring report submitted to the USFWS and CDPR that documents all methods and results of the monitoring.</p> <p>After post-construction monitoring data have been obtained, GRWF shall review the data and, in consultation with the USFWS and the CDFW, determine which, if any, specific turbines generate disproportionately high levels of avian mortalities (based on evidence of statistically significant higher levels of mortality relative to other turbines). If specific turbines are found to</p>	

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Environmental Impact	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>result in disproportionately high avian mortalities, GRWF shall consult with USFWS and CDFW to evaluate any feasible measures that can be implemented to reduce or avoid mortalities at those specific turbines. During the mortality monitoring, additional 800-meter avian use counts shall be conducted to identify avian use, particularly of eagles and raptors, potentially utilizing the re-powered Project site and to compare with pre-construction avian point counts. The point counts shall be conducted by a qualified avian biologist twice a month at the same point count stations and utilizing the same data methods as conducted during the pre-construction survey. An annual report shall be prepared that describes the methods and results of the avian use counts for that survey year.</p> <p><b>BIO-9: Avian Power Line Interaction Committee Standards for New Transmission Line.</b> To minimize the potential for collision and electrocution to eagles, California condors, and other raptor species, the New Transmission Line shall incorporate the transmission line and tower component separation standards, as well as recommendations to reduce collision risk, included in these standards to minimize/avoid electrocution of eagles and other raptors (including California condors) attempting to perch or nest on the towers, and to avoid collisions with transmission lines between towers during low-level flights. These design standards typically address configuration and spacing of transmission lines, use of line marking devices/diverters, and appropriate spacing of electrical components affixed to towers/poles. The latest published Avian Power Line Interaction Committee standards and guidelines shall be used.</p> <p><b>BIO-10: Bird and Bat Conservation Strategy.</b> The Project applicant, GRWF, shall retain a qualified avian and bat biologist to develop a Bird and Bat Conservation Strategy (BBCS) to address Project impacts to special-status avian and bat species and shall submit the plan to the USFWS for review prior to initiation of proposed construction associated with Phase I. The BBCS shall be prepared in accordance with the interim guidance provided by USFWS (2010) and shall include methods and results of avian and bat surveys conducted at the Project site; a risk assessment associated with potential collisions with proposed turbines and electrocution (associated with the proposed New Transmission Line); potential avoidance, minimization, and mitigation measures to address this risk; methods and protocols associated with post-construction monitoring; and adaptive management actions that can be taken based on the monitoring results.</p>	
		<p><b>White-tailed kite and northern harrier</b></p> <p><b>BIO-11: Pre-construction bird nest surveys.</b> A nesting bird survey shall be completed by a qualified biologist if construction, ground disturbance, and/or vegetation trimming/removal activities are scheduled to occur during the breeding season (March 1-August 30 for most native bird species in this region) to determine if any native birds protected by the federal Migratory Bird Treaty Act and/or the California Fish and Game Code are nesting within the disturbance area or within 200 feet of the disturbance area. If any active nests are observed during surveys, a suitable avoidance buffer from the nests shall be determined by the qualified biologist. The avoidance buffer distance shall consider such factors as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.</p> <p><b>California condor</b> Implementation of Mitigation Measures BIO-3, BIO-7, BIO-8, BIO-9, and BIO-10</p> <p><b>Pallid bat, western mastiff bat, and western red bat</b></p> <p><b>BIO-12: Bat roost pre-construction surveys.</b> The Project applicant, GRWF shall retain a qualified avian and bat biologist to implement the following measures to avoid and minimize impacts to bat day roosts, maternity roosts, and individuals of the pallid bat, western mastiff bat, and western red bat:</p> <ol style="list-style-type: none"> <li>1. Surveys for roosting bats shall be conducted during the maternity season (March 1 to July 31) for any construction or ground disturbance that occurs within 300 feet of rocky outcrops or other habitat capable of supporting bat nursery colonies. These areas shall be surveyed by a qualified bat biologist and shall include a minimum of one (1) day and one (1) evening visit.</li> <li>2. Should an active maternity roost be identified, the roost shall not be disturbed and vegetation- and/or ground-disturbing activities within 300-feet shall be postponed or halted until the roost is vacated and juveniles (if a maternity roost) have fledged, as determined by the qualified bat biologist. This avoidance measure shall be applied to all bat species, including special-status and non-special-status species.</li> <li>3. No earlier than 30 days prior to the commencement of vegetation- and ground-disturbing activities associated with the Project site, a qualified biologist shall conduct pre-construction surveys of identified trees to be removed to determine if active day roosts of bats are present within the trees to avoid the potential of harm or mortality to individual bats.</li> <li>4. If a day roost (or winter roost) is found in trees or in rock outcrop crevices within or immediately adjacent to the disturbance footprint, the individuals shall be safely evicted under the direction of the qualified bat biologist. If individuals cannot be safely evicted from a winter roost due to factors such as cold temperatures or lack of alternative roosting sites, as determined by the qualified bat biologist, vegetation- and/or ground-disturbing activities within 300-feet of the roost shall be postponed or halted until conditions are suitable for safe eviction or the roost is vacated naturally.</li> </ol>	
		<p><b>American badger</b></p> <p><b>BIO-13: Pre-construction surveys.</b> GRWF shall implement the following measures to avoid and minimize impacts to American badgers and active dens.</p> <ol style="list-style-type: none"> <li>1. No earlier than 30 days prior to the commencement of vegetation- and ground-disturbing activities, a qualified biologist shall conduct pre-construction surveys to determine if active American badger dens are present on or within 100-feet of the Project disturbance zone.</li> </ol>	



