

Mitigation Monitoring Reporting Program

An Environmental Assessment / Initial Study (EA/IS) has been prepared to assess the Alta Mesa Wind Project’s potential environmental effects and appropriate mitigation was developed to reduce potentially significant impacts to less than significant. AM Wind Repower LLC, Applicant, would be responsible for implementing all applicable measures, including the adopted mitigation measures and conditions of project approval, as well as conditions imposed in any permits or regulations administered by other responsible agencies. Riverside County is responsible for monitoring and reporting on required mitigation. The following Mitigation Monitoring Reporting Program summarizes the mitigation implementation, timing, and monitoring requirements.

Mitigation Monitoring Program

Air Quality

MITIGATION MEASURE	MM-AQ-1 Fugitive Dust Control Plan. The Project would mitigate the particulate matter impact caused by dust emissions during construction by implementing a suite of effective dust control practices, such as using soil stabilizers or watering exposed areas (2 times/day or as needed) throughout construction and by limiting vehicle travel speeds to no more than 15 miles per hour on unpaved areas within the construction site. Visible speed limit signs would be posted at site entrance.
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Timing/Location	During Construction
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Responsible Party	Applicant
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Responsible Monitoring Party	Riverside County
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Verification Approval Party	Riverside County
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MITIGATION MEASURE	MM-AQ-2 Control On-Site Off-Road Equipment Emissions. The Project would mitigate the NOx, PM10, and PM2.5 in diesel exhaust emissions by requiring use of the off-road equipment achieving Tier 3 engine emissions standards. To implement this standard, the Project owner, when entering into construction contracts or when procuring off-road equipment or vehicles for on-site construction activities, shall ensure that only 2008-or-newer model year equipment or vehicles are obtained. All construction equipment using diesel engines shall either be registered under California Air Resources Board’s Statewide Portable Equipment Registration Program or shall meet the Tier 3 California Emission Standards for Off-Road Compression-Ignition Engines, as specified in California Code of Regulations, Title 13, section 2423(b)(1). All diesel-fueled engines used in the construction of the facility shall have clearly visible tags showing that the engine meets the standards of this measure.
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Timing/Location	During Construction
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Responsible Party	Applicant
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Responsible Monitoring Party	Riverside County
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Verification Approval Party	Riverside County
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Mitigation Monitoring Program

Biological Resources

MITIGATION MEASURE	MM BIO-1 Wildlife Relocation. The Applicant will prepare and implement a Wildlife Relocation Plan to ensure that special-status wildlife species, including (but not limited to) desert tortoise, burrowing owl, and desert kit fox, are safely relocated outside the Project construction area prior to construction. The Wildlife Relocation Plan will conform to USFWS guidelines for desert tortoise surveys and relocation and to CDFW guidelines for burrowing owl and desert kit fox passive relocation, including scheduling to avoid disturbance to natal dens or burrows. The Wildlife Relocation Plan will specify methodology for pre-construction clearance surveys on the proposed Project construction sites; monitoring or tracking special-status species, burrows, or dens that may be located during the surveys; construction of off-site artificial burrows, if needed; relocation methods for localized “out of harm’s way” relocation; passive relocation methods for burrowing owl or desert kit fox; qualifications of field personnel who may handle desert tortoises; and follow-up monitoring of relocated animals.
Timing/Location	Prior to and During Construction
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

MITIGATION MEASURE

MM BIO-2 Biological Monitoring. The Applicant will assign an Authorized Biologist as the primary point of contact for the lead resource agencies regarding biological resources mitigation and compliance. For desert tortoise protection measures (BIO-6, below), the Authorized Biologist will serve as the Field Contact Representative (FCR). The Applicant will provide the resume of the proposed Authorized Biologist to the County, USFWS, and CDFW (as appropriate) for concurrence at least 30-days prior to onset of ground-disturbing activities. The Authorized Biologist will have demonstrated expertise with the biological resources within the Project area. In general, the duties will include, but will not be limited to those listed below:

- Regular, direct communication with representatives of County, USFWS and CDFW, and other agencies, as appropriate.
- Train and supervise additional Biological Monitors to ensure that all biological monitoring activities are completed properly and according to schedules. Monitoring will include clearance surveys of any area or activity that may impact biological resources to ensure compliance with all avoidance and minimization measures for biological resources.
- Conduct or oversee WEAP training (MM BIO-3).
- Conduct or oversee clearance surveys and monitoring duties.
- Halt any activities in any area if it is determined that the activity, if continued, would cause an unauthorized adverse impact to biological resources.
- Clearly mark sensitive biological resource areas during construction, O&M, and decommissioning, and inspect these areas at appropriate intervals for compliance with regulatory terms and conditions.
- Conduct or oversee compliance inspections during ground disturbing construction and decommissioning activities. Inspections will include delineating limits of disturbance, fence construction activities, pre-construction clearance surveys; and clearing, grubbing, and grading.
- Inspect or oversee daily inspection of active construction or O&M activity areas where animals may have become trapped. At the end of each workday, either inspect installation of structures that prevent entrapment or allow escape during periods of construction inactivity. Periodically inspect areas with high vehicle activity (e.g., parking lots) for animals in harm's way and relocate them if necessary.
- During the operations phase of the Project, provide annual report conduct compliance inspections (trash management, wildlife mortality logs per incident, etc.); conduct weed monitoring and control (according to the Integrated Weed Management Plan).
- Immediately notify the Applicant, County, and resource agencies (as applicable) in writing of dead or injured special-status species, or of any non-compliance with biological mitigation measures or permit conditions.
- During construction, provide weekly verbal or written updates to County, and, for any information pertinent to state or federal permits, to the County and resource agencies.
- During construction and O&M, prepare and submit monthly and annual compliance reports, respectively.

