

**LIST OF PROJECT DESIGN FEATURES,
MITIGATION MEASURES, AND ENVIRONMENTAL
DESIGN CONSIDERATIONS**

The following provides a consolidated list of project design features (PDFs) and mitigation measures (M) for each environmental topic addressed in Chapter 2 and Chapter 3 of this Environmental Impact Report (EIR) for the Campo Wind Project with Boulder Brush Facilities (Project). Through an extensive environmental constraints analysis, the Project layout has been designed to avoid environmental impacts to the extent feasible. Chapter 1, Project Description, Location, and Environmental Setting, describes the Project and is used as the basis for the environmental analysis conducted. As outlined in Chapter 1, the following construction-related PDFs would be implemented as part of the Boulder Brush Facilities:

- PDF-CON-1** On-site access roads would be staked at the outermost perimeter of 40 feet, to ensure no Project personnel go beyond these boundaries. Stakes would be placed every 200 feet in accordance with industry standards. Additionally, on-site construction workers performing ground-disturbance activities would be equipped with GPS units that would clearly delineate the limits of grading.
- PDF-CON-2** Prior to construction of roadway improvements, the off-site, up to 30-foot roadway improvement boundaries would be marked by stakes every 200 feet in accordance with industry standards, to delineate the extent of allowed grading limits. Additionally, on-site construction workers performing ground-disturbance activities would be equipped with GPS units that would clearly delineate the limits of grading.
- PDF-CON-3** Prior to the issuance of a grading permit for Boulder Brush Facilities, the Worker Environmental Awareness Program (WEAP) training for on-site personnel would be submitted for approval to the County. The County may require additional information to be added to the WEAP training, and must approve the finalized WEAP training prior to its implementation. All Boulder Brush Facilities personnel would be required to attend the WEAP training prior to working on site and monthly updated lists, to include full name, phone number, and position/company of personnel who have received the WEAP training, would be provided to the County. In addition, temporary personnel delivering equipment and supplies to the site would be aware of the requirements and required to comply with the WEAP training, including, but not limited to, speed limit, stopping for wildlife observed in the access road, driving within the approved right-of-way, observing bird buffer signs and not stopping within the buffers, and driving slower than the approved speed limit, should dust occur on the access road.

- PDF-CON-4** Stockpiles of soil shall be properly contained to eliminate or reduce sediment transport from the site to on-site access roads, drainage facilities, or adjacent properties via runoff, vehicle tracking, or wind. Stockpiles would be stabilized using temporary cover best management practices to protect stockpiles and prevent erosion and runoff through the application of seeding, soil blankets, mulches, mats, soil binders, positioning of fiber rolls and silt fence around the stockpile, or other cover on bare soil. Additional methods such as applying water or installing wind barriers should also be used to reduce wind erosion. Temporary disturbance areas would be reseeded with native species in accordance with the applicable requirements.
- PDF-CON-5** Blasting operations would be in general conformance with the blasting specifications prepared by the U.S. Bureau of Mines and the blasting permit requirements issued by the County. The blasting contractor would be required to limit the blasting intensities so as to prevent damage to all existing structures, and in no case would intensities exceed the safety standard of particle velocity recommended by the U.S. Bureau of Mines. Also, air-borne noise from drilling operations is regulated through Section 36.410 of the County's noise ordinance.

7.1 Aesthetics

7.1.1 Mitigation Measures

Boulder Brush Facilities

With the exception of effects to community character/valued visual character and focal or panoramic vistas, impacts of the Boulder Brush Facilities would be less than significant. No feasible mitigation has been identified for impacts to valued visual character and focal or panoramic vistas associated with the silhouetted segments of the Off-Reservation gen-tie line.

Campo Wind Facilities

M-AE-A through **M-AE-H** are recommended in the EIS (BIA 2019) and would reduce impacts associated with visual resources to the extent feasible. These measures are recommended mitigation measures in the EIS for the Campo Wind Facilities on the Reservation, subject to the BIA's Record of Decision.

- M-AE-A** **Temporary Screening.** If visible from nearby roads, residences, public gathering areas, recreational areas, or trails, stationary construction sites and staging areas and temporary staging areas shall be visually screened (to the extent feasible) using temporary screening fencing. Temporary screening fencing shall be of an

appropriate design and color intended to compliment the surrounding area. Where practical, construction staging shall be screened with opaque fencing.

- M-AE-B Activity Limit/Signposting Guidelines.** No paint or permanent discoloring agents shall be applied to rocks or vegetation to indicate survey or construction activity limits.
- M-AE-C Minimization of Views of Graded Terrain.** Permanent access or spur roads shall be constructed at appropriate angles from the originating primary travel facilities to minimize extended in-line views of newly graded terrain, when feasible. Contour grading should be used where feasible to better blend graded surfaces with existing terrain.
- M-AE-D Revegetation of Disturbed Areas.** All graded roads and areas not required for ongoing operation, maintenance, or access shall be revegetated and/or returned to preconstruction conditions, as feasible.
- M-AE-E Minimization of Vegetation and Topsoil Removal.** To the extent feasible and wherever the limits of grading areas are adjacent to sensitive vegetation communities or other biological resources, the minimum amount of vegetation necessary for construction of structures and facilities shall be removed.
- M-AE-F Color Mitigation.** Substation components shall be painted Shadow Gray (or a similar dark gray color) from the BLM Standard Environmental Colors Chart CC-00 or equivalent. Color mitigation would not be required on facilities that are treated in accordance with safety and engineering concerns.
- M-AE-G Conductor Design Requirements.** All transmission line conductors are to be non-specular in design to reduce conductor visibility and visual contrast.
- M-AE-H FAA Approved Lighting.** The Developer would implement a lighting plan in accordance with current Federal Aviation Administration (FAA) standards. These lights would have the minimum number of flashes per minute and the briefest flash duration allowable per current FAA standards. The number of wind turbines that would be lit would be minimized to the extent allowable by the FAA.

7.1.2 Project Design Features

Boulder Brush Facilities

No project design features are proposed for the Boulder Brush Facilities related to Aesthetics.

Campo Wind Facilities

Consistent with the EIS, the following PDFs would be implemented as part of Campo Wind Facilities operation:

PDF-AE-1 Shadow Flicker (On-Reservation). The Developer will coordinate with the relevant tribe to assess shadow flicker complaints made within one year from the initial operations date of the Project by the resident of any existing (existing as of the date of Record of Decision approval) On-Reservations receptor located within a distance of 15 x Rotor Diameter (i.e. approximately 6,750 feet) of a Project turbine. This assessment would include possible remedies that the Developer may implement depending upon the level of shadow flicker impacts occurring at the On-Reservations receptor, including financial assistance for the installation of screening vegetation or window coverings. Requests for assistance can be made through a Project hotline to be established by the Developer and published to the Developer's website.

PDF-AE-2 Shadow Flicker (Off-Reservation). While BIA lacks jurisdiction to impose Project conditions implemented Off-Reservations, the Developer will coordinate with the resident of any existing (existing as of the date of Record of Decision approval) Off-Reservations receptor located within a distance of 15 x Rotor Diameter (i.e. approximately 6,750 feet) of a Project turbine to assess their shadow flicker complaints made within one year from the initial operations date of the Project. This assessment would include possible remedies that the Developer may implement depending upon the level of shadow flicker impacts occurring at the Off-Reservations receptor, including financial assistance for the installation of screening vegetation or window coverings. Requests for assistance can be made through a Project hotline to be established by the Developer and published to the Developer's website.

7.2 Air Quality

7.2.1 Mitigation Measures

Boulder Brush Facilities

Mitigation Measures **M-AQ-1** through **M-AQ-5** are provided to reduce VOC, NO_x, PM₁₀, PM_{2.5}, and DPM emissions to the extent feasible.

M-AQ-1 Off-Road Construction Equipment. Prior to the County approval of any construction-related permits, the Boulder Brush Developer or its designee shall place the following requirements on all plans, which shall be implemented during each

construction phase to minimize volatile organic compound (VOC), carbon monoxide (CO), oxides of nitrogen (NO_x), and diesel particulate matter emissions:

- a. Prior to the commencement of any construction activities, the Boulder Brush Developer or its designee shall provide evidence to the County that for off-road equipment with engines rated at 75 horsepower or greater, no construction equipment shall be used that is less than Tier 4 Final. An exemption from these requirements may be granted by the County in the event that the Boulder Brush Developer documents to the satisfaction of the County that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions would be achieved from other construction equipment. Before an exemption may be considered by the County, the Boulder Brush Developer shall be required to demonstrate that three construction fleet owners/operators in the San Diego region were contacted and that those owners/operators confirmed Tier 4 Final equipment could not be located within the San Diego region.
- b. Vehicles in loading and unloading queues shall not idle for more than 5 minutes and shall turn their engines off when not in use to reduce vehicle emissions.
- c. All construction equipment shall be properly tuned and maintained in accordance with manufacturer specifications.
- d. The use of electrical or natural-gas-powered construction equipment shall be employed where feasible, including forklifts and other comparable equipment types.

M-AQ-2 Fugitive Dust Control. The following control measures shall be implemented to minimize fugitive dust (coarse particulate matter [PM₁₀] and fine particulate matter [PM_{2.5}]) and diesel particulate matter, to comply with County Code Section 87.428 (Grading Ordinance), and with San Diego Air Pollution Control District (SDAPCD) Rule 55 (Fugitive Dust Control). Prior to the County's issuance of any Grading Permits, the Boulder Brush Developer or its designee shall demonstrate compliance with the requirements of this mitigation measure on site and grading plans prepared as part of the Grading Permit application:

- a. A SDAPCD-approved non-toxic dust control agent shall be used on the grading areas or watering shall be applied at least three times daily.
- b. All main roadways shall be constructed and paved as early as possible in the construction process.
- c. Grading areas shall be stabilized as quickly as possible.

- d. Chemical stabilizer shall be applied, a gravel pad shall be installed, or the last 100 feet of internal travel path within the construction site shall be paved prior to public road entry and for all haul roads.
- e. Wheel washers shall be installed adjacent to the apron for tire inspection and washing prior to vehicle entry on public roads.
- f. Visible track-out into traveled public streets shall be removed with the use of sweepers, water trucks, or similar method within 30 minutes of occurrence.
- g. Sufficient perimeter erosion control shall be provided to prevent washout of silty material onto public roads.
- h. Haul trucks shall be covered or at least 2 feet of freeboard shall be maintained to reduce blow-off during hauling.
- e. Transported material in haul trucks shall be watered or treated.
- i. All soil disturbance and travel on unpaved surfaces shall be suspended if winds exceed 25 miles per hour.
- j. On-site stockpiles of excavated material shall be covered.
- k. A 15 mile per hour speed limit on unpaved surfaces shall be enforced.
- l. Construction traffic control plans shall route delivery and haul trucks required during construction away from sensitive receptor locations and congested intersections to the extent feasible. Construction Traffic Control Plans shall be finalized and approved prior to issuance of grading permits.

M-AQ-3

The following measures shall be implemented for the Boulder Brush Facilities to reduce fugitive dust emissions (PM₁₀ and PM_{2.5}) associated with blasting and rock-crushing activities. Prior to the County's issuance of any Grading Permits, the Boulder Brush Developer or its designee shall demonstrate compliance with the requirements of this mitigation measure on site and grading plans prepared as part of the Grading Permit application:

- a. During blasting activities, the construction contractor shall implement measures to control fugitive dust, including exhaust ventilation, blasting cabinets and enclosures, vacuum blasters, drapes, water curtains, or wet blasting. Watering methods, such as water sprays and water applications, shall be implemented during blasting, rock crushing, cutting, chipping, sawing, or any activity that would release dust particles to reduce fugitive dust emissions.

- b. During rock-crushing transfer and conveyance activities, material shall be watered prior to entering the crusher. Crushing activities shall not exceed an opacity limit of 20% (or Number 1 on the Ringelmann Chart) as averaged over a 3-minute period in any period of 60 consecutive minutes, in accordance with San Diego Air Pollution Control District (SDAPCD) Rule 50, Visible Emissions. A qualified opacity observer shall monitor opacity from crushing activities once every 30 days while crushers are employed on site to ensure compliance with SDAPCD Rule 50. Water sprayers, conveyor belt enclosures, or other mechanisms shall be employed to reduce fugitive dust generated during transfer and conveyance of crush material.

M-AQ-4 To reduce emissions of NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, all Boulder Brush Facilities phases involving blasting shall conform to the following requirements:

- Each blasting event shall employ approximately 1.2 tons of ammonium nitrate/fuel oil (ANFO).
- Blasting activities shall be restricted to not more than two blasts per day.
- All blasting shall be performed by a blast contractor and blasting personnel licensed to operate in San Diego County.

M-AQ-5 **Construction Architectural Coating Limits.** The Boulder Brush Facilities shall comply with the following volatile organic compound (VOC) content limits for architectural coatings during construction for residential and non-residential and uses: 50 grams per liter VOC for interior surfaces and 100 grams per liter VOC for exterior coatings.

Campo Wind Facilities

No mitigation is required for the Campo Wind Facilities related to Air Quality. See Section 7.2.2 for Project Design Features that would be implemented for construction of the Campo Wind Facilities.

7.2.2 Project Design Features

Boulder Brush Facilities

No project design features are proposed for the Boulder Brush Facilities related to Air Quality.

Campo Wind Facilities

The BIA's EIS prepared for the Project states that the activities on the Reservation would include **PDF-AQ-1** through **PDF-AQ-5**, which are equivalent to the requirements of **M-AQ-1** through **M-**

AQ-5. As described in the EIS prepared by the BIA, and Chapter 1, Project Description, the following construction-related PDFs would be implemented as part of the Campo Wind Facilities:

PDF-AQ-1 Prior to the Tribe's approval of any construction-related permits, the Developer or its designee shall place the following requirements on all plans, which shall be implemented during each construction phase to minimize VOC, CO, and NO_x emissions:

- a. Prior to the commencement of any construction activities, the lessee or its designee shall provide evidence to the Tribe that for off-road equipment with engines rated at 75 horsepower or greater, no construction equipment shall be used that is less than Tier 4 Final. An exemption from these requirements may be granted by the Tribe in the event that the Developer documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment. Before an exemption may be considered by the Tribe, the Developer shall be required to demonstrate that three construction fleet owners/operators in the San Diego region were contacted and that those owners/operators confirmed Tier 4 Final equipment could not be located within the San Diego region.
- b. Vehicles in loading and unloading queues shall not idle for more than 5 minutes and shall turn their engines off when not in use to reduce vehicle emissions.
- c. All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.
- d. The use of electrical or natural gas-powered construction equipment shall be employed where feasible, including forklifts and other comparable equipment types.

PDF-AQ-2 Fugitive Dust Control. The Developer or its designee shall implement the following measures to minimize fugitive dust (PM₁₀ and PM_{2.5}):

- a. Water or other approved dust control non-toxic agent shall be used on the grading areas at least three times daily.
- b. Grading areas shall be stabilized as quickly as possible.
- c. Chemical stabilizer shall be applied, a gravel pad shall be installed, or the last 100 feet of internal travel path within the construction site shall be paved prior to public road entry and for all haul roads.

