SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

ITEM: 21.4
(ID # 15576)
MEETING DATE:
Tuesday, July 27, 2021

FROM: TLMA-PLANNING:

SUBJECT: TRANSPORTATION AND LAND MANAGEMENT AGENCY/PLANNING: PUBLIC HEARING ON CHANGE OF ZONE NO. 2000032, ORDINANCE NO. 348.4968, COMMERCIAL WECS PERMIT NO. 2000003, AND VARIANCE CASE NO. 210001 and MITIGATED NEGATIVE DECLARATION for ENVIRONMENTAL ASSESSMENT NO. 210007 -- Applicant: Mountain View Power Partners (MVPP), LLC – Fifth Supervisorial District – Western Coachella Valley Area Plan – 1,203 Acres – Location: South of I-10 and Garnet St; approximately 3 miles west of North Indian Canyon Dr; approximately 0.5 miles north of SR-111 – REQUEST: Change of Zone No. 2000032 proposes to modify a 281.81-acre portion of an existing 600-acre parcel (APN 522-070-027) from Rural Residential (R-R) to Wind Energy (W-E). Commercial WECS Permit No. 200003 proposes removal of 93 existing Mitsubishi 600-kilowatt (kW) Wind Turbine Generators (WTGs) and the subsequent installation of 16 Vestas 3.6 and 4.3 Megawatts (MWs) WTGs with a maximum height of 492 ft Six (6) existing Mitsubishi 600 kW WTGs, located outside Riverside County jurisdiction, would remain during project operation. One additional existing WTG, originally permitted by the County under WECS 107, would remain operational. Section 18.41.D.3(e) of Ordinance No. 348 allows consideration to reduce the established scenic setbacks to 1.25 times the total WECS 492' height, or 615 ft. The applicant has requested a setback reduction for two WTGs in the northeast portion of the project site to reduce the required scenic setback from 1,320 ft to 1,000 ft Variance Case No. 210001 proposes to reduce the five (5) times rotor diameter wind access setback for one (1) existing WTG and five (5) new WTGs. Five (5) times the rotor diameter for the one-existing and five new WTGs would be 412.5 meters (1,353.35 ft) and 585 meters (1,919.29 ft), respectively. The applicant proposes reducing the five (5) time rotor diameter wind access setback for the existing and new WTGs to a minimum of 110 meters (360.89 ft), District 5. [Applicant Fees 100%]

RECOMMENDED MOTION: That the Board of Supervisors:

1. **ADOPT** a **MITIGATED NEGATIVE DECLARATION** for **CEQ NO. 210007**, based on the findings and conclusions provided in the initial study, attached hereto, and the conclusion that the project will not have a significant effect on the environment;

Continued on Page 2

ACTION: Policy

John Hildebrand, Planning Director 7/14/2021

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Hewitt, seconded by Supervisor Perez and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended, and that Ordinance 348.4968 is adopted with waiver of the reading.

Ayes:	Jeffries, Spiegel, Washington, Perez, Hewitt
Nays:	None
Absent:	None
Date:	July 27, 2021
xc:	Planning, COB

Kecia R. Harper
Clerk of the Board
By: _____ Deputy

RECOMMENDED MOTION: That the Board of Supervisors:

2. **APPROVE CHANGE OF ZONE NO. 2000032**, to change the zoning classification for the subject property from Rural Residential (R-R) to Wind Energy (W-E) as shown on Exhibit 3 attached hereto, based upon the findings and conclusions incorporated in the staff report;

3. **ADOPT ORDINANCE NO. 348.4968** amending the zoning in the Whitewater Zoning Area shown on Map No. 2.2465 Change of Zone Case No. 2000032 attached hereto and incorporated herein by reference;

4. **APPROVE VARIANCE CASE NO. 210001,** subject to the attached advisory notification document and conditions of approval and based upon the findings and conclusions incorporated in the attached staff report; and

5. **APPROVE COMMERCIAL WECS PERMIT NO. 200003,** subject to the attached advisory notification document and conditions of approval and based upon the findings and conclusions incorporated in the attached staff report.

Continued on Page 3

SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	$ N/A	$ N/A	$ N/A	$ N/A
NET COUNTY COST	$ N/A	$ N/A	$ N/A	$ N/A
SOURCE OF FUNDS: Applicant Fees 100%			**Budget Adjustment:**	No
			For Fiscal Year:	21/22

C.E.O. RECOMMENDATION: Approve

BACKGROUND:

Summary

Change of Zone No. 2000032 proposes to modify a 281.81-acre portion of an existing 600-acre parcel (APN 522-070-027) from Rural Residential (R-R) to Wind Energy (W-E).

Commercial WECS Permit No. 200003 proposes the removal of 93 existing Mitsubishi 600-kilowatt (kW) Wind Turbine Generators (WTGs) and the subsequent installation of 16 Vestas 3.6 and 4.3 Megawatts (MWs) WTGs with a maximum height of 492 feet. One additional existing WTG, originally permitted by the County under WECS 107, would remain operational, and is anticipated to be decommissioned after year 10 of this permit. Additionally, Section 18.41.D.3(e) of Ordinance No. 348 allows the planning commission to reduce the established scenic setbacks to 1.25 times the total WECS 492 foot height, or 615 feet. The applicant has requested a setback reduction for two WTGs in the northeast portion of the project site to reduce the required scenic setback from 1,320 feet to 1,000 feet.

Variance Case No. 210001 proposes to reduce the five (5) times rotor diameter wind access setback for four (4) new WTGs. Five (5) times the rotor diameter for the new WTGs would be 585 meters (1,919.29 feet). The applicant proposes reducing the five (5) time rotor diameter wind access setback for the new WTGs to a minimum of 110 meters (360.89 feet).

The project site is located South of I-10 and Garnet Street; approximately 3 miles west of North Indian Canyon Drive; approximately 0.5 miles north of SR-111.

The Project's Initial Study CEQ No. 210007 was circulated with the State Clearinghouse for a 30-day review period between April 6, 2021 and May 17, 2021. Comment letters were received from various groups and agencies including from various Indian Tribes, Mission Springs Water District, Coalition for a Balanced Environment, California Department of Fish and Wildlife, Sierra Club, and Adams Broadwell Joseph & Cardozo on behalf of California Unions for Reliable Energy. The Final Initial Study for CEQ210007 dated June 2021 provided Responses to Comments addressing these comment letters and no further comments were received.

The Planning Commission heard the project on July 7, 2021. During the hearing, staff provided a brief PowerPoint presentation and the applicant's representative provided an introduction. Two (2) members of the public spoke in favor of the project. No one from the public spoke in a neutral position, or in opposition to the project. Additionally, the applicant provided five (5) letters in support of the project prior to the hearing.

Staff also provided a Planning Commission Memorandum dated July 7, 2021 regarding recommended condition amendments relating to the Coachella Valley Multiple Species Habitat Conservation Plan disturbance acreage and conservation land fee credits, and deletion of a transportation related heavy haul condition at the grading permit issuance milestone.

After testimony was concluded from staff and applicant, and public comment received in favor of the project, the Planning Commission closed the public hearing and recommended the following actions to the Board of Supervisors: adopt the Mitigated Negative Declaration for CEQ No. 210007, to approve Change of Zone No. 2000032, to approve Variance Case No. 210001, and to approve Commercial WECS Permit No. 200003. The project was then recommended for approval with a 4-0 vote.

Impact on Residents and Businesses

The impacts of this Project have been evaluated through the discretionary review process through the Planning Department and the recommendation for Project approval by the Planning Commission at the July 7, 2021, public hearing.

ATTACHMENTS:

- **A. Ordinance No. 348.4968 with zoning map**
- **B. Planning Commission Staff Report**
- **C. Planning Commission Memorandum**
- **D. Planning Commission Minutes**
- **E. Site Plan & Preliminary Grading Plan**
- **F. Support Letters**

Jason Farin, Principal Management Analyst 7/21/2021

ORDINANCE NO. 348.4968

AN ORDINANCE OF THE COUNTY OF RIVERSIDE

AMENDING ORDINANCE NO. 348 RELATING TO ZONING

The Board of Supervisors of the County of Riverside ordains as follows:

Section 1. Section 4.1 of Ordinance No. 348, and official Zoning Plan Map No. 2, as amended, are further amended by placing in effect in the Whitewater Area, the zone or zones as shown on the map entitled "Change of Official Zoning Plan Amending Ordinance No. 348, Map No. 2.2465, Change of Zone Case No. 2000032" which map is made a part of this ordinance.

Section 2. This ordinance shall take effect 30 days after its adoption.