Qualifications of Authorized Biologist. The Applicant shall assign at least one Authorized Biologist to the Project. The Applicant shall submit the resume and USFWS health assessment letter, if applicable, of the proposed Authorized Biologist(s), with at least three references and contact information, to the County for approval in consultation with CDFW and USFWS at least 30-days prior to the start of ground disturbing activities. The Authorized Biologist must meet the following minimum qualifications:

- Bachelor's degree in biological sciences, zoology, botany, ecology, or a closely related field;
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- Three years of experience in field biology or current certification of a nationally recognized biological society, such as The Ecological Society of America or The Wildlife Society;
- Have at least one year of field experience with biological resources found in or near the Project area;
- Meet the current USFWS Authorized Biologist qualifications criteria, demonstrate familiarity with protocols and guidelines for the desert tortoise, and be approved by the USFWS;
- Possess a CESA Memorandum of Understanding pursuant to §2081(a) for desert tortoise.
- In lieu of the above requirements, the resume shall demonstrate to the satisfaction of the County, in consultation with CDFW and USFWS, that the proposed Authorized Biologist or alternate has the appropriate training and background to effectively implement the mitigation measures.

Process of approving a Biological Monitor

- The Authorized Biologist or Applicant shall submit the resume, at least three references, and contact information of the proposed Biological Monitors to the County. The resume shall demonstrate, to the satisfaction of the County, the appropriate education and experience to accomplish the assigned biological resource tasks. The Biological Monitor is the equivalent of the USFWS-approved biologist (also “Service-approved biologist”).
- Biological Monitor(s) training by the Authorized Biologist shall include familiarity with the project design features, BO, WEAP, and USFWS guidelines on desert tortoise surveys and handling procedures.

Timing/Location	Prior to and During Construction
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

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MM BIO-3 Worker Environmental Awareness Program Training. The FCR or Authorized Biologist will prepare and implement a WEAP. The Applicant will be responsible for ensuring that all workers at the site receive WEAP training prior to beginning work on the Project and throughout construction and operations. The WEAP will be available in English and Spanish. The Applicant will submit the WEAP to County for approval prior to implementation. If the County does not respond to submittal of the draft Plan within 60 days, the Project owner may consider this a waiver of the County’s authority to comment and the Plan may be considered approved. The WEAP will:

- Be developed by or in consultation with the Authorized Biologist and consist of an onsite or training center presentation with supporting written material and electronic media, including photographs of protected species, available to all participants.
- Provide an explanation of the function of flagging that designates authorized work areas; specify the prohibition of soil disturbance or vehicle travel outside designated areas.
- Discuss general safety protocols such as vehicle speed limits, hazardous substance spill prevention and containment measures, and fire prevention and protection measures.
- Review mitigation and biological permit requirements.
- Explain the sensitivity of the vegetation and habitat within and adjacent to work areas, and proper identification of these resources.
- Discuss the federal and State Endangered Species Acts, Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act and the consequences of non-compliance with these acts.
- Discuss the locations and types of sensitive biological resources on the Project site and adjacent areas and explain the reasons for protecting these resources. This includes the biology and ecology of sensitive biological resources on the Project site and adjacent areas.
- Inform participants that no snakes, other reptiles, birds, bats, or any other wildlife will be harmed or harassed.
- Place special emphasis on species that may occur on the Project site including special-status plants, desert tortoise, burrowing owl, golden eagle, nesting birds, desert kit fox, American badger, and Nelson’s bighorn sheep.
- Specify guidelines for avoiding rattlesnakes and reporting rattlesnake observations to ensure worker safety and avoid killing or injuring rattlesnakes. Wherever feasible, rattlesnakes should be safely removed from the work area using appropriate snake handling equipment, including a secure storage container for transport.
- Describe workers’ responsibilities regarding wildlife avoidance, prohibitions of pets and firearms, and for avoiding the introduction of invasive weeds onto the Project site and surrounding areas, describe the Integrated Weed Management Plan.
- Provide contact information for the FCR and Authorized Biologist and instructions for notification of any threatened, endangered or sensitive wildlife discoveries, vehicle-wildlife collisions or dead or injured wildlife species encountered during Project-related activities.
- Include a training acknowledgment form to be signed by each worker indicating that they received training and will abide by the guidelines.

