CHAPTER S. EXECUTIVE SUMMARY

This chapter provides a summary of the Draft Environmental Impact Report (EIR) for the Starlight Solar Project (project), prepared in accordance with the California Environmental Quality Act (CEQA). In compliance with CEQA requirements, this EIR (1) evaluates the potentially significant direct, indirect, and cumulative environmental impacts of the project; (2) identifies feasible measures to avoid or substantially mitigate significant adverse impacts; and (3) explores a range of reasonable alternatives to the project, including the mandatory No Project Alternative. The County of San Diego (County) serves as the lead agency for the project and is primarily responsible for preparing this EIR. According to the State CEQA Guidelines (14 California Code of Regulations 15000 et seq.), this EIR encompasses an assessment of the entire project's effects. The County will use this EIR to inform public agencies, the public, and decision-makers about the significant environmental impacts of the project, suggest ways to minimize these impacts, and describe reasonable alternatives to the project.

S.1 PROJECT SYNOPSIS

S.1.1 Project Description

Starlight Solar LLC (Applicant) is requesting a Major Use Permit (MUP) from the County of San Diego (County) to develop, finance, construct, and operate an unoccupied renewable energy solar and battery storage project in southeastern San Diego County. The County's General Plan (County of San Diego 2011) designates the project site as Rural Lands 80 (RL-80), and the County's Zoning Ordinance identifies the site as General Rural (S92). The County's General Regulation states that solar power plant projects are considered a Major Impact Service and Utility in all zones and thus require the approval of a MUP (County of San Diego 2022).

The project would use photovoltaic (PV) electric generation system technology to produce approximately 100 megawatts (MW) of alternating current (AC) of solar energy at the utility scale. The project would also include an 868-megawatt-hour (MWh) (approximately 217 MW, 4-hour batteries) battery energy storage system (BESS). The project site encompasses a total of approximately 588 acres within the Mountain Empire Subregion in unincorporated San Diego County (Figure 1-1 in Chapter 1.0, Project Description, Location, and Environmental Setting). The project would be constructed in two phases: the first phase would consist of 20 MW of solar energy generation and 17 MW of battery storage, and the second would consist of 80 MW of solar energy generation and 200 MW of battery storage.

S.1.2 Project Objectives

Specific objectives for the project are as follows:

1. Develop a solar energy project that maximizes energy generation and battery storage potential with a rated capacity of approximately 100 MW and an approximately 217-MW BESS facility that can supply electricity to indirectly reduce the need to emit greenhouse gases (GHGs) caused by the generation of similar quantities of electricity from either existing or future nonrenewable sources to meet existing and future electricity demands, including during on-peak power periods.
2. Develop a renewable solar energy project that can meet the criteria to achieve the maximum state and federal solar investment tax credits, which are intended to decrease the cost of renewable energy generation and delivery, promote the diversity of energy supply, and decrease the dependence of the United States on foreign energy supplies.

3. Assist in achieving the state's Renewables Portfolio Standard (RPS), as mandated under the 100 Percent Clean Energy Act of 2018 (Senate Bill 100), by developing and constructing California RPS-qualified solar generation from eligible renewable energy resources by December 31, 2045.
4. Develop a utility-scale solar energy project that improves electrical reliability for the San Diego region by providing a source of local generation as near as possible to existing San Diego Gas and Electric (SDG&E) transmission infrastructure.
5. Provide a new source of energy storage that assists the state in achieving or exceeding its energy storage targets, consistent with the terms of Assembly Bill 2514, and its GHG reduction targets, consistent with Assembly Bill 32, Senate Bill 32, and Assembly Bill 1279.
6. Site a solar energy project in an area within San Diego County that has excellent solar attributes, including but not limited to high direct normal irradiance, in order to maximize productivity.
7. Develop a utility-scale solar energy facility within San Diego County that supports the economy by investing in the region and creating construction jobs.

S.1.3 Project Location

The project site encompasses approximately 588 acres in unincorporated San Diego County, south of the community of Boulevard and approximately 0.93 mile north of the United States border. The project site is approximately 1 mile south of Interstate 8 (I-8) and Old Highway 80, and east of Tierra Del Sol Road. Regional access to the project site would be provided by State Route 94 and I-8. Access to the project site would be provided by Jewel Valley Road, which runs north to south and connects to Old Highway 80 in the town of Boulevard. An underground generation-tie (gen-tie) line would be located on the east side of Tule Jim Lane and connect into the southeastern corner of the SDG&E Boulevard East Substation. Although the majority would be underground, the gen-tie line would have one overhead portion in order to cross Tule Jim Road and would encompass 7 acres. An off-site vehicle turnaround area on Jewel Valley Road would be 0.06 acre in size.

S.1.4 Environmental Setting

The entire project site is currently undeveloped. It lies within the boundaries of the privately owned Empire Ranch, an approximately 3,795-acre ranch that stretches from south of Old Highway 80 to the United States border with Mexico. Beyond the project site boundaries, Empire Ranch currently contains a ranch compound with residential buildings, structures for livestock, private roads, and an airstrip. Empire Ranch also previously contained agricultural uses, which are currently reduced in scale. A section of the San Diego and Arizona Eastern Railway that is no longer in service runs east to west through the southern portion of the project site. Boundary Creek also flows in a southeastern direction directly south of Jewel Valley Road.

The project site is surrounded by unpaved roads, other rural residential development, an electrical substation, and undeveloped land. The SDG&E Boulevard East Substation is located on approximately 2 acres to the northeast of the project site, directly south of Old Highway 80. The project site is topographically diverse. In the northern portion of the site, east- and south-facing sloping hillsides are characteristic, with elevations up to 3,650 feet above mean sea level (amsl) in the northeast. In the southern portion of the site, elevation decreases to 3,450 amsl. There are 14 natural vegetation communities and land cover types and three additional cover types within the category of disturbed or developed land.

S.2 SUMMARY OF SIGNIFICANT EFFECTS AND MITIGATION MEASURES THAT REDUCE OR AVOID THE SIGNIFICANT EFFECTS

The potentially significant effects of the project disclosed in this environmental analysis are summarized in Table S-1. Mitigation measures have been identified to address environmental impacts related to Aesthetics (Section 2.1), Biological Resources (Section 2.2), Cultural Resources (Section 2.3), Hydrology and Water Quality (Section 2.4), Noise (Section 2.5), Tribal Cultural Resources (Section 2.6), and Wildfire (Section 2.7). The mitigation measures are designed to reduce potentially significant impacts to a level below significance; however, impacts to Aesthetics (Impacts AE-1 through AE-3, AE-CU-1 through AE-CU-3), remain significant and unavoidable. A detailed analysis of significant environmental effects and corresponding mitigation measures is presented in Chapter 2.0, Significant Environmental Effects of the Proposed Project, of this EIR. Table S-1 does not include project design features (PDFs), which have been identified to further reduce the impacts identified for each resource area. Appliable PDFs are provided in the impact analysis section for each topic.

S.3 AREAS OF CONTROVERSY

Section 15123(b)(2) of the State CEQA Guidelines requires that an EIR identify areas of controversy as well as issues to be resolved known to the lead agency, including issues raised by other agencies and the public. On March 23, 2023, in accordance with Sections 15063 and 15082 of the State CEQA Guidelines, the County published a Notice of Preparation (NOP) for the EIR and circulated it to governmental agencies, organizations, and persons who may be interested in the proposed project, including nearby landowners, homeowners, and tenants. As part of releasing the NOP, the County requested comments on the scope of the EIR and asked interested parties for their suggestions regarding ways the project could be revised to reduce or avoid any significant environmental impacts. The NOP provided a general description of the proposed project, a description of the project site, and a preliminary list of potential environmental effects. The 30-day comment period extended through April 24, 2023.

A public scoping meeting was held at 39919 Ribbonwood Road, Boulevard, California on April 12, 2023, to solicit input from any interested parties on the scope and content of the EIR in conformance with Section 21083.9 of the California Public Resources Code. Following the close of the 30-day comment period on the NOP, comment letters were reviewed to identify any key issues that may require additional technical studies or background research. Copies of written comments received during the NOP comment period and the Initial Study are presented in Appendix A, NOP, Initial Study, and Public Comments, of this EIR. Through the environmental review process for this project, other areas of concern and issues to be resolved include:

- Potential impacts on habitats and special-status plant and wildlife species
- Potential impacts on hydrology, water quality, and water supply
- Potential impacts to cultural and tribal cultural resources
- Potential impacts to traffic and circulation
- Potential impacts to air quality to surrounding properties including health effects from air pollution
- Potential impacts resulting from noise
- Potential impacts to residences including the degradation of the visual character of the area
- Potential impacts of the BESS (potential fire risk and hazardous materials)

To the extent these issues and concerns are within the scope of CEQA, they are addressed in the evaluation and identification of potential mitigation measures for each environmental issue area included in Chapter 2.0, Significant Environmental Effects of the Proposed Project and Chapter 3.0, Environmental Effects Found Not to Be Significant.

S.4 ISSUES TO BE RESOLVED BY THE DECISION-MAKING BODY

The San Diego County Planning Commission serves as the decision-making body for MUPs; however, the proposed project requires a Fire Services Agreement, which must be approved by the County Board of Supervisors. Therefore, for the proposed project, the Board of Supervisors is the decision-making body for the MUP. The Planning Commission will make a recommendation on the proposed project to the Board of Supervisors. Issues to be resolved by the Board of Supervisors include (1) how to mitigate the significant effects of the proposed project; (2) whether to reject or approve one of the alternatives to the proposed project and other environmental findings; and (3) whether to reject or approve the proposed project. The Board of Supervisors must adopt detailed findings on the feasibility of mitigation measures that substantially lessen or avoid the significant effects of the project on the environment.

In addition to mitigation measures, the Board of Supervisors will decide whether to adopt the proposed project or any of the project alternatives that would feasibly attain most of the project objectives while avoiding or substantially reducing any of the significant impacts of the proposed project.

Because this EIR has identified adverse environmental effects that are unavoidable, the Board of Supervisors must also determine whether the adverse environmental effects are considered acceptable with consideration given to economic, social, technological, and other relevant benefits of the proposed project pursuant to CEQA Section 15093. Specifically, the proposed project would have significant and unavoidable impacts related to Aesthetics. The Board of Supervisors would prepare a statement of overriding considerations as described in CEQA Section 15093 to reflect the ultimate balancing of competing project objectives if the Board of Supervisors decides to approve the proposed project, proposed project alternatives, or components of either, which have the potential to cause one or more significant effects on the environment.