- d. Wheel washers shall be installed adjacent to the apron for tire inspection and washing prior to vehicle entry on public roads.
- e. Visible track-out into traveled public streets shall be removed with the use of sweepers, water trucks, or similar method within 30 minutes of occurrence.
- f. Sufficient perimeter erosion control shall be provided to prevent washout of silty material onto public roads.
- g. Unpaved construction site egress points shall be graveled to prevent track-out.
- h. Construction access points shall be wet-washed at the end of the workday if any vehicle travel on unpaved surfaces has occurred.
- i. Transported material in haul trucks shall be watered or treated.
- j. All soil disturbance and travel on unpaved surfaces shall be suspended if winds exceed 25 miles per hour.
- k. On-site stockpiles of excavated material shall be covered.
- l. A 15 mile per hour speed limit on unpaved surfaces shall be enforced.
- m. Construction traffic control plans shall route delivery and haul trucks required during construction away from sensitive receptor locations and congested intersections to the extent feasible. Construction Traffic Control plans shall be finalized and approved prior to issuance of grading permits.

PDF-AQ-3 The following measures shall be included as part of the Campo Wind Facilities' Fugitive Dust Control Plan to reduce emissions associated with **blasting and rock-crushing** activities:

- a. During blasting activities, the construction contractor shall implement measures to control fugitive dust, including exhaust ventilation, blasting cabinets and enclosures, vacuum blasters, drapes, water curtains, or wet blasting. Watering methods, such as water sprays and water applications, shall be implemented during blasting, rock crushing, cutting, chipping, sawing, or any activity that would release dust particles to reduce fugitive dust emissions.
- b. During rock crushing transfer and conveyance activities, material shall be watered prior to entering the crusher. Crushing activities shall not exceed an opacity limit of 20% (or Number 1 on the Ringelmann Chart) as averaged over a 3-minute period in any period of 60 consecutive minutes. A qualified opacity observer shall monitor opacity from crushing activities once every 30 days while crushers are employed on site. Water sprayers, conveyor belt enclosures,

or other mechanisms shall be employed to reduce fugitive dust generated during transfer and conveyance of crush material.

PDF-AQ-4 All Campo Wind Facilities phases involving **blasting** shall conform to the following requirements:

- Each blasting event shall employ approximately 1.2 tons of ammonium nitrate/fuel oil (ANFO).
- Blasting activities shall be restricted to not more than two blasts per day.
- All blasting shall be performed by a blast contractor and blasting personnel licensed to operate in the County.

PDF-AQ-5 **Construction Architectural Coating Limits.** The Campo Wind Facilities shall comply with the following volatile organic compound (VOC) content limits for architectural coatings during construction for residential and non-residential and uses: 50 grams per liter VOC for interior surfaces and 100 grams per liter VOC for exterior coatings.

7.3 Biological Resources

7.3.1 Mitigation Measures

Boulder Brush Facilities

The Mitigation Measures **M-BI-1** through **M-BI-16** are provided to reduce impacts biological resources associated with the Boulder Brush Facilities.

M-BI-1 **Implementation of USFWS-Issued Terms and Conditions for Quino Checkerspot Butterfly.** All terms and conditions developed as part of the Section 7 consultation process with the U.S. Fish and Wildlife Service (USFWS) and provided in the Project's Biological Opinion shall be implemented. Terms and conditions shall apply to federally listed species that may be impacted by the Project. Ratios for habitat-based mitigation shall be determined during the Section 7 consultation process. The mitigation shall focus on habitat preservation and creation for long-term conservation of metapopulation dynamics. Habitat mitigation ratios will be determined through the Section 7 consultation. Terms and conditions outlined in the Project's Biological Opinion shall take precedence over the measures outlined herein to the extent there is conflict between the two.

(a) **Temporary Construction Flagging/Fencing and Signage.** Construction flagging/fencing and signage will be installed, per USFWS requirements when

construction of the Project occurs immediately adjacent to mapped occupied Quino checkerspot butterfly habitat to prevent unnecessary intrusion into occupied Quino checkerspot butterfly habitat. Signage shall be installed where high-use areas of the Boulder Brush Facilities border suitable Quino checkerspot butterfly habitat to prevent intrusion into sensitive habitat and remind personnel of restrictions regarding activities within these areas.

M-BI-2 Biological Monitoring. To prevent inadvertent disturbance to areas outside the limits of grading, fencing or flagging, as required, shall be installed and all grading shall be monitored by a biologist in environmentally sensitive areas. A biologist (Project Biologist) approved by the County of San Diego (County) shall be contracted to perform biological monitoring during all grading, clearing, grubbing, trenching, construction, and decommissioning activities.

The Project Biologist shall perform the monitoring duties before, during, and after construction pursuant to the most current version of the County's Guidelines for Determining Significance and Report Format and Content Requirements: Biological Resources (County Guidelines). The contract provided to the County shall include an agreement that this shall be completed, and a Memorandum of Understanding between the biological consulting company and the County shall be executed. In addition to performing monitoring duties pursuant to the most current version of the County Guidelines, the Project Biologist shall also perform the following duties:

1. A Worker Environmental Awareness Program (WEAP) would be prepared for construction contractors and all on-site personnel. WEAP training would cover the sensitive resources found on site, flagging/fencing of exclusion areas, permit requirements, and other environmental issues and permit constraints. The WEAP would also educate and instruct on-site personnel to avoid harassment and disturbance of wildlife, especially during reproductive activities (e.g., courtship and nesting) during construction. In addition, temporary personnel delivering equipment and supplies to the Project Site will be aware of the requirements and required to comply with the WEAP training, including, but not limited to, speed limit, stopping for wildlife observed in the access road, driving within the approved project right-of-way, observing bird buffer signs and not stopping within the buffers, and driving slower than the approved project speed limit, should dust occur on the access road. All on-site personnel would be required to attend the WEAP training in conjunction with hazard and safety training prior to working on site.

2. Attend the preconstruction meeting with the construction contractor and other key construction personnel prior to clearing, grubbing, or grading to reduce conflict between the timing and location of construction activities with other mitigation requirements (e.g., seasonal surveys for nesting birds).
3. Conduct meetings with the construction contractor and other key construction personnel describing the importance of restricting work to designated areas prior to clearing, grubbing, or grading and clarifying that the Project Biologist has the authority to halt work that could harm or harass a protected species.
4. Review and/or designate the construction area in the field with the construction contractor in accordance with the final grading plan prior to clearing, grubbing, or grading.
5. Conduct a field review of the staking to be set by the surveyor, designating the limits of all construction activity prior to clearing, grubbing, or grading.
6. Flush special-status species (i.e., avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities.
7. To address hydrology impacts, the Project Biologist shall verify that grading plans include a Stormwater Pollution Prevention Plan (if required pursuant to provisions of the State Water Resources Control Board 2009-0009-DWQ Construction General Permit, or equivalent applying the standards set forth in the County of San Diego Stormwater Standards Manual); see **M-BI-4**.
8. Periodically monitor the construction site to see that dust is minimized according to the fugitive dust control measures delineated in M-AQ-2 and M-AQ-3 and that temporary impacted areas are revegetated as soon as possible.
9. Periodically monitor the construction site to verify that artificial security light fixtures are directed away from open space and are shielded.
10. Oversee the construction site so that cover and/or escape routes for wildlife from excavated areas are provided on a daily basis. All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and the edges covered with soils and plastic sheeting such that small wildlife cannot access them, and/or excavations shall provide an earthen ramp to allow for a wildlife escape route.

M-BI-3 Temporary Construction Flagging/Fencing. Prior to issuance of grading or building permits, the Boulder Brush Developer or its designee shall install temporary flagging or fencing, as required, where the limits of grading are adjacent to sensitive vegetation communities or jurisdictional aquatic resources. Temporary

flagging or fencing, as required, will also be installed for areas where Boulder Brush Facilities impacts are adjacent to a population of special-status plant species. Temporary flagging or fencing shall remain in place for the duration of construction activities. All temporary flagging/fencing shall be shown on plans and a Fencing and Flagging Plan will be prepared and submitted to applicable agencies for review prior to construction. Access roads would be staked at the outermost perimeter of 40 feet, to ensure no project personnel go beyond these boundaries. Stakes would be placed every 200 feet in accordance with industry standards. Additionally, all on-site construction workers performing ground disturbance activities would be equipped with GPS units that would clearly delineate the limits of grading.

M-BI-4 SWPPP. If required, the Stormwater Pollution Prevention Plan (SWPPP) shall include, at a minimum, the best management practices listed below. The combined implementation of these requirements shall protect adjacent habitats and special-status species during construction to the maximum extent practicable. At a minimum, the following measures and/or restrictions shall be incorporated into the SWPPP and noted on construction plans, where appropriate, to avoid impacts to special-status species, sensitive vegetation communities, and/or jurisdictional waters during construction. The Project Biologist shall verify the implementation of the following design requirements:

1. No planting or seeding of invasive plant species (per the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the project region) shall be permitted.
2. Construction activity shall not be permitted in jurisdictional waters of the United States/state except as authorized by applicable law and permit(s), including permits and authorizations approved by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board.
3. Silt settling basins installed during the construction process shall be located away from areas of ponded or flowing water to prevent discolored, silt-bearing water from reaching areas of ponded or flowing water during normal flow regimes.
4. Temporary structures, staging, and storage areas for construction equipment and/or materials shall not be located in jurisdictional waters, including wetlands and riparian areas.
5. Any equipment or vehicles driven and/or operated within jurisdictional waters of the United States/state shall be checked and maintained by the operator daily

to prevent leaks of oil or other petroleum products that could be deleterious to aquatic life if introduced to the watercourse.

6. No stationary equipment, such as motors, pumps, generators, and welders, or fuel storage tanks shall be located within 200 feet of jurisdictional waters of the United States/state.
7. No debris, bark, slash sawdust, rubbish, cement, concrete, oil, or petroleum products shall be stored where it may be washed by rainfall or runoff into jurisdictional waters of the United States/state.
8. When construction operations are completed, any excess materials or debris shall be removed from the work area.
9. No equipment maintenance shall be performed within 200 feet of jurisdictional waters of the United States/state where petroleum products or other pollutants from the equipment may enter these areas.
10. Fully covered trash receptacles that are animal-proof and weather-proof shall be installed and used by the operator to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Littering shall be prohibited and trash shall be removed from construction areas daily. All food-related trash and garbage shall be removed from the construction sites on a daily basis.

M-BI-5

- (a) Pre-Construction Surveys.** Pre-construction surveys for special-status plants and Quino checkerspot butterfly host plants will be conducted during the spring and summer within the portion of the Boulder Brush Facilities development footprint that has not been previously surveyed (approximately 2.6 acres). If any special-status plants are found, the Applicant shall develop a plant relocation plan for the open space (prepared by a biologist with at least 5 years of experience in rare plant relocation), with plant specimens grown on site or from local seed or cutting sources. The individuals shall be planted within the open space to secure a 2:1 mitigation ratio for any County List A species, and a 1:1 mitigation ratio for County list B species identified. The plant relocation plan shall require the Applicant to submit a revegetation plan, including annual monitoring reports for at least 5 years after the replanting to demonstrate that the plants have been successfully established at the required mitigation ratio.

If any Quino checkerspot butterfly host plants are found, the habitat model for Quino checkerspot butterfly shall be updated and additional mitigation for potentially occupied habitat may be required, as determined through M-BI-1.

(b) Habitat Preservation. To mitigate for impacts to vegetation communities and habitats for special-status wildlife species and occurrences of special-status plant species resulting from the Boulder Brush Facilities, suitable off-site mitigation land shall be acquired prior to issuance of grading or building permits. The Boulder Brush Developer shall purchase habitat credit or provide for the conservation of habitat generally consistent with the assemblage of vegetation communities impacted by the Boulder Brush Facilities. As proposed, the Boulder Brush Facilities is estimated to impact the following vegetation community acreages; however, the permanent open space acres shall be dependent on the actual temporary and permanent areas of impact. Montane buckwheat scrub (17.0 acres), red shank chaparral (18.3 acres), semi-desert chaparral (31.1 acres), and unvegetated stream channel (0.1 acres) would be mitigated at a 1:1 ratio; big sagebrush scrub (9.2 acres) would be mitigated at a 2:1 ratio; wildflower field (3.7 acres), emergent wetland (0.2 acres), southern arroyo willow riparian forest (0.4 acres), coast live oak woodland (5.4 acres), open coast live oak woodland (0.1 acre), and oak root zone (7.3 acres) would be mitigated at a 3:1 ratio; and granitic northern mixed chaparral (33.4 acres), and granitic chamise chaparral (3.6 acres) would be mitigated at a 0.5:1 ratio. The permanent open space acres shall be dependent on the final as-built drawings. This shall mitigate for Boulder Brush Facilities impacts to sensitive vegetation communities, thereby preserving compensatory habitat that provides equal or greater benefit to plant and wildlife species. The off-site mitigation options are described below:

County List A and B species shall be mitigated based on impacts to individual plants. County List A plant species will be mitigated at 2:1, List B species are mitigated at 1:1 and impacts to List D species are not ratio based but will be through the preservation of suitable habitat. Therefore, mitigation for the loss of special-status plant species shall be as follows: 2:1 mitigation ratio for impacts to 111 Jacumba milk-vetch individuals, 20 southern jewelflower individuals, and 61 Tecate tarplant individuals; and 1:1 mitigation ratio for impacts to 1,308 desert beauty individuals and 203 sticky geraea individuals. Impacts to Colorado Desert larkspur will be mitigated through preservation of suitable habitat for the species. If additional special-status plant populations are recorded during the pre-construction surveys in the additional survey areas, the off-site mitigation site shall provide for any additionally required mitigation.

This shall mitigate for Boulder Brush Facilities impacts to sensitive vegetation communities, thereby preserving compensatory habitat that provides equal or

greater benefit to plant and wildlife species. The off-site mitigation site will also provide for the preservation of known populations of special-status plants impacted by the Boulder Brush Facilities. The off-site mitigation options for the Boulder Brush Facilities are described below:

Option 1: If purchasing mitigation credit, the mitigation bank shall be approved by the Wildlife Agencies (i.e., U.S. Fish and Wildlife Service and California Department of Fish and Wildlife). The evidence of purchase shall include the following information to be provided by the mitigation bank:

1. A copy of the purchase contract referencing the project name and numbers for which the habitat credits were purchased.
2. If not stated explicitly in the purchase contract, a separate letter must be provided identifying the entity responsible for the long-term management and monitoring of the preserved land.
3. To ensure the land is protected in perpetuity, evidence must be provided that a dedicated conservation easement or similar land constraint has been placed over the mitigation land.
4. An accounting of the status of the mitigation bank. This shall include the total amount of credits available at the bank, the amount required by the project and the amount remaining after use by the project.

Option 2: If habitat credit cannot be purchased in a mitigation bank, then the Boulder Brush Developer shall provide for the conservation of habitat of the same amount and type of land located in San Diego County as required per County guidelines:

1. Prior to purchasing the land for the proposed mitigation, the location shall be pre-approved by the Department of Planning and Development Services (PDS).
2. A Resource Management Plan (RMP) shall be prepared and approved pursuant to the County of San Diego Report Format and Content Requirements: Biological Resources to the satisfaction of the Director of PDS.
3. An open space easement or deed restrictions over the land shall be dedicated to the County of San Diego or like agency to the satisfaction of the Director of PDS. The land shall be protected in perpetuity.
4. The purchase and dedication of the land and the selection of the Resource Manager and establishment of an endowment to ensure funding of annual

ongoing basic stewardship costs shall be complete prior to the approval of the RMP.