Timing/Location	Prior to and During Construction
Responsible Party	Applicant
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Verification Approval Party	Riverside County

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Method of Verification

MITIGATION MEASURE	<p>MM BIO-4 Minimization of Vegetation and Habitat Impacts. Prior to ground-disturbing activities, work areas (including, but not limited to, staging areas, access roads, and sites for temporary placement of construction materials and spoils) will be delineated with construction fencing (e.g., the common orange vinyl material) or staking to clearly identify the limits of work and will be verified by the Authorized Biologist. No paint or permanent discoloring agents shall be applied to rocks or vegetation (to indicate surveyor construction activity limits or for any other purpose). Fencing/staking will remain in place for the duration of construction. Spoils will be stockpiled in disturbed areas. All disturbances, vehicles, and equipment will be confined to the fenced/flagged areas.</p> <p>When feasible, construction activities will minimize soil and vegetation disturbance to minimize impacts to soil and root systems. Upon completion of construction activities in any given area, all unused materials, equipment, staking and flagging, and refuse shall be removed and properly disposed of, including wrapping material, cables, cords, wire, boxes, rope, broken equipment parts, twine, strapping, buckets, and metal or plastic containers. Any unused or leftover hazardous products shall be properly disposed of offsite.</p> <p>Hazardous materials will be handled and spills or leaks will be promptly corrected and cleaned up, according to applicable requirements. Vehicles will be properly maintained to prevent spills or leaks. Hazardous materials, including motor oil, fuel, antifreeze, hydraulic fluid, grease, will not be allowed to enter drainage channels.</p>
Timing/Location	Prior to and During Construction
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

MITIGATION MEASURE

MM BIO-5 Wildlife Protection. The Applicant shall undertake the following measures during construction and O&M to avoid or minimize impacts to wildlife. Implementation of all measures shall be subject to review and approval by the County.

- *Wildlife avoidance.* Wherever feasible, Project activities will avoid interference with wildlife (include ground-dwelling species, birds, bats) by allowing animals to escape from a work site prior to disturbance; conducting pre-construction surveys and exclusion measures for certain species as specified in other measures; checking existing structures and foundations for wildlife that may be present, and safely excluding them prior to removing the structures.
 - *Minimize traffic impacts.* The Applicant will specify and enforce 15 miles per hour as the maximum vehicle speed limits, to minimize risk of wildlife collisions and fugitive dust.
 - *Minimize lighting impacts.* Night lighting, when in use, shall be designed, installed, and maintained to prevent side casting of light towards surrounding fish or wildlife habitat. Any FAA required safety lighting color and pattern (e.g., steady vs. flashing lighting) will be designed to minimize potential hazards (i.e., attraction and subsequent collision) to native birds and bats.
 - *Avoid use of toxic substances.* Soil bonding and weighting agents used for dust sup-pression on unpaved surfaces shall be non-toxic to wildlife and plants.
 - *Minimize noise and vibration impacts.* The Applicant will minimize noise to offsite habitat.
 - *Water.* Potable and non-potable water sources such as tanks, ponds, and pipes shall be covered or otherwise secured to prevent animals (including birds) from entering. Prevention methods may include storing water within closed tanks or covering open tanks with 2-centimeter netting. Dust abatement will use the minimum amount of water on dirt roads and construction areas to meet safety and air quality standards. Water sources (e.g., hydrants, tanks, etc.) shall be checked periodically by biological monitors to ensure they do not create puddles.
 - *Trash.* All trash and food-related waste shall be contained in vehicles or covered trash containers inaccessible to ravens, coyotes, or other wildlife and removed from the site regularly.
 - *Workers.* Workers shall not feed wildlife or bring pets to the Project site. Except for law enforcement personnel, no workers or visitors to the site shall bring firearms or weapons.
 - *Wildlife netting or exclusion fencing.* The existing fence surrounding the O&M structure will be updated to include desert tortoise exclusion fencing. The Applicant may install temporary or permanent netting or fencing around equipment, work areas, or Project facilities to prevent wildlife exposure to hazards such as toxic materials or vehicle strikes, or prevent birds from nesting on equipment or facilities. Bird deterrent netting will be maintained free of holes and will be deployed and secured on the equipment in a manner that, insofar as possible, prevents wildlife from becoming trapped inside the netted area or within the excess netting. The Desert Tortoise Monitor or Authorized Biologist will inspect netting (if installed) twice daily, at the beginning and close of each work day. The Desert Tortoise Monitor or Authorized Biologist will inspect exclusion fence (if installed) weekly.
 - *Wildlife entrapment.* Project-related excavations shall be secured to prevent wildlife entry and entrapment. Holes and trenches shall be backfilled, securely covered, or fenced. Excavations that cannot be fully secured shall incorporate wildlife ramp or other means to allow trapped animals to escape. At the end of each workday, a Desert Tortoise Monitor
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or Authorized Biologist shall ensure that excavations have been secured or provided with appropriate means for wildlife escape.