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		<p>2. If an active den, as determined by the qualified biologist, is located, the den shall be flagged and the biologist shall determine if the den is a maternity den or non-maternity den. If a non-maternity den, construction shall be halted within 50 feet of the den until the badger has left the den on its own accord, as determined by the biologist. At that point the den can be collapsed and construction can continue. If the den is determined by the biologist to be an active maternity den, then construction shall be halted and a no-disturbance buffer of 100 feet established around the den until all pups have matured to the point of leaving the den and the den is determined by the biologist to be vacated by both young and adults. At that point, the den can be collapsed and construction can continue.</p> <p><b>San Joaquin kit fox</b></p> <p><b>BIO-14: Pre-construction surveys.</b> GWRF shall implement the following measures to avoid and minimize impacts to the San Joaquin kit fox and active dens.</p> <ol style="list-style-type: none"> <li>1. No earlier than 90 days prior to the commencement of vegetation- and ground-disturbing activities, a qualified biologist shall conduct pre-construction den surveys within suitable habitat along the proposed New Transmission line alignment and within 200 feet of the alignment to determine if any burrows or dens potentially used by San Joaquin kit fox are present.</li> <li>2. If likely dens are located, the den shall be flagged and the biologist shall determine the status of the den pursuant to USFWS protocols and definitions for San Joaquin kit fox (USFWS 1999) and appropriate avoidance measures taken pursuant to USFWS protocols (USFWS 2011). For dens determined to be “known” or “natal” dens (as defined by USFWS 1999), den avoidance measures include establishing construction exclusion zones around burrows/dens potentially used by kit foxes pursuant to the exclusion zone design and setback distances defined in USFWS 2011, shall be implemented. The exclusion zones shall be maintained until all construction related disturbances have been terminated.</li> </ol> <p><b>BIO-15: San Joaquin kit fox avoidance plan.</b> Pursuant to a meeting with the USFWS in August 2018, GWRF shall retain a qualified biologist to prepare a San Joaquin kit fox take avoidance plan that shall include the following: (1) a description of the pre-construction surveys discussed above for burrow/dens within/immediately adjacent to the New Transmission Line alignment potentially used by San Joaquin kit fox, and (2) USFWS-documented avoidance measures (and any others that GRWF proposes) that minimizes/avoids the potential for take of this species in the unlikely event individual kit foxes do occur within the eastern-most portion of the New Transmission Line alignment during construction.</p>	
3.2-2: Implementation of the proposed Project may have a substantial adverse effect on riparian habitat or other sensitive natural community identified in regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.	LTS	None required.	LTS
3.2-3: Implementation of the proposed Project may 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.	LTS	None required.	LTS
3.2-4: Implementation of the proposed Project may have a cumulative adverse effect on biological resources when viewed in connection with the effects of other past, present or future projects.	LTS	None required.	LTS
<i>3.3 Transportation and Circulation</i>			
3.3-1: Implementation of the proposed Project under Existing plus Project conditions could degrade operations at the SR-152/Dinosaur Point Road intersection.	S	None available.	SU
3.3-2: Implementation of the proposed Project could increase VMT throughout the duration of the project construction.	LTS	None required.	LTS
3.3-3: Delivery trucks associated with the proposed Project could increase hazards or result in incompatible uses along SR-152 and at the SR-152/Dinosaur Point Road intersection.	S	<b>TRAFF 1:</b> Prior to receiving an Encroachment Permit and a Transportation Permit from Caltrans, the applicant (GRWF), or their Delivery contractor, shall prepare an Oversized Vehicle Transportation and Delivery Plan that identifies the types of oversized vehicles required to transport wind turbine equipment, travel route(s) on state highways and local roadways, requirements for turning radii, height and weight requirements, and any other relevant information. This Plan shall be reviewed by Caltrans and affected local agencies, and approved by Caltrans and affected local agencies to ensure the safe transport of oversized Project materials. This Plan shall be used to obtain proper permits required by Caltrans and affected local agencies.	LTS