5. In lieu of providing a private habitat manager, the Boulder Brush Developer may contract with a federal, state, or local government agency with the primary mission of resource management to take fee title and manage the mitigation land. Evidence of satisfaction must include a copy of the contract with the agency, and a written statement from the agency that (1) the land contains the specified acreage and the specified habitat, or like functioning habitat, and (2) the land shall be managed by the agency for conservation of natural resources in perpetuity.

(c) Resource Management Plan. If Option 2 is chosen, to provide for the long-term management of the proposed Open Space Preserve, an RMP shall be prepared and shall be implemented. The final RMP shall be completed to the satisfaction of the Director of PDS, as follows: (1) the RMP shall be prepared and approved pursuant to the most current version of the County of San Diego Report Format and Content Requirements: Biological Resources; (2) the habitat land to be managed shall be owned by a land conservancy or equivalent; (3) open space easements shall be dedicated or deed restrictions recorded in perpetuity; (4) a resource manager shall be selected and approved, with evidence provided demonstrating acceptance of this responsibility; (5) the RMP funding mechanism shall be identified and adequate to fund annual costs for implementation; and (6) a contract between the Boulder Brush Developer and County of San Diego shall be executed for the implementation of the RMP, and funding will be established with the County of San Diego as the third-party beneficiary.

M-BI-6 Nesting Bird Survey. To avoid any direct impacts to raptors and/or any migratory birds protected under the Migratory Bird Treaty Act and California Fish and Game Code, removal of habitat that supports active nests on the proposed area of disturbance shall occur outside of the nesting season for these species (January 15 through September 1, annually). If, however, removal of habitat on the proposed area of disturbance must occur during the nesting season, the Boulder Brush Developer or its designee shall retain a biologist approved by the County of San Diego to conduct a preconstruction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The preconstruction survey must be conducted within 72 hours prior to the start of construction that would impact any vegetation that could support nesting birds.

If nesting birds are detected by the biologist, buffers shall be established per the biologist's best professional judgment. The buffer shall be flagged in the field and mapped on the construction plans. The non-construction buffer zones shall be avoided until the nesting cycle is complete. Exceptions may be made if the biologist determines that work within the buffer would not affect the nesting cycle.

- M-BI-7** **Revegetation of Temporarily Impacted Areas.** Disturbed areas that are not required to be clear for operations and maintenance activities (i.e., temporarily disturbed areas) shall be revegetated or stabilized using soil binders within 90 days of construction completion. The Boulder Brush Facilities would result in temporary impacts to sensitive upland and jurisdictional aquatic resources (ephemeral channels). Temporary impacts shall be revegetated to provide erosion control, slope stabilization, or other necessary function. Revegetation areas may incorporate salvaged materials, such as seed collection and translocation of plant materials, as determined to be appropriate. The Project Biologist shall review the plant materials prior to grading and determine if salvage is warranted. Ephemeral channels will be restored to pre-construction conditions, as feasible.
- M-BI-8** **APLIC Standards.** Provide evidence to the Director of PDS that all transmission poles and lines are designed to conform to Avian Power Line Interaction Committee (APLIC) standards. The Boulder Brush Facilities shall implement recommendations by the APLIC (2006, 2012), which will protect raptors and other birds from electrocution. These measures are sufficient to protect even the largest birds that may perch or roost on transmission lines or poles from electrocution. Specifically these measures will include guidance on proper pole and crossmember dimensions, phasing, and insulator design and dimensions to preclude wire to wire contact with a goal of providing 150 centimeters (approximately 60 inches) of separation between energized conductors and energized hardware and ground wire.
- M-BI-9** **Removal of Carcasses.** All large animal carcasses (e.g., any domestic livestock, feral animal, or big game) incidentally found within or adjacent to the development footprint during operation and maintenance activities shall be removed from the Boulder Brush Corridor to prevent attraction of carrion-consuming birds of prey.
- M-BI-10** **Fugitive Dust Control.** The Boulder Brush Developer shall implement the fugitive dust control measures outlined in mitigation measures M-AQ-2 and M-AQ-3 (Fugitive Dust Control) of the Final EIR.
- M-BI-11** **Erosion and Runoff Control.** During construction, material stockpiles shall be placed such that they cause minimal interference with on-site drainage patterns. This shall protect sensitive vegetation from being inundated with sediment-laden runoff.

Dewatering shall be conducted in accordance with standard regulations of the Regional Water Quality Control Board (RWQCB). A construction National Pollutant Discharge Elimination System permit, issued by RWQCB to discharge water from dewatering activities, shall be required prior to start of construction. This shall minimize erosion, siltation, and pollution within sensitive communities.

Design of drainage facilities shall incorporate long-term control of pollutants and stormwater flow to minimize pollution and hydrologic changes. An Urban Runoff Plan and operational best management practices shall be approved by the San Diego County Department of Planning & Development Services prior to construction.

M-BI-12 Regulation of Chemical Pollutants. Weed control treatments shall include legally permitted chemical, manual, and mechanical methods applied with the authorization of the County of San Diego agriculture commissioner. The application of herbicides shall be in compliance with all state and federal laws and regulations under the prescription of a Pest Control Adviser and implemented by a licensed applicator. Where manual and/or mechanical methods are used, disposal of the plant debris shall follow the regulations set by the County agriculture commissioner.

In addition, use of rodenticides shall not be allowed.

M-BI-13 Prevention of Invasive Plant Species. A County of San Diego –approved plant list shall be used for the revegetation areas. A hydroseed mix that incorporates native species and is appropriate to the area, shall be used for slope stabilization in transitional areas. No invasive plant species as included on the most recent version of the California Invasive Plant Council’s California Invasive Plant Inventory for the Project region shall be included in the seed mix, and the plant palette shall be composed of native species that do not require high irrigation rates. The hydroseed mix and a map of the seeded areas shall be submitted and approved by the County of San Diego prior to re-seeding.

M-BI-14 Fire Protection. To minimize impacts to biological resources from fire hazards, the Boulder Brush Facilities Fire Protection Plan shall be implemented in conjunction with development of the Boulder Brush Facilities.

M-BI-15 Access Control. To minimize unauthorized access to the Boulder Brush Facilities, all access roads adjacent to a public road shall be gated and locked to the extent permitted by adjacent land owners, easements, and County of San Diego requirements.

M-BI-16 Federal and State Agency Permits. Prior to impacts occurring to U.S. Army Corps of Engineers (ACOE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) (collectively, the Resource Agencies) jurisdictional aquatic resources, the Boulder Brush Developer or its designee shall obtain the following permits: ACOE 404 permit or authorization under a Nationwide Permit, RWQCB 401 Water Quality Certification, and California Fish and Game Code 1602 Streambed Alteration Agreement. To mitigate for impacts to jurisdictional waters, the Developer may purchase mitigation bank credits, including establishment, re-establishment, enhancement, or rehabilitation. Alternatively, a suitable mitigation site shall be selected and approved by the Resource Agencies during the permitting process. Either of these mitigation options would result in no net loss of jurisdictional aquatic resources. A functional assessment, such as the California Rapid Assessment Method (CRAM), of the jurisdictional areas proposed to be impacted and preserved at the mitigation site shall be conducted. The purpose of the functional assessment is to evaluate the existing functions and services within the jurisdictional drainages and ensure that the functions and values of the jurisdictional areas lost are replaced at the mitigation site. The precise mitigation ratio shall depend on the functions and values of the mitigation site and any restoration activities that may be conducted to further increase the functions and values of the mitigation site.

Impacts to Resource Protection Ordinance wetlands (with the exception of the intermittent channel) shall be mitigated at a minimum of ratio 3:1, with a minimum of 1:1 impact-to-creation ratio; restoration/enhancement of existing wetlands may be used to make up the remaining requirements. This would result in no net loss of County RPO wetlands.

If mitigation is proposed to occur within the Boulder Brush Corridor or within the off-site mitigation area, then a Wetlands Mitigation and Monitoring Plan shall be prepared. Prior to issuance of land development permits, including clearing, grubbing, and grading permits for activities that would impact jurisdictional aquatic resources, the Boulder Brush Developer shall prepare a Wetlands Mitigation and Monitoring Plan to the satisfaction of the Director of Planning & Development Services (or his/her designee). The Conceptual Wetlands Mitigation and Monitoring Plan shall, at a minimum, prescribe site preparation, planting, irrigation, and a 5-year maintenance and monitoring program with qualitative and quantitative evaluation of the revegetation effort and specific performance criteria to determine successful revegetation.

Campo Wind Facilities

The following mitigation measures **M-BI-A** through **M-BI-D** are the recommended mitigation measures in the EIS for the Campo Wind Facilities, and are subject to the BIA's Record of Decision.

M-BI-A Implementation of USFWS-Issued Terms and Conditions. All terms and conditions developed as part of the Section 7 consultation process with the U.S. Fish and Wildlife Service (USFWS) and provided in the Project's Biological Opinion shall be implemented. Terms and conditions shall apply to any ESA-listed species that may be impacted by the Project. Ratios for habitat-based mitigation (if any) shall be determined during the Section 7 consultation process. The mitigation shall focus on habitat preservation and creation for long-term conservation of metapopulation dynamics. Per coordination with USFWS, seasonal avoidance of mapped suitable Quino checkerspot butterfly habitat during Project construction would not be required. Terms and conditions outlined in the Project's Biological Opinion shall take precedence over the measure outlined herein. The measure described below would be subject to enforcement by the Campo Environmental Protection Agency on the Reservation, and by the County of San Diego for the Boulder Brush Facilities. The Project's Biological Opinion will be issued to the BIA and the BIA will be responsible for implementing the terms and conditions of the Biological Opinion.

(a) **Construction Flagging and Signage.** Construction flagging and/or signage will be installed when construction of the Project occurs immediately adjacent to mapped occupied Quino checkerspot butterfly habitat (i.e., within a 200-meter radius around host plant concentrations or Quino checkerspot butterfly detections that are located within 1 kilometer of a mapped Quino checkerspot butterfly location) to prevent unnecessary intrusion into occupied Quino checkerspot butterfly habitat. Signage shall be installed where construction activity high-use areas border suitable Quino checkerspot butterfly habitat to prevent intrusion into sensitive habitat and remind personnel of restrictions regarding activities within these areas.

M-BI-B Avian-Specific Avoidance, Minimization, and Mitigation Measures.

(a) **Vegetation Clearing Seasonal Avoidance/Nest Clearance Surveys.** Vegetation clearing will take place outside of the general avian breeding season (February 15 through August 15) when practicable. If not practicable to conduct vegetation clearing outside the general avian breeding season, it is recommended that a Project biologist with a minimum of 3 years' experience

conducting migratory bird surveys conduct a nest-clearance survey within 500 feet (152 meters) of a vegetation clearance area no more than 5 days prior to vegetation clearing. Vegetation clearing crews shall coordinate with the Project biologist prior to the start of construction to verify that the area has been adequately surveyed. If no active nests are discovered, vegetation clearing may proceed. If an active nest is discovered, the nest and an avoidance buffer (at least 300 feet (91 meters) for passerines and at least 500 feet (152 meters) for raptors) shall be flagged or otherwise marked for avoidance. The Project biologist shall monitor any active nest discovered on at least a weekly basis to track the status of each nest. Vegetation clearing shall not take place within the avoidance buffer until nesting is complete (i.e., nestlings have fledged or nest has failed), as determined by the Project biologist. If clearing in a given area ceases for five or more consecutive days during the nesting season, repeat nest clearance surveys will be conducted to verify that new nesting locations have not been established.

(b) Construction Seasonal Avoidance/Pre-Construction Surveys. Construction (non-vegetation-clearing activities; see MM-BIO-3(a) for vegetation clearing restrictions) that cannot occur outside the general avian breeding season (February 15 through August 15) shall proceed under the following recommended protocols. If nest clearance surveys (see MM-BIO-3[a]) have not been conducted within 5 days of the start of construction, the Project biologist shall conduct a pre-construction nest survey within 500 feet (152 meters) of the construction area no more than 5 days prior to the start of construction in a given area of the construction footprint. Construction crews shall coordinate with the Project biologist prior to the start of construction to verify that the area has been adequately surveyed. If no active nests are discovered, construction may proceed. If an active nest is discovered, the nest and an avoidance buffer (at least 300 feet [91 meters] for passerines and at least 500 feet [152 meters] for raptors) shall be flagged or otherwise marked prior to the start of construction. The Project biologist shall coordinate with construction crews to determine the types of construction activities that may take place within the avoidance buffer. The following shall be taken into consideration when determining whether a construction activity may take place within the avoidance buffer: (1) location of nest; (2) status of nesting; (3) species-specific sensitivity to potential disturbances associated with an activity; (4) type, duration, and timing of construction activity; (5) existing level of disturbances; and (6) influence of other environmental factors on potential disturbances. The Project biologist shall be responsible for monitoring any active nests discovered on at least a

weekly basis to track the status of each nest. Should the Project biologist determine that construction activities may disturb the nesting activity, then construction activities shall cease within the avoidance buffer until nesting is complete. If construction in a given area ceases for 5 or more consecutive days during the nesting season, repeat pre-construction surveys shall be required to verify that new nesting locations have not been established.

(c) **Bird and Bat Conservation Strategy.** The Developer shall prepare a Bird and Bat Conservation Strategy (BBCS). The BBCS shall be prepared by a qualified biologist and shall include methods and results of avian and bat surveys conducted in 2017, 2018, and 2019 at the Project Site; a risk assessment associated with potential collisions/barotrauma with Project turbines and meteorological towers and electrocution associated with overhead transmission lines; recommended 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 monitoring results. The BBCS shall be submitted to USFWS for review. The BBCS may include the following:

- **Implementation of a Post-Construction Monitoring Program.** A Post-Construction Monitoring Program shall provide a means of methodically recording and collecting information on dead or injured birds and bats within the Project Site by professional biologists. This monitoring program will include standardized survey methods, observer trials, and carcass removal trials to assist in determining accurate collision estimates for the Project. These rates will allow for comparison to other projects and assist in determining what, if any, adaptive management activities should be implemented. This monitoring program will occur for a minimum of 2 years and be initiated after completion of Project construction.
- **Implementation of a Worker Response Reporting System (WRRS).** The WRRS shall provide a means of recording and collecting information on incidental discoveries of dead or injured birds and bats within the Project Site by site personnel. The WRRS shall be used by site personnel who discover bird and bat carcasses during construction and routine maintenance activities. Site personnel shall be provided a set of standardized instructions to follow in response to wildlife incidents in the Project Area.
- **Notification and Implementation Activities.** In accordance with the WRRS, during construction, site personnel shall notify the Project biologist to collect the following data on the incidentally detected avian and bat

wildlife: species, date, time, location (e.g., nearest Project structure), and how the animal died, if known. Results shall be reported to the Tribe and the Developer on a quarterly basis unless federally listed species are involved. During operations, a procedure shall be developed for site personnel to collect the same data, take photographs, and notify the Project's environmental manager, who shall then notify the Tribe and the Developer unless listed species are involved, in which case USFWS shall be notified within 48 hours. In the event of an injury to federally protected species, the USFWS shall be contacted immediately for instruction on how to handle the situation. Workers shall be trained on the WRRS during Worker Environmental Awareness Program training. The WRRS shall be used for the life of the Project. To accommodate these requirements, a Project biologist shall be on retainer throughout the construction period, and one shall be available during the life of the Project to assist in avian and bat identifications, data collection, determination of cause of death or injury, and implementing the WRRS.