- *All pipes or other construction materials or supplies* will be covered or capped in storage or laydown areas. No pipes or tubing will be left open either temporarily or permanently, except during use or installation. Any construction pipe, culvert, or other hollow materials will be inspected for wildlife before it is moved, buried, or capped.
- *Dead or injured wildlife* will be reported to CDFW or the local animal control agency, as appropriate (special-status species must be reported to USFWS, County, and CDFW). An Authorized Biologist shall safely move the carcass out of the road or work area if needed and dispose of the animal as directed by the agency. If an animal is entrapped, an Authorized Biologist shall free the animal if feasible, or work with construction crews to free it, in compliance with safety requirements, or work with animal control or USFWS and CDFW to resolve the situation.
- *Pest control*. No anticoagulant rodenticides, such as Warfarin and related compounds (indandiones and hydroxycoumarins), may be used within the project site, on off-site project facilities and activities, or in support of any other project activities.

Timing/Location	During Construction and O&M
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

MITIGATION MEASURE

MM BIO-6 Desert Tortoise Protection. All ground-disturbing activities would avoid desert tortoise take by either exclusion fencing or on-site monitoring. The determination whether to fence work areas will be made on a case-by-case basis dependent on the schedule and extent of planned activities and topography of the work site. Desert tortoises would be handled or translocated according to the Desert Tortoise Relocation Plan, to be prepared as specified in MM BIO-1, pending approval by both the USFWS and CDFW.

The Authorized Biologist shall conduct or oversee pre-construction clearance surveys for each work area, watch for tortoises wandering into the construction areas, check under vehicles, and examine excavations and other potential pitfalls for entrapped animals. The Authorized Biologist will be responsible for overseeing compliance with desert tortoise protective measures and for coordination with the County, USFWS, and CDFW (described below). The Authorized Biologist shall have the authority to halt all Project activities that are in violation of these measures or that may result in take of a desert tortoise. Only the Authorized Biologist or Desert Tortoise Monitor with direct oversight from the Authorized Biologist will handle or relocate desert tortoises and only as specifically outlined in the Desert Tortoise Relocation Plan. Any incident that is considered by the Authorized Biologist to be in noncompliance with these measures will be documented immediately.

The Authorized Biologist will be responsible for overseeing compliance with desert tortoise protective measures and for coordination with resource agencies. The FCR will also have the authority to halt any Project activities that may risk take of a desert tortoise or that may be inconsistent with adopted mitigation measures or permit conditions. Neither the FCR nor any other Project employee may bar or limit any communications between any Natural Resource Agency or County and any Project biologist, biological monitor or contracted biologist. Upon notification by another Authorized Biologist or Monitor of any noncompliance, the FCR will ensure that appropriate corrective action is taken and documented. The following incidents will require immediate cessation of any Project activities that could harm a desert tortoise: (1) location of a desert tortoise within a work area; (2) imminent threat of injury or death to a desert tortoise; (3) unauthorized handling of a desert tortoise, regardless of intent; (4) operation of construction equipment or vehicles outside a Project area cleared of desert tortoise, except on designated roads; and (5) conducting any construction activity without a Desert Tortoise Monitor where one is required.

The Authorized Biologist will be responsible for implementing, inspecting, or overseeing the following requirements in coordination with Desert Tortoise Monitors, the Applicant, and all its on-site contractors.

- *Monitor Desert Tortoise Exclusion Fence Installation (if necessary).* The desert tortoise exclusion fence installation will be monitored by the Authorized Biologist or Desert Tortoise Monitor, under supervision from the Authorized Biologist, who will ensure stipulations provided in the Service's (2009, Chapter 8) guidance for tortoise exclusionary fencing are met. Throughout the construction phase, the tortoise exclusionary fence will be checked regularly and immediately after major rainfall events to ensure its integrity. Repairs will be made within 48 hours of discovery to prevent a tortoise from entering the site.
 - *Preconstruction Clearance Survey for fenced areas.* For construction areas that would be fenced with desert tortoise exclusion fencing or standard construction fencing, clearance surveys will follow procedures outlined in the Service's Desert Tortoise Field Manual (December 2009) or more current Service guidance. The Authorized Biologist will conduct preconstruction clearance surveys immediately prior to initiation of ground disturbing activities in desert tortoise habitat regardless of the time of year. The goal of a clearance survey is to find all tortoises on the surface
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and in burrows that could be harmed by construction activities. Surveys will cover 100 percent of the acreage to be disturbed. All potential burrows within 100 feet of construction activity will be marked and avoided to the extent practicable. Those that cannot be avoided will be excavated by the Authorized Biologist.