BOARD OF SUPERVISORS OF THE COUNTY
OF RIVERSIDE, STATE OF CALIFORNIA

By: Karen S. Spiegel
Chair, Board of Supervisors
KAREN SPIEGEL

ATTEST:
KECIA R. HARPER
Clerk of the Board

By:

(SEAL)

APPROVED AS TO FORM

July 12, 2021

By:
AARON C. GETTIS
Supervising Deputy County Counsel

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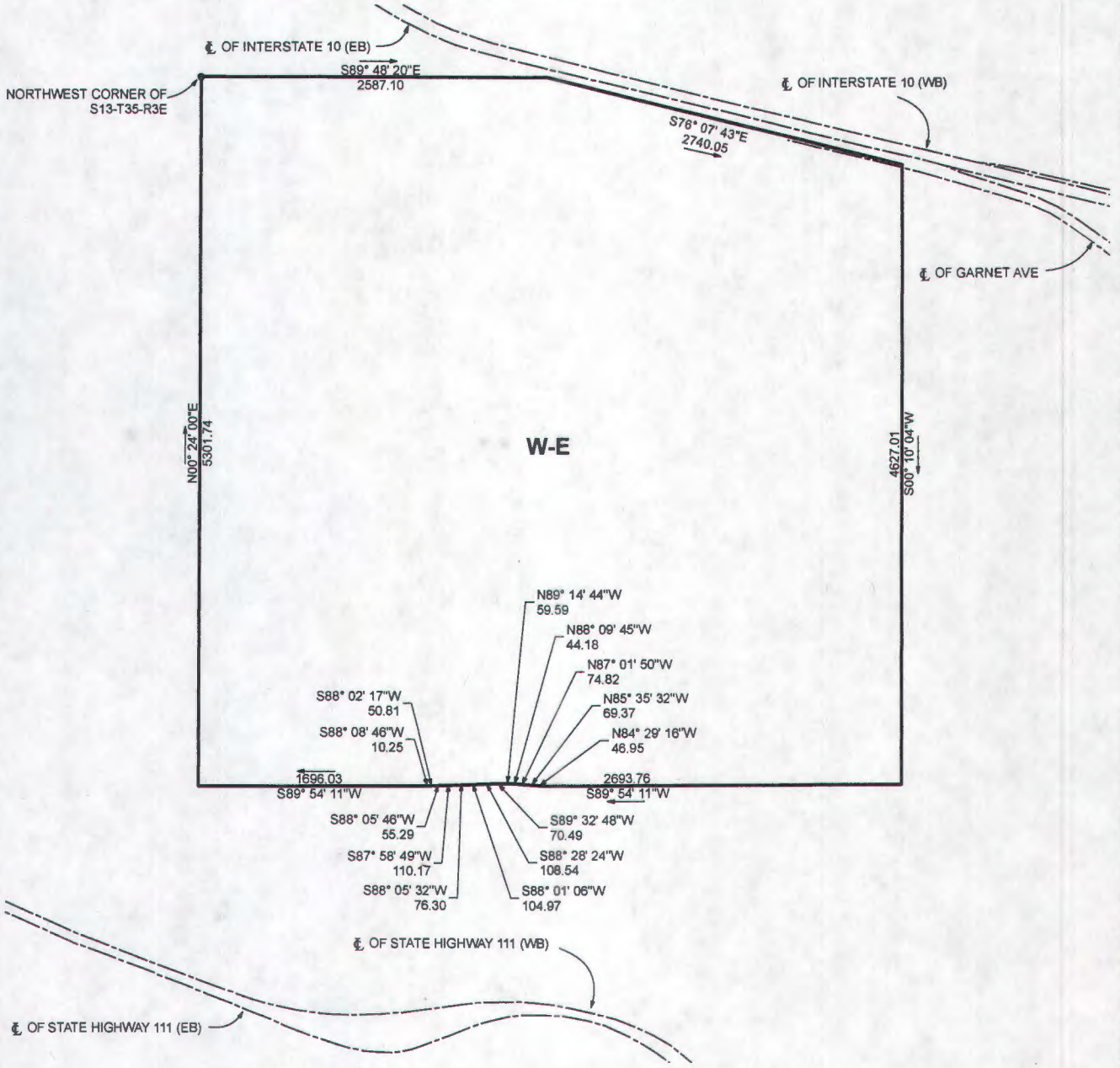
JUL 27 2021 21.4

WHITEWATER AREA
SEC. 13, T. 3S., R. 3E. S.B.M



W-E WIND ENERGY RESOURCE ZONE

MAP NO. 2.2465

CHANGE OF OFFICIAL ZONING PLAN

AMENDING
MAP NO. 2 ORDINANCE NO. 348

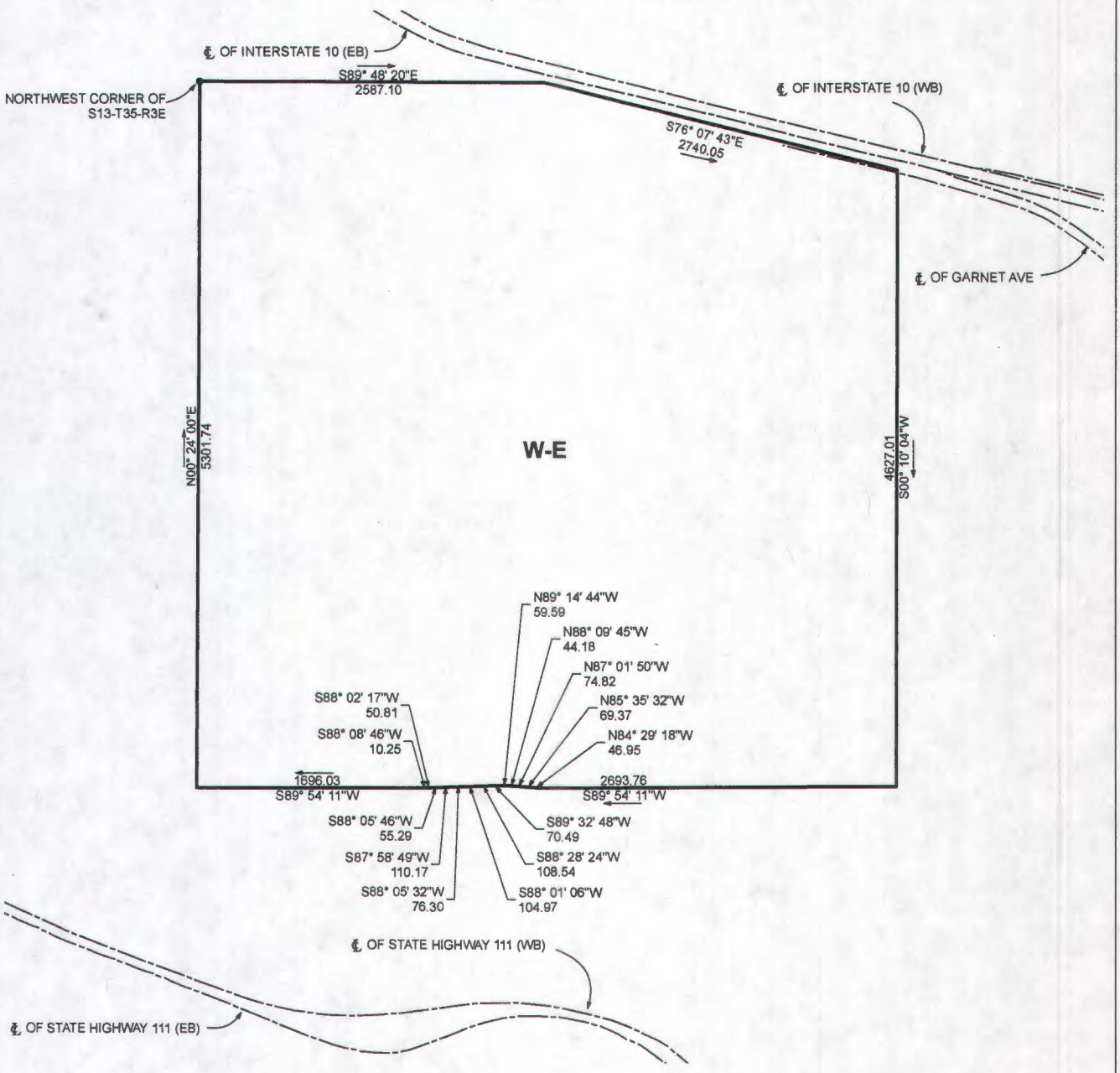
CHANGE OF ZONE CASE NO. CZ2000032
ADOPTED BY ORDINANCE NO. 348.4968
(DATE:) _____
RIVERSIDE COUNTY BOARD OF SUPERVISORS

N

SCALE IN FEET
0 500 1,000

APN(s): 522-070-027

WHITEWATER AREA
SEC. 13, T. 3S., R. 3E. S.B.M



W-E WIND ENERGY RESOURCE ZONE

MAP NO. 2.2465

CHANGE OF OFFICIAL ZONING PLAN

AMENDING
MAP NO. 2 ORDINANCE NO. 348

CHANGE OF ZONE CASE NO. CZ2000032
ADOPTED BY ORDINANCE NO. 348.4968
(DATE:) _____
RIVERSIDE COUNTY BOARD OF SUPERVISORS

N

SCALE IN FEET
0 500 1,000

APN(s): 522-070-027

STATE OF CALIFORNIA)
) ss
COUNTY OF RIVERSIDE)

I HEREBY CERTIFY that at a regular meeting of the Board of Supervisors of said county held on July 27, 2021, the foregoing ordinance consisting of 2 Sections was adopted by the following vote:

AYES:	Jeffries, Spiegel, Washington, Perez and Hewitt
NAYS:	None
ABSENT:	None

DATE: July 27, 2021

KECIA R. HARPER
Clerk of the Board
BY: _____
Deputy

SEAL

Item 21.4

Maxwell, Sue

From: COB
Sent: Monday, July 26, 2021 4:07 PM
To: Maxwell, Sue
Subject: FW: Board comments web submission

From: cob@rivco.org <cob@rivco.org>
Sent: Friday, July 23, 2021 12:35 PM
To: COB <COB@RIVCO.ORG>; ella.gannon@morganlewis.com
Subject: Board comments web submission

First Name:	Ella
Last Name:	Foley Gannon
Address (Street, City and Zip):	1 Market Street, Spear Tower, San Francisco, CA
Phone:	4158463663
Email:	ella.gannon@morganlewis.com
Agenda Item # or Public Comment:	Agenda #21 County Land Use Public Hearing Meeting item 4
State your position below:	Support

Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use Meeting ID #864 4411 6015 . Password is 20210727. You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am am with the phone number you provided in the form so you can be identified during the meeting.