- (d) Removal of Carcasses.** All large animal carcasses (e.g., any domestic livestock, feral animal, or big game) incidentally found within the Project Site during operation and maintenance activities shall be removed from the site to prevent attraction of carrion-consuming birds of prey.
- (e) APLIC Standards.** The Project shall implement 2006 and 2012 recommendations by the Avian Power Line Interaction Committee (APLIC) to protect raptors and other birds from electrocution. When properly designed and implemented, these measures can be sufficient to protect even the largest birds that may perch or roost on transmission lines or towers from electrocution. Specifically, these measures will include design specifications regarding proper pole and crossmember dimensions, phasing, and insulator design and dimensions to preclude wire-to-wire contact with a goal of providing appropriate separation between energized conductors and energized hardware and ground wire. In addition, bird diverters or other means to make lines more visible to birds will be installed where appropriate to help avoid collisions.

M-BI-C General Avoidance and Minimization Measures.

- (a) Project Biologist(s).** A Project biologist(s) approved by the U.S. Fish and Wildlife Service (USFWS) and the Campo Band of Diegueño Mission Indians (Tribe) shall be designated by the Developer. The Campo Environmental Protection Agency is recommended to oversee the duties of the Project biologist

for all work conducted on the Reservation. The Developer shall submit the names, documented experience, any relevant permit numbers, and resumes for the Project biologist(s) to USFWS and the Tribe for approval prior to initiation of construction. The Project biologist(s) shall be responsible for the following:

- Providing training to all construction workers (may take the form of any documentable training platform).
- Reviewing and/or designating the construction area in the field with the construction contractor in accordance with the final grading plan prior to clearing, grubbing, or grading.
- Conducting a field review of the staking to be set by the professional surveyor, designating the limits of construction activity prior to clearing, grubbing, or grading.
- Flushing wildlife species (i.e., reptiles, mammals, avian, or other mobile species) from occupied habitat areas immediately prior to (i.e., within 2 hours) brush-clearing and earthmoving activities. This does not include disturbance of nesting birds (see M-BI-B) or “flushing” of federally listed species (e.g., Quino checkerspot butterfly [see M-BI-A]).
- Regularly monitoring construction activities to verify that construction is proceeding in compliance with all permit requirements specific to biological resources.
- Overseeing the construction site so that cover and/or escape routes for wildlife from excavated areas are provided on a daily basis. All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and the edges covered with soils and plastic sheeting such that small wildlife cannot access them, and/or excavations shall provide an earthen ramp or boards to allow for a wildlife escape route at the ends and every 30 feet.
- Maintaining communication with the appropriate personnel (construction Project manager, resident engineer) so that issues relating to biological resources are appropriately and lawfully managed.
- Verifying that grading plans include a stormwater pollution prevention plan.
- Reporting any noncompliance issues to the Bureau of Indian Affairs, resident engineer, and the Tribe.

(b) Environmental Training Program. A worker environmental awareness program shall be developed and implemented prior to the start of construction.

The Project biologist(s) shall use this program to conduct environmental training for construction personnel. All construction site personnel shall be required to attend the environmental training in conjunction with hazard and safety training prior to working on site.

- (c) **SWPPP.** The stormwater pollution prevention plan (SWPPP) or equivalent shall include, at a minimum, the best management practices listed below. The combined implementation of these requirements shall protect adjacent habitats and special-status species during construction to the maximum extent practicable. At a minimum, the following measures and/or restrictions shall be incorporated into the SWPPP and noted on construction plans, where appropriate, to avoid impacts to special-status species, special-status vegetation communities, and/or jurisdictional waters during construction. The measures described in the SWPPP would be subject to enforcement by the Campo Environmental Protection Agency on the Reservation, and the County of San Diego for the Boulder Brush Facilities.

The Project biologist(s) shall verify the implementation of the following design requirements:

- No planting or seeding of invasive plant species (per the most recent version of the California Invasive Plant Council's California Invasive Plant Inventory for the Project region) shall be permitted.
- Construction activity shall not be permitted in jurisdictional waters of the United States except as authorized by applicable law and permit(s), including permits and authorizations approved by the U.S. Army Corps of Engineers.
- Silt settling basins installed during the construction process shall be located away from areas of ponded or flowing water to prevent discolored, silt-bearing water from reaching areas of ponded or flowing water during normal flow regimes.
- Temporary structures, staging, and storage areas for construction equipment and/or materials shall not be located in jurisdictional waters, including wetlands and riparian areas.
- Any equipment or vehicles driven and/or operated within jurisdictional waters of the United States shall be checked and maintained by the operator daily to prevent leaks of oil or other petroleum products that could be deleterious to aquatic life if introduced to the watercourse.

- No stationary equipment, such as motors, pumps, generators, and welders, or fuel storage tanks shall be located within 200 feet of jurisdictional waters of the United States.
- No debris, bark, slash sawdust, rubbish, cement, concrete, oil, or petroleum products shall be stored where it may be washed by rainfall or runoff into jurisdictional waters of the United States.
- When construction operations are completed, any excess materials or debris shall be removed from the work area.
- No equipment maintenance shall be performed within 200 feet of jurisdictional waters of the United States where petroleum products or other pollutants from the equipment may enter these areas.
- Fully covered trash receptacles that are animal-proof and weather-proof shall be installed and used by the construction contractor(s) to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Littering shall be prohibited and trash shall be removed from construction areas daily. All food-related trash and garbage shall be removed from the construction sites on a daily basis.

(d) Fugitive Dust Control. The Developer or its designee shall implement the fugitive dust control measures outlined in project design features PDF-AQ-2 and PDF-AQ-3 (Fugitive Dust Control) of the Final EIR.

(e) Revegetation. Disturbed areas that are not required to be clear for operations and maintenance activities (i.e., temporarily disturbed areas) shall be revegetated or stabilized using soil binders within 90 days of construction completion. If soil binders are used they shall be as efficient, or more efficient, for fugitive dust control than California Air Resources Board-approved soil stabilizers. Soil would be revegetated with native plant species found within adjacent habitats. Locally available seed will be used, and that seed from species that are unavailable for collection would not be incorporated into the final seed palette. Revegetation of temporarily disturbed areas shall provide a minimum of 40% cover of plant species native to adjacent habitats within a 2-year time frame. If 40% cover of native species is not achieved within 2 years, adaptive management measures (e.g., supplemental seeding, erosion control, pest control) will be pursued until 40% cover of native species is achieved.

Prior to decommissioning of Campo Wind Facilities, a decommissioning plan would be prepared and implemented. The decommissioning plan shall include

revegetation of the previously disturbed areas. Soil would be revegetated with native plant species found within adjacent habitats. Locally available seed would be used, and seed from species that are unavailable for collection would not be incorporated into the final seed palette. Revegetation of disturbed areas shall provide a minimum of 40% cover of plant species native to adjacent habitats within 2 years of construction completion. If 40% cover of native species is not achieved within 2 years, adaptive management measures will be pursued until 40% cover of native species is achieved.

(f) Erosion and Runoff Control. During construction, material stockpiles shall be placed such that they cause minimal interference with on-site drainage patterns. This will protect jurisdictional resources from being inundated with sediment-laden runoff. Design of drainage facilities shall incorporate long-term control of pollutants and stormwater flow to minimize pollution and hydrologic changes.

(g) Weed Management. A weed management plan shall be developed and approved by the Tribe prior to commencement of construction activities on the Reservation. The plan shall include the following:

- Weed inventory and risk assessment;
- Identification of problem areas and necessary preventive measures;
- Annual surveys within the restoration areas to document weed patches for 2 years post construction;
- Success standards, such as no more than a 10% increase in weed species in restoration areas;
- Adaptive management measures; and
- Reporting.

All herbicide application shall be in compliance with applicable state and federal laws and regulations under the prescription of a Pest Control Adviser and implemented by a licensed applicator.

(h) Fire Protection. To minimize the potential exposure of the Project to fire hazards, a Boulder Brush Fire Protection Plan (FPP) shall be prepared and a Fire Protection Plan for the Campo Wind Facilities shall be prepared to the satisfaction of the CRFPD. The FPPs shall be implemented in conjunction with development of the Project.

M-BI-D Jurisdictional Waters and Wetlands Compensation. Temporary and permanent impacts to jurisdictional waters and wetlands shall be mitigated per the Project's federal Clean Water Act permit conditions. Temporary impacts shall be restored in place to pre-activity functions; permanent impacts shall be mitigated through a U.S. Army Corps of Engineers-approved mitigation bank and/or in-lieu fee program. Either of these mitigation options would result in no net loss of jurisdictional aquatic resources. A functional assessment, such as the California Rapid Assessment Method, of the jurisdictional areas proposed to be impacted and preserved at the mitigation site shall be conducted. The purpose of the functional assessment is to evaluate the existing functions and services within the jurisdictional drainages and ensure that the functions and values of the jurisdictional areas lost are replaced at the mitigation site. The precise mitigation ratio shall depend on the functions and values of the mitigation site and any restoration activities that may be conducted to further increase the functions and values of the mitigation site. Refer to MM-BIO-C for success criteria for revegetation areas.

7.3.2 Project Design Features

No project design features are proposed for the Boulder Brush Facilities or Campo Wind Facilities related to Biological Resources.

7.4 Cultural Resources

7.4.1 Mitigation Measures

Boulder Brush Facilities

The Mitigation Measures outlined herein, are provided to reduce impacts on cultural resources. Mitigation Measures **M-CR-1** through **M-CR-3** shall be required as part of the County's MUP approval to address impacts identified associated with the Boulder Brush Facilities. Mitigation Measures **M-CR-A** through **M-CR-C** are recommended in the BIA's EIS for the Campo Wind Facilities, and referenced herein, which would reduce impacts associated with cultural resources. The following mitigation measures would reduce the identified significant impacts on cultural resources to less than significant:

M-CR-1 Temporary Fencing. To prevent inadvertent disturbance of archaeological sites within the avoidance areas (avoided by Project design), temporary fencing shall be installed where resources are located within 50 feet of the

Boulder Brush area of direct impact (ADI). The temporary fencing shall include the following requirements:

- Prior to the commencement of any grading and/or clearing in association with the grading and/or improvement plan, temporary orange construction fencing shall be placed to protect archaeological sites from inadvertent disturbance within the avoidance areas (avoided by Project design) and the unimpacted portions of sites outside of the Boulder Brush ADI during earth-disturbing activities. Temporary fencing shall be installed prior to the pre-construction meeting and prior to any clearing, grubbing, trenching, grading, or land disturbances; and shall remain for the duration of earth-disturbing activities. The temporary fencing plan shall be prepared in consultation with a County-approved archaeologist and the Kumeyaay Native American monitor. The fence shall be installed under the supervision of the County-approved archaeologist prior to commencement of any earth-disturbing activities. The temporary fencing plan shall include the following:
 - Temporary fencing is required in all locations of the Project where proposed grading or clearing is within 50 feet of any archaeological site within avoidance areas (open space) or the unaffected portions of sites outside of the Boulder Brush ADI. The Project archaeologist shall identify the locations where temporary fencing is required.
 - The placement of temporary fencing shall be approved by the County. Upon approval, the temporary fencing shall be installed under the supervision of the Project archaeologist.
 - A signed and stamped statement from a California Registered Engineer, or licensed surveyor shall be submitted to Planning & Development Services for approval. The statement shall identify that temporary fencing has been installed in all required locations where grading or clearing is within 50 feet of an archaeological site or the unaffected portions of sites outside of the Boulder Brush ADI.
 - The fencing shall remain in place until the conclusion of grading activities, after which the fencing shall be removed.
 - Installation of temporary fencing shall require the presence of monitor(s) (archaeological and Kumeyaay Native American).

M-CR-2 Archaeological Monitoring. To mitigate for potential impacts to undiscovered, buried archaeological resources in the Boulder Brush area of direct impact (ADI), an archaeological monitoring program and potential data recovery program shall be implemented pursuant to the County of San Diego's (County's) Guidelines for

Determining Significance and Report Format and Requirements for Cultural Resources and the California Environmental Quality Act (CEQA) and shall include the following requirements:

a. Pre-Construction

- The Boulder Brush Developer shall contract with a County-approved archaeologist to perform archaeological monitoring. The Project archaeologist shall contract with a Kumeyaay Native American monitor(s) to conduct Native American monitoring for the Project.
- The pre-construction meeting shall be attended by the Project archaeologist and the Kumeyaay Native American monitor(s).

b. Construction

- Monitoring. Both the Project archaeologist and Kumeyaay Native American monitor(s) are to be on site during all earth-disturbing activities. The frequency and location of monitoring of native soils shall be determined by the Project archaeologist in consultation with the Kumeyaay Native American monitor(s). Both the Project archaeologist and the Kumeyaay Native American monitor(s) shall evaluate fill soils to ensure that they are negative for cultural resources.
- Inadvertent Discoveries
 - Both the Project archaeologist and the Kumeyaay Native American monitor(s) have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - The Project archaeologist shall contact the County archaeologist.
 - The Project archaeologist, in consultation with the County archaeologist and the Kumeyaay Native American monitor(s), shall determine the significance of discovered resources.
 - Construction activities shall be allowed to resume after the County archaeologist has agreed with the significance evaluation.
 - Isolates and non-significant deposits shall be minimally documented in the field. If the isolates and non-significant deposits are not be collected by the Project archaeologist, the Kumeyaay Native American monitor(s) may collect the cultural material for transfer to a tribal curation facility or repatriation program.

- If cultural resources are determined to be significant, a research design and data recovery program shall be prepared by the Project archaeologist in consultation with the Kumeyaay Native American monitor(s) and approved by the County archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites, the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
- c. Human Remains
- The Property Owner or their representative (Boulder Brush Developer) shall contact the County coroner and the County Planning & Development Services staff archaeologist.
 - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County coroner has made the necessary findings as to origin. Should the human remains need to be taken offsite for evaluation, they shall be accompanied by a Kumeyaay Native American monitor.
 - If the remains are determined to be of Native American origin, the most likely descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative to determine proper treatment and disposition of the remains.
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by California Public Resources Code, Section 5097.98, has been conducted.
 - California Public Resources Code, Section 5097.98; CEQA Guidelines, Section 15064.5; and California Health and Safety Code, Section 7050.5, shall be followed in the event that human remains are discovered.
 - On the Reservation, the procedures outlined in the Native American Graves Protection and Repatriation Act (NAGPRA) will be followed. The Tribe is the responsible government agency for treatment of human remains under NAGPRA.

d. Rough Grading

- Upon completion of rough grading, a monitoring report identifying whether resources were encountered shall be prepared. A copy of the monitoring report shall be provided to any culturally affiliated tribe that requests a copy.

e. Final Grading

- A final report substantiating that earth-disturbing activities are completed and whether cultural resources were encountered shall be prepared. A copy of the final report shall be submitted to the South Coastal Information Center (SCIC) and any culturally affiliated tribe that requests a copy.

f. Cultural Material Conveyance

The final report shall include the following:

- Evidence that all prehistoric materials have been curated at a San Diego curation facility or tribal curation facility that meets federal standards according to Title 36, Part 79, of the Code of Federal Regulations or alternatively have been repatriated to a culturally affiliated tribe.
- Evidence that historic materials have been curated at a San Diego curation facility that meets federal standards according to Title 36, Part 79, of the Code of Federal Regulations.