- *Monitor and oversee activities within construction phase tortoise exclusion fencing.* Prior to construction of Alta Mesa Wind repower, temporary or permanent desert tortoise exclusion fencing may be installed around the laydown area (temporary areas in use during construction and decommissioning phases only). The existing fence surrounding the O&M structure will be updated to include desert tortoise exclusion fencing. The fence will adhere to USFWS design guidelines (Service, 2009). The Authorized Biologist will conduct or oversee a clearance survey before the tortoise fence is enclosed to ensure no tortoises are in the work area. Any potentially occupied burrows will be avoided until monitoring or field observations (e.g., with a motion-activated camera or fiber-optic mounted video camera) determines absence. If live tortoises or an occupied tortoise burrow are identified in the work area, tortoises shall be relocated by the Authorized Biologist or allowed to leave on their own accord before enclosing the fence. The fence shall be either continuously monitored prior to closure, or clearance surveys shall be repeated prior to closure after tortoises are removed. Once installed, exclusion fencing will be inspected at least daily and following all rain events, and corrective action taken if needed to maintain it. Fencing around each work area will include a “cattle guard” or desert tortoise exclusion gate at each entry point. This gate will remain closed at all times, except when vehicles are entering or leaving the Project area. If it is deemed necessary to leave the gate open for extended periods of time (e.g., during high traffic periods), the gate may be left open as long as an Authorized Biologist or Desert Tortoise Monitor is present to monitor for tortoise activity in the vicinity.
 - *Monitor and oversee activities within unfenced work areas.* As an alternative to exclusion fencing, for any work conducted in an area that is not fenced to exclude desert tortoises, the work area must be surveyed no more than two hours prior to any planned vehicle or equipment activities and monitored by a Desert Tortoise Monitor who will stop work if a tortoise enters the work area. Work activities will only proceed at the site and within a suitable buffer area after the tortoise has either moved away of its own accord, or if it has been relocated out of harm’s way by an Authorized Biologist or a Monitor under the direct supervision of the Authorized Biologist. Work sites with potential hazards to desert tortoise (e.g., auger holes, steep-sided depressions) that are outside of the desert tortoise exclusion fencing will be securely covered or filled at the end of each workday. Note that work areas without tortoise exclusion fencing nonetheless will be clearly defined by other fencing materials, staking, flagging, or other measures (BIO-4, above).
 - *Tortoises under vehicles.* The ground beneath parked vehicles will be inspected immediately prior to the vehicle being moved. If a tortoise is found beneath a vehicle, the tortoise shall be allowed to move out of the area on its own. If it does not leave within 30 minutes, the Authorized Biologist may move the tortoise out of harm’s way in a manner consistent with MM BIO 1 and Service handling guidance.
 - *Tortoises on roads.* If a tortoise is observed on or near the road accessing a work area, the Authorized Biologist or Desert Tortoise Monitor will be contacted immediately, and vehicles will stop to allow the tortoise to move off the road on its own. If it does not leave the site within 30 minutes, the Authorized Biologist may move the tortoise out of harm’s way in a manner consistent with MM BIO 1 and Service handling guidance.
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- *Tortoise Observations.* Any time a desert tortoise is observed within or near a work site, Project work activities will only proceed at the site and within a suitable buffer area after the tortoise has either moved away of its own accord, or if it has been moved from harm's way by the Authorized Biologist. If a tortoise is observed in an unfenced work area, construction will stop and the tortoise shall be allowed to move out of the area on its own. If it does not leave the site within 30 minutes, the Authorized Biologist may move the tortoise out of harm's way in a manner consistent with MM BIO 1 and Service handling guidance. If a tortoise or tortoise burrow is observed within the exclusion fencing, construction in the vicinity will stop, pending relocation of the tortoise.
- *Dead or Injured Desert Tortoise.* Upon locating a dead or injured tortoise, the Authorized Biologist will immediately notify the County, the USFWS's Palm Springs Fish and Wildlife Office, and CDFW by telephone. Written notification must be made within five days of the finding to the Palm Springs Fish and Wildlife Office and CDFW. The information provided must include the date and time of the finding or incident (if known), location of the carcass or injured animal, a photograph, cause of death, if known, and other pertinent information. Additionally, the Authorized Biologist will be responsible for identifying a nearby veterinarian capable of treating and rehabilitating any injured tortoises, and immediately transporting any injured tortoise to that office. The Project Proponent will be responsible for veterinary expenses.