S.5 PROJECT ALTERNATIVES

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR summary identify the choice among project alternatives. Alternatives to the project are discussed in detail in Chapter 4.0, Alternatives, of this EIR in accordance with Section 15126.6 of the State CEQA Guidelines. Alternatives required to be considered under CEQA are those that would avoid or substantially lessen one or more of the significant environmental effects identified during evaluation of the proposed project. State CEQA Guidelines Section 15126.6(a) states that an EIR shall describe a range of reasonable alternatives. As evaluated throughout Chapter 2.0 of this EIR, the significant impacts of the project prior to implementation of mitigation measures would occur in the following environmental issues areas: Aesthetics, Biological Resources, Cultural Resources, Hydrology and Water Quality, Land Use and Planning, and Tribal Cultural Resources.

S.5.1 Proposed Project Alternatives

CEQA Section 15126.6(a) requires an EIR to "describe a reasonable range of alternatives to a project, or to the location of a project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Therefore, the analyzed alternatives were examined for their ability to reduce the

project's significant environmental impacts. Chapter 4.0 of this EIR identifies, describes, and evaluates the following three alternatives:

- **No Project/No Build Alternative**. Section 15126.6(e) of the State CEQA Guidelines requires analysis of the No Project/No Build Alternative. In the No Project/No Build Alternative, implementation of the project would not occur. No project-related construction or ground disturbance activities would occur, and there would be no changes to the existing land use types or operational characteristics of the project site. None of the impacts associated with the construction, operation, maintenance, and future decommissioning of the project to any of the resources identified and discussed in Chapter 2.0 would occur.

- **Visual Buffer Alternative**. The Visual Buffer Alternative would remove approximately 50 acres of solar arrays from the northernmost portion of the project site within Area A-2. The 50 acres of solar arrays would be relocated to south of Area A-1, directly west of Tule Jim Lane. This relocation would move arrays south of the ridgeline that runs west to east and bisects Areas A-2 and A-1. The project site slopes upward in elevation by an average of 8% from the northern project boundary on Jewel Valley Way to the ridgeline. Under the Visual Buffer Alternative, the fencing, landscaping, and solar arrays would be set back at least 800 feet from Jewel Valley Way to the north. The relocation would provide a visual and topographical buffer between the proposed project and State Route 94, Jewel Valley Road. The Visual Buffer Alternative would include similar numbers of PV modules as the proposed project and generate the same amount of electricity. The BESS, switchyard, gen-tie line, and other project components would be the same as the project. The length of construction may be slightly reduced under this alternative, but the daily construction would remain the same as the proposed project.
- **Reduced Development Alternative**. Under the Reduced Development Alternative, the development footprint would be 538 acres, a reduction of 50 acres from the proposed project. This alternative would remove approximately 50 acres of solar arrays and infrastructure in the northern portion of the project (Areas A-1 and A-2). This reduction in development footprint would remove solar arrays from the northern side of the ridgeline and provide a visual buffer between the proposed solar facility, Old Highway 80, I-8, and the private properties, as well as a noise buffer from residential uses during construction and operations. This reduction in PV modules would reduce the amount of energy generated by this alternative. The Reduced Development Alternative would generate 90 MW compared to the proposed project's generation of 100 MW, which is a reduction of 10 MW. The BESS, switchyard, substation, gen-tie line, and other project components would be the same as the proposed project.

S.5.2 Environmentally Superior Alternative

The State CEQA Guidelines require an analysis of alternatives to identify an Environmentally Superior Alternative among the alternatives evaluated in the EIR. The Environmentally Superior Alternative is the alternative that would minimize adverse impacts on the environment. Based on the evaluation of the alternatives in this chapter and the comparison of impacts, as discussed in Chapter 4.0, Alternatives, both the Visual Buffer Alternative and the Reduced Development Alternative would minimize the project's adverse impacts on the environment in a similar manner; however, the Reduced Development Alternative reduces the project's adverse impacts to a further degree than the Visual Buffer Alternative. As directed by the State CEQA Guidelines Section 15126.6(e)(2):

- "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

Therefore, the Reduced Development Alternative would be the Environmentally Superior Alternative, because it would be the built alternative that minimizes the project's adverse impacts on the environment. Compared to the project, the Reduced Development Alternative would have decreased impacts to aesthetics and would have decreased impacts to biological resources, cultural resources, hydrology and drainage patterns, and construction noise due to decreased earthwork and grading activities. However, mitigation would still be required of the Reduced Development to reduce these impacts to less than significant, as for the proposed project. While the Reduced Development Alternative would meet five of the stated project objectives, it would not meet the objective (Objective 1) of the project to maximize the solar energy generation of the project site, and it would only partially meet the objective (Objective 4) to provide a utility-scale solar energy project that improves electrical reliability for the San Diego region by providing a source of local generation as near as possible to existing SDG&E transmission infrastructure.

Refer to Chapter 4.0, Alternatives, for a discussion of the environmental effects of the alternatives compared to the proposed project, and the relationship of the alternatives to the project objectives.

Table S-1. Summary of Significant Effects and Mitigation Measures

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
2.1 Aesthetics			
Impact AE-1: Visual Character and Quality	Significant	No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level	Significant and unavoidable
Impact AE-2: Valued Visual Character and Image of Neighborhood or Community	Significant	No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level	Significant and unavoidable
Impact AE-3: Focal and Panoramic Vistas	Significant	No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level	Significant and unavoidable
Impact AE-CU-1: Cumulative, Visual Character and Quality	Significant	No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level	Significant and unavoidable
Impact AE-CU-2: Cumulative, Valued Visual Character and Image of Neighborhood or Community	Significant	No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level	Significant and unavoidable
Impact AE-CU-3: Cumulative, Focal or Panoramic Vistas	Significant	No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level	Significant and unavoidable
2.2 Biological Resources			
Impact BI-SP-1: Short-term direct to County List A and B plants	Significant	**M-BI-1 Biological Monitoring.** 1. To prevent inadvertent disturbance to sensitive resource areas outside the approved area of impact, a County-approved biologist (Project Biologist) shall be contracted to perform biological monitoring during grading, clearing, grubbing, trenching, construction, and decommissioning activities. The contract for biological monitoring will be provided to the County by the Applicant and shall include an agreement that this will be completed, and a memorandum of understanding (MOU) between the biological consulting company and the County shall be executed. The contract shall include a cost estimate for the monitoring work and reporting. a. The Project Biologist shall perform the monitoring duties before, during, and after construction pursuant to the most current version of the County guidelines (County of San Diego 2010b). 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: i. Conduct required preconstruction surveys as applicable and outlined in M-BI-5 below. ii. Conduct meetings with the contractor and other key construction personnel describing the importance of restricting work to designated areas prior to	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		clearing, grubbing, or grading and clarifying that the Project Biologist has the authority to halt work that could harm or harass a protected species. Worker Environmental Awareness Program training will be provided by the Project Biologist for minimizing harm to or harassment of wildlife encountered during construction with the contractor and other key construction personnel prior to clearing, grubbing, or grading. iii. Review the construction area in the field with the contractor in accordance with the final grading plan and 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. iv. Monitor vegetation clearing, grubbing, and grading to ensure against direct and indirect impacts on biological resources that are intended to be protected and preserved. v. Flush special-status species (i.e., avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities. If brush-clearing and earthmoving activities take place within the bird breeding season, the process outlined in M-BI-5 will be followed. vi. Verify that grading plans include a stormwater pollution prevention plan (SWPPP) (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) to address hydrology impacts; see M-BI-6. vii. Periodically monitor the construction site to see that dust is minimized according to the Fugitive Dust Control Plan and that temporarily impacted areas are revegetated as soon as possible. viii. Periodically monitor the construction site to verify that light fixtures are directed away from open space and are shielded. ix. Monitor the construction site so that cover and/or escape routes for wildlife from excavated areas are provided daily during vegetation clearing, grubbing, and grading. 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. Soil piles shall be covered at night to prevent wildlife from burrowing in. The edges of the sheeting shall be weighted down with sandbags. These areas may also be fenced to prevent wildlife from gaining access. Exposed trenches, holes, and excavations shall be inspected twice daily (i.e., each morning and prior to sealing the exposed area at the end of the day) by a qualified biologist to monitor for wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route. x. Except as stated otherwise herein, biological monitoring is daily during vegetation clearing, grubbing, and grading. Once the PV field construction commences, the monitoring shall be weekly.	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		b. The cost of the monitoring shall be added to the grading bonds or bonded separately with County Planning and Development Services (PDS). **Documentation:** The Applicant shall provide a copy of the biological monitoring contract, cost estimate, and MOU to the PDS. Additionally, the cost amount of the monitoring work shall be added to the grading bond cost estimate. **Timing:** In each phase, prior to approval of any grading and or improvement plans and issuance of any grading or construction permits. **Monitoring:** The PDS shall review the contract, MOU, and cost estimate or separate bonds for compliance with this condition. The cost estimate should be forwarded to the PDS project manager, for inclusion in the grading bond cost estimate, and grading bonds. The County Department of Public Works (DPW)/PDS shall add the cost of the monitoring to the grading bond costs. 2. To ensure that the biological monitoring occurs during the grading phase of the project, weekly monitoring logs will be provided to the Applicant and PDS project manager, and a final biological monitoring report shall be prepared. The Project Biologist shall prepare the final biological monitoring report. The reports shall substantiate the supervision of the grading activities and confirm that grading or construction activities did not impact any additional areas or any other sensitive biological resources. The final report shall conform to County guidelines (County of San Diego 2010b) and include the following items: a. Photos of the temporary fencing or flagging that was installed during the trenching, grading, or clearing activities b. Monitoring logs showing the date and time that the monitor was on-site c. Photos of the site after the grading and clearing activities **Documentation:** The Project Biologist shall prepare the final report and submit it to the PDS for review and approval. **Timing:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the final report shall be approved. **Monitoring:** The PDS shall review the final report for compliance with this condition and the report format guidelines. Upon approval of the report, PDS shall inform DPW that the requirement is complete, and the bond amount can be relinquished. If the monitoring was bonded separately, then PDS shall inform the bonding entity to release the bond back to the Applicant. 3. Compliance with this measure shall be required during decommissioning activities. **M-BI-2** **Temporary Construction Fencing.** Prior to issuance of permits in each phase, including clearing, grubbing, grading, and/or construction permits, the Project Applicant or its designee shall install fencing wherever the limits of grading are adjacent to sensitive vegetation communities or other biological resources, as identified by the Project Biologist. Fencing shall remain in place during all construction activities. All temporary fencing shall be shown on plans. Prior to release of grading and/or improvement bonds, a qualified biologist shall provide evidence to the satisfaction of the Director of the San Diego County	