M-CR-3 Three Resource Protection Ordinance (RPO) significant sites (CA-SDI-7140, CA-SDI-7151/7162, and CA-SDI-22581), are located on unincorporated County lands within the Boulder Brush Boundary and contain human remains. The locations of human remains at each site shall be entirely avoided by Project design.

Campo Wind Facilities

M-CR-A, M-CR-B, and M-CR-C are recommended in the EIS and would reduce potential impacts associated with cultural resources to less than significant. These measures are recommended mitigation measures in the EIS for the Campo Wind Facilities on the Reservation, subject to the BIA's Record of Decision.

M-CR-A **Monitoring and Treatment Plan.** A post-environmental review cultural resources monitoring and discoveries treatment plan (Monitoring and Treatment Plan) will be prepared prior to the start of construction and shall outline the specific requirements for monitoring at the conclusion of stakeholder consultation. The Monitoring and Treatment Plan shall clearly identify roles and responsibilities of Project personnel, and lines of communication and authority

for reporting and management. The Monitoring and Treatment Plan shall include the procedures to be followed when construction results in an inadvertent discovery including work stoppage, protection of the discovery to allow for inspection by a qualified archaeologist, significance evaluation if the resource is not an isolated find, coordination with the Bureau of Indian Affairs (BIA) and developer to attempt avoidance of further effects if the resource is found to be significant, and the procedures for data recovery mitigation if avoidance is not feasible. The Monitoring and Treatment Plan shall be prepared by the developer's Secretary of the Interior-qualified archaeologist and submitted to the BIA for review and approval prior to the start of construction.

M-CR-B Archaeological and Native American Monitoring. It is anticipated that monitoring will be required for all primary ground disturbance and for extended excavations when construction encroaches on historic properties that are avoided but are near to ground-disturbing activities, and at those locations where sensitive remains or significant deposits are more likely to be unearthed during construction-related ground disturbance.

Ground-disturbing activities include, but are not limited to, brush clearance, grubbing, excavation, trenching, grading, and drilling. Any archaeological monitors shall be qualified archaeologists or work under the direct supervision of a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's standards for professional archaeology, and shall be approved by the Bureau of Indian Affairs (BIA). The monitors shall be familiar with the types of historical and prehistoric resources that could be encountered on the Project Site.

The archaeological monitors shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis. The archaeological monitors shall be present on the Project Site according to a schedule as detailed in the Monitoring and Treatment Plan and shall maintain a daily log of activities, which will be appended to a final monitoring report that shall be submitted to the BIA and South Coastal Information Center at the conclusion of monitoring. Specific monitoring reporting procedures shall be detailed in the Monitoring and Treatment Plan.

In the event of inadvertent discovery of human remains, all work shall immediately be halted within a 100-foot radius and temporary protective measures shall be implemented. The Developer shall immediately contact the Tribe, and follow the Native American Graves Protection and Repatriation Act (NAGPRA) plan of action provided in the Monitoring and Treatment Plan. The NAGPRA plan of

action will minimally include coordination with the San Diego County Coroner (Coroner) for formal determination of the remains. If the Coroner determines that the remains are Native American, the Coroner shall contact the Native American Heritage Commission, in accordance with California Health and Safety Code, Section 7050.5c, and California Public Resources Code, Section 5097.98 (as amended by Assembly Bill 2641). The Native American Heritage Commission shall coordinate with the Tribe to identify a Most Likely Descendant for the remains per California Public Resources Code, Section 5097.98, unless the Tribe has already made such a determination. If the remains are determined to be neither of forensic value to the Coroner, nor of Native American origin, provisions of the California Health and Safety Code (7100 et seq.) directing identification of the next of kin will apply.

M-CR-C Significance Evaluation and Data Recovery. Requirements for treatment of inadvertent discoveries that occur during construction, operation and maintenance, and decommissioning, shall be detailed in the Monitoring and Treatment Plan (M-CR-A), and shall minimally include stoppage of all activity within 100 feet of the find until a qualified archaeologist can assess the significance of the find. The Bureau of Indian Affairs (BIA) shall also be contacted. If the qualified archaeologist, in consultation with the BIA, determines the resource is significant (i.e., qualifies as a historic property), then the archaeologist shall determine appropriate avoidance measures or other appropriate mitigation. Preservation in place shall be the preferred manner of mitigation to avoid effects on significant cultural resources. If it is demonstrated that resources cannot be feasibly avoided, the qualified archaeologist shall implement the provisions for mitigation detailed in the Monitoring and Treatment Plan. Work shall not resume within 100 feet of the discovery until permission is received from the BIA.

Where preservation in place of a significant archaeological resource is not feasible, a qualified archaeologist, in consultation with the BIA, and the Project developer shall complete archaeological data recovery. The standard for completion of data recovery may vary for individual archaeological sites, but is understood herein to be collection of a statistically representative sample of the archaeological deposits such that data redundancy is achieved and the unique properties of the archaeological sites are addressed. Implementation of data recovery mitigation shall include the following steps:

1. The Monitoring and Treatment Plan (M-CR-A) will include a research design and archaeological data recovery plan prior to ground disturbance for the

recovery of resources in unavoidable sites that will capture those categories of data for which the site is significant, and implement the data recovery plan.

2. The data recovery phase shall focus on recovering archaeological data sufficient to mitigate the destruction of a portion of the site or the entire site within the area of direct impacts.
3. If, in the opinion of the qualified archaeologist and in light of the data available, the significance of the site is such that data recovery cannot capture the values that qualify the site for inclusion on the National Register of Historic Places (NRHP), the developer shall reconsider Project plans in light of the high value of the cultural resource, and implement more substantial modifications to the proposed Project that shall allow the site to be preserved intact, such as Project redesign or capping the site with fill soil.
4. Standard archaeological collection and/or excavation units may be used, with methods consistent with those employed during previous investigations in the region. Following completion of the excavations, all cultural materials shall be washed, cataloged, and analyzed. Technical analyses may include artifact analysis, radiocarbon dating, obsidian hydration, pollen and protein residue, and other analyses as needed to describe the cultural materials and archaeological deposits. A data recovery report shall be prepared and filed with the BIA and the South Coastal Information Center.
5. The Developer shall provide for the permanent curation of recovered materials during construction at a federally recognized archaeological repository, such as the San Diego Archaeological Center or the Imperial Valley Desert Museum.

For archaeological sites considered significant and eligible for NRHP listing that can be avoided, reasonable protective measures shall be provided, including protective fencing around an avoided resource with an appropriate buffer, silt fencing to avoid indirect effects through Project-related runoff, and other measures as applicable. In certain instances, avoidance through capping using sterile fill matrix, use of rubber mats, or other measures may be deemed appropriate to achieve avoidance.

7.4.2 Project Design Features

No project design features are proposed for the Boulder Brush Facilities or Campo Wind Facilities related to Cultural Resources.

7.5 Hazards and Hazardous Materials

7.5.1 Mitigation Measures

Boulder Brush Facilities

M-HZ-1 is provided to reduce impacts associated with the handling and/or accidental release of hazardous materials. **M-WF-1** is provided to address wildfire hazards. These mitigation measures shall be required of Boulder Brush Facilities as part of the County's Major Use Permit approval to address impacts identified associated with the Boulder Brush Facilities.

M-HZ-1 Hazardous Materials Management Plan (HMMP). Prior to approval of final construction plans by the County, the Boulder Brush Developer and/or contractor(s) will prepare an HMMP for the construction phase of the Boulder Brush Facilities, which would be reviewed and approved by the coordinating agencies. The HMMP would be included as part of all contractor specifications and final construction plans to the satisfaction of the appropriate agency. The HMMP would include the following components:

- The HMMP shall identify all hazardous materials that could be present on any portion of the construction site, including fuels, solvents, and petroleum products. The HMMP would address storage, use, transport, and disposal of each hazardous material anticipated to be used at the site. The HMMP would establish inspection procedures, storage requirements, storage quantity limits, inventory control, nonhazardous product substitutes, and disposition of excess materials.
- The HMMP would identify secondary containment and spill prevention countermeasures, as well as a contingency HMMP to identify potential spill hazards, how to prevent their occurrence, and responses for different quantities of spills that may occur. Secondary containment and countermeasures would be in place throughout construction so that if any leaks or spills occur, responses shall be made immediately. Emergency spill supplies and equipment would be clearly marked and located adjacent to areas of work and in temporary construction staging areas.
- The HMMP would identify adequate safety and fire-suppression devices for construction-related activities involving toxic, flammable, or explosive materials (including refueling construction vehicles and equipment). Such devices would be readily accessible at the Boulder Brush Facilities, as specified by the County Fire Department and per the Uniform Building Code and Uniform Fire Code.

- Prior to construction, the Boulder Brush Developer/all contractor and subcontractor personnel would receive training regarding the components of the HMMP, as well as applicable environmental laws and regulations related to hazardous materials handling, storage, and spill prevention and response measures.
- The Boulder Brush Developer and/or Boulder Brush Developer's contractor would designate a qualified environmental field representative who would be on site to observe, enforce, and document adherence to the plan for all construction activities. The HMMP would be submitted to the appropriate agencies for approval prior to construction.

M-WF-1 Fire Protection Measures. To minimize the fire risk, all fire protection measures and features identified in the Boulder Brush Facilities Fire Protection Plan (FPP) shall be implemented in conjunction with development of the Boulder Brush Facilities.

The following measures and design considerations identified in Section 7 of the FPP (Appendix I) would be employed:

- FMZs throughout the Boulder Brush Corridor for Off-Reservation gen-tie power line structures, high-voltage substation, switchyard, and access roads (Required measure).
- A contiguous fuel modification zone 50 feet outside of the perimeter fences (approximately 100 feet from the electrical components) around the high-voltage substation and switchyard would be maintained. The high-voltage substation pad area will be free of vegetation around all electrical equipment (Required measure).
- A technical report (See Appendix H to this FPP for more details) indicating special precautions for firefighting response (Code-exceeding measure).
- Up to 30-foot wide primary access road that connects to the high-voltage substation and switchyard. 16-foot wide roads provide access to Off-Reservation gen-tie power line structures (Required measure).
- Off-Reservation gen-tie power line poles would be non-combustible (steel) with lightning protection (Code-exceeding measure).
- Participation in an Agreement with SDCFA, for funding firefighting and emergency medical resources, the details of which will be determined in the Fire Service Developer Agreement (Required measure).

- Boulder Brush Developer annual fuel modification zone inspections to ensure compliance with this FPP (Code-exceeding measure).
- Motion sensor illuminated (and/or reflective) signage at main entrance (Required measure).
- Preparation and implementation of a CFPP for the Boulder Brush Facilities. (Code-exceeding measure).
- Class B/C, 15-pound portable carbon dioxide (CO₂) fire extinguishers mounted at high-voltage transformer units (Required measure).
- Three (3) 10,000-gallon water tanks will be installed near the switchyard and high-voltage substation dedicated for firefighting purposes (Required measure).
- During construction, one pick-up truck would be outfitted with Skid-Mounted Unit, including fire pump, hoses, and nozzle, and personnel properly trained to use the firefighting equipment. After construction is completed, the pickup truck will remain on the Project Site and personnel will be trained to use the firefighting equipment (Required measure).
- Boulder Brush Facilities contact information with local fire agencies/stations to assist responding firefighters during an emergency (Required measure).
- On-going maintenance of all facility components for the life of the Boulder Brush Facilities (Required measure).
- Maintenance logs to be kept and made available upon request to SDCFA/CAL FIRE (Required measure).
- Consistent placarding and labeling of all components for fire safety/response (Required measure).

Additional measures to reduce the risk of ignitions would also be employed, as appropriate, during each phase of the Boulder Brush Facilities (construction, operation, maintenance, and decommissioning). These measures would be enforced by the site Safety Officer (SSO) and through ongoing worker safety training:

- Fire rules shall be posted on the Facilities bulletin board at the contractor's field office or permanent operations and maintenance building in areas visible to employees. This shall include the field offices of all contractors and subcontractors if more than one.
- Internal combustion engines used for construction of the Boulder Brush Facilities shall be equipped with spark arrestors that are in good working order.

- Once initial two-track roads have been cut, light-duty trucks and cars shall be used only on roads where the roadway is cleared of vegetation. Mufflers on cars and light-duty trucks shall be maintained in good working order.
- A cache of shovels, Mcleods, and Pulaskis shall be available at staging sites. The amount of equipment shall be determined by consultation between SSO and SDCFA/CAL FIRE. Additionally, on-site pickup trucks would be equipped with first aid kits, fire extinguishers, and shovels. Contractor vehicles would be required to include the same basic equipment.
- Equipment parking areas and small stationary engine sites (e.g., generators) shall be cleared of extraneous flammable materials and provided with a gravel surface.
- Restrict use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives during Red Flag Warnings. When the above tools are used, water tanks equipped with hoses, fire rakes, and axes shall be easily accessible to personnel.
- A fire watch (person responsible for monitoring for ignitions) shall be provided during hot work and shall monitor for a minimum of 30 minutes following completion of the hot work activities.
- No smoking within 50 feet of combustible materials storage, 25 feet of dispensing, 20 feet of storage/refueling areas, and no smoking on Red Flag Warning days. No smoking signs shall be posted in these areas.
- Each construction area (if construction occurs simultaneously at various locations) shall be equipped with fire extinguishers and firefighting equipment sufficient to extinguish small fires.
- The Boulder Brush Developer shall ensure coordination with SDCFA/CAL FIRE to create a training component for emergency first responders to prepare for specialized emergency incidents that may occur at the Boulder Brush Facilities.
- Construction workers, plant personnel, and maintenance workers visiting the plant and/or transmission lines to perform maintenance activities shall receive training on the evacuation plans and routes, proper use of firefighting equipment and procedures to be followed in the event of a fire. Training records shall be maintained and be available for review by the SDCFA/CAL FIRE.
- Employees shall participate in annual fire prevention and response training exercises with SDCFA/CAL FIRE.
- Implement ongoing fire patrols during Red Flag Warning periods. The SSO shall be assigned as fire patrol to monitor work activities when an activity risk exists

for fire compliance. The SSO shall verify proper tools and equipment are on site, assess any fire agency work restrictions, and serve as a lookout for fire starts, including staying behind (e.g., a fire watch) to make certain no residual fire exists. The SSO shall perform routine patrols of the facilities during the fire season equipped with a portable fire extinguisher and communications equipment. SDCFA/CAL FIRE shall be notified of the name and contact information of the SSO in the event of any change.