Timing/Location	Prior to and During Construction
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

MITIGATION MEASURE **MM BIO-7 Integrated Weed Management Plan.** The Applicant will prepare and implement an Integrated Weed Management Plan (IWMP) to minimize or prevent invasive weeds from infesting the site or spreading into surrounding habitat. The County must approve the plan. The IWMP will identify weed species occurring or potentially occurring in the Project area, means to prevent their introduction or spread (e.g., vehicle cleaning and inspections), monitoring methods to identify infestations, and timely implementation of manual or chemical (as appropriate) suppression and containment measures to control or eradicate invasive weeds. The IWMP will identify herbicides that may be used for control or eradication, and avoid herbicide use in or around any environmentally sensitive areas. The IWMP will also include a reporting schedule, to be implemented by the Applicant.

Timing/Location	Prior to and During Construction
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

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MITIGATION MEASURE **MM BIO-8 Monitoring and Reporting Schedule.** Encounters with desert tortoise shall be immediately reported to the FCR, Authorized Biologist, or Monitor. The Authorized Biologist shall maintain a record of all desert tortoises encountered during construction and decommissioning activities. Information recorded for each desert tortoise will include: the location; date of observation; general condition of health and apparent injuries and state of healing; location of damaged exclusion fence (if applicable); if moved, location moved from and location moved to and whether the desert tortoise voided its bladder; and diagnostic markings (i.e., identification numbers or marked lateral scutes).

The Project proponent will provide monthly reports to the County, USFWS, and CDFW throughout the construction and decommissioning phases that summarizes the implementation of Project measures pertaining to desert tortoise management. The reports will be prepared by the Authorized Biologist.

The Project proponent will provide annual reports to the County, USFWS, and CDFW throughout the construction and decommissioning phases, and a final report upon completion of construction and decommissioning, that summarize the implementation of Project measures pertaining to desert tortoise management. The reports will be prepared by the Designated Biologist or other qualified biologist.

Timing/Location	During Construction and Decommissioning
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

MITIGATION MEASURE **MM BIO-9 Trash Management.** All garbage associated with the Project during all phases of the Project will be contained in secure receptacles to prevent the introduction of food resources that could potentially attract or support common ravens, coyotes, and other predators or scavengers. Secure, wildlife proof self-closing waste bins will be used for all organic waste. To reduce the possibility of ravens or other scavengers from ripping into bags and exposing the garbage, plastic bags containing garbage will not be left out for pickup. All such waste material must be in secure waste bins or dumpsters at all times.

Timing/Location	All Project Phases
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

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MITIGATION MEASURE **MM BIO-10 Raven Management Plan.** The Project applicant will develop and implement a Raven Management Plan to address activities that may occur during the pre-construction, construction, decommissioning, and O&M phases of the Project that may attract common ravens (*Corvus corax*), a nuisance species that is a subsidized predator of desert tortoises and other sensitive species in the Project vicinity. The measures contained in the Raven Management Plan will be designed to:

- Identify conditions associated with the Project that might provide raven subsidies or attractants.
- Describe management practices to avoid or minimize conditions that might increase raven numbers and predatory activities.
- Describe control practices for ravens.
- Address monitoring during construction and for the life of the Project and discuss reporting requirements.

The Project Applicant will submit payment to the Project sub-account of the Renewable Energy Action Team (REAT) Account held by the National Fish and Wildlife Foundation (NFWF) to support the Service’s Regional Raven Management Program. The one-time fee will be as described in the cost allocation methodology or more current guidance as provided by the Service or CDFW. The contribution to the regional raven management plan will be \$105 per acre impacted.

Timing/Location	All Project Phases
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

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MITIGATION MEASURE	<p>MM BIO-11 Revegetation. The Applicant will prepare and implement a Revegetation Plan for all temporarily disturbed areas, to be reviewed and approved by County, USFWS, and CDFW. The Revegetation Plan will specify success criteria and materials and methods for site preparation, reseeding, maintaining, and monitoring revegetated areas in the following two categories:</p> <ul style="list-style-type: none"> • Temporarily disturbed areas where no future disturbance will occur (e.g., cut and fill slopes along roadways or turbine pads, to be left undisturbed throughout the life of the project). The goal of revegetation on these sites will be restoration of vegetation and habitat characteristics to provide habitat for listed species comparable to what is present before the disturbance. • Temporarily disturbed construction areas around turbines, where future repairs or maintenance may necessitate further disturbance during the life of the project. The goal of revegetation on these sites will be to minimize dust, erosion, and invasive weeds from disturbed sites, but not to restore pre-disturbance habitat values (those impacts are mitigated through off-site compensation).
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The nature of revegetation will differ according to each site, its pre-disturbance condition, and the nature of the construction disturbance (e.g., drive and crush vs. blading). The Plan will include: (a) soil preparation measures, including locations of recontouring, decompacting, imprinting, or other treatments; (b) details for topsoil storage, as applicable; (c) plant material collection and acquisition guidelines, plants from the project site, as well as obtaining replacement plants from outside the project area (sources for plant materials will be limited to locally occurring native species from the local area); (d) a plan drawing or schematic depicting the temporary disturbance areas described above; (e) time of year that the planting or seeding will occur and the methodology of the planting; (f) a description of the irrigation, if used; (g) success criteria; and (h) a monitoring program to measure the success criteria, commensurate with the Plan's goals, (i) contingency measures for failed revegetation efforts not meeting success criteria.