7/27/21 21.4

Maxwell, Sue

From: COB
Sent: Monday, July 26, 2021 4:05 PM
To: Maxwell, Sue
Subject: FW: Board comments web submission

From: cob@rivco.org <cob@rivco.org>
Sent: Monday, July 26, 2021 8:07 AM
To: COB <COB@RIVCO.ORG>; logan.winston@aes.com
Subject: Board comments web submission

First Name:	Logan
Last Name:	Winston
Address (Street, City and Zip):	282 Century Place #2000
Phone:	415-694-2144
Email:	logan.winston@aes.com
Agenda Date:	07/27/2021
Agenda Item # or Public Comment:	15576
State your position below:	Support

Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use Meeting ID #864 4411 6015 . Password is 20210727. You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am am with the phone number you provided in the form so you can be identified during the meeting.

7/27/21 21.4

COUNTY OF RIVERSIDE
PLANNING DEPARTMENT
STAFF REPORT

Agenda Item No.:

4.2

Planning Commission Hearing: July 7, 2021

PROPOSED PROJECT

Case Number(s):	CZ2000032; WCS200003; VAR210001	**Applicant:**	Mt. View Power Partners, LLC
EA No.:	CEQ210007 MND		
Area Plan:	Western Coachella Valley	**Representative:**	Charlie Karustis
Zoning District:	Cathedral City-Palm Desert District		
Supervisorial District:	Fifth District		
Project Planner:	Jay Olivas		
Project APN(s):	522-070-027, 669-020-008, etc.		

John Hildebrand
Planning Director

PROJECT DESCRIPTION AND LOCATION

Change of Zone No. 2000032 proposes to change the zoning classification of a 281.81-acre portion of an existing 600-acre parcel (APN 522-070-027) from Rural Residential (R-R) to Wind Energy (W-E).

Commercial WECS Permit No. 200003 proposes removal of 93 existing Mitsubishi 600-kilowatt (kW) Wind Turbine Generators (WTGs) and the subsequent installation of 16 Vestas 3.6 and 4.3 Megawatts (MWs) WTGs with a maximum height of 492 feet. Six (6) existing Mitsubishi 600 kW WTGs, located outside Riverside County jurisdiction, would remain during project operation. One additional existing WTG, originally permitted by the County under WECS 107, would remain operational, and is anticipated to be decommissioned after year 10 of this permit. The proposed project would be capable of producing approximately 229.90 gigawatt hours (GWh) of power per year for operational years 1 through 10. Beyond operational year 10, assuming decommissioning of the seven Mitsubishi 600 kW WTGs, the proposed project would produce approximately 215.90 GWh of power annually for the remainder of its operational life. The proposed project would repower the existing wind energy facilities with modern, higher capacity WTGs. The project is planned to be operational by December 2022. The project site is mostly located within the boundaries of the existing MVPP I & II wind energy facilities and covers 1,202.86 acres of private land with primary access from Garnet Avenue. Section 18.41.D.3.(e) of Ordinance No. 348 allows the planning commission to reduce the established scenic setbacks to 1.25 times the total WECS 492' height, or 615 feet. The applicant has requested a setback reduction for two WTGs in the northeast portion of the project site to reduce the required scenic setback from 1,320 feet to 1,000 feet.

Variance Case No. 210001 proposes to reduce the five (5) times rotor diameter wind access setback for one (1) existing WTG and five (5) new WTGs. Five (5) times the rotor diameter for the one-existing and five new WTGs would be 412.5 meters (1,353.35) feet and 585 meters (1,919.29 feet), respectively. The applicant proposes reducing the five (5) time rotor diameter wind access setback for the existing and new WTGs to a minimum of 110 meters (360.89 feet), subject to proposed Variance Case No. 210001.

The above discretionary actions are herein identified as the "Project" or "project".

North:	Open Space-Conservation Habitat (OS-CH); Rural Desert (RD)
East:	Rural Desert (RD)
South:	Open Space-Conservation-Water (OS-W); Rural Desert (R-D)
West:	City of Palm Springs
Existing Zoning Classification:	Wind Energy (W-E); Rural Residential (R-R)
Proposed Zoning Classification:	Wind Energy (W-E)
Surrounding Zoning Classifications	
North:	Rural Residential (R-R)
East:	Wind Energy (W-E)
South:	Controlled Development Areas (W-2)
West:	City of Palm Springs
Existing Use:	93 existing wind turbines (WECS)
Surrounding Uses	
North:	Interstate 10; Existing wind turbines; Scattered dwellings
South:	Vacant land; San Gorgonio River; State Highway 111
East:	Existing wind turbines
West:	Whitewater River; Existing wind turbines; Substation

Project Site Details:

Item	*Value*	*Min./Max. Development Standard*
Project Site (Acres):	1,203	10 Acre minimum
Existing Building Area (SQFT):	None-existing WECS	No Maximum Lot Coverage
Proposed Building Area (SQFT):	None-proposed WECS	Not applicable
Floor Area Ratio:	Not applicable	Not applicable
WECS Height (FT):	492.13-feet WECS	500-feet WECS

Parking:

Type of Use	*Building Area (in SF)*	*Parking Ratio*	*Spaces Required*	*Spaces Provided*
Wind turbines	N/A	1-space per 2-employees	2	2
TOTAL:			2	2

Located Within:

City's Sphere of Influence:	City of Palm Springs
Community Service Area ("CSA"):	No

The two (2) county portions were previously approved under Commercial WECS permit No. 103 and Commercial WECS permit No. 107. Commercial WECS permit No. 103 was approved in 2000 and was approved for forty-five (45) 600 kW wind turbines at 271-feet in height or thirty-five (35) 900-1000 kW wind turbines at 286-feet in height along with accessory meteorological towers up to 240-feet and construction of 2.5 miles of off-site overhead electrical transmission lines. Commercial WECS Permit No. 107 was approved in 2001 for thirty-nine (39) wind turbines at a height of 271 feet or forty-two (42) wind turbines at a height of 290 feet within various Assessor's Parcel Numbers.

MVPP is now proposing to repower the existing wind farm in the county portions involving the removal of 93 existing Mitsubishi 600-kilowatt (kW) WTGs and the subsequent installation of 16 Vestas 3.6 and 4.3 MW WTGs; one (1) existing Mitsubishi 600 kW WTGs would remain as part of the proposed project.

ENVIRONMENTAL REVIEW AND FINDINGS

An Initial Study (IS), CEQ210007, and Mitigated Negative Declaration (MND), was prepared for this project in accordance with the California Environmental Quality Act (CEQA). The IS/MND represents the independent judgment of Riverside County and determines that the proposed project, with appropriate mitigation, would not have a significant effect on the environment. A Notice of Intent to Adopt a Mitigated Negative Declaration was prepared, and the Mitigated Negative Declaration was made available for public review per the State CEQA Guidelines Section 15105 for at least 30 days. The project as proposed and conditioned will not result in any potentially significant environmental impacts, with mitigation incorporated.

The Project's Initial Study was circulated with the State Clearinghouse for a 30-day review period between April 16, 2021 and May 17, 2021 in advance of the public hearing scheduled for July 7, 2021. As of this writing (6/11/21), comment letters were received from various groups and agencies including from various Indian Tribes, Mission Springs Water District, Coalition for a Balanced Environment, California Department of Fish and Wildlife, Sierra Club, and Adams Broadwell Joseph & Cardozo on behalf of California Unions for Reliable Energy. The Final Initial Study for CEQ210007 dated June 2021 provides Responses to Comments addressing these comment letters.

FINDINGS AND CONCLUSIONS

In order for the County to approve the proposed project, the following findings are required to be made:

1. The project site is currently mapped by the General Plan as being Rural Desert (RD) and Open Space-Water (OS-W) on the Western Coachella Valley Area Plan. The project is also located within the San Gorgonio Pass Wind Energy Policy Area.

2. The RD and OS-W land use designations encourage alternative energy land uses. The proposed project, which is for wind energy conversion systems (WECS), is therefore an appropriate land use for that land use designation.

3. Surrounding land use designations consist of Rural Desert (RD) to the east, Open-Space Water to the south (OS-W), Open Space-Conservation Habitat (OS-CH) to the north, and City of Palm Springs incorporated land to the west.

of the proposed development is considered low. 4. Since the groundwater is found at depths greater than 150 feet and since the subsurface materials are in a very dense state, the potential for liquefaction is considered minimal, etc.