<table>
<tr><th>Impact</th><th>Impacts Prior to Mitigation</th><th>Mitigation Measures</th><th>Impacts Following Mitigation</th></tr>
<tr><td></td><td></td><td>PDS (or designee) that work was conducted as authorized under the approved permits and associated plans.</td><td></td></tr>
<tr><td>Impact BI-SP-2: Long-term direct impacts to County List A and B plants</td><td>Significant</td><td>M-BI-3 Habitat Preservation. To mitigate for impacts to sensitive vegetation communities, habitat for plant and wildlife species, and special-status plant and wildlife individuals, the Applicant shall provide an off-site biological open space easement (see M-BI-4 regarding the resource management plan [RMP] for the mitigation site). To protect sensitive biological resources, pursuant to the ECMSCP, RPO, and CEQA, a biological open space easement will be granted over 447.93 acres of sensitive vegetation communities, special-status plant species, and habitat for special-status species. The project is estimated to impact sensitive vegetation communities that require mitigation as summarized in Table 10 of the Biological Resources Report (see below).
<table>
<tr><th>Habitat / Vegetation Community</th><th>Existing (acres)</th><th>Impacts (acres)</th><th>Off-site Impacts (acres)</th><th>Impact Neutral (acres)</th><th>Total Impacts (acres)</th><th>Mitigation Ratio</th><th>Mitigation Required (acres)</th><th>Preserved On-site (acres)</th><th>Off-site Mitigation (acres)</th></tr>
<tr><td>Phase 1</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>Granitic Northern Mixed Chaparral (37131)</td><td>99.58</td><td>92.54</td><td>0</td><td>7.04</td><td>92.54</td><td>0.5:1</td><td>46.27</td><td>0</td><td>46.27</td></tr>
<tr><td>Redshank Chaparral (37300)</td><td>24.53</td><td>24.53</td><td>0</td><td>0</td><td>24.53</td><td>1:1</td><td>24.53</td><td>0</td><td>24.53</td></tr>
<tr><td>Granitic Chamise Chaparral (37210)</td><td>3.03</td><td>3.03</td><td>0</td><td>0</td><td>3.03</td><td>0.5:1</td><td>1.52</td><td>0</td><td>1.52</td></tr>
<tr><td>Montane Buckwheat Scrub (37K00)</td><td>1.97</td><td>1.97</td><td>0</td><td>0</td><td>1.97</td><td>1:1</td><td>1.97</td><td>0</td><td>1.97</td></tr>
<tr><td>Field/Pasture (18310)</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0.5:1</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td>Big Sagebrush Scrub (35210)</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>2:1</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td>Disturbed (11300)</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>None</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td>Bare Ground</td><td>2.56</td><td>2.52</td><td>0</td><td>0.04</td><td>2.52</td><td>None</td><td>0</td><td>0</td><td>0</td></tr>
</table></td><td>Less than significant</td></tr>
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Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation

Urban/ Developed (12000)	0	0	0	0	0	None	0	0	0
Open Coast Live Oak Woodland (71161)	0.32	0.32	0	0	0.32	3:1	Included in oak root zone mitigation	0	Included in oak root zone mitigation
Non-native Grassland (42200)	0	0	0	0	0	0.5:1	0	0	0
Tamarisk Scrub (63810)	0	0	0	0	0	3:1	0	0	0
Freshwater Seep (45400)	0	0	0	0	0	3:1	0	0	0
Southern Riparian Scrub (63300)	0	0	0	0	0	3:1	0	0	0
Freshwater (64140)	0	0	0	0	0	3:1	0	0	0
Coast Live Oak Woodland (71160)	0	0	0	0	0	3:1	0	0	0
Alkali Marsh (52300)	0	0	0	0	0	3:1	0	0	0
Oak Root Zone*	0.91	0.91	0	0	0.94	3:1	2.82	0	2.82
Total	**131.99**	**124.91**	**0**	**7.08**	**124.91**		**77.11**	**0**	**77.11**
Phase 2									
Granitic Northern Mixed Chaparral (37131)	136.91	126.33	0	49.68	126.33	0.5:1	63.17	0	63.17
Redshank Chaparral (37300)	121.67	119.35	0	2.71	119.35	1:1	119.35	0	119.35

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation

Granitic Chamise Chaparral (37210)	62.04	61.56	0	7.41	61.56	0.5:1	30.78	0	30.78
Montane Buckwheat Scrub (37K00)	52.92	51.14	0	0.07	51.14	1:1	51.14	0	51.14
Field/Pasture (18310)	28.10	27.98	0	0	27.98	0.5:1	13.99	0	13.99
Big Sagebrush Scrub (35210)	15.38	15.38	0	0	15.38	2:1	30.76	0	30.76
Disturbed (11300)	10.01	10.01	0	0	10.01	None	0	0	0
Bare Ground	22.17	21.53	0	0.47	21.53	None	0	0	0
Urban/ Developed (12000)	0.03	0	0	0	0	None	0	0	0
Open Coast Live Oak Woodland (71161)	4.32	4.31	0	0	4.31	3:1	Included in oak root zone mitigation	0	Included in oak root zone mitigation
Non-Native Grassland (42200)	2.49	1.05	0	0	1.05	0.5:1	0.53	0	0.53
Tamarisk Scrub (63810)	0	0	0	0	0	3:1	0	0	0
Freshwater Seep (45400)	0.04	0.04	0	0	0.04	3:1	0.12	0	0.12
Southern Riparian Scrub (63300)	0	0	0	0	0	3:1	0	0	0
Freshwater (64140)	0	0	0	0	0	3:1	0	0	0

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation

Coast Live Oak Woodland (71160)	0	0	0	0	0	3:1	0	0	0
Alkali Marsh (52300)	0	0	0	0.0	0	3:1	0	0	0
Oak Root Zone*	12.47	12.47	0	0	12.47	3:1	37.41	0	37.41
Total	**456.08**	**438.68**	**0**	**60.34**	**438.68**		**347.25**	**0**	**347.25**

*This is an overlay to the vegetation community layer and is not counted toward the total acreage of on-site habitats; it is only used in determining required mitigation.

The biological open space easement shall mitigate for project impacts to sensitive vegetation communities and habitat for wildlife species as shown in Table 10 of the Biological Resources Report (see above), thereby preserving compensatory habitat that provides equal or greater benefit to plant and wildlife species. This biological open space easement will be granted to the County or other approved conservation entity. Granting of this open space authorizes the County and its agents to periodically access the land to perform management and monitoring activities for the purposes of species and habitat conservation. This easement is for the protection of biological resources and prohibits all of the following on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space. Granting of this open space authorizes the County and its agents to periodically access the land to perform management and monitoring activities for the purposes of species and habitat conservation. The only exceptions to this prohibition are (1) vegetation clearing by hand, by written order of the fire authority for reduction of an identified fire hazard; (2) activities conducted pursuant to an approved revegetation or RMP; (3) vector control by written order of the County; and (4) construction, use, and maintenance of approved multi-use, non-motorized trails. No trails have been approved as part of this project and would require subsequent environmental review and approval by PDS. Permanent signage indicating the area is a biological open space will be required and will be installed by the developer. As the project is proposed in two phases, two separate open space easements would be dedicated within the 447.93-acre area. The recordation of each open space easement would occur prior to grading of each phase.

Documentation: In each phase, the Applicant shall prepare the draft plats and legal descriptions of the easements, then submit them for preparation and recordation with the County Department of General Services, and concurrence with PDS, and pay all applicable fees associated with preparation of the documents.

Timing: Prior to approval of any plan or issuance of any permit, and prior to use of the premises in reliance of this permit the easements shall be recorded.

Monitoring: The Applicant shall prepare the easement documents and send them to PDS for pre-approval. The PDS shall pre-approve the language and estimated location of the easements before they are released to the Applicant for signature and subsequent