- Remote monitoring of major electrical equipment (transformers and inverters) shall screen for unusual operating conditions. Higher than nominal temperatures, for example, could be compared with other operational factors to indicate the potential for overheating which, under certain conditions, could precipitate a fire. Units could then be shut down or generation could be curtailed remotely until corrective actions are taken.
- Fires ignited on site shall be immediately reported to SDCFA and CAL FIRE.
- The engineering, procurement, and construction contracts for the Boulder Brush Facilities shall clearly state the fire safety requirements that are the responsibility of any person who enters the Boulder Brush Facilities, as described in the CFPP.
- Upon completion of constructing the internal roadway network, light trucks and cars shall be used only on roads where the roadway is cleared of vegetation. Roads are to be kept free of ruts, drainages, wash boarding, and maintained in a hard-compacted state to support fire engines.
 - a) All site Vehicles used during construction, operation and maintenance, and decommissioning shall be equipped with the following fire prevention equipment (employee vehicles are not required to include this equipment):
 - 10 pound, 4A:80BC dry chemical fire extinguisher
 - 46-inch round-point shovel
 - 5 gallons of water or a 5-gallon water backpack
 - First aid kit
- No driving (cars, trucks, all-terrain vehicles, or similar) over unmaintained dry vegetation shall occur.
- Vehicles can be parked a minimum of 10 feet from vegetation as long as the vehicle is parked in an area previously cleared of vegetation.

- Site activities shall be restricted during Red Flag Warning weather periods; stay alert to fire and weather conditions and, in the event of an emergency, evacuate employees if it is safe to do so.
- Consultants/contractors shall conduct operations safely to limit the risk of fire.
- Minimize combustible and flammable materials storage on site.
- Store combustible or flammable materials that need to be on site away from ignition sources.
- Keep evacuation routes free of obstructions.
- Tanks and containers shall be labeled as required in CFC Chapter 34, to identify potentially hazardous materials with their contents, and store in the same location as flammable or combustible liquids.
- Perform “hot work”¹ according to fire safety practices in a controlled environment and with fire suppression equipment at the job site. “Hot work” is defined as operations involving cutting, welding, thermite welding, brazing, soldering, grinding, thermal spraying, thawing pipe, or other similar operations. Hot work areas are defined as the areas exposed to sparks, hot slag, radiant heat, or convective heat because of the hot work.
- A fire watch person (Fire Patrol), with extinguishing capability (e.g. fire extinguishers), should be in place for all ‘Hot Work’ activities during construction. Ensure hot work adheres to the guidelines provided.
- Report and repair fuel leaks without delay.
- Do not overload circuits or rely on extension cords where other options would be safer.
- Turn off and unplug electrical equipment when not in use.

Campo Wind Facilities

M-HZ-A through **M-HZ-C** are recommended in the EIS and included herein, to reduce impacts associated with the handling and/or accidental release of hazardous materials. **M-HZ-D** addresses wind turbine setbacks. **M-BI-C (h)** addresses wildfire hazards, and is first outlined in Chapter 2.3, Biological Resources of this EIR. This measure is the recommended mitigation measure included in the EIS, for the Campo Wind Facilities on the Reservation, subject to the BIA’s Record of Decision.

¹ “Hot work” is defined as operations involving cutting, welding, thermite welding, brazing, soldering, grinding, thermal spraying, thawing pipe, or other similar operations. Hot work areas are defined as the areas exposed to sparks, hot slag, radiant heat, or convective heat because of the hot work.

M-HZ-A Hazardous Materials Management Plan (HMMP). Prior to approval of final construction plans by the Campo Environmental Protection Agency, the Developer and/or contractor(s) will prepare an HMMP for the construction phase of the Campo Wind Facilities, which would be reviewed and approved by the coordinating agencies. The HMMP would be included as part of all contractor specifications and final construction plans to the satisfaction of the appropriate agency. The HMMP would include the following components:

- The HMMP shall identify all hazardous materials that could be present on any portion of the construction site, including fuels, solvents, and petroleum products. The HMMP would address storage, use, transport, and disposal of each hazardous material anticipated to be used at the site. The HMMP would establish inspection procedures, storage requirements, storage quantity limits, inventory control, nonhazardous product substitutes, and disposition of excess materials.
- The HMMP would identify secondary containment and spill prevention countermeasures, as well as a contingency HMMP to identify potential spill hazards, how to prevent their occurrence, and responses for different quantities of spills that may occur. Secondary containment and countermeasures would be in place throughout construction so that if any leaks or spills occur, responses shall be made immediately. Emergency spill supplies and equipment would be clearly marked and located adjacent to all areas of work and in temporary construction staging areas.
- The HMMP would identify adequate safety and fire-suppression devices for construction-related activities involving toxic, flammable, or explosive materials (including refueling construction vehicles and equipment). Such devices would be readily accessible at the Campo Wind Facilities, as specified by the Campo Reservation Fire Protection District (CRFPD) and per the Uniform Building Code and Uniform Fire Code.
- Prior to construction, the Developer/all contractor and subcontractor personnel would receive training regarding the components of the HMMP, as well as applicable environmental laws and regulations related to hazardous materials handling, storage, and spill prevention and response measures.
- The Developer or Developer's contractor would designate a qualified environmental field representative who would be on site to observe, enforce, and document adherence to the plan for all construction activities. The HMMP would be submitted to the appropriate agencies for approval prior to construction.

M-HZ-B Health and Safety Program. Prior to approval of final construction plans, the Developer or Developer's contractor(s) will prepare a Health and Safety Program (HSP) for each phase of the Campo Wind Facilities (i.e., construction, operation, and decommissioning). The HSP would be developed to protect both workers and the general public during all phases of the Campo Wind Facilities and would be implemented to educate construction workers about the hazards associated with the Campo Wind Facilities and the safety measures that must be taken to prevent injury. The HSP would include standards regarding occupational safety, safe work practices for each task, hazard training requirements for workers, and mechanisms for documentation and reporting.

Regarding occupational health and safety, the HSP would identify all applicable federal and Tribal occupational safety standards; establish safe work practices for each task (e.g., requirements for personal protective equipment and safety harnesses; OSHA standard practices for safe use of explosives and blasting agents; and measures for reducing occupational electromagnetic field exposures); establish fire safety evacuation procedures; and define safety performance standards. The HSP would include a training program to identify hazard training requirements for workers and establish procedures for providing required training to all workers. The HSP would include worker training regarding how to identify potentially contaminated soils and/or groundwater. Documentation of training and a mechanism for reporting serious accidents to appropriate agencies would be established.

The HSP would identify requirements for temporary fencing around staging areas, storage yards, and excavation areas during construction or decommissioning activities. Such fencing would be designed to restrict transient traffic, off-highway vehicle use, and the general public from accessing areas under construction and would be removed once construction or decommissioning activities are complete. The HSP would also identify appropriate measures to be taken during operation of the Campo Wind Facilities to limit public access to hazardous facilities (e.g., permanent fencing, locked access).

M-HZ-C Safety Assessment. Prior to commencing construction activities, the Developer or Developer's contractor(s) shall prepare a safety assessment to describe potential safety issues associated with the Campo Wind Facilities, how safety prevention measures would be implemented, where medical aid kits would be located, the appropriate response action for each safety hazard, and procedures for notifying the appropriate authorities and agencies involved. The safety assessment shall address issues such as site access/hazards, construction hazards, safe work practices,

security, heavy equipment transportation, traffic management, emergency procedures, and fire control.

M-HZ-D Wind Turbine Safety Zone and Setbacks. Prior to approval of final construction plans and as part of the HSP (**M-HZ-B**), it is recommended that the Developer demonstrate to the Tribe adequate setbacks for wind turbine generators from residents and occupied buildings, roads, rights-of-way, transmission lines, and other public access areas, in compliance with the Campo Lease. Plans detailing the proposed setbacks would be submitted to the Tribe for review and approval at least 30 days prior to construction.

M-BI-C (h) Fire Protection. To minimize the potential exposure of the Project to fire hazards, a Boulder Brush Fire Protection Plan (FPP) shall be prepared and a Fire Protection Plan for the Campo Wind Facilities shall be prepared to the satisfaction of the CRFPD. The FPPs shall be implemented in conjunction with development of the Project.

7.5.2 Project Design Features

No project design features are proposed for the Boulder Brush Facilities or Campo Wind Facilities related to Hazards and Hazardous Materials.

7.6 Hydrology and Water Quality

7.6.1 Mitigation Measures

No mitigation measures are required for the Boulder Brush Facilities, Campo Wind Facilities or the Project related to Hydrology and Water Quality.

7.6.2 Project Design Features

Boulder Brush Facilities

PDF-HY-2 Implementation of GMMP for JCSD: To ensure non-potable water purchased from the Jacumba Community Services District (JCSD) does not result in impacts to the aquifers accessed by JCSD's non-potable water production wells (Well 6, Highland Center Well, and Park Well), the Boulder Brush Developer will implement the Groundwater Mitigation Monitoring and Mitigation Plans (GMMPs) for the Flat Creek and Boundary Creek Watersheds.

Campo Wind Facilities

Consistent with the Campo Wind EIS, the following PDF would be implemented as part of Campo Wind Facilities operation:

PDF-HY-1 Groundwater Monitoring: Campo Environmental Protection Agency (CEPA) will monitor the depth to groundwater in wells located between existing On-Reservation production wells anticipated to be a source of groundwater supply for Project construction and other nearby On-Reservation production wells. A groundwater level drawdown threshold for On-Reservation monitoring wells should be established to ensure that declines in groundwater levels in On-Reservation wells remain at less than 20 feet resultant from On-Reservation pumping for Project construction. Groundwater level monitoring should be conducted at least weekly during Project construction and do not interfere with individual and Public Water System (PWS) wells that provide drinking water to residents and others. Should the groundwater drawdown threshold be exceeded, CEPA will require the cessation of on-site pumping for Project construction, from such production wells as is necessary, until groundwater levels in the monitoring wells rise above the threshold.

7.7 Noise

7.7.1 Mitigation Measures

Boulder Brush Facilities

The mitigation measures below are provided to reduce impacts associated with noise to the extent feasible. The mitigation provided below shall be required to address impacts identified on private lands within the jurisdiction of the County as part of its Major Use Permit approval. The County has no ability to require mitigation for impacts occurring on or emanating from activity on the Reservation but refers the reader to the EIS for the Project, which contains the noise mitigation measures summarized below to be implemented to mitigate impacts occurring on or emanating from activities on the Reservation. BIA can and should include these measures as a requirement of approval and the Record of Decision.

M-N-1 Construction Noise Best Management Practices for Activities on Private Land.

- Ensure that all construction equipment driven or powered by internal combustion engines shall be equipped with a factory-approved or recommended muffler. If traffic control and construction signs that require power for lighting or flashing are located near residences, the source of power should be batteries, solar cells, or another quiet source.
- Where and when construction activity is expected to occur within 200 feet of an Off-Reservation noise-sensitive land use (NSLU) and/or along the segment of Ribbonwood Road from the intersection of Opalocka Road to the entrance

to the Boulder Brush Boundary, provide the owner/occupant at least 24 hours advance notice of anticipated construction schedule and activities. Information should include a contact phone number so that noise concerns can be brought to the contractor's attention.

- Restrict the use of engine exhaust compression braking (a.k.a. "jake braking") on all trucks.
- All stationary construction equipment (especially pieces that are expected to operate frequently, or in a continuous or otherwise "steady-state" manner) should be located as far as practicable from NSLUs.
- Vehicles should observe limitations on duration of engine idling, as defined by applicable standards (e.g., air quality regulations and policies).

For roadway improvements to Ribbonwood Road, which would benefit members of the community that use this roadway, the Project applicant or its contractors shall apply for a variance per Sections 36.423 through 36.427 of the San Diego County Code. This variance, granted after review and approval by the County's designated noise control officer, provides a means for "non-emergency work on a public right-of-way, public utility facility, public transportation facility or some other project for the benefit of the general public" to temporarily deviate from the 75 dBA $L_{eq(8hr)}$ construction noise standard per 36.409 of the County Noise Ordinance.

Campo Wind Facilities

No mitigation measures are required for the Campo Wind Facilities related to Noise.

7.7.2 Project Design Features

No project design features are proposed for the Boulder Brush Facilities or Campo Wind Facilities related to Noise.

7.8 Traffic and Transportation

7.8.1 Mitigation Measures

Boulder Brush Facilities

No mitigation is required for the Boulder Brush Facilities related to Traffic and Transportation. See Section 7.8.2 for the Project Design Feature that would be implemented during construction of the Boulder Brush Facilities.

Campo Wind Facilities

The mitigation measures below are provided to reduce impacts associated with traffic and transportation to the extent feasible related to the Campo Wind Facilities. The County has no ability to require mitigation for impacts occurring on the Reservation, but refers the reader to the BIA's EIS for the Project (BIA 2019), which contains traffic mitigation measures M-TR-A, M-TR-B, and M-TR-C, which are also listed below. These measures are the recommended mitigation measures included in the EIS for the Campo Wind Facilities subject to the BIA's Record of Decision. With these mitigation measures, traffic impacts will be reduced to a level of less than significant.

M-TR-A Use of Traffic Flagger during PM Peak Hour. As set forth in the Project's Environmental Impact Statement (EIS), the Developer shall use a trained and qualified traffic flagger for the duration of construction at the Project driveways at the end of the day shift (PM peak hour) to stagger outbound Project traffic to minimize delays at the intersection of Crestwood Road/Interstate 8 westbound ramps. Although this mitigation is not warranted, it corresponds to M-TRA-1 (Use of Traffic Flagger during the PM Peak Hour) included in the Bureau of Indian Affairs' EIS for the Project.

M-TR-B Repair and Restoration of Roads. Prior to obtaining a certificate of occupancy or operation from the Bureau of Indian Affairs (BIA), the Developer shall, based on requirements imposed by the BIA and the Campo Band of Diegueño Mission Indians (Tribe) described in the Project's Environmental Impact Statement (EIS), repair roadways damaged by construction activities. BIA streets shall be repaired, resurfaced, and restriped by the contractor prior to release of Project. Although this mitigation is not warranted, it corresponds to M-TRA-2 (Repair and Restoration of Roads) included in the BIA's EIS for the Project.

M-TR-C Traffic Control and Management Plan. Prior to obtaining a certificate of occupancy or operation from the Bureau of Indian Affairs (BIA), the Developer shall implement a traffic control and management plan including following measures:

- Temporary traffic control devices in accordance with the California Department of Transportation's (Caltrans) California Manual on Uniform Traffic Control Device to identify locations/sections where construction is ongoing. This may include slow-moving-vehicle warning signs, signage to warn of merging trucks, barriers for separating construction and non-construction traffic, use of traffic control flaggers, and any additional measures required for the sole convenience of safely passing non-construction traffic (including transit, bicyclists and pedestrians) through and around construction areas.