GEO200044 requires: 1. Prior to any site grading, surface vegetation, trash, and debris should be removed and disposed of offsite. Existing subsurface installations, such as abandoned foundations, pipes, cables, utility collectors, and/or tanks, if present, should be removed or abandoned per the Geotechnical Engineer's recommendations and in accordance with applicable regulations. 2. Site grading is anticipated to encounter some excavation difficulties due to the broad presence of cobbles and boulders throughout the site, especially in the western portion near Turbines 1 through 11 and the proposed location of the meteorological tower. Excavations up to about 14 feet deep are expected to accommodate the wind turbine foundations and about 6 feet deep for the meteorological tower, etc.

GEO No. 200044 satisfies the requirement for a geologic/geotechnical study for Planning/CEQA purposes subject to these requirements outlined by AND Planning-GEO.1.

13. The project was reviewed under County Paleontological Report (PDP) No. 1677 to address paleontology. The Project adequately addresses paleontology concerns based on the following facts and requirements:

    County Paleontological Report (PDP) No. 1677, submitted for this case (WCS200003), concluded: Given the young age and coarse-grained nature of the surficial sediments present within the project area, they are assigned a low potential to yield paleontological resources. However, these young alluvial sediments are likely underlain by older Pleistocene alluvial sediments with a high paleontological potential (High B) resource sensitivity given the fact that these same age deposits have yielded fossils elsewhere in the region.

    PDP No. 1677 requires: Prior to construction-related excavations, a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP 2010) standards should be retained, attend the pre-construction meeting, and present a worker environmental awareness program (WEAP) to the construction crew. The WEAP should discuss the types of fossils that may potentially be uncovered during project excavations, regulation protecting paleontological resources, and appropriate actions to be taken if fossils are discovered. If excavations of 10 feet or more below the original ground surface (i.e. 10 feet below the depth of documented artificial fill) are planned for the project, the qualified paleontologist, or qualified paleontological monitor, meeting the Society of Vertebrate Paleontology (SVP 2010) standards, should be present to monitor the excavations for paleontological resources. The qualified paleontologist should determine if the sediments are old enough and fine-grained enough to warrant continued monitoring. If it is determined to not continue paleontological monitoring at the 10-foot depth due to subsurface geological conditions, then paleontological spot-checking should occur at 5-foot increments below 10 feet to determine the suitability for fossil preservation.

    PDP No. 1677 satisfies the requirement for a paleontological study for Planning/CEQA purposes subject to these requirements outlined by COA 60.Planning-PAL.1.

14. The proposed use conforms to all the requirements of the General Plan, Ordinance No. 348 and with all applicable requirements of State law and the ordinances of Riverside County. The General Plan land use designation of Rural Desert (RD) and Open Space-Water (OS-W), encourages rural

3. The proposed W-E zone within APN 522-070-027 is conditionally consistent with the existing General Plan Land Use Designations of Rural Desert (RD) and Open-Space Water which generally allow for commercial wind turbines.

4. The proposed W-E zone which specifically allows for commercial wind turbines, will maintain the character of the area containing existing wind turbines, vacant land, and scattered dwellings along the Interstate 10 corridor within the San Gorgonio Pass Wind Energy Policy Area.

Development Standards Findings:

1. The proposed land use, as a proposed WECS project, is consistent with the development standards set forth in Section 17.3 of the Wind Energy Zone (W-E) Zone in that:

   I. Height Limits - No commercial WECS shall exceed 500 feet in height. The project with existing wind turbine at approximately 271 feet in height and 16 new wind turbines proposed at 492.13-feet in height are less than 500-feet in compliance with Section 17.3A.

   II. Setbacks – No building or structure shall be closer than 50-feet from any lot line. The Project proposes no building or structure within 50-feet from any lot line and is therefore in compliance with Section 17.3B.

2. The proposed project is consistent with the Development Standards and Development Criteria as provided in Section 18.41(D.), respectively, of Ordinance No. 348 in that:

   I. Safety and security measures, such as fencing to prevent unauthorized access, are in place via the existing perimeter chain link fence. Meteorological tower guy wires will be distinctly marked, and warning signs will be in English and Spanish at the base of each existing and proposed WECS tower and perimeter fence warning of electrical and other hazards (Conditions of Approvals 90.Planning.3 – Perimeter Fence; AND.Planning.22-Warning Signs).

   II. Safety setbacks are complied with and are not a factor for the proposed project to decommission 93 existing wind turbines, keep one (1) existing wind turbine, and install 16 new wind turbines.

   III. Wind access setbacks for the project are proposed to reduce the five (5) times rotor diameter wind access setback for one (1) existing WTG and five (5) new WTGs. Five (5) times the rotor diameter for the one existing and five new WTGs would be 412.5 meters (1,353.35) feet and 585 meters (1,919.29 feet), respectively. The applicant proposes reducing the five (5) time rotor diameter wind access setback for the existing and new WTGs to a minimum of 110 meters (360.89 feet), subject to proposed Variance No. 210001.

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

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

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

While the proposed WTGs would be taller and more prominent when compared to existing WTGs, the replacement of 93 existing turbines with 16 new, taller turbines would ultimately reduce the overall visual clutter, creating unobstructed visual corridors to the San Jacinto Mountain Range. As such, pursuant to Section 18.41.D.3(e) of Ordinance No. 348, the applicant is requesting a Scenic Setback reduction for two WTGs in the northeast portion of the project site to decrease the scenic setback from 1,320 feet to 1,000 feet from I-10, or approximately 2.03 times the total WECS height. The incremental setback reduction of two WTGs would not be easily perceptible by motorists traveling on I-10 due to presence of other nearby WTGs that make up the primary viewshed along the San Gorgonio Pass corridor. Table 2-6 summarizes the project's conformity to required scenic setback development standards.

Scenic Setbacks

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

XII. No work is proposed on the existing interconnection line at the southerly project boundary, and the existing off-site Mount Wind Substation to east of the project site will be reused, with replacement of electrical transformer with new transformer.

XIII. Height limits are complied with in that new proposed turbines will be up to 492-feet in height and do not exceed 500 feet in height.

XIV. Sign criteria is complied with in that no advertising sign or logo shall be placed or painted on any commercial WECS. A commercial WECS permit may permit the placement of no more than two advertising signs relating to the development on the project site, but no such sign shall exceed 15 square feet in surface area or eight feet in height.

XV. Color and finish of proposed WECS will be light grey with matte finish. The proposed project has also provided Visual Simulations with 5-vantage point locations to further address visual impacts.

Variance Findings pursuant to Section 18.27, Ordinance No. 348:

3. Variance Case No. 2100001 requests a modification to Section 18.41D of Ordinance No. 348 as follows: to reduce the wind access setbacks in accordance with Zoning Ordinance No. 348.

   Special circumstances support the reduction of wind access setbacks with respect to the Project property including shape, topography, location, and surroundings.

   Due to size, surroundings, special features and topography, opportunities for turbine development within these existing and proposed W-E zoned parcels are much more limited than other parcels zoned W-E within Riverside County, depriving this property of privileges enjoyed by other W-E zoned property. Combined with parcels that are too narrow to support stand along wind turbines, and rail road parcels that are too narrow, these property features adversely impact the Project by significantly reducing the land that would normally be available for wind turbine placement.

   A variance from the wind access setback would not adversely impact surrounding properties.

   Without this variance, development of wind turbines on this Project property would be severely constrained.

   Therefore, **Variance Case No. 210001** is justified in accordance with Section 18.27 and recommended for approval.

Other Findings:

4. The project is located within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) and an approximate 609.45 acre-portion is located within the Whitewater Floodplain Conservation Area.

   New construction is proposed with 16 new turbines in the central portion of the project site and includes new total permanent disturbed acreage of up to 26.25-acres and new temporary disturbed acreage of 77.10-acres.

from the consulting Tribe(s) to be present during grading activities so that any potential Tribal Cultural Resources found during project construction activities will be handled in a culturally appropriate manner. The project will also be required to adhere to State Health and Safety Code Section 7050.5 in the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made.

CEQA requires the Lead Agency to address any unanticipated cultural resources discoveries during Project construction. Therefore, a condition of approval/mitigation measure that dictates the procedures to be followed should any unanticipated cultural resources be identified during ground disturbing activities has been placed on this project. Implementation of **MM-TCR-1 through MM-TCR-4** would ensure that any potential impacts to any previously unidentified Tribal Cultural Resources are reduced to less-than significant levels.

7. The permit holder shall remain in compliance with the attached Airport Land Use Commission (ALUC) letter dated January 14, 2021 summarized as follows: 1) WECS shall not generate electrical interference; 2) WECS rotor blades shall utilize flat or matte non glossy finish; 3) WECS shall not generate smoke or water vapor; 4) combined height of each WECS and foundation shall not exceed 492-feet feet above ground level; 5) any new structures taller than 200-feet not part of this WECS permit will require review by ALUC and FAA; 6) FAA has conducted aeronautical studies of each proposed wind turbine and has specified that each of these structures shall be marked/lighted in accordance with FAA Advisory circular 70/7460, etc. as outlined in AND Planning.4-ALUC Letter.