Timing/Location	Prior to and During Construction
Responsible Party	Applicant
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Verification Approval Party	Riverside County

MITIGATION MEASURE	<p>MM BIO-12 Post construction monitoring for birds and bats. The Applicant would conduct post construction mortality surveys for bird and bat populations on the repowered Alta Mesa Wind.</p>
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Timing/Location	Post Construction
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

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MITIGATION MEASURE **MM BIO-13 Bird and Bat Conservation Strategy.** The Applicant will prepare and implement a Bird and Bat Conservation Strategy (BBCS) in coordination with the County, USFWS, and CDFW. The BBCS will specify (1) pre-construction survey schedule and methodology to locate nesting birds, including burrowing owl, near planned construction activities; (2) minimization and avoidance measures to prevent project-related nest abandonment or other potential take of nesting birds; (3) passive relocation methods to be implemented if an active burrowing owl burrow is located near work activity areas; (4) pre- and post-operation monitoring protocol for bird and bat mortality; (5) mortality thresholds for listed or sensitive birds that will trigger adaptive management measures, (6) an adaptive management strategy to be implemented in the event mortality thresholds are exceeded, and (7) a format and schedule for reporting monitoring data and adaptive management actions to the County, USFWS, and CDFW.

Timing/Location	All Project Phases
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

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Cultural Resources

Mitigation Monitoring Program

MITIGATION MEASURE

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

The CRMP shall contain at a minimum the following:

- Archaeological Monitor – An adequate number of qualified archaeological monitors shall be onsite to ensure all earth moving activities are observed for areas being monitored. This includes all grubbing, grading and trenching onsite and for all offsite improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined and directed by the Project Archaeologist.
- Cultural Sensitivity Training – The Project Archaeologist and if required, a representative designated by the Tribe shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; the areas to be avoided during grading activities; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training and all construction personnel must attend prior to beginning work on the project site. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.
- Unanticipated Resources – In the event that previously unidentified potentially significant cultural resources are discovered, the Archaeological and/or Tribal Monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The Project Archaeologist, in consultation with the Tribal monitor, shall determine the significance of the discovered resources. The County Archaeologist must concur with the evaluation before construction activities will be allowed to resume in the affected area. Further, before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Project Archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits shall be minimally documented in the field and the monitored grading can proceed.
- Artifact Disposition – the landowner(s) shall relinquish ownership of all cultural resources that are unearthened on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery.

The Professional Archaeologist may submit a detailed letter to the County of Riverside during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for monitoring.

Mitigation Monitoring Program

Timing/Location Prior to and During Construction

Responsible Party Applicant

Responsible Monitoring Party Riverside County

Verification Approval Party Riverside County

MITIGATION MEASURE **MM CUL-2 Project Archaeologist.** Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A Cultural Resource Monitoring Plan shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval.

Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.

Timing/Location Prior to and During Construction

Responsible Party Applicant

Responsible Monitoring Party Riverside County

Verification Approval Party Riverside County

MITIGATION MEASURE **MM CUL-3 Temporary Fencing.** Temporary fencing shall be required for the protection of cultural site(s) P-33-000075 during any grading activities. Prior to commencement of grading or brushing, the project archaeologist shall confirm the site boundaries and determine an adequate buffer for protection of the site(s). The applicant shall direct the installation of fencing under the supervision of the project archaeologist and if required, Native American Monitor. The fencing can be removed only after grading operations have been completed.

Timing/Location Prior to and During Construction

Responsible Party Applicant

Responsible Monitoring Party Riverside County

Verification Approval Party Riverside County

Geology and Soils

MITIGATION MEASURE **MM GEO 1 Conformance with Geotechnical Recommendations.** Site design and engineering shall be conducted in conformance with recommendations specified in site-specific geotechnical and geologic feasibility studies and soils reports prepared for the Project.

Timing/Location Prior to Construction

Responsible Party Applicant

Responsible Monitoring Party Riverside County

Verification Approval Party Riverside County

Mitigation Monitoring Program

Paleontological Resources

MITIGATION MEASURE **PAL-1 Sampling and Worker Environmental Awareness Program (WEAP).** A 600 pound sample of the paleosol shall be tested (screened) for microvertebrate fossils. If none are found, paleontological resources monitoring is not required. If microvertebrate fossils are located, then monitoring would be warranted, and a Paleontological Resources Impact Mitigation Program (PRIMP) should describe procedures for unexpected discovery protocols, monitoring, sediment sampling and processing, identification, reporting and curation of fossils found on the Project, as well as radiocarbon dating of pedogenic carbonate from the Project footprint. If microvertebrate fossils are not located during pre-construction testing, then the PRIMP will consist only of a WEAP and an unexpected discovery of fossils plan.