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		recordation. Upon Recordation of the easements, the Applicant shall forward a copy of the recorded documents to PDS for satisfaction of the condition. **M-BI-4** **Resource Management Plan (RMP).** To provide for the long-term management of the proposed on-site biological open space, an RMP will be prepared and implemented (Appendix K). The final RMP cannot be approved until the following has been completed to the satisfaction of the Director of PDS as follows: 1. The plan will be prepared and approved pursuant to the most current version of the County's Report Format and Content Requirements for Biological Resources (County of San Diego 2010b). 2. The habitat land to be managed will be owned by a land conservancy or equivalent. 3. Open space easements will be dedicated to the County in perpetuity, unless conveyed to another public agency subject to approval by the Director of PDS. 4. A resource manager will be selected and approved, with evidence provided demonstrating acceptance of this responsibility. 5. The RMP funding mechanism to fund annual costs for basic stewardship shall be identified and approved by the County. The RMP funding mechanism will be identified and adequate to fund annual costs for implementation; typically determined by a Property Analysis Record as a non-wasting endowment. 6. A contract between the Applicant and County will be executed for the implementation of the RMP. 7. The final RMP shall have project-specific requirements for the following mitigation implementation and monitoring measures: a. Special-status plant species mitigation 8. Goals: The final RMP will accomplish the following: a. Preserve and manage lands to the benefit of the flora, fauna, and native ecosystem functions reflected in the natural communities occurring within the biological open space. b. Provide 2:1 replacement of Jacumba milk-vetch, long spined spineflower, and Tecate tarplant, and 1:1 replacement of sticky geraea and desert beauty per the attached Conceptual Revegetation Plan (Appendix L of the Biological Resources Report). If Jacumba milk-vetch, long-spined spineflower, Tecate tarplant, sticky geraea, and desert beauty are transplanted or established from seed collected from individuals within the project footprint, then success of this Mitigation Program will be achieved for Phase 1 when at least 292 Jacumba milk-vetch, 336 sticky geraea, and 769 desert beauty are documented within the off-site biological open space easement during 1 or more years in the 3-year monitoring period. Similarly, success of the Mitigation Program will be achieved for Phase 2 when 2,104 Jacumba milk-vetch, 100 long-spined spineflower, 856 Tecate tarplant, 1,042 sticky geraea, and 74 desert beauty are documented within the open space. **Documentation:** The Applicant shall prepare an RMP and submit it to PDS and pay all applicable review fees.	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		Timing: Prior to approval of any plan or issuance of any permit, and prior to use of the premises in reliance on this permit, the RMP shall be approved. **Monitoring:** The PDS shall review the RMP for compliance with the content guidelines, the conceptual RMP, and this condition.	
Impact BI-SP-3: Long-term direct impact to County List C and D plants	Significant	Implement Mitigation Measures **M-BI-3 and M-BI-4.**	Less than significant
Impact BI-SP-4: Short-term indirect impact to County List A and B plants	Significant	Implement Mitigation Measures **M-BI-1, M-BI-2, and:** **M-BI-6 Biological Monitoring of Stormwater Pollution Prevention Plan (SWPPP) Implementation.** A SWPPP shall be prepared that meets all County requirements. Implementation of the SWPPP shall protect habitats and special-status species adjacent to the project during construction and decommissioning activities. The items below shall be included in the SWPPP, and the Project Biologist shall verify that they are implemented during construction and decommissioning monitoring: 1. No planting or seeding of invasive plant species on the most recent version of the California Invasive Plant Council's California Invasive Plant Inventory for the project region. 2. Dust control fencing is in place and intact if fencing is required. 3. Construction activity is located outside of jurisdictional WOTUS/WOS except as authorized by applicable law and permit(s), including permits and authorizations approved by the USACE, CDFW, and Water Board. 4. Silt-settling basins installed during the construction process are 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. Design of drainage facilities shall incorporate long-term control of pollutants and stormwater flow to minimize pollution and hydrologic changes. 5. Temporary structures, staging, and storage areas for construction equipment and/or materials are located outside of jurisdictional waters, including wetlands and riparian areas. 6. No material stockpiles, debris, bark, slash sawdust, rubbish, cement, concrete or washing thereof, oil, or petroleum products are stored where they may be washed by rainfall or runoff into jurisdictional WOTUS or WOS. 7. When construction operations are completed, excess materials or debris have been removed from the work area. 8. No equipment maintenance is performed within or near jurisdictional WOTUS/WOS where petroleum products or other pollutants from the equipment may enter these areas. 9. Fully covered trash receptacles that are animal-proof and weather-proof are installed and used by the operator to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Littering is prohibited, and removal of trash	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		from construction areas daily is required. All food-related trash and garbage are removed from construction sites daily. 10. There are no pets on or adjacent to construction sites. 11. Speed limits in and around all construction areas are enforced so that vehicles do not exceed 15 mph on unpaved roads and the right-of-way accessing the construction site, or 10 mph during the night. **Documentation**: The permittee shall submit a SWPPP for review and approval by the County of San Diego biologist. **Timing**: The following actions shall occur throughout the duration of construction for each phase. **Monitoring**: The County of San Diego shall review the SWPPP and ensure its implementation. **M-BI-7** **Prevention of Chemical Pollutants.** Weed control treatments shall include all legally permitted chemical, manual, and mechanical methods applied with the authorization of the County agriculture commissioner. The application of herbicides shall be in compliance with all federal and state laws and regulations under the prescription of a licensed Pest Control Adviser with at least 2 years of experience 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. The timing of the weed control treatment shall be determined for each plant species in consultation with the Pest Control Adviser, the County agriculture commissioner, and the California Invasive Plant Council, with the goal of controlling populations before they start producing seeds. During project construction, operation, and decommissioning, all areas that use chemicals that are potentially toxic or impactive to sensitive habitats or plants shall incorporate best management practices (e.g., avoid applications during or before rain events and avoid placing materials close to sensitive habitats) on-site to reduce impacts caused by the application and/or drainage of such materials within the development footprint. In addition, use of rodenticides and pesticides shall not be allowed. **Documentation:** The permittee shall assume responsibility pursuant to this condition. **Timing:** Upon establishment of use, the condition shall apply during the term of this permit for each phase. **Monitoring:** The PDS is responsible for enforcement of this permit.	
Impact BI-SP-5: Long-term indirect impacts to County List A and B plants	Significant	Implement Mitigation Measures **M-BI-3, M-BI-4 M-BI-7 and:** **M-BI-8** **Prevention of Invasive Plant Species.** A County of San Diego-approved plant list shall be used for areas immediately adjacent to open space. A hydroseed mix that incorporates native species, is appropriate to the area, and is free from invasive species shall be used for landscaped areas adjacent to the biological open space. The PDS landscape architect shall require that all final landscape plans comply with the following: 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, and the plant palette shall be composed of native species that do not require high irrigation rates. The Project Biologist shall periodically check landscape products for compliance with these	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		requirements. Planting, seeding, and weed control for the mitigation site are discussed in the RMP. **M-BI-9** **Operations and Maintenance Signage.** Signage shall be posted at all entrances to the facility stating that operations and maintenance personnel shall be prohibited from the following: 1. Harming, harassing, or feeding wildlife and/or collecting special-status plant or wildlife species 2. Smoking 3. Traveling (either on foot or in a vehicle) outside of the solar facility in undisturbed portions of the project site 4. Having pets on the project site 5. Littering 6. Remaining at the facility after daylight hours unless conducting operations and maintenance activities 7. Exceeding normal nighttime operation noise and lighting **M-WF-1** **Fire Protection Plan**. The following items ensure adequate fire mitigation, access, and safety: 1. Six 10,000-gallon water tanks shall be available on-site: one tank shall be at each of the two entrances and one tank shall be located by each battery energy storage system (BESS); the other two shall be spread strategically across the project site. Each tank shall be labeled “Fire Water: 10,000 gallons” with reflective paint. All tanks shall have fire department connections available and a minimum 250-gallon-per-minute flow. 2. Increased road width near water storage tanks shall accommodate filling without blocking the road. 3. A Knox Box shall be placed at every gated project entrance to allow emergency service resources to access the site. 4. A lighted map identifying equipment and structures shall be available at every project entrance. 5. The project has adequate emergency response according to land use designation, ensured with a Fire Services Agreement. 6. There shall be a built-in heat detection and fire protection system and a fire extinguishing system for each BESS in compliance with NFPA Standard 855. The heat and fire detection system shall be linked to an automatic inert gas suppression system within each cabinet. The cabinets shall also have an interior aerosol fire suppression system. 7. An internal perimeter road with an improved width of 24 feet, and internal roads improved to 20 feet and the capability to handle a weight of 75,000 pounds, designed to accommodate fire apparatuses with an inner turning radius of 28 feet, shall provide essential access infrastructure.	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
Impact BI-W-1: Short-term direct impacts to County Group 1 animals	Significant	Implement Mitigation Measures **M-BI-1, M-BI-2, and:** **M-BI-5 Avian Breeding and Special-status Wildlife Impact Avoidance.** This mitigation measure serves to avoid take of birds protected under the MBTA and California Fish and Game Code during the nesting season (M-BI-5(1)) and trampling or crushing special-status amphibians, reptiles, and mammals ((M-BI-5(2)), and special-status invertebrates (M-BI-5(3)) and (M-BI-5(4)). 1. **Nesting Bird Survey.** To avoid any direct impacts on raptors and/or any migratory birds protected under the MBTA and California Fish and Game Code, removal of habitat that supports active nests on the proposed area of disturbance shall occur outside the nesting season for these species (which is January 15 through August 31, annually). If construction or decommissioning work must occur during the avian breeding season (January 15 to August 31, annually), the Applicant shall do the following: a. In consultation with the County, CDFW, and the USFWS prepare a Nesting Bird Management, Monitoring, and Reporting Plan (NBMMRP) to address avoidance of impacts to nesting birds. The Applicant will submit to the County the NBMMRP (see following for details) for review and approval prior to commencement of the project during the breeding season. The NBMMRP should include the following: i. Nest survey protocols describing the nest survey methodologies ii. A management plan describing the methods to be used to avoid nesting birds and their nests, eggs, and chicks iii. A monitoring and reporting plan detailing the information to be collected for incorporation into a regular Nest Monitoring Log (NML) with sufficient details to enable USFWS and CDFW to monitor the Applicant's compliance with Fish and Game Code Sections 3503, 3503.5, 3511, and 3513 iv. A schedule for the submittal (usually weekly) of the NML v. Standard buffer widths deemed adequate to avoid or minimize significant project-related edge effects (disturbance) on nesting birds and their nests, eggs, and chicks (i.e., 300 feet for nests of passerines and 500 feet for nests of raptors). The NBMMRP will outline a nest buffer reduction process to be approved by USFWS, CDFW, and PDS. vi. A detailed explanation of how the buffer widths were determined vii. All measures the Applicant will implement to preclude birds from utilizing project-related structures (i.e., construction equipment, facilities, or materials) for nesting b. Conduct preconstruction nesting bird surveys within 72 hours of construction-related activities; conduct preconstruction survey sweeps immediately prior to ground-disturbing activities; and implement appropriate avoidance measures for identified nesting birds in the NBMMRP. Resurvey, if construction activities are halted for 10 consecutive days.	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		c. Conduct surveys beyond the project site —300 feet for passerine birds and 500 feet for raptors—to determine presence of nesting birds that the project activities may affect. The survey protocols shall include a detailed description of methodologies utilized by CDFW-approved avian biologists to search for nests and describe avian behaviors that indicate active nests. The protocols shall include but are not limited to the size of the project site being surveyed, method of search, and behavior that indicates active nests. d. Each nest identified in the project site shall be included in the NML. The NMLs should be updated daily and submitted to the CDFW weekly. Since the purpose of the NMLs is to allow the CDFW to track compliance, the NMLs shall include information necessary to allow comparison between nests protected by standard buffer widths recommended for the project (300 feet for passerine birds, 500 feet for raptors) and nests whose standard buffer width was reduced by encroachment of project-related activities. The NMLs shall provide a summary of each nest identified, including the species, status of the nest, buffer information, and fledge or failure data. The NMLs shall allow for tracking the success and failure of the buffers and would provide data on the adequacy of the buffers for certain species. e. The Applicant will rely on its avian biologists to determine the appropriate standard buffer widths for nests within the project corridor/footprint to employ based on the sensitivity levels of specific species or guilds of avian species. The determination of the standard buffer widths shall be site- and species-/guild-specific and data-driven and not based on generalized assumptions regarding all nesting birds. The determination of the buffer widths shall be developed in the NBMMRP approved by the USFWS, CDFW, and PDS, and will consider the following factors: i. Nesting chronologies ii. Geographic location iii. Existing ambient conditions (human activity within line of sight—cars, bikes, pedestrians, dogs, noise) iv. Type and extent of disturbance (e.g., noise levels and quality—punctuated, continual, ground vibrations—blasting-related vibrations proximate to tern colonies are known to make the ground-nesting birds flush the nests) v. Visibility of disturbance vi. Duration and timing of disturbance vii. Influence of other environmental factors viii. Species' site-specific level of habituation to the disturbance Application of the standard buffer widths shall avoid the potential for project-related nest abandonment and failure of fledging and minimize any disturbance to the nesting behavior. If project activities cause or contribute to a bird being flushed from a nest, the buffer must be widened. This measure does not apply to nests that are started on construction equipment or panels or supporting structures.	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		Documentation: The Project Biologist shall prepare the final report and submit it to the PDS for review and approval. **Timing:** Surveys shall be conducted prior to any clearing, grubbing, trenching, grading, or any land disturbances during the avian breeding season. Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the final report shall be approved. **Monitoring:** The PDS shall review the final report for compliance with this condition and the report format guidelines. Upon approval of the report, PDS shall inform the Applicant that the requirement is complete. 2. **Special-Status Species Preconstruction Surveys and Relocation Plan.** Prior to construction, the Applicant shall develop preconstruction surveys for special-status terrestrial reptiles (e.g., Southern California legless lizard, coast horned lizard, California glossy snake, red-diamond rattlesnake, rosy boa, and San Diego ringneck snake,), small terrestrial mammals (i.e., San Diego black-tailed jackrabbit, Dulzura pocket mouse, northwestern San Diego pocket mouse, pallid San Diego pocket mouse, and southern grasshopper mouse), bats (i.e., pallid bat, greater western mastiff bat, western red bat, small-footed myotis, long-eared myotis), and mule deer, mountain lion, and ringtail documented on-site or with high potential to occur on-site. The plan shall at minimum include the timing and locations where surveys should be conducted; if and species are confirmed, provide the habitat and conditions in the proposed relocation site(s); the methods that would be used for trapping and relocating the individual species; and the method for documenting/recording the species and number of animals relocated. The plan shall be submitted to the County by a qualified biologist prior to any ground-disturbing activities within potentially occupied habitat. **Preconstruction Surveys**. No more than 3 days prior to construction, a qualified biologist shall conduct a preconstruction survey within areas of suitable habitat for special-status species wildlife documented on-site (i.e., Cooper's hawk, sharp-shinned hawk, Bell's sage sparrow, turkey vulture, Southern California legless lizard, coast horned lizard, San Diego black-tailed jackrabbit, San Diego desert woodrat, coastal whiptail, California horned lark, western bluebird, mule deer, and mountain lion) as well as those with high potential to occur (i.e., southern California rufous-crowned sparrow, golden eagle, long-eared owl, red-shouldered hawk, northern harrier, white-tailed kite, prairie falcon, loggerhead shrike, Lewis' woodpecker, California glossy snake, red-diamond rattlesnake, pallid bat, Dulzura pocket mouse, northwestern San Diego pocket mouse, pallid San Diego pocket mouse, greater western mastiff bat, southern grasshopper mouse, mountain quail, rosy boa, San Diego ringneck snake, ringtail, western red bat, small-footed myotis, long-eared myotis, and monarch butterfly). The biologist shall look for special-status species that may be located within or immediately adjacent to the project work areas, as permitted by access. If determined by the qualified biologist that, based on the construction activities, time of year, and presence/location of special-status wildlife species, relocation of special-status wildlife species is necessary, relocation will occur to nearby undisturbed areas within suitable habitat in the on-site open space easement as specified in the plan and a California scientific collecting permit (SCP) (if applicable), but as close to their origin as possible	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		(consistent with the approved plan). The biologist relocating the species shall possess a California SCP to handle these species if required by applicable CDFW regulations. A qualified biologist shall be present during initial ground-disturbing activities (i.e., vegetation removal) immediately adjacent to or within the vegetation communities and/or disturbed habitats that could support populations of special-status wildlife species to monitor vegetation removal and topsoil salvaging and stockpiling, where applicable. If special-status wildlife species are detected in the work area during biological monitoring, the individual(s) will be documented and relocated as per the approved Plan and in accordance with the SCP conditions as applicable. **Documentation:** The Project Biologist shall prepare the final survey report and relocation plan and submit it to the PDS for review and approval. **Timing:** Surveys shall be conducted prior to any clearing, grubbing, trenching, grading, or any land disturbances. Prior to final grading release, or use of the premises in reliance of this permit for each phase, the final survey report and Relocation Plan shall be approved. **Monitoring:** The PDS shall review the final survey report and Relocation Plan for compliance with this condition and the report format guidelines. Upon approval of the report, PDS shall inform the Applicant that the requirement is complete, and the bond amount can be relinquished. 