- Coordination with Caltrans to secure the necessary encroachment and trip permits necessary for specialized haul trucks. Also, any excessive height/length vehicles should use pilot car services to provide safe over-the-road operations and overhead height warnings, if necessary.
- Coordination with Caltrans and California Highway Patrol to secure necessary encroachment permit for overnight highway closure along Interstate 8 to string the On-Reservation gen-tie line across the freeway.
- Notification of the California Highway Patrol, if necessary, to facilitate slowing freeway traffic to ensure safe access for motorists.
- Coordination with Caltrans, California Highway Patrol, and County officials, including the Sheriff's department.
- Employment of a contract transport company that would be responsible for surveying the route to determine how turns on existing roads would be accomplished and ensuring that is reflected in the Traffic Control and Management Plan.
- Establishment of procedures for coordinating with local emergency response agencies to ensure dissemination of information regarding emergency response vehicle routes affected by construction activities.
- Encouragement of carpooling among workers to reduce worker commuter trips entering and exiting the Project Area.

7.8.2 Project Design Features

Boulder Brush Facilities

With the implementation of **PDF-TR-1**, all impacts associated with construction of the Boulder Brush Facilities would be less than significant. No mitigation is required for the Boulder Brush Facilities.

PDF-TR-1 Traffic Control Plan. Prior to obtaining a grading permit from the County of San Diego for the Boulder Brush Facilities, the Boulder Brush Developer shall implement a construction Traffic Control Plan. The Boulder Brush Developer would participate in the Transportation Impact Fee program by paying into the program based on the projected use and new trips generated by the development of the Boulder Brush Facilities on local and regional roads.

Campo Wind Facilities

No project design features are proposed for the Campo Wind Facilities related to Traffic and Transportation.

7.9 Tribal Cultural Resources

7.9.1 Mitigation Measures

Boulder Brush Facilities

This section discusses mitigation measures as applicable to Project components on County administered lands (Boulder Brush Facilities and Off-Reservation [i.e., anything outside of the Reservation Boundary] improvements).

M-TCR-1 Temporary Fencing. To prevent inadvertent disturbance of tribal cultural resources (TCRs) within the avoidance areas (preservation in place), temporary fencing shall be installed where resources are located within 50 feet of the Boulder Brush area of direct impact (ADI). The temporary fencing shall include the following requirements:

- Prior to the commencement of any grading and/or clearing in association with the grading and/or improvement plan, temporary orange construction fencing shall be placed to protect archaeological sites from inadvertent disturbance within the avoidance areas (preservation in place) and the unimpacted portions of sites outside of the Boulder Brush ADI during earth-disturbing activities. Temporary fencing shall be installed prior to the pre-construction meeting and prior to any clearing, grubbing, trenching, grading, or land disturbances; and shall remain for the duration of earth-disturbing activities. The temporary fencing plan shall be prepared in consultation with a County of San Diego (County)-approved archaeologist and the Kumeyaay Native American monitor. The fence shall be installed under the supervision of the County-approved archaeologist prior to commencement of any earth-disturbing activities. The temporary fencing plan shall include the following:
 - Temporary fencing is required in all locations of the Project where proposed grading or clearing is within 50 feet of any archaeological site within avoidance areas (open space) or the unaffected portions of sites outside of the Boulder Brush ADI. The Project archaeologist shall identify the locations where temporary fencing is required.

- The placement of temporary fencing shall be approved by the County. Upon approval, the temporary fencing shall be installed under the supervision of the Project archaeologist.
- A signed and stamped statement from a California Registered Engineer, or licensed surveyor shall be submitted to Planning & Development Services for approval. The statement shall identify that temporary fencing has been installed in all required locations where grading or clearing is within 50 feet of an archaeological site or the unaffected portions of sites outside of the Boulder Brush ADI.
- The fencing shall remain in place until the conclusion of grading activities, after which the fencing shall be removed.
- Installation of temporary fencing shall require the presence of monitor(s) (archaeological and Kumeyaay Native American).

M-TCR-2 Archaeological and Tribal Monitoring. To mitigate for potential impacts to undiscovered, buried tribal cultural resources (TCRs) in the Boulder Brush area of direct impact (ADI), an archaeological and tribal monitoring program and potential data recovery program shall be implemented pursuant to the County of San Diego's (County's) Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources and the California Environmental Quality Act (CEQA) and shall include the following requirements:

- a. Pre-Construction
 - The Boulder Brush Developer shall contract with a County-approved archaeologist to perform archaeological and tribal monitoring. The Project archaeologist shall contract with a Kumeyaay Native American monitor(s) to conduct Native American monitoring for the Project.
 - The pre-construction meeting shall be attended by the Project archaeologist and the Kumeyaay Native American monitor(s).
- b. Construction
 - Monitoring. Both the Project archaeologist and Kumeyaay Native American monitor(s) are to be on site during all earth-disturbing activities. The frequency and location of monitoring of native soils shall be determined by the Project archaeologist in consultation with the Kumeyaay Native American monitor(s). Both the Project archaeologist and the Kumeyaay Native American monitor(s) shall evaluate fill soils to ensure that they are negative for cultural resources.

- Inadvertent Discoveries
 - Both the Project archaeologist and the Kumeyaay Native American monitor(s) have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - The Project archaeologist shall contact the County archaeologist.
 - The Project archaeologist, in consultation with the County archaeologist and the Kumeyaay Native American monitor(s), shall determine the significance of discovered resources and whether they constitute a TCR.
 - Construction activities shall be allowed to resume after the County archaeologist has agreed with the significance evaluation.
 - Isolates and non-significant deposits shall be minimally documented in the field. If the isolates and non-significant deposits are not be collected by the Project archaeologist, the Kumeyaay Native American monitor(s) may collect the cultural material for transfer to a tribal curation facility or repatriation program.
 - If cultural resources are determined to be significant, a research design and data recovery program shall be prepared by the Project archaeologist in consultation with the Kumeyaay Native American monitor(s) and approved by the County archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites, the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
- c. Human Remains
 - The Property Owner or their representative (Boulder Brush Developer) shall contact the County coroner and the County Planning & Development Services staff archaeologist.
 - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County coroner has made the necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Kumeyaay Native American monitor.
 - If the remains are determined to be of Native American origin, the most likely descendant (MLD), as identified by the Native American Heritage

Commission (NAHC), shall be contacted by the Property Owner or their representative to determine proper treatment and disposition of the remains.

- The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by California Public Resources Code, Section 5097.98, has been conducted.
- California Public Resources Code, Section 5097.98; CEQA Guidelines, Section 15064.5; and California Health and Safety Code, Section 7050.5, shall be followed in the event that human remains are discovered.
- On the Reservation, the procedures outlined in the Native American Graves Protection and Repatriation Act (NAGPRA) will be followed. The Tribe is the responsible government agency for treatment of human remains under NAGPRA.

d. Rough Grading

- Upon completion of rough grading, a monitoring report identifying whether resources were encountered shall be prepared. A copy of the monitoring report shall be provided to any culturally affiliated tribe that requests a copy.

e. Final Grading

- A final report substantiating that earth-disturbing activities are completed and whether cultural resources were encountered shall be prepared. A copy of the final report shall be submitted to the South Coastal Information Center (SCIC) and any culturally affiliated tribe that requests a copy.

f. Cultural Material Conveyance

The final report shall include the following:

- Evidence that all prehistoric materials have been curated at a San Diego curation facility or tribal curation facility that meets federal standards according to Title 36, Part 79, of the Code of Federal Regulations or alternatively have been repatriated to a culturally affiliated tribe.
- Evidence that historic materials have been curated at a San Diego curation facility that meets federal standards according to Title 36, Part 79, of the Code of Federal Regulations.

M-TCR-3 Three Resource Protection Ordinance (RPO) significant sites (CA-SDI-7140, CA-SDI-7151/7162, and CA-SDI-22581), are located on unincorporated County of San Diego lands within the Boulder Brush Boundary and contain human

remains. The locations of human remains at each site shall be preserved in perpetuity through preservation in place. The entirety of each site will be avoided by the Boulder Brush Facilities.

Campo Wind Facilities

M-CR-A, M-CR-B, and M-CR-C outlined in Section 2.4 of this EIR, are recommended in the EIS and would reduce potential impacts associated with TCRs to less than significant. These measures are recommended mitigation measures in the EIS for the Campo Wind Facilities on the Reservation, subject to the BIA's Record of Decision. **M-CR-A, M-CR-B, and M-CR-C** outlined in Section 2.4 of this EIR, are included below for reference.

M-CR-A Monitoring and Treatment Plan. A post-environmental review cultural resources monitoring and discoveries treatment plan (Monitoring and Treatment Plan) will be prepared prior to the start of construction and shall outline the specific requirements for monitoring at the conclusion of stakeholder consultation. The Monitoring and Treatment Plan shall clearly identify roles and responsibilities of Project personnel, and lines of communication and authority for reporting and management. The Monitoring and Treatment Plan shall include the procedures to be followed when construction results in an inadvertent discovery including work stoppage, protection of the discovery to allow for inspection by a qualified archaeologist, significance evaluation if the resource is not an isolated find, coordination with the Bureau of Indian Affairs (BIA) and Developer to attempt avoidance of further effects if the resource is found to be significant, and the procedures for data recovery mitigation if avoidance is not feasible. The Monitoring and Treatment Plan shall be prepared by the Developer's Secretary of the Interior-qualified archaeologist and submitted to the BIA for review and approval prior to the start of construction.

M-CR-B Archaeological and Native American Monitoring. It is anticipated that monitoring will be required for all primary ground disturbance and for extended excavations when construction encroaches on historic properties that are avoided but are near to ground-disturbing activities, and at those locations where sensitive remains or significant deposits are more likely to be unearthed during construction-related ground disturbance.

Ground-disturbing activities include, but are not limited to, brush clearance, grubbing, excavation, trenching, grading, and drilling. Any archaeological monitors shall be qualified archaeologists or work under the direct supervision of a qualified archaeologist, defined as an archaeologist meeting the Secretary of the

Interior's standards for professional archaeology, and shall be approved by the Bureau of Indian Affairs (BIA). The monitors shall be familiar with the types of historical and prehistoric resources that could be encountered on the Project Site.

The archaeological monitors shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis. The archaeological monitors shall be present on the Project Site according to a schedule as detailed in the Monitoring and Treatment Plan and shall maintain a daily log of activities, which will be appended to a final monitoring report that shall be submitted to the BIA and South Coastal Information Center at the conclusion of monitoring. Specific monitoring reporting procedures shall be detailed in the Monitoring and Treatment Plan.

In the event of inadvertent discovery of human remains, all work shall immediately be halted within a 100-foot radius and temporary protective measures shall be implemented. The Developer shall immediately contact the Tribe, and follow the Native American Graves Protection and Repatriation Act (NAGPRA) plan of action provided in the Monitoring and Treatment Plan. The NAGPRA plan of action will minimally include coordination with the San Diego County Coroner (Coroner) for formal determination of the remains. If the Coroner determines that the remains are Native American, the Coroner shall contact the Native American Heritage Commission, in accordance with California Health and Safety Code, Section 7050.5c, and California Public Resources Code, Section 5097.98 (as amended by Assembly Bill 2641). The Native American Heritage Commission shall coordinate with the Tribe to identify a Most Likely Descendant for the remains per California Public Resources Code, Section 5097.98, unless the Tribe has already made such a determination. If the remains are determined to be neither of forensic value to the Coroner, nor of Native American origin, provisions of the California Health and Safety Code (7100 et seq.) directing identification of the next of kin will apply.

M-CR-C Significance Evaluation and Data Recovery. Requirements for treatment of inadvertent discoveries that occur during construction, operation and maintenance, and decommissioning, shall be detailed in the Monitoring and Treatment Plan (M-CR-A), and shall minimally include stoppage of all activity within 100 feet of the find until a qualified archaeologist can assess the significance of the find. The Bureau of Indian Affairs (BIA) shall also be contacted. If the qualified archaeologist, in consultation with the BIA, determines the resource is significant (i.e., qualifies as a historic property), then the archaeologist shall determine appropriate avoidance measures or other appropriate mitigation. Preservation in place shall be the preferred manner of mitigation to avoid effects on significant cultural resources. If it is demonstrated that resources cannot be feasibly avoided,

the qualified archaeologist shall implement the provisions for mitigation detailed in the Monitoring and Treatment Plan. Work shall not resume within 100 feet of the discovery until permission is received from the BIA.

Where preservation in place of a significant archaeological resource is not feasible, a qualified archaeologist, in consultation with the BIA, and the Developer shall complete archaeological data recovery. The standard for completion of data recovery may vary for individual archaeological sites, but is understood herein to be collection of a statistically representative sample of the archaeological deposits such that data redundancy is achieved and the unique properties of the archaeological sites are addressed. Implementation of data recovery mitigation shall include the following steps:

1. The Monitoring and Treatment Plan (M-CR-A) will include a research design and archaeological data recovery plan prior to ground disturbance for the recovery of resources in unavoidable sites that will capture those categories of data for which the site is significant, and implement the data recovery plan.
2. The data recovery phase shall focus on recovering archaeological data sufficient to mitigate the destruction of a portion of the site or the entire site within the area of direct impacts.
3. If, in the opinion of the qualified archaeologist and in light of the data available, the significance of the site is such that data recovery cannot capture the values that qualify the site for inclusion on the National Register of Historic Places (NRHP), the Developer shall reconsider Project plans in light of the high value of the cultural resource, and implement more substantial modifications to the proposed Project that shall allow the site to be preserved intact, such as Project redesign or capping the site with fill soil.
4. Standard archaeological collection and/or excavation units may be used, with methods consistent with those employed during previous investigations in the region. Following completion of the excavations, all cultural materials shall be washed, cataloged, and analyzed. Technical analyses may include artifact analysis, radiocarbon dating, obsidian hydration, pollen and protein residue, and other analyses as needed to describe the cultural materials and archaeological deposits. A data recovery report shall be prepared and filed with the BIA and the South Coastal Information Center.
5. The Developer shall provide for the permanent curation of recovered materials during construction at a federally recognized archaeological repository, such as the San Diego Archaeological Center or the Imperial Valley Desert Museum.

For archaeological sites considered significant and eligible for NRHP listing that can be avoided, reasonable protective measures shall be provided, including protective fencing around an avoided resource with an appropriate buffer, silt fencing to avoid indirect effects through Project-related runoff, and other measures as applicable. In certain instances, avoidance through capping using sterile fill matrix, use of rubber mats, or other measures may be deemed appropriate to achieve avoidance.

7.9.2 Project Design Features

No project design features are proposed for the Boulder Brush Facilities or Campo Wind Facilities related to Tribal Cultural Resources.

7.10 Wildfire

7.10.1 Mitigation Measures

Boulder Brush Facilities

M-WF-1 is provided to reduce impacts associated with the possibility of wildfires. This mitigation measure shall be required of Boulder Brush Facilities as part of the County's Major Use Permit approval to address wildfire risks associated with implementation of the Boulder Brush Facilities.

M-WF-1 Fire Protection Measures. To minimize the fire risk, all fire protection measures and features identified in the Boulder Brush Facilities Fire Protection Plan (FPP) shall be implemented in conjunction with development of the Boulder Brush Facilities.