8. Additionally, regarding the decommissioning of the 93 exiting turbines, and prior to issuance of building permit for the 16 new wind turbines, a Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for approval. At a minimum, the WRP must identify the materials (i.e., concrete, asphalt, wood, etc.) that will be generated by construction and development, the projected amounts, the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of materials, the facilities and/or haulers that will be utilized, and the targeted recycling or reduction rate. During project construction, the project site shall have, at a minimum, two (2) bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept. Arrangements can be made through the franchise hauler, as indicated by Condition of Approval 80. Waste Resources 1.

PUBLIC HEARING NOTIFICATION AND OUTREACH

Public hearing notices were mailed to property owners within ½ mile of the proposed project site. The Notice of Hearing was also published in the Press Enterprise and Desert Sun newspapers on June 27, 2021. As of this writing (6/28/21), staff has received no communications from the public.

The project applicant hosted three virtual public outreach meetings via Zoom for the proposed project. The first two meetings were held on March 30 and April 13, 2021. Hard copy notices for the first public outreach meeting were mailed to stakeholders, including property owners within 2 miles of the project site, on March 10 and March 16, 2021. An additional hard copy notice was mailed to stakeholders for the two

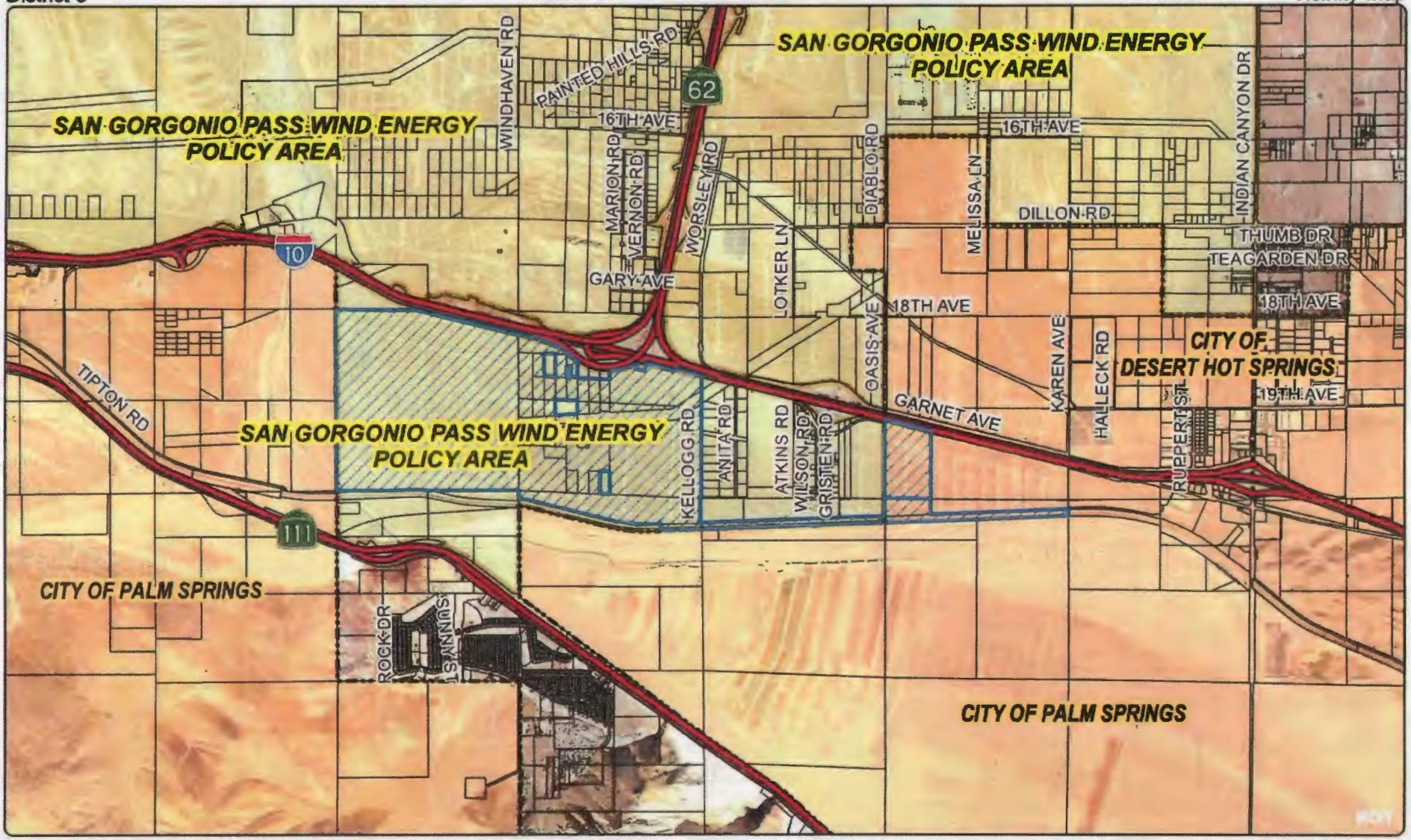
RIVERSIDE COUNTY PLANNING DEPARTMENT

CZ2000032 WCS200003 VAR210001

VICINITY/POLICY AREAS

Supervisor: Hewitt
District 5

Date Drawn: 05/26/2021
Vicinity Map



Zoning Dist: Pass & Desert
Zoning Area: Whitewater

Author: Vinnie Nguyen

N

0 2,000 4,000 8,000
Feet

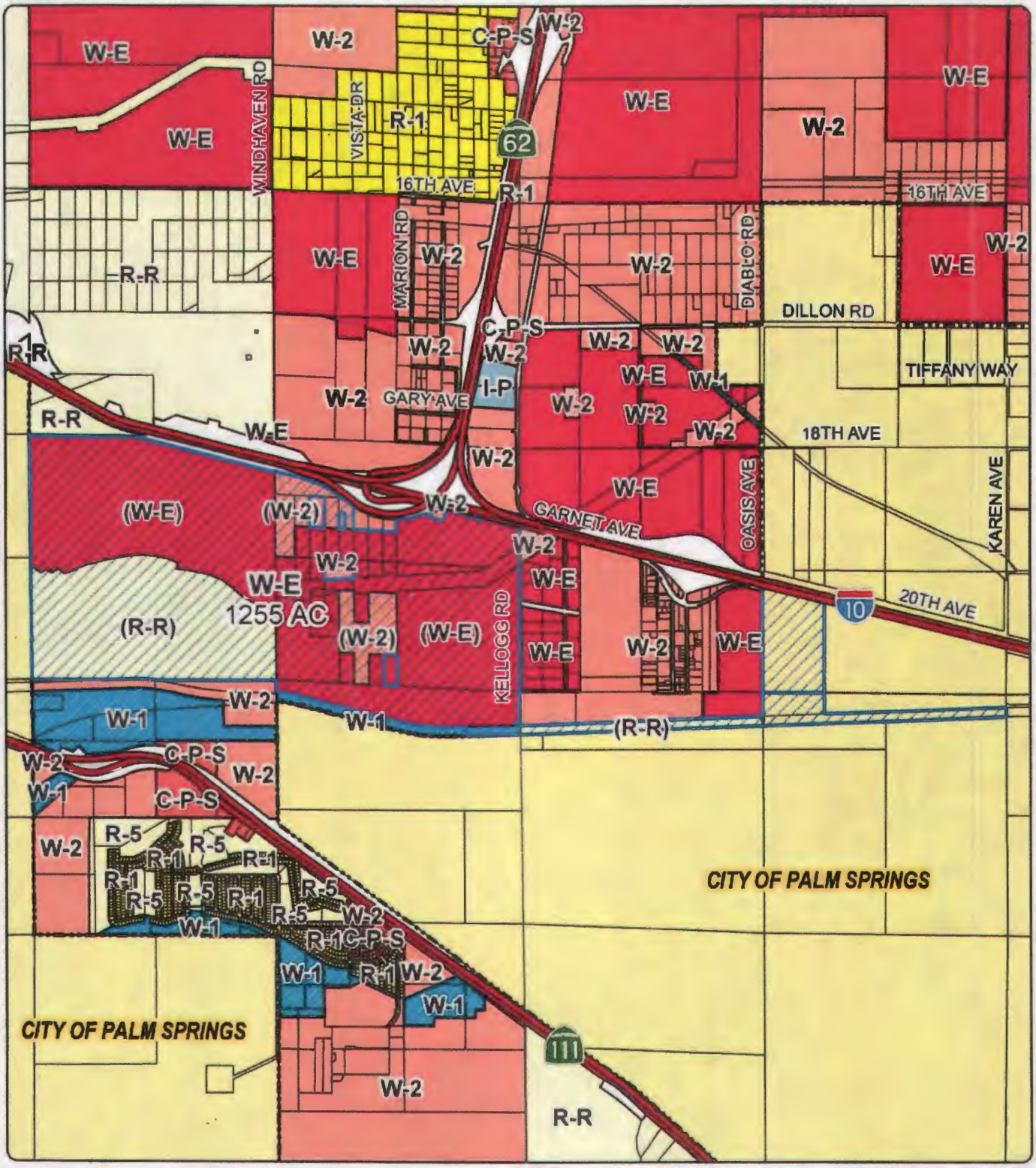
RIVERSIDE COUNTY PLANNING DEPARTMENT

CZ2000032 WCS200003 VAR210001

Supervisor: Hewitt
District 5

Date Drawn: 05/25/2021
Exhibit 3

PROPOSED ZONING



Zoning Dist: Pass & Desert
Zoning Area: Whitewater

Author: Vinnie Nguyen

N

0 1,500 3,000 6,000
Feet

DISCLAIMER: On October 7, 2003, the County of Riverside adopted a new General Plan providing new land use designations for unincorporated Riverside County parcels. The new General Plan may contain different type of land use than is provided for under existing zoning. For further information, please contact the Riverside County Planning Department offices in Riverside at (951)955-3200 (Western County) or in Palm Desert at (760)863-8277 (Eastern County) or Website http://planning.rctlma.org