3. To avoid impacts to nesting birds and other special-status wildlife species during decommissioning, the Project operator shall be required to implement the measures outlined in subsections (1) and (2) prior to undertaking decommissioning activities. 4. **Crotch's bumblebee Habitat Assessment and Surveys.** This mitigation measure shall only be required if Crotch's bumble bee remains as a candidate state endangered species or is listed as a state endangered species at the time of project construction. **a. Habitat assessment.** If not previously completed, or if surveys are no longer valid for any reason, a biologist with demonstrated experience with Crotch's bumblebee will conduct a desktop habitat assessment to determine the presence of suitable habitat for Crotch's bumble bee within the project site. This assessment will evaluate historical and current species distribution, proximity to the last known sighting, and potential foraging (including native and non-native), nesting, and overwintering resources. Field verification surveys will be conducted during the floral blooming period, typically April through August, and will include an in-person project site observation, quantification of blooming vegetation (e.g., percent cover or a scale), and an assessment of plant diversity. **Documentation:** The qualified Biologist shall prepare the final habitat assessment report and submit it to the CDFW for review and approval for each phase. b. **Focused Surveys.** If the habitat assessment and field verification survey indicate a high likelihood for take of the species, occupancy will be assumed, or, a proposed survey protocol will be submitted to the Wildlife Agencies for review. If surveys are proposed, a survey methodology will be designed that is project- and site-specific, including the qualifications of the biologist conducting the	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		surveys. The survey methodology will follow the general guidelines and best practices outlined in CDFW's "Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species" (June 6, 2023). If surveys are conducted andoccupied Crotch's bumble bee habitat within or bordering the project site is documented, or if Crotch's bumble bee is assumed to be present based on the habitat assessment, pre-construction surveys of such habitat for active bee nest colonies shall be required no more than 5 days prior to any ground disturbance activities that occur between February 15 and September 15. The project biologist will establish, monitor, and maintain a no-work buffer around any active nest colonies identified during surveys. The size and configuration of the no-work buffer will be based on the best professional judgment of the project biologist in consultation with CDFW. The buffer should provide at least 50 feet of clearance around nest entrances. Construction activities should not occur within the no-work buffers until the colony is no longer active. To determine that a nest is no longer active, the nest will be observed for a minimum of 60 minutes each day across multiple days (three days minimum) during suitable flight weather (i.e., ambient air temperature between 60- and 90-degrees Fahrenheit, winds under 10 mph, and no precipitation heavier than a drizzling rain). If no bees are seen flying in or out of the nest it will be determined that the next season's queens have dispersed from the colony and the nest is no longer active. If Crotch's bumble bee is found on-site during habitat assessments or protocol surveys, the project proponent shall: i. Notify CDFW of the species' presence within 48 hours and consult with the CDFW to determine whether the project needs to obtain an ITP, and adhere to the following minimum conditions: ii. Implement Immediate Avoidance and Minimization Measures: 1. Conduct a nest search within suitable habitat areas identified during surveys 2. Establish and clearly mark no-work buffer zones of at least 50 feet around active nest colonies if found 3. Avoid all ground-disturbing activities within these buffer zones during the active bee season (February 15 through September 15) iii. Have a monitor present during initial ground disturbance and vegetation clearance. Compensatory mitigation for permanent direct impacts to suitable Crotch's bumble bee habitat shall be offset through compensatory mitigation, which may include, but is not necessarily limited to, on-site or off-site habitat preservation, enhancement, restoration, and/or creation at a ratio of no less than 1:1. If an incidental take permit covering Crotch's bumble bee is issued for the project, the measures and mitigation ratios specified in that permit shall take precedence over those outlined in this report. 5. **Western Spadefoot Avoidance and Mitigation.** To minimize impacts, project design shall prioritize avoidance of areas where there is potential for western spadefoot	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		occurrence, to the extent feasible. Avoidance efforts will focus on protecting both permanent and temporary wetlands that are suitable for western spadefoot breeding, including natural and altered water features that retain water for at least 30 days. These habitats include, but are not limited to: • Vernal pools • Ephemeral streams • Artificial ponds (e.g., livestock, sedimentation, flood control) • Irrigation and roadside ditches • Roadside puddles, tire ruts, and borrow pits. In addition, adjacent upland habitats—which include scrubland, oak woodlands, chaparral, and grasslands—within 1,500 feet of breeding sites, which provide foraging areas, movement corridors, and overwintering locations, shall also be avoided. Contingent upon the western spadefoot's formal listing under the ESA, the project will initiate formal consultation with the U.S. Fish and Wildlife Service (USFWS) to develop and implement scientifically appropriate mitigation strategies. These strategies may include, but are not limited to, establishing species-specific avoidance buffer distances and implementing targeted exclusionary fencing to minimize potential adverse impacts on the species.	
Impact BI-W-2: Impacts to active nests or young of nesting County Group 1 animals	Significant	Implement Mitigation Measures **M-BI-1 and M-BI-5.**	Less than significant
Impact BI-W-3: Removal of suitable habitat of County Group 1 animals	Significant	Implement Mitigation Measures **M-BI-3 and M-BI-4.**	Less than significant
Impact BI-W-4: Impacts to active nests or young of nesting County Group 2 animals	Significant	Implement Mitigation Measures **M-BI-1 and M-BI-5.**	Less than significant
Impact BI-W-5: Long-term direct impacts to County Group 2 animals	Significant	Implement Mitigation Measures **M-BI-3 and M-BI-4.**	Less than significant
Impact BI-W-6: Long-term direct impacts to Golden Eagles	Significant	Implement Mitigation Measures **M-BI-3 and M-BI-4.**	Less than significant
Impact BI-W-7: Loss of foraging habitat for raptors	Significant	Implement Mitigation Measures **M-BI-3 and M-BI-4.**	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
Impact BI-W-8: Loss of Core Wildlife Area	Significant	Implement Mitigation Measures **M-BI-3 and M-BI-4.**	Less than significant
Impact BI-W-9: Short-term indirect impacts to Special-status Animals Detected or with High Potential to Occur	Significant	Implement Mitigation Measures **M-BI-1, M-BI-2, M-BI-5, M-BI-6, and:** **M-BI-10 Noise Reduction.** Construction- and decommissioning-related activities that are excessively noisy (e.g., clearing, grading, grubbing, or blasting) adjacent to breeding/nesting areas shall incorporate noise-reduction measures (described below) or be curtailed during the breeding/nesting season of sensitive bird species. 1. Trucks and other engine-powered equipment shall be equipped with noise reduction features, such as mufflers and engine shrouds, which are no less effective than those originally installed by the manufacturer. 2. Trucks and other engine-powered equipment shall be operated in accordance with posted speed limits and limited engine idling requirements. 3. Usage of truck engine exhaust compression braking systems shall be limited to emergencies. 4. Back-up beepers for all construction equipment and vehicles shall be adjusted to the lowest noise levels possible, provided that Occupational Safety and Health Administration's (OSHA's) and the California Division of Occupational Safety and Health's safety requirements are not violated. These settings shall be retained for the duration of construction activities. 5. Vehicle horns shall be used only when absolutely necessary, as specified in the contractor's specifications. 6. Radios and other noise-generating "personal equipment" shall be prohibited. If construction-related activities that are excessively noisy (e.g., clearing, grading, grubbing, or blasting) occur during the period of January 15 through August 31, a County-approved biologist shall conduct preconstruction surveys in suitable nesting habitat adjacent to the construction area to determine the location of any active nests in the area (see M-BI-5).	Less than significant
Impact BI-W-10: Long-term indirect impacts to Special-status Animals Detected or with High Potential to Occur	Significant	Implement Mitigation Measures **M-BI-3, M-BI-4, M-BI-7, M-BI-8, M-BI-9 and M-WF-1.**	Less than significant
Impact BI-V-1: Short-term direct impacts to Special-status Upland Vegetation Communities	Significant	Implement Mitigation Measures **M-BI-1 and M-BI-2**.	Less than significant
Impact BI-V-2: Long-term direct impacts to Special-status Upland Vegetation Communities	Significant	Implement Mitigation Measures **M-BI-3 and M-BI-4.**	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
Impact BI-JR-1: Short-term direct impacts to Jurisdictional Resources	Significant	Implement Mitigation Measures **M-BI-1, M-BI-2, and:** **M-BI-11 Mitigation Measures and Design Considerations for Jurisdictional Wetlands and Waterways.** 1. **Erosion Control Around RPO Wetland Buffers:** Actively implement erosion control measures to prevent erosion and the discharge of sediment and pollutants into all San Diego County Wetland Protection Ordinance wetlands and their protection buffers (50-feet) within the project during project activities. Erosion controls shall be made from biodegradable materials where applicable (mulch) and monitored and repaired, if necessary, to ensure maximum erosion, sediment, and pollution control and removed at the time of project completion. 2. **Flagging RPO Wetland Buffers:** Contractor shall flag all San Diego County Wetland Protection Ordinance (RPO) wetland buffers (50-feet) for avoidance. No work including site access shall occur within the RPO wetland buffers. 3. **Waters Agency Coordination:** Coordinate with all applicable agencies with potential jurisdiction over aquatic resources within the project. If necessary, submit and obtain waters permits prior to project construction. 4. **Waters Permits:** If applicable, all waters permits (printed or electronic) shall be on-site during all project activities, and all personnel shall be aware of and understand all applicable permit conditions. The work must comply with the permitted scope of work and all permit conditions. Ensure coordination with the applicable agencies if permits require advanced notification to start work.	Less than significant
Impact BI-JR-2: Long-term direct impacts to Jurisdictional Resources	Significant	Implement Mitigation Measures **M-BI-3, M-BI-4, and M-BI-11.**	Less than significant
Impact BI-JR-3: Short-term indirect impacts to Jurisdictional Resources	Significant	Implement Mitigation Measures **M-BI-1, M-BI-2, M-BI-6, M-BI-7, and M-BI-11.**	Less than significant
Impact BI-JR-4: Long-term indirect impacts to Jurisdictional Resources	Significant	Implement Mitigation Measures **M-BI-3, M-BI-4, M-BI-7, M-BI-8, M-WF-1, and M-BI-11.**	Less than significant
Impact BI-V-3: Short-term indirect impacts to Special-status Upland Vegetation Communities	Significant	Implement Mitigation Measures **M-BI-1, M-BI-2, M-BI-6, M-BI-7, and M-BI-9.**	Less than significant
Impact BI-V-4: Long-term indirect impacts to Special-status Upland Vegetation Communities	Significant	Implement Mitigation Measures **M-BI-3, M-BI-4, M-BI-6, M-BI-7, M-BI-8, M-BI-9, and M-WF-1.**	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
Impact BI-WM-1: Short-term direct impacts to Foraging and Breeding Habitat	Significant	Implement Mitigation Measures **M-BI-1 and M-BI-2.**	Less than significant
Impact BI-WM-2: Long-term direct impacts to Foraging and Breeding Habitat	Significant	Implement Mitigation Measures **M-BI-3 and M-BI-4.**	Less than significant
Impact BI-WM-3: Short-term and long-term indirect impacts to Foraging and Breeding Habitat	Significant	Implement Mitigation Measures **M-BI-1, M-BI-2, M-BI-5, M-BI-6, M-BI-9, and M-BI-10.**	Less than significant
Impact BI-WM-4: Short-term and long-term direct impacts to Wildlife Connectivity	Significant	Implement Mitigation Measures **M-BI-3 and:** **M-BI-12 Wildlife Corridor.** In order to comply with Figure 15 of the Biological Resources Report depicting wildlife corridors, a minor deviation must be provided and approved to reflect the project changes. Prior to approval of any plan in any phase, issuance of any permit, and prior to use of the premises in reliance of this permit, a minor deviation must be submitted and approved with updated plans to the San Diego County PDS. The Applicant shall submit updated plans to reflect Figure 15 or as deemed appropriate by the County of San Diego and all applicable Wildlife Agencies (as deemed by the County) and gain approval. PDS shall review and approve the minor deviation for compliance with this condition. 1. **Wildlife Corridor Access.** The project shall provide wildlife-friendly fencing to allow for wildlife moving within the project site.	Less than significant
Impact BI-P-1: Short-term direct impacts to Sensitive Habitat Lands	Significant	Implement Mitigation Measures **M-BI-1 and M-BI-2.**	Less than significant
Impact BI-P-2: Long-term direct impacts to Sensitive Habitat Lands	Significant	Implement Mitigation Measures **M-BI-3 and M-BI-4.**	Less than significant
Impact BI-P-3: Short-term indirect impacts to Sensitive Habitat Lands	Significant	Implement Mitigation Measures **M-BI-1, M-BI-2, M-BI-6, M-BI-7, and M-BI-9.**	Less than significant
Impact BI-P-4: Long-term indirect impacts to Sensitive Habitat Lands	Significant	Implement Mitigation Measures **M-BI-3, M-BI-4, M-BI-6, M-BI-7, M-BI-8, M-BI-9, and M-WF-1.**	Less than significant
Impact BI-P-5: Migratory Bird Treaty Act	Significant	Implement Mitigation Measures **M-BI-1 and M-BI-5.**	Less than significant
Impact BI-P-6: Bald and Golden Eagle Protection Act	Significant	Implement Mitigation Measures **M-BI-3 and M-BI-4.**	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
2.3 Cultural Resources			
Impact CR-1: Known Archaeological Resources	Significant	**M-CR-1** **Dedicated Cultural Open Space Easement for Significant Archaeological Resources**. Prior to grading of Phase I, and in order to protect sensitive cultural resources, a Cultural Resource Open Space Easement shall be granted to the County of San Diego (County) as shown on an approved Open Space Easement exhibit. Within Phase I of the project, this easement is for the protection of archaeological sites P-37-027350, P-37-033497/P-37-033502/P-37-033503, P-37-040847, P-37-040848, P-37-040850, P-37-040851, P-37-040861, P-37-040866, and P-37-040865. Prior to grading of Phase II, and in order to protect sensitive cultural resources, a Cultural Resource Open Space Easement shall be granted to the County as shown on an approved Open Space Easement exhibit. Within Phase II of the project, this easement is for the protection of archaeological sites P-37-010476/P-37-034159, P-37-033310, P-37-040857, P-37-040858, P-37-040859, P-37-040862, P-37-040863, P-37-040864, P-37-040867, P-37-040869, P-37-040870, and P-37-040872. The easement prohibits all of the following on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space. The sole exceptions to this prohibition are: 1. Implementation of a site-capping plan approved by the Director of Planning and Development Services, if necessary 2. Selective clearing of vegetation by hand to the extent required by written order of the fire authorities for the express purpose of reducing an identified fire hazard 3. Activities required to be conducted pursuant to a revegetation, habitat management, or landscaping plan approved by the Director of Planning and Development Services 4. Vegetation removal or application of chemicals for vector control purposes where expressly required by written order of the Department of Environmental Health, in a location and manner approved in writing by the Director of Planning and Development Services 5. Installation of temporary or permanent fencing for the purpose of preventing inadvertent disturbance of archaeological sites during construction, maintenance, and decommissioning activities. The Applicant shall prepare the legal descriptions of the easements, then submit them for preparation and recordation with the County and pay all applicable fees associated with preparation of the documents prior to the approval of any plan and issuance of any permit. For recordation by separate document, the County Department of General Services shall prepare and approve the easement documents and send them to the County Department of Planning and Development Services for preapproval. Planning and Development Services shall preapprove the language and estimated location of the easements prior to recordation. Upon recordation of the easements the Department of General Services shall forward a copy of the recorded documents to Planning and Development Services for satisfaction of the condition.	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		M-CR-2 **Cultural Resources Treatment Agreement and Preservation Plan**. In order to mitigate for impacts to cultural resources and tribal cultural resources (TCRs), the Applicant shall develop and enter into a Cultural Resources Treatment Agreement and Preservation Plan with the consulting Native American tribes. A Cultural Resources Treatment Agreement and Preservation Plan shall be developed between the Applicant or their representative and the consulting Native American tribes. The Cultural Resources Treatment Agreement and Preservation Plan shall be reviewed and agreed to by the County prior to final signature and authorization. The Cultural Resources Treatment Agreement and Preservation Plan shall include but is not limited to the following: 1. Parties entering into the agreement and contact information. 2. Responsibilities of the Property Owner or their representative, Principal Investigator, archaeological monitors, Kumeyaay Native American monitors, and consulting tribes. 3. Requirements of the Archaeological Monitoring Program including unanticipated discoveries. The requirements shall address grading and grubbing requirements including controlled grading and controlled vegetation removal in areas of cultural sensitivity, analysis of identified cultural materials, and on-site storage of cultural materials. 4. Treatment of identified Native American cultural materials and TCRs. 5. Treatment of Native American human remains and associated grave goods. 6. Incorporation of P-37-027350, P-37-033497/P-37-033502/P-37-033503, P-37-040847, P-37-040848, P-37-040850, P-37-040851, P-37-040861, P-37-040866, and P-37-040865 into dedicated open space in Phase I. Incorporation of P-37-010476/P-37-034159, P-37-033310, P-37-040857, P-37-040858, P-37-040859, P-37-040862, P-37-040863, P-37-040864, P-37-040867, P-37-040869, P-37-040870, and P-37-040872 into dedicated open space in Phase II. 7. Interim treatment and final internment of Native American cultural soils and materials. 8. Confidentiality of cultural information including location and data. 9. Regulations that apply to cultural resources and TCRs that have been identified or may be identified during project construction. A copy of the implemented agreement shall be submitted to the County for approval, prior to the approval of any plan and issuance of any permit. The County shall review the implemented agreement for compliance this condition. **M-CR-3** **Archaeological and Native American Monitoring**. In order to mitigate for potential impacts to undiscovered buried archaeological resources and human remains, an Archaeological Monitoring Program and potential Data Recovery Program shall be implemented pursuant to the *County of San Diego Guidelines for Determining Significance, Cultural Resources: Archaeological and Historic Resources* and the California Environmental Quality Act (CEQA). This shall be implemented prior to approval of any grading and or improvement plans and issuance of any Grading or Construction Permits, for both phases for the period of time that ground-disturbing activities have the potential to uncover or disturb cultural resources, as determined by the Principal Investigator.	