**Table ES-1  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
3.1-4: Implementation of the proposed Project under Cumulative plus Project conditions could contribute to unsatisfactory operations at the SR-152/Dinosaur Point Road intersection under cumulative conditions.	S	None available.	SU
<i>Initial Study</i>			
a. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 (of the CEQA Guidelines)?	S	<p><b>CUL-1</b> Prior to commencing construction activities, construction workers shall be alerted to the potential to encounter sensitive historic-era or prehistoric archaeological material. Information detailing what these resources could look like shall be provided as part of an environmental sensitivity training. This information can be provided as a handout or in person. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. This work exclusion buffer may be adjusted by the qualified archaeologist in consultation with the lead agency. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. Prior to any disturbing investigative techniques, the feasibility of resource avoidance shall be considered. If the discovery proves significant, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.</p> <p><b>CUL-2</b> During ground disturbing activities associated with construction of the turbines, Operations &amp; Maintenance building, substation, New Transmission Line, and any underground utilities within 300 feet of any waterways, caves, springs or known archaeological sites, the Project contractor shall coordinate with CDPR staff to contact the Amah Mutsun Tribal Band to provide on-site monitors during these activities. The Project contractor shall retain an archaeological consultant to provided Archaeological monitoring in these areas. Archaeological and Native American monitoring shall occur in these areas.</p>	LTS
d. 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?	S	<b>HAZ-1</b> The Health and Safety Plan (HSP) prepared by the Project (construction contractor) shall include procedures for identification and management of hazardous materials/wastes. The HSP shall include information on how to detect and identify potentially contaminated soils and groundwater (e.g., visual and olfactory) and health and safety measures that shall be implemented should contaminated materials be present and proper management and reporting procedures. Contaminated materials shall be managed and disposed of in accordance with federal, state and local regulations.	LTS

S=Significant LTS = Less than Significant SU = Significant and Unavoidable N/A = not applicable

## **ES.5 SUMMARY OF PROJECT ALTERNATIVES**

Section 15126.6 of the CEQA Guidelines identifies the parameters within which consideration and discussion of alternatives to a project should occur. As stated in this section of the guidelines, alternatives must focus on those that are reasonably feasible and that attain most of the basic objectives of the project. Each alternative should be capable of avoiding or substantially lessening any significant effects of the project. The rationale for selecting the alternatives to be evaluated and a discussion of the No Project Alternative are also required, per Section 15126.6.

### **ES.5.1 Alternatives Evaluated**

This EIR includes an evaluation of the following alternatives:

- Alternative 1 - No Project Alternative
- Alternative 2 – Smaller Footprint Alternative

#### **Alternative 1 - No Project Alternative**

The No Project Alternative assumes that the Project would not be developed and the current wind energy facility would remain and not be altered.

Although this alternative would not meet the objectives identified for the Project, CEQA requires an alternative that forgoes the Project be analyzed.

#### **Alternative 2 – Smaller Footprint Alternative**

Under Alternative 2, fewer, larger wind turbines could be installed for the Project. Using larger turbines would reduce the total number of wind turbines from 40 to the low 20s. Other components of the Project, such as roads and collection lines, could be reduced under this alternative. It is generally assumed that because fewer turbines would be installed there would be somewhat less site disturbance. However, decommissioning of the existing wind farm would still be required under this alternative so there would be site disturbance associated with these activities.

## **ES.6 Environmentally Superior Alternative**

Table ES-2, Comparison of Impacts of the Alternatives, provides a summary of the alternatives impact analysis considered in the EIR and identifies the areas of potential environmental effects per CEQA, and ranks each alternative as better, the same, or worse than the Project with respect to each issue area.

**Table ES-2  
Comparison of Impacts of the Alternatives**

Environmental Issue Area	Project	Alternative 1 – No Project	Alternative 2 – Smaller Footprint
Aesthetics	LTS	▼	▼
Biological Resources	LTS	▼	▼
Traffic and Circulation	SU	▼	—

△ Alternative is likely to result in greater impacts to issue when compared to Project.

— Alternative is likely to result in similar impacts to issue when compared to Project.

▼ Alternative is likely to result in reduced impacts to issue when compared to Project.

LTS/MM = Less than significant impact with mitigation, LTS = Less than significant impact, SU=Significant and Unavoidable

As indicated in Table ES-2, Alternative 1, the No Project Alternative would result in the fewest environmental impacts, and subsequently would be considered the environmentally superior alternative. However, Section 15126.6(e)(2) of the CEQA Guidelines states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Of the alternatives evaluated above, Alternative 2 was found to be the environmentally superior alternative because it is feasible and reduces impacts associated with biological resources. Alternative 2 was found to have a reduction in impacts related to aesthetics and biological resources. Alternative 2 also generally meets all of the Project objectives.