Exhibit A

Commercial WECS

For Project:

Mountain View Power Partners (MVPP)
Proposed Wind Energy Repower

Applicant:
AES NORTH AMERICAN DEVELOPMENT, LLC
690 NORTH STUDEBAKER ROAD
LONG BEACH, CA 90803
TEL: (562) 493-7307
EMAIL: MICHAEL.HUGHES@AES.COM
CONTACT: MICHAEL HUGHES, PE, GC

Exhibit Preparer:
DUDEK
605 THIRD STREET
ENCINITAS, CA 92024
TEL: (760) 942-5147
EMAIL: WWORTHY@DUDEK.COM
CONTACT: WENDY WORTHY

Property Data:

EXISTING ZONING: SEE SHEET 6

GROSS AND NET AREA: 1,226.8 ACRES

UTILITIES: SOUTHERN CALIFORNIA EDISON (ELECTRIC)

COMMUNITY FACILITIES DISTRICT/COUNTY SERVICES AREA: NONE

LEGAL DESCRIPTION: SEE RECORDED DEEDS PROVIDED

ASSESSORS PARCEL NUMBERS:
522-070-027, 668-290-003, 668-290-008, 668-300-001, 668-300-003, 668-300-005, 668-300-008, 668-300-009, 668-300-010, 668-300-011, 668-300-012, 668-300-013, 668-300-014, 668-300-015, 668-310-014, 668-310-015, 668-310-017, 668-310-019, 668-310-023, 668-310-024, 668-310-025, 668-310-026, 668-310-027, 668-310-028, 668-310-029, 668-310-030, 668-310-032, 668-310-033, 668-310-034, 668-310-036, 668-310-037, 668-310-038, 668-310-039, 668-310-040, 668-310-043, 668-310-045, 668-310-046, 668-310-047, 668-412-001, 669-020-008, 669-040-006

Sheet List

Sheet Number	Sheet Title
1	Project Location
2	Existing Conditions
3	Proposed Site Plan and Grading
4	Circulation Plan
5	Project Setback Detail
6	Existing and Proposed Land Use and Zoning Designations
7	Construction Details

Exhibit Amendments:

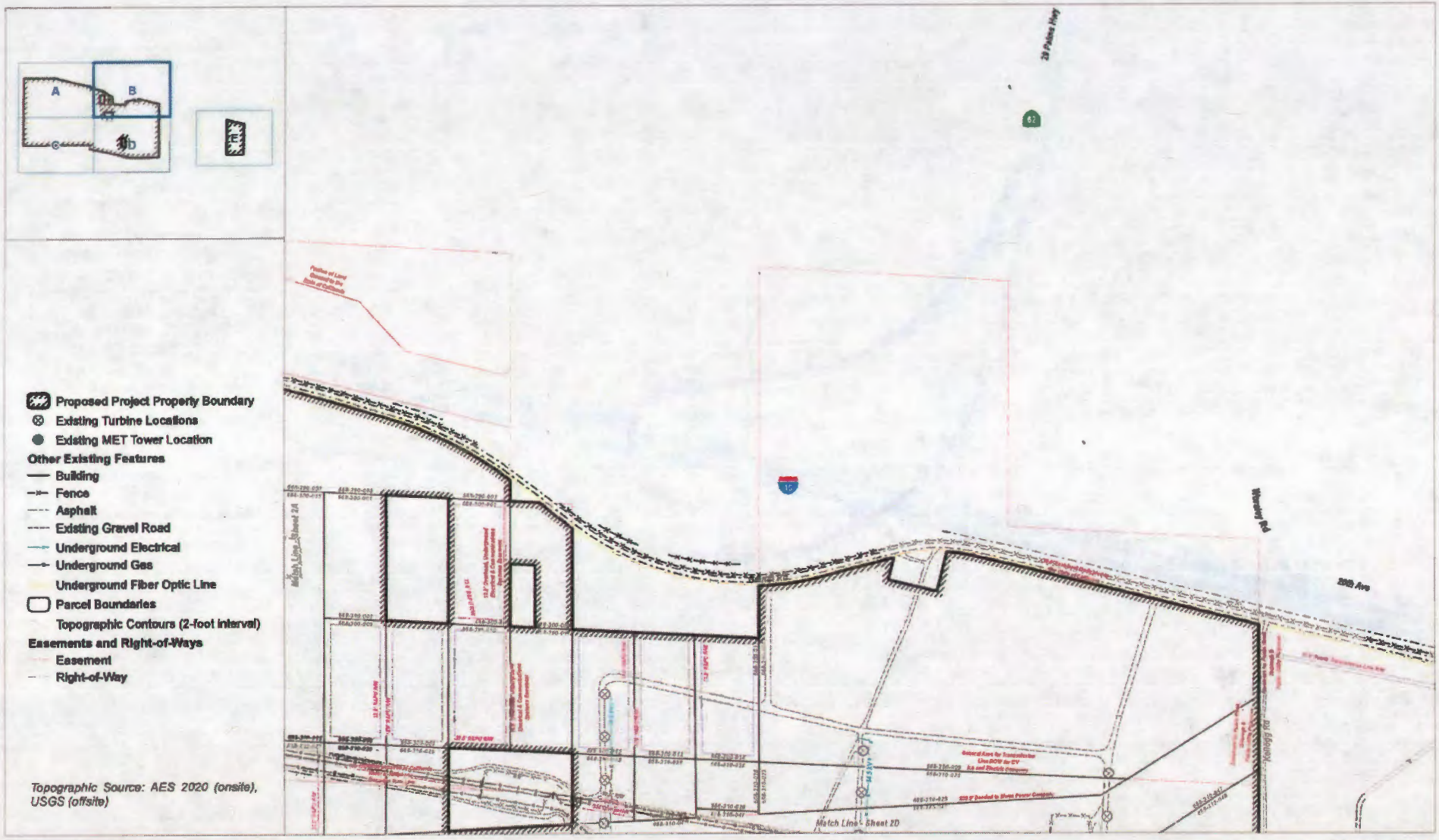
11/02/2020 (initial submittal)

5/25/2021

Regional Location

Local Vicinty

DUDEK



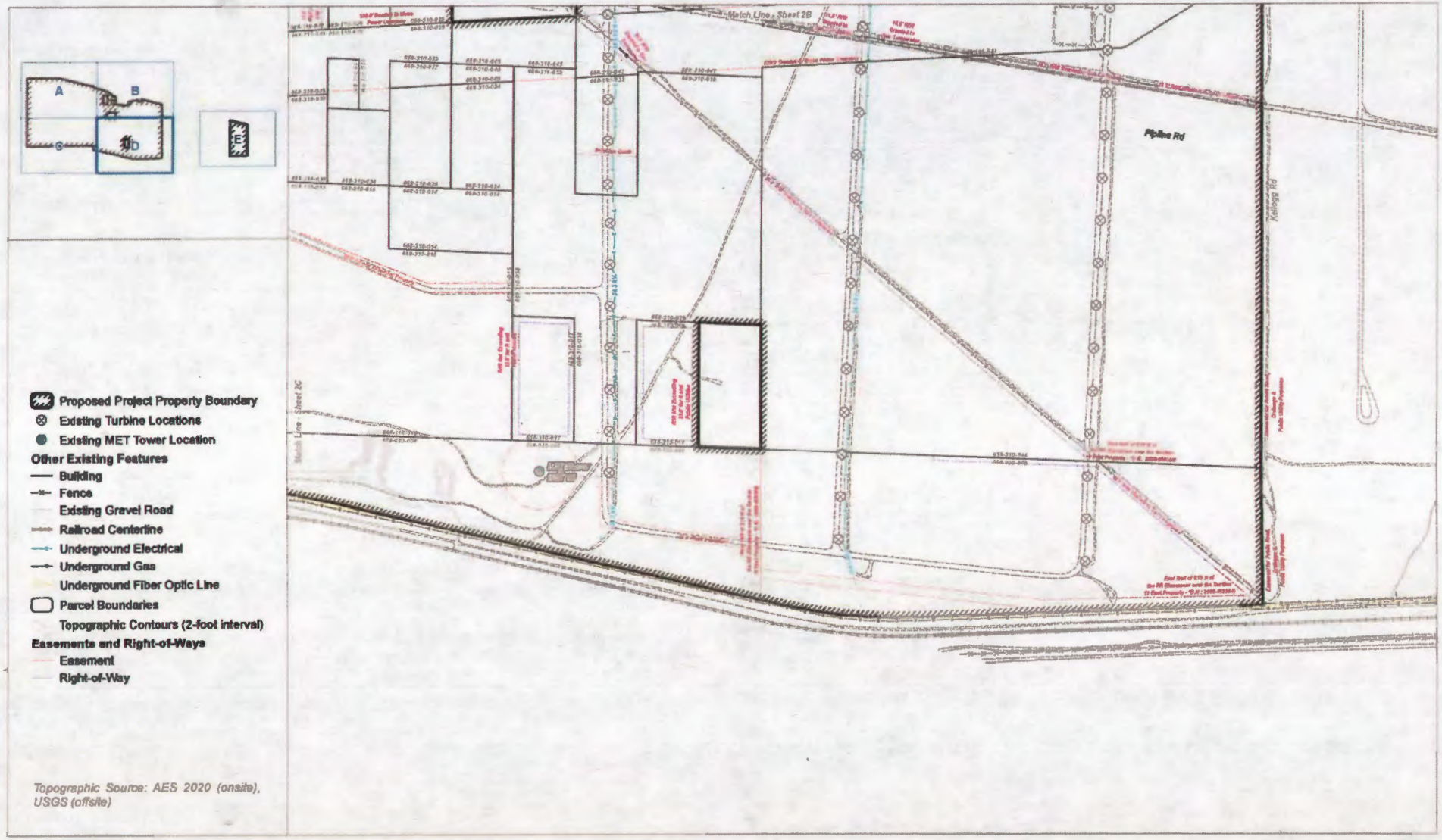
SOURCE: Topo by AES 2020, Aerials by Riverside County 2018, FEMA, SCAG 2016