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		A County-approved Principal Investigator known as the "Project Archaeologist" shall be contracted to perform monitoring and a potential Data Recovery Program during all grading, clearing, grubbing, trenching, and earth-disturbing activities for both Phases I and II. The Project Archaeologist shall contract with a Kumeyaay Native American monitor(s) to conduct Native American monitoring for the project. The monitoring program for both Phases I and II shall include the following: 1. Preconstruction a. Contract with a County-approved archaeologist to perform archaeological monitoring and a potential Data Recovery Program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during and after construction. b. Hold a preconstruction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor(s) to explain the monitoring requirements. 2. Construction Monitoring a. Both the Project Archaeologist and Kumeyaay Native American monitor(s) are to be on-site during 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. Both the Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to ensure that they are negative for cultural resources, including those that could be identified as TCRs. b. If cultural resources or TCRs are identified: i. Both the Project Archaeologist and Kumeyaay Native American monitor(s) have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery. ii. The Project Archaeologist shall contact the County Archaeologist at the time of discovery. iii. The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American monitor(s) shall determine the significance of discovered resources. iv. Construction activities shall be allowed to resume after the County Archaeologist has concurred with the significance evaluation. v. Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a tribal curation facility or repatriation program. c. 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 or Sacred Sites, including TCRs; the	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for nonunique cultural resources. The preferred option is preservation (avoidance). 3. Human Remains a. The Property Owner or their representative shall contact the County Coroner and the Planning and Development Services Staff Archaeologist. b. 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. If the human remains are to be taken off-site for evaluation, they may be accompanied by the Kumeyaay Native American monitor. c. 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 in order to determine proper treatment and disposition of the remains. d. 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 Public Resources Code Section 5097.98 has been conducted. e. Public Resources Code Section 5097.98, CEQA 15064.5, and Health and Safety Code 7050.5 shall be followed in the event that human remains are discovered. 4. Rough Grading a. Monitoring Report. Upon completion of rough grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally affiliated tribe who requests a copy. 5. Final Grading a. Final Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center and any culturally affiliated tribe who requests a copy. b. The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or tribal curation facility that meets federal standards per 36 Code of Federal Regulations (CFR) 79, or alternatively have been repatriated to a culturally affiliated tribe. c. The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR 79. The Applicant shall provide a copy of the Archaeological Monitoring Contract or letter of acceptance, cost estimate, and memorandum of understanding (MOU) to the County. Additionally, the cost amount of the monitoring work shall be added to the grading bond cost estimate for both Phases I and II.	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		Planning and Development Services shall review the contract or letter of acceptance, MOU, and cost estimate or separate bonds for compliance with this condition. The cost estimate should be forwarded to the County for inclusion in the grading bond cost estimate, and grading bonds and the grading monitoring requirement shall be made a condition of the issuance of the grading or construction permit. **M-CR-4** **Temporary Fencing**. To prevent inadvertent disturbance of archaeological sites, temporary fencing shall be installed around the archaeological sites where they are located within 50 feet of the project area of direct impact (ADI). The temporary fencing shall include the following requirements: 1. Prior to the commencement of any grading and/or clearing in association with the grading and/or improvement plan, temporary construction fencing shall be placed at a distance of 50 feet around the known boundaries of archaeological sites, to protect archaeological sites or portions of sites from inadvertent disturbance. This temporary fencing shall be placed around the following sites in Phase I: P-37-027350, P-37-033497/P-37-033502/P-37-033503, P-37-040847, P-37-040848, P-37-040850, P-37-040851, P-37-040861, P-37-040866, and P-37-040865 adjacent to the project ADI during earth-disturbing activities. This temporary fencing shall be placed around the following sites in Phase II: P-37-010476/P-37-034159, P-37-033310, P-37-040857, P-37-040858, P-37-040859, P-37-040862, P-37-040863, P-37-040864, P-37-040867, P-37-040869, P-37-040870, and P-37-040872 adjacent to the project ADI during earth-disturbing activities. Temporary fencing shall be installed prior to the preconstruction meeting and any clearing, grubbing, trenching, grading, or ground disturbance during both construction and decommissioning. The temporary fencing shall remain for the duration of project earth-disturbing activities. 2. Temporary fencing shall be required in all locations of the project where proposed grading or clearing is within 50 feet of any archaeological site outside of the project ADI. 3. The placement of such fencing shall be approved by the County. Upon approval, the fencing shall remain in place until the conclusion of grading activities, after which the fencing shall be removed. 4. Installation and maintenance of temporary fencing shall require the presence of monitor(s) (archaeological and Native American) pursuant to **M-CR-3**. 5. A signed and stamped statement from a California Registered Engineer, or licensed surveyor, shall be submitted to Planning and 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 outside of the project ADI. **M-CR-5** **Permanent Fencing**. To prevent inadvertent disturbance of archaeological sites within the avoidance areas and to the unimpacted portions of the site outside of the ADI, permanent fencing shall be installed at a distance of 50 feet from the boundaries of archaeological sites as indicated on the approved project plans. The fencing shall be a three-strand barbed wire fence with a total height of four feet once constructed to keep an unobstructed view and to keep with the rural character of the region. The installation of the permanent fencing shall occur by Phase.	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		This permanent fencing shall be placed around the following sites in Phase I: P-37-027350, P-37-033497/P-37-033502/P-37-033503, P-37-040847, P-37-040848, P-37-040850, P-37-040851, P-37-040861, P-37-040866, and P-37-040865 adjacent to the project ADI. This permanent fencing shall be placed around the following sites in Phase II: P-37-010476/P-37-034159, P-37-033310, , P-37-040857, P-37-040858, P-37-040859, P-37-040862, P-37-040863, P-37-040864, P-37-040867, P-37-040869, P-37-040870, and P-37-040872 adjacent to the project ADI. The permanent fencing shall include the following requirements: 1. Installation of permanent fencing shall require the presence of monitor(s) (archaeological and Native American) pursuant to **M-CR-3**. 2. A signed and stamped statement from a California Registered Engineer, or licensed surveyor shall be submitted to Planning and 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 outside of the project ADI. **M-CR-6** **Long-Term Preservation of Resources.** All operation and maintenance (O&M) and decommissioning activities shall be performed within the proposed project ADI – no ground-disturbing activities shall occur outside the proposed project ADI or in the conservation areas. Employees and contractors performing O&M and decommissioning activities shall receive training or instructions regarding the archaeological and cultural sensitivity of the project site to ensure no inadvertent impacts occur to the potentially significant sites (or portions thereof) that are adjacent to the proposed project ADI.	
Impact CR-2: Undiscovered Archaeological Resources	Significant	Implement Mitigation Measures **M-CR-1, M-CR-2, and M-CR-3.**	Less than significant
Impact CR-3: Human Remains	Significant	Implement Mitigation Measures **M-CR-1, M-CR-2, and M-CR-3.**	Less than significant
2.4 Hydrology and Water Quality			
Impact HY-1: Flood Hazards and Risk of Pollutant Release	Significant	**M-HY-1: Flood Fencing.** Prior to approval of final design plans, the Applicant shall demonstrate to the satisfaction of the County Department of Public Works (DPW) Flood Control through hydrologic and hydraulic analyses, acceptable to DPW Flood Control and performed by a California licensed engineer in accordance with standard engineering practice, that the design features for the perimeter fencing avoids the blockage and/or redirection of storm flows resulting from the accumulation of debris and/or detritus at wash crossings. This can be accomplished through a number of means such as a) use of breakaway fencing perpendicular to flood flows to prevent obstruction and accumulation of debris b) use of fencing that spans washes (without posts) above the anticipated peak flow depth, c) or an alternative design measure that would avoid accumulations of detritus at perimeter fence wash crossings, subject to County approval. The Applicant shall show the proposed fencing design or alternative design measure on the Final Grading Plans. The associated Drainage Study shall contain hydrologic and hydraulic analyses, acceptable to DPW Flood Control and performed by a California licensed engineer in accordance with standard engineering practice, that model the proposed fencing and/or	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures		Impacts Following Mitigation
			design measures and demonstrate that the fencing shall not cause alteration of drainage patterns and/or flood hazards from pre-project conditions. The Drainage Study shall be in compliance with the County Hydrology Manual and the County Hydraulic Design Manual. Prior to the approval of any grading and/or improvement plans and issuance of Grading or Construction Permits, the Drainage Study and Plans shall be approved. The County DPW Flood Control shall review and approve the hydrologic and hydraulic analyses contained in the Drainage Study and the final fencing design and layout to ensure the flood flow is fully mitigated to pre-project conditions.	
2.5 Noise				
Impact N-1: Noise-Sensitive Land Uses Affected by Airborne Noise	Significant	**M-N-1**	**Stationary Equipment.** The project would comply with the County of San Diego's Noise Ordinance Section 36.404 based upon the current proposed layout and the anticipated major noise-producing operating stationary equipment (equipment) deployed for the project. The equipment modeled in the noise analysis report prepared for the EIR (Appendix J.1 of the EIR) was selected as representative technology at the time the report was prepared. The Applicant may propose to use different equipment than what was used to perform the noise modeling in the noise analysis report or propose a change in the equipment layout. If different equipment is selected and/or the layout of equipment is changed subsequent to project approval, the Applicant will be required to submit a revised noise analysis and a revised site plan if needed, as follows: 1. The Project Applicant shall retain a County-approved CEQA Noise Consultant to prepare a new predictive operations noise analysis in accordance with the County of San Diego, Report Format and Content Requirements – Noise (County of San Diego 2009). Any alterations or modifications proposed and approved pursuant to this procedure shall be included in the proposed project design plans. Any proposed equipment selections, equipment duty cycles, project layout alterations, and/or the addition, modification, reduction of the preceding equipment noise limits and measures may be approved, if they are demonstrated to comply at the property line with applicable outdoor hourly Leq noise limits per Section 36.404(a) of the County Noise Ordinance. 2. The above-identified measures shall take place prior to approval of any building plans for the project. Any alterations or modifications proposed and approved pursuant to this procedure shall be included in the proposed project design plans.	Less than significant
Impact N-2: Project-Generated Airborne Noise, Construction and Decommissioning	Significant	**M-N-2**	**Construction Noise Management Plan.** Prior to construction and decommissioning, the Applicant shall prepare a Construction Noise Management Plan (CNMP) which establishes construction activity restrictions in order to reliably achieve compliance with the County's 8-hour 75 dBA Leq standard at the project property lines adjoining existing occupied properties, defined by Section 36.402(m) as "property on which there is a building for which a certificate of occupancy has been issued". The CNMP shall demonstrate compliance with the County Noise Ordinance for avoiding potential impacts caused by operating construction equipment and vehicle noise sufficiently proximate to these property lines of occupied properties. The CNMP shall be submitted to County Planning and	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		Development Services 30 days prior to any land disturbance. Components of the CNMP shall include the following: 1. Affected property owners shall be notified in writing 2 weeks prior to construction activity within 500 feet of their property boundaries. 2. In order to comply with the County Noise Ordinance (Section 36.409, Construction Equipment), the acoustical usage factors (AUF) of heavy construction equipment used on the project site shall be comparable to those listed in Table 1 of the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) User Guide (FHWA 2017). Lmax values at 50 feet shall be the lower of either the "Spec. 721.560" or "Actual Measured" values in Table 1 of the RCNM User Guide, and duration of heavy equipment operating for construction shall comply with the following limitations by activity, for the specified distance between the indicated heavy equipment operations and a position along the property line of an occupied parcel: a. Perimeter fence installation – up to two flatbed trucks and a front-end loader: i. Within 15 feet – not permitted ii. 15 to 25 feet – no more than 20 minutes per 8-hour period iii. 25 to 50 feet – no more than 1 hour per 8-hour period iv. 50 to 75 feet – no more than 4 hours per 8-hour period v. Beyond 75 feet – no restriction b. Site preparation (clearing) – water truck and tractor (mowing attachment): i. Within 20 feet – not permitted ii. 20 to 25 feet – no more than 20 minutes per 8-hour period iii. 25 to 50 feet – no more than 30 minutes per 8-hour period iv. 50 to 75 feet – no more than 2 hours per 8-hour period v. 75 to 100 feet – no more than 4 hours per 8-hour period vi. Beyond 100 feet – no restriction c. Site preparation (earthmoving) – bulldozer, water truck, and scraper: i. Within 25 feet – not permitted ii. 25 to 50 feet – no more than 20 minutes per 8-hour period iii. 50 to 75 feet – no more than 1 hour per 8-hour period iv. 75 to 100 feet – no more than 3 hours per 8-hour period v. 100 to 125 feet – no more than 6 hours per 8-hour period vi. Beyond 125 feet – no restriction d. Site preparation (grading) – flatbed truck, grader, water truck, and sheepsfoot roller: i. Within 25 feet – not permitted ii. 25 to 50 feet – no more than 20 minutes per 8-hour period iii. 50 to 75 feet – no more than 1 hour per 8-hour period	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		iv. 75 to 100 feet – no more than 3 hours per 8-hour period v. 100 to 125 feet – no more than 6 hours per 8-hour period vi. Beyond 125 feet – no restriction e. Underground work (trenching) – excavator, sheepsfoot roller, water truck, 5-kilowatt (kW) generator, and Gradall (4 × 4 forklift): i. Within 25 feet – not permitted ii. 25 to 50 feet – no more than 20 minutes per 8-hour period iii. 50 to 75 feet – no more than 1.5 hours per 8-hour period iv. 75 to 100 feet – no more than 3 hours per 8-hour period v. Beyond 100 feet – no restriction f. Underground work (backfilling) – Aussie padder, sheepsfoot roller, water truck, 5-kW generator, and Gradall (4 × 4 forklift): i. Within 25 feet – not permitted ii. 25 to 50 feet – no more than 20 minutes per 8-hour period iii. 50 to 75 feet – no more than 1.5 hours per 8-hour period iv. 75 to 100 feet – no more than 3 hours per 8-hour period v. Beyond 100 feet – no restriction g. System installation – Gradall (4 × 4 forklift), crane, all-terrain vehicle, vibratory pile driver (RGT Model RG21T or comparable), pickup truck, and 5-kW generator: i. Within 25 feet – not permitted ii. 25 to 50 feet – no more than 20 minutes per 8-hour period iii. 50 to 75 feet – no more than 1.5 hours per 8-hour period iv. 75 to 100 feet – no more than 4 hours per 8-hour period v. Beyond 100 feet – no restriction All construction equipment operations shall incorporate all recommended noise reducing measures such as, but not limited to, limiting construction equipment operations, installation of temporary noise barriers, and implementation of the recommendations within the CNMP to demonstrate compliance with the County Noise Ordinance, Sections 36.408 and 36.409. Concurrent construction activities may occur so long as next closest construction activity to the same studied property line position is at least four times its "no restriction" distance away. By way of example, if earth moving was occurring near a fixed point on the potentially affected property line, the next closest set of earthmoving equipment performing like work, or perhaps an overlapping and comparable scheduled activity (e.g., grading), would be permitted if no closer than 500 feet (equal to 4 × 125 feet) from the same receptor point. 3. If distance buffers or duration limits cannot be maintained, then the Applicant or its contractor will implement on-site temporary sound abatement measures, such as a	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		field-erected noise barrier (e.g., sound blankets) of sufficient height and horizontal extent, or the placement of storage containers and other similarly solid sound-occluding structures, to ensure construction activity noise at the project property line complies with County standards. 4. The CNMP will also include direction for the Applicant or its contractor(s) to implement the following: a. Trucks and other engine-powered equipment shall be equipped with noise reduction features, such as mufflers and engine shrouds, which are no less effective than those originally installed by the manufacturer; b. Trucks and other engine-powered equipment shall be operated in accordance with posted speed limits and limited engine idling requirements; c. Usage of truck engine exhaust compression braking systems shall be limited to emergencies; d. Back-up beepers for all construction equipment and vehicles shall be adjusted to the lowest noise levels possible, provided that Occupational Safety and Health Administration (OSHA) and California OSHA's safety requirements are not violated; e. Vehicle horns shall be used only when necessary, as specified in the contractor's specifications; and **f.** Radios and other noise-generating "personal equipment" shall be prohibited.	
2.6 Tribal Cultural Resources			
Impact TR-1: Tribal Cultural Resources	Significant	Implement Mitigation Measures **M-CR-2 and M-CR-3.**	Less than significant
2.7 Wildfire			
Impact WF-1: Exacerbated Wildfire Risk	Significant	Implement Mitigation Measures **M-WF-1 and:** **M-WF-2 Fuel Modification Zones.** Fuel Modification Zones (FMZs) shall be implemented and maintained as follows: 1. An FMZ for each phase of the project shall be in place before any combustible material is brought on-site. 2. Designated areas shall be mowed, brushed, chipped, or otherwise reduced to a vegetation height of less than 6 inches. Material may remain on-site, as long as it is spread out to a depth of no more than 6 inches. Alternative methods of vegetation control include manual removal, herbicide application, prescribed herbivory, or installation of weed barriers in certain areas, such as beneath the PV modules. 3. A 30-foot FMZ around the perimeter between the fence line and internal perimeter road shall reduce vegetation to less than 6 inches and be regularly maintained. 4. Vegetation shall be maintained to 10 feet on either side of every interior access road, ensuring minimum unobstructed vertical clearance of 13 feet and 6 inches.	Less than significant