The following measures and design considerations identified in Section 7 of the FPP (Appendix I) would be employed:

- FMZs throughout the Boulder Brush Corridor for Off-Reservation gen-tie power line structures, high-voltage substation, switchyard, and access roads (Required measure).
- A contiguous fuel modification zone 50 feet outside of the perimeter fences (approximately 100 feet from the electrical components) around the high-voltage substation and switchyard would be maintained. The high-voltage substation pad area will be free of vegetation around all electrical equipment (Required measure).
- A technical report (See Appendix H to this FPP for more details) indicating special precautions for firefighting response (Code-exceeding measure).

- Up to 30-foot wide primary access road that connects to the high-voltage substation and switchyard. 16-foot wide roads provide access to Off-Reservation gen-tie power line structures (Required measure).
- Off-Reservation gen-tie power line poles would be non-combustible (steel) with lightning protection (Code-exceeding measure).
- Participation in an Agreement with SDCFA, for funding firefighting and emergency medical resources, the details of which will be determined in the Fire Service Developer Agreement (Required measure).
- Boulder Brush Developer annual fuel modification zone inspections to ensure compliance with this FPP (Code-exceeding measure).
- Motion sensor illuminated (and/or reflective) signage at main entrance (Required measure).
- Preparation and implementation of a CFPP for the Boulder Brush Facilities. (Code-exceeding measure).
- Class B/C, 15-pound portable carbon dioxide (CO₂) fire extinguishers mounted at high-voltage transformer units (Required measure).
- Three (3) 10,000-gallon water tanks will be installed near the switchyard and high-voltage substation dedicated for firefighting purposes (Required measure).
- During construction, one pick-up truck would be outfitted with Skid-Mounted Unit, including fire pump, hoses, and nozzle, and personnel properly trained to use the firefighting equipment. After construction is completed, the pickup truck will remain on the Project Site and personnel will be trained to use the firefighting equipment (Required measure).
- Boulder Brush Facilities contact information with local fire agencies/stations to assist responding firefighters during an emergency (Required measure).
- On-going maintenance of all facility components for the life of the Boulder Brush Facilities (Required measure).
- Maintenance logs to be kept and made available upon request to SDCFA/CAL FIRE (Required measure).
- Consistent placarding and labeling of all components for fire safety/response (Required measure).

Additional measures to reduce the risk of ignitions would also be employed, as appropriate, during each phase of the Boulder Brush Facilities (construction, operation, maintenance, and decommissioning). These measures would be enforced by the site Safety Officer (SSO) and through ongoing worker safety training:

- Fire rules shall be posted on the Facilities bulletin board at the contractor's field office or permanent operations and maintenance building in areas visible to employees. This shall include the field offices of all contractors and subcontractors if more than one.
- Internal combustion engines used for construction of the Boulder Brush Facilities shall be equipped with spark arrestors that are in good working order.
- Once initial two-track roads have been cut, light-duty trucks and cars shall be used only on roads where the roadway is cleared of vegetation. Mufflers on cars and light-duty trucks shall be maintained in good working order.
- A cache of shovels, Mcleods, and Pulaskis shall be available at staging sites. The amount of equipment shall be determined by consultation between SSO and SDCFA/CAL FIRE. Additionally, on-site pickup trucks would be equipped with first aid kits, fire extinguishers, and shovels. Contractor vehicles would be required to include the same basic equipment.
- Equipment parking areas and small stationary engine sites (e.g., generators) shall be cleared of extraneous flammable materials and provided with a gravel surface.
- Restrict use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives during Red Flag Warnings. When the above tools are used, water tanks equipped with hoses, fire rakes, and axes shall be easily accessible to personnel.
- A fire watch (person responsible for monitoring for ignitions) shall be provided during hot work and shall monitor for a minimum of 30 minutes following completion of the hot work activities.
- No smoking within 50 feet of combustible materials storage, 25 feet of dispensing, 20 feet of storage/refueling areas, and no smoking on Red Flag Warning days. No smoking signs shall be posted in these areas.
- Each construction area (if construction occurs simultaneously at various locations) shall be equipped with fire extinguishers and firefighting equipment sufficient to extinguish small fires.

- The Boulder Brush Developer shall ensure coordination with SDCFA/CAL FIRE to create a training component for emergency first responders to prepare for specialized emergency incidents that may occur at the Boulder Brush Facilities.
- Construction workers, plant personnel, and maintenance workers visiting the plant and/or transmission lines to perform maintenance activities shall receive training on the evacuation plans and routes, proper use of firefighting equipment and procedures to be followed in the event of a fire. Training records shall be maintained and be available for review by the SDCFA/CAL FIRE.
- Employees shall participate in annual fire prevention and response training exercises with SDCFA/CAL FIRE.
- Implement ongoing fire patrols during Red Flag Warning periods. The SSO shall be assigned as fire patrol to monitor work activities when an activity risk exists for fire compliance. The SSO shall verify proper tools and equipment are on site, assess any fire agency work restrictions, and serve as a lookout for fire starts, including staying behind (e.g., a fire watch) to make certain no residual fire exists. The SSO shall perform routine patrols of the facilities during the fire season equipped with a portable fire extinguisher and communications equipment. SDCFA/CAL FIRE shall be notified of the name and contact information of the SSO in the event of any change.
- Remote monitoring of major electrical equipment (transformers and inverters) shall screen for unusual operating conditions. Higher than nominal temperatures, for example, could be compared with other operational factors to indicate the potential for overheating which, under certain conditions, could precipitate a fire. Units could then be shut down or generation could be curtailed remotely until corrective actions are taken.
- Fires ignited on site shall be immediately reported to SDCFA and CAL FIRE.
- The engineering, procurement, and construction contracts for the Boulder Brush Facilities shall clearly state the fire safety requirements that are the responsibility of any person who enters the Boulder Brush Facilities, as described in the CFPP.
- Upon completion of constructing the internal roadway network, light trucks and cars shall be used only on roads where the roadway is cleared of vegetation.

Roads are to be kept free of ruts, drainages, wash boarding, and maintained in a hard-compacted state to support fire engines.

a) All site Vehicles used during construction, operation and maintenance, and decommissioning shall be equipped with the following fire prevention equipment (employee vehicles are not required to include this equipment):

- 10 pound, 4A:80BC dry chemical fire extinguisher
- 46-inch round-point shovel
- 5 gallons of water or a 5-gallon water backpack
- First aid kit

- No driving (cars, trucks, all-terrain vehicles, or similar) over unmaintained dry vegetation shall occur.
- Vehicles can be parked a minimum of 10 feet from vegetation as long as the vehicle is parked in an area previously cleared of vegetation.
- Site activities shall be restricted during Red Flag Warning weather periods; stay alert to fire and weather conditions and, in the event of an emergency, evacuate employees if it is safe to do so.
- Consultants/contractors shall conduct operations safely to limit the risk of fire.
- Minimize combustible and flammable materials storage on site.
- Store combustible or flammable materials that need to be on site away from ignition sources.
- Keep evacuation routes free of obstructions.
- Tanks and containers shall be labeled as required in CFC Chapter 34, to identify potentially hazardous materials with their contents, and store in the same location as flammable or combustible liquids.
- Perform “hot work”² according to fire safety practices in a controlled environment and with fire suppression equipment at the job site. “Hot work” is defined as operations involving cutting, welding, thermite welding, brazing, soldering, grinding, thermal spraying, thawing pipe, or other similar operations. Hot work areas are defined as the areas exposed to sparks, hot slag, radiant heat, or convective heat because of the hot work.

² “Hot work” is defined as operations involving cutting, welding, thermite welding, brazing, soldering, grinding, thermal spraying, thawing pipe, or other similar operations. Hot work areas are defined as the areas exposed to sparks, hot slag, radiant heat, or convective heat because of the hot work.

- A fire watch person (Fire Patrol), with extinguishing capability (e.g. fire extinguishers), should be in place for all ‘Hot Work’ activities during construction. Ensure hot work adheres to the guidelines provided.
- Report and repair fuel leaks without delay.
- Do not overload circuits or rely on extension cords where other options would be safer.
- Turn off and unplug electrical equipment when not in use.

Campo Wind Facilities

M-BI-C (h) is recommended in the EIS and referenced herein, which would reduce impacts associated with the possibility of wildfires. This measure is the recommended mitigation measure included in the EIS, for the Campo Wind Facilities on the Reservation, subject to the BIA’s Record of Decision.

M-BI-C (h) Fire Protection. To minimize the potential exposure of the Project to fire hazards, a Boulder Brush Fire Protection Plan (FPP) shall be prepared, and a Fire Protection Plan for the Campo Wind Facilities shall be prepared to the satisfaction of the CRFPD. The FPPs shall be implemented in conjunction with development of the Project.

Additionally, the following measures would be employed, as appropriate, during each phase of the Campo Wind Facilities (construction, operation and maintenance, and decommissioning) to reduce the risk of ignitions. These measures would be enforced by the SSO and through ongoing worker safety training:

- Fire rules shall be posted on the bulletin board at the contractor’s field office or permanent operations and maintenance building in areas visible to employees. This shall include the field offices of all contractors and subcontractors if more than one.
- Internal combustion engines used at the Facilities site shall be equipped with spark arrestors that are in good working order.
- Once initial two-track roads have been cut and initial fencing has been completed, light-duty trucks and cars shall be used only on roads where the roadway is cleared of vegetation. Mufflers on cars and light-duty trucks shall be maintained in good working order.
- During construction, the Campo Wind Facilities site will have at a minimum one pick-up truck outfitted with Type-6 Skid-Mounted Units, including fire pump, hose, and nozzle, that are staffed with personnel properly trained to use the equipment.

- During construction, the Project shall be equipped with up to three water trucks each with a 4,000-gallon capacity. Each truck would be equipped with 50 feet of 0.25-inch fast response hose with fog nozzles. Any hose size greater than 1.5 inches shall use “national hose” couplings.
- A cache of shovels, Mcleods, and Pulaskis shall be available at staging sites. The amount of equipment shall be determined by consultation between SSO and CRFPD. Additionally, on-site pickup trucks would be equipped with first aid kits, fire extinguishers, and shovels. Contractor vehicles would be required to include the same basic equipment.
- Equipment parking areas and small stationary engine sites shall be cleared of extraneous flammable materials and provided with a gravel surface.
- The on-site contractor or Campo Wind Facilities staff shall restrict use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives during Red Flag Warnings. When the above tools are used, water tanks equipped with hoses, fire rakes, and axes shall be easily accessible to personnel.
- A fire watch (person responsible for monitoring for ignitions) shall be provided during hot work and shall monitor for a minimum of 30 minutes following completion of the hot work activities.
- No smoking within 50 feet of combustible materials storage, 25 feet of dispensing, 20 feet of storage/refueling areas, and no smoking on Red Flag Warning days. No smoking signs shall be posted in these areas.
- Each Facility construction site (if construction occurs simultaneously at various locations) shall be equipped with fire extinguishers and firefighting equipment sufficient to extinguish small fires.
- The on-site contractor or Campo Wind Facilities staff shall coordinate with the CRFPD to create a training component for emergency first responders to prepare for specialized emergency incidents that may occur on the Campo wind Facilities site.
- Construction workers, plant personnel, and maintenance workers visiting the plant and/or transmission lines to perform maintenance activities shall receive training on the evacuation plans and routes, proper use of firefighting equipment and procedures to be followed in the event of a fire. Training records shall be maintained and be available for review by the CRFPD.
- Vegetation near all buildings, substation electrical equipment, ancillary equipment, and access roads shall be controlled through periodic cutting and spraying of weeds. Vegetation near ancillary equipment and access roads shall be controlled through implementing weed management practices. The collector substation within the Campo Wind Facilities shall include contiguous fuel modification zone from 30 feet outside of

the perimeter fence inward onto the pad area. The substation pad area shall be free of vegetation around electrical equipment.

- On-site employees shall participate in annual fire prevention and response training exercises with the CRFPD.
- The Campo Wind Facilities shall implement ongoing fire patrols during Red Flag Warning periods. The SSO shall be assigned as fire patrol to monitor work activities when an activity risk exists for fire compliance. The SSO shall verify proper tools and equipment are on site, assess any fire agency work restrictions, and serve as a lookout for fire starts, including staying behind (e.g., a fire watch) to make certain no residual fire exists. The SSO shall perform routine patrols of the facilities during the fire season equipped with a portable fire extinguisher and communications equipment. The Facilities staff shall notify the CRFPD FIRE of the name and contact information of the SSO in the event of any change.
- Remote monitoring of major electrical equipment (transformers and inverters) shall screen for unusual operating conditions. Higher than nominal temperatures, for example, could be compared with other operational factors to indicate the potential for overheating which, under certain conditions, could precipitate a fire. Units could then be shut down or generation could be curtailed remotely until corrective actions are taken.
- Fires ignited on site shall be immediately reported to the CRFPD.
- The engineering, procurement, and construction contracts for the Facilities shall clearly state the fire safety requirements that are the responsibility of any person who enters the Campo Wind Facilities site, as described in the Fire Risk Analysis and Management Plan.
- Upon completion of constructing the internal roadway network and initial fencing completed, light trucks and cars shall be used only on roads where the roadway is cleared of vegetation. Roads are to be kept free of ruts, drainages, wash boarding, and maintained in a hard compacted state to support fire engines.
 - All site vehicles used during construction, operation and maintenance, and decommissioning shall be equipped with the following fire prevention equipment (employee vehicles are not required to include this equipment): 10 pound, 4A:80BC dry chemical fire extinguisher
 - 46-inch round-point shovel
 - 5 gallons of water or a 5-gallon water backpack
 - First aid kit
- No driving (cars, trucks, all-terrain vehicles, or similar) over unmaintained dry vegetation shall occur.

- Vehicles can be parked a minimum of 10 feet from any vegetation as long as the vehicle is parked in an area devoid of any vegetation.
- Clear parking areas and fuel or oil storage areas of grass and brush by a distance of at least 30 feet.
- Site activities shall be restricted during Red Flag Warning weather periods; stay alert to fire and weather conditions and evacuate employees, if safe to do so.
- Consultants/contractors shall conduct operations safely to limit the risk of fire.
- Minimize combustible and flammable materials storage on site.
- Store any combustible or flammable materials that need to be on site away from ignition sources.
- Keep evacuation routes free of obstructions.
- Tanks and containers shall be labeled as required in CFC Chapter 34, to identify potentially hazardous materials with their contents and store in the same location as flammable or combustible liquids.
- Perform “hot work”³ according to fire safety practices in a controlled environment and with fire suppression equipment at the job site. A fire watch person (Fire Patrol), with extinguishing capability (e.g. fire extinguishers), should be in place for all ‘Hot Work’ activities during construction. Ensure hot work adheres to the guidelines provided.
- Report and repair fuel leaks without delay.
- Do not overload circuits or rely on extension cords where other options would be safer.
- Turn off and unplug electrical equipment when not in use.

7.10.2 Project Design Features

No project design features are proposed for the Boulder Brush Facilities or the Campo Wind Facilities related to Wildfire.

³ ‘Hot work’ is defined as operations involving cutting, welding, thermite welding, brazing, soldering, grinding, thermal spraying, thawing pipe, or other similar operations. Hot work areas are defined as the areas exposed to sparks, hot slag, radiant heat, or convective heat because of the hot work.

INTENTIONALLY LEFT BLANK