DUDEK

EXHIBIT A, SHEET 2B

Existing Conditions

Mountain View Power Partners (MVPP) Proposed Wind Energy Repower



SOURCE: Topo by AES 2020, Aerials by Riverside County 2016, FEMA, SCAG 2016

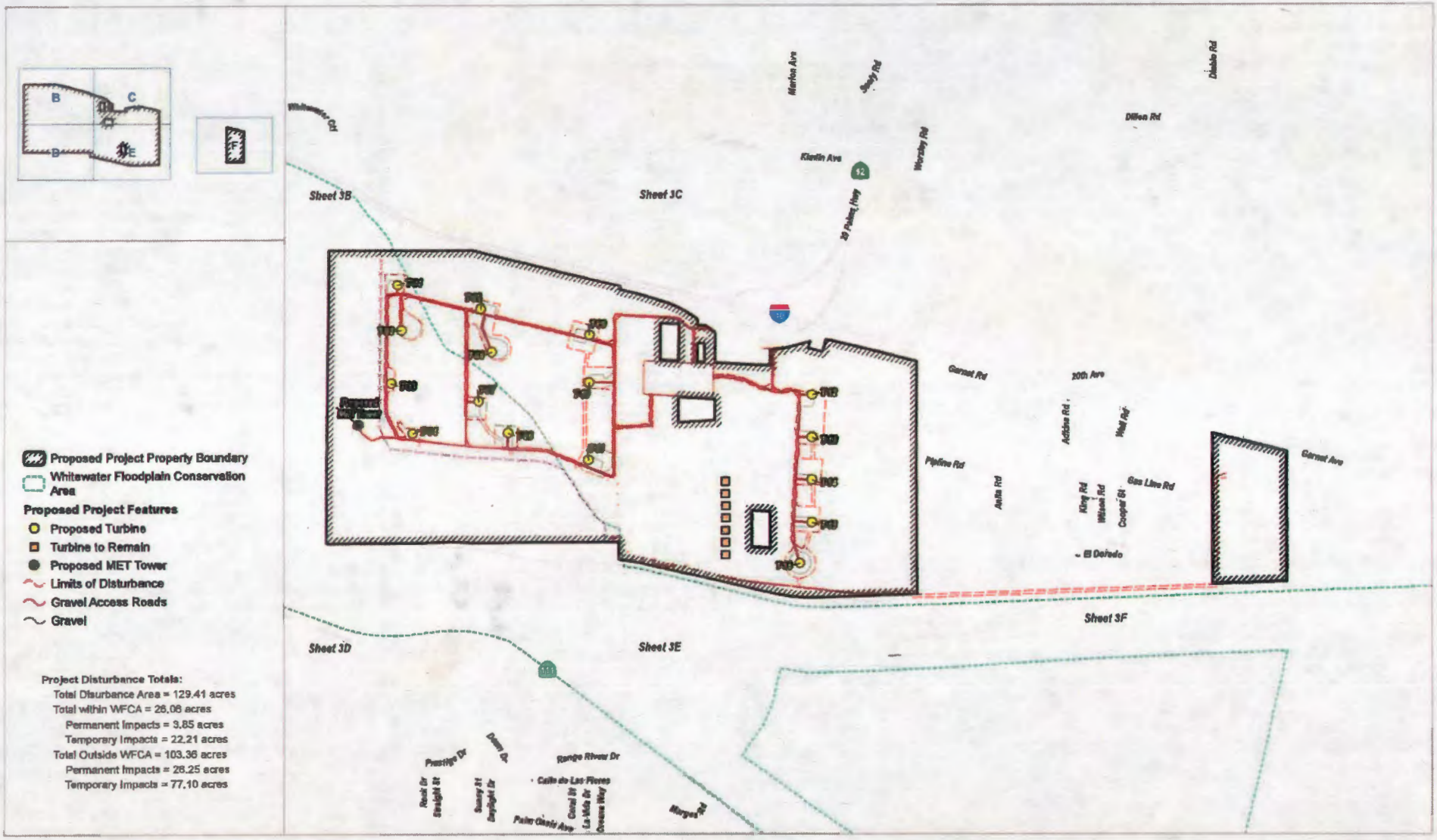
DUDEK

235 470 Feet

EXHIBIT A, SHEET 2D

Existing Conditions

Mountain View Power Partners (MVPP) Proposed Wind Energy Repower



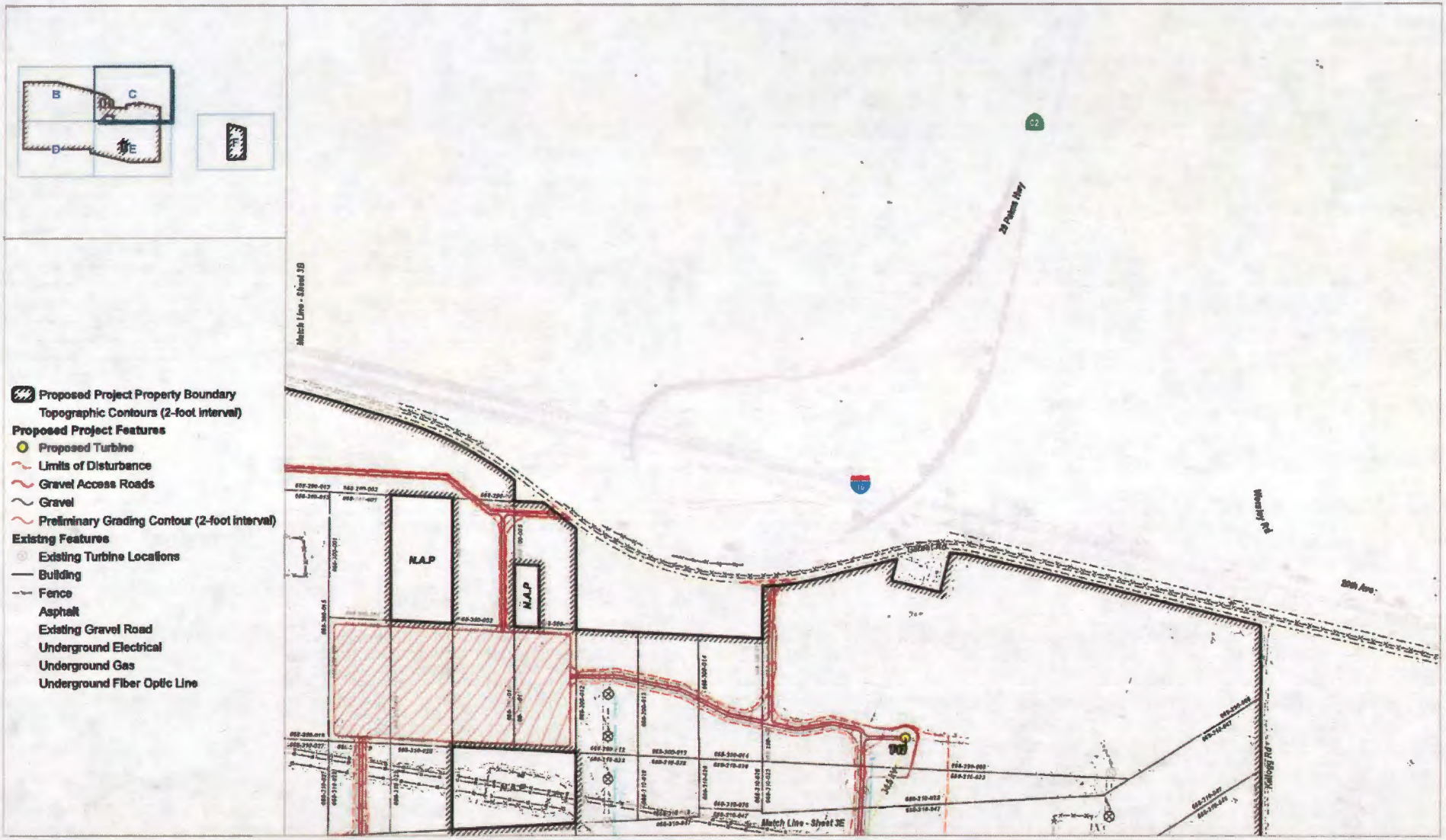
SOURCE: Aerials by Riverside County 2019