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		5. A 100-foot FMZ around each BESS shall reduce vegetation to less than 6 inches in height and be regularly maintained. 6. A 30-foot FMZ around the collector substation pad shall reduce vegetation to less than 6 inches in height and be regularly maintained. 7. Vegetation under PV modules shall be maintained to a vertical height of no more than 6 inches. 8. Vegetation within the 14 internal open space easements shall be maintained to a vertical height of no more than 6 inches. **M-WF-3** **Battery Energy Storage System Measures. T**he following measures shall be incorporated to reduce wildfire risk to the BESS and to reduce spread potential from a fire starting in the BESS: 1. Both BESSs shall be constructed on concrete pads and enclosed. 2. Each unit shall be separated by a drive aisle for easy access. 3. Automatic internal heat detecting system shall be linked to an inert gas system. 4. Each BESS shall have an internal aerosol suppression system that is regularly tested and maintained. 5. A 100-foot FMZ will surround each BESS to further reduce risk of fire spread. **M-WF-4** **Construction Fire Protection Plan.** The following shall be implemented based on the FPP guidance (see Appendix L): 1. An FMZ for each phase of the project shall be in place before any combustible material is brought on-site. 2. Continual training in fire prevention, communication, and fire reporting shall be provided to all on-site personnel. 3. Smoking shall be limited to designated areas that are free of vegetation and combustible materials for a minimum 30-foot distance. 4. Two water tenders (at least 3,000 gallons each) shall remain on-site until project water supply tanks are installed. 5. Two water tank trucks (at least 300 gallons each) shall remain on-site during construction and shall be within 0.25 mile of active construction areas. 6. Daily fire risk briefings shall be held with all on-site personnel. 7. Hot work shall be done under supervision in an approved area. 8. All motors on-site shall be equipped with a spark arrestor by the manufacturer. 9. Evacuation routes shall be maintained and cleared; these routes shall never be used as parking spaces. 10. Spills of combustible, hazardous, or potentially dangerous materials shall be cleaned up immediately. 11. Electrical equipment shall be unplugged when not in use, and there shall be no “jerry rigging” of extension cords. 12. All extension cords shall be rated appropriately for the work and properly grounded.	