Timing/Location Prior to and During Construction

Responsible Party Applicant

Responsible Monitoring Party Riverside County

Verification Approval Party Riverside County

Traffic/Transportation

MITIGATION MEASURE **MM-TRA-1 Construction Management Plan.** Prior to finalization of plans and specifications, a construction management plan (CMP) should be prepared by the Applicant and/or their construction contractor for any construction activities that encroach into the public right-of-way. The CMP shall include measures designed to reduce the impact of temporary construction traffic and any necessary lane or street closure. Such measures may include but are not limited to providing early notification of closures to the County Fire Department and Sheriff's Departments, residents, and nearby businesses; the use of signage before and during construction activities that clearly delineates detour routes around the lane and street closures; and flaggers to direct traffic in the vicinity of the closure. The CMP will also include a description or pictures of the pre-construction conditions of the roadways and ensure that they are restored to the same or better conditions after construction.

Timing/Location Prior to and During Construction

Responsible Party Applicant

Responsible Monitoring Party Riverside County

Verification Approval Party Riverside County

Mitigation Monitoring Program

Tribal Cultural Resources

MITIGATION MEASURE	<p>MM TCR-1 Tribal Monitoring. Prior to the issuance of grading permits, the developer/permit applicant shall enter into agreement(s) with the consulting tribe(s) for Native American Monitor(s).</p> <p>The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.</p> <p>The developer/permit applicant shall submit a fully executed copy of the agreement(s) to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition.</p> <p>This agreement shall not modify any condition of approval or mitigation measure.</p>
Timing/Location	Prior to and During Construction
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

Mitigation Monitoring Program

Wildfire

MITIGATION MEASURE	MM-FIRE 1 Construction Fire Prevention Plan. Prior to construction, the Applicant (in coordination with their contractors shall prepare a Construction Fire Prevention Plan for review and approval by the Riverside County Fire Department (RCFD) that includes (but not be limited to) the following information and provisions: <ul style="list-style-type: none">• Responsibilities of the Project Applicant, their contractor(s), and RCFD with respect to fire prevention and inspection of work areas.• On-site personnel in charge of overseeing Fire Plan implementation.• Construction staff and equipment that can be used for fighting fire.• Emergency measures for construction curtailment.• Provisions for fire/emergency services access if roadway blockage occurs due to large loads during construction and operation.• Cleared, maintained worker parking and construction staging areas shall be designated; no parking or construction activities shall be allowed in non-designated areas.• Smoking and open fires shall be prohibited at the Project site during construction and operations. A copy of the notification to all contractors regarding prohibiting smoking and burning shall be provided to the RCFD.• Assurances that all internal combustion construction equipment shall be equipped with appropriate spark arrestors and carry fire extinguishers.• A fire watch with appropriate firefighting equipment shall be available at the Project site at all times when welding activities are taking place. Spark producing activities (such as welding and metal cutting) shall not occur when sustained winds exceed limits set forth by the RCFD.• Appropriate hot work permits/approvals (for activities such as welding and metal cutting) shall be obtained from the jurisdictional fire agency.• All construction activities shall be curtailed in the event of a fire or when fuel and weather conditions get into the “very high” and “extreme” ranges (Red Flag Warning), as determined by the National Weather Service. Any specific Project-related activities to be allowed during very high or extreme weather conditions would be at the discretion of the RCFD.
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Timing/Location	Prior to and During Construction
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County

Mitigation Monitoring Program

MITIGATION MEASURE	<p>MM-FIRE 2 Renew and Expand the Existing Operational Fire Safety Plan. Prior to operation of new WTGs, the Project Applicant shall expand the existing Operational Fire Safety Plan for review and approval by the RCFD. The plan shall contain (but not be limited to) the following provisions:</p> <ul style="list-style-type: none"> • Responsibilities of the Project Applicant, their contractor(s), and RCFD with respect to fire prevention and inspection of work areas. • A vegetation management plan to address vegetation clearance around all WTGs; and plans for regularly scheduled brush clearance of vegetation on and adjacent to all access roads, power lines, and other facilities. All vegetation clearance and fire breaks shall be consistent with federal and State requirements, whichever is most stringent. • Means for ensuring on-site operational fire water supply (i.e. a functioning well or storage tank) is available prior to operation. • Procedures for Supervisory Control and Data Acquisition (SCADA) system (or other constant monitoring equipment) providing immediate notifications to emergency fire services. • By December 31 of each operational year, the applicant shall provide a report to Riverside County Planning and Fire that summarizes ongoing fire abatement measures, results of RCFD inspections, any fires onsite, and any adaptive measures to further minimize fire risk.
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Timing/Location	Prior to Operations
Responsible Party	Applicant
Responsible Monitoring Party	Riverside County
Verification Approval Party	Riverside County