Impact	Impacts Prior to Mitigation	Mitigation Measures	Impacts Following Mitigation
		13. All vehicles shall carry, at a minimum, an approved fire extinguisher and shovel. 14. All equipment and vehicles shall be properly maintained. 15. A cache of firefighting tools and water shall be at the main staging area or at another location approved by the Site Safety Officer. **M-WF-5 Red Flag Warning Measures.** During Red Flag Warnings the following precautions shall be taken: 1. No hot work shall be conducted during Red Flag Warnings. 2. No vehicle shall be permitted to drive over vegetation; vehicles must remain on roads or areas that are devoid of flammable vegetation. 3. "Red Flag" signage shall be displayed at the project main gate and construction office on days when the warning is issued. **M-WF-6 Fire Protection and Mitigation Agreement.** As a condition to providing service and pursuant to the Safety Element of the General Plan, the Applicant shall enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection District (SDCFPD) prior to approval of a Major Use Permit to make a fair share contribution toward local emergency response capabilities. The funding shall be used by the SDCFPD to mitigate risks of wildfires and to enhance fire suppression and emergency services capabilities for the proposed project and the southeast portion of CSA 135.	
Impact WF-2: Infrastructure Contribution to Wildfire Risk	Significant	Implement Mitigation Measures **M-WF-1, M-WF-2, M-WF-3, M-WF-4, M-WF-5, and M-WF-6.**	Less than significant
Impact WF-CU-1: Cumulative, Emergency Response/ Evacuation Plan	Significant	Implement Mitigation Measures **M-WF-1, M-WF-2, M-WF-3, M-WF-4, M-WF-5, and M-WF-6.**	Less than significant
Impact WF-CU-2: Cumulative, Exacerbated Wildfire Risk	Significant	Implement Mitigation Measures **M-WF-1, M-WF-2, M-WF-3, M-WF-4, M-WF-5, and M-WF-6.**	Less than significant
Impact WF-CU-3: Cumulative, Infrastructure Contribution to Wildfire Risk	Significant	Implement Mitigation Measures **M-WF-1, M-WF-2, M-WF-3, M-WF-4, M-WF-5, and M-WF-6.**	Less than significant