DUDEK

EXHIBIT A, SHEET 1A

Proposed Site Plan and Grading - Overview

Mountain View Power Partners (MVPP) Proposed Wind Energy Repower



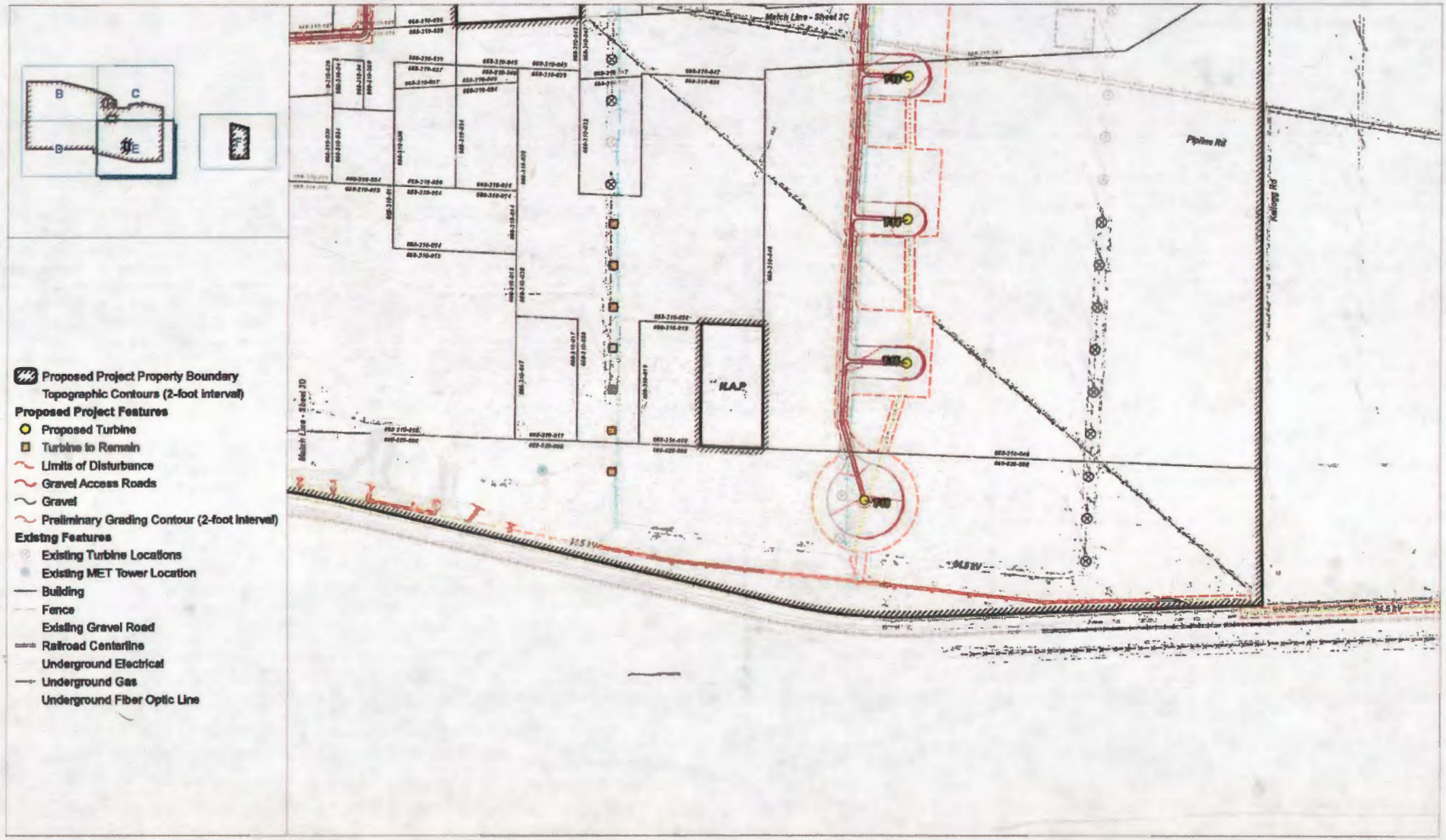
SOURCE: Aerials by Riverside County 2019

DUDEK

EXHIBIT A, SHEET 3C

Proposed Site Plan and Grading

Mountain View Power Partners (MVPP) Proposed Wind Energy Repower



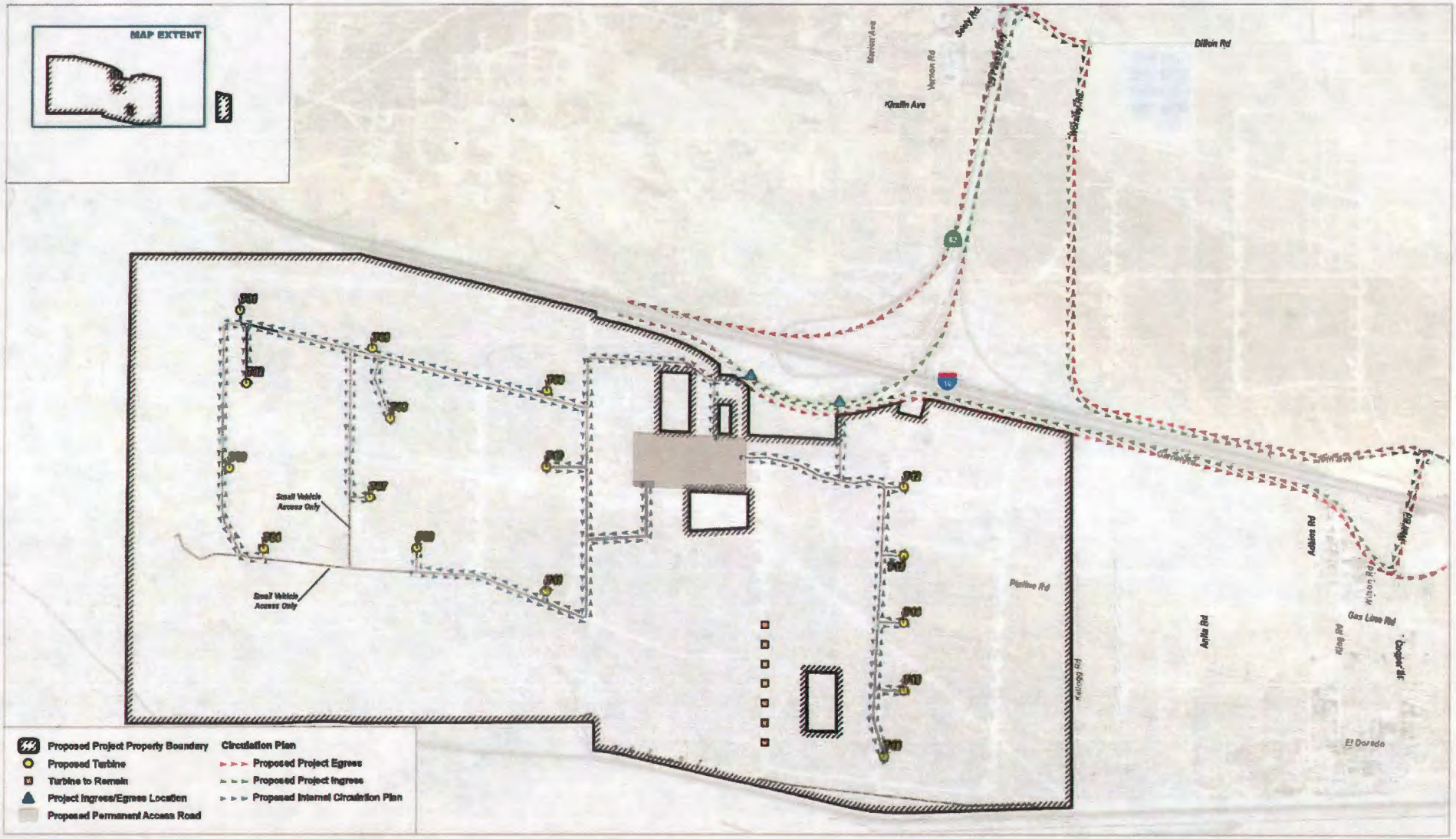
SOURCE: Aerials by Riverside County 2010

DUDEK

EXHIBIT A, SHEET 3E

Proposed Site Plan and Grading

Mountain View Power Partners (MVPP) Proposed Wind Energy Repower



SOURCE: SCAG, County of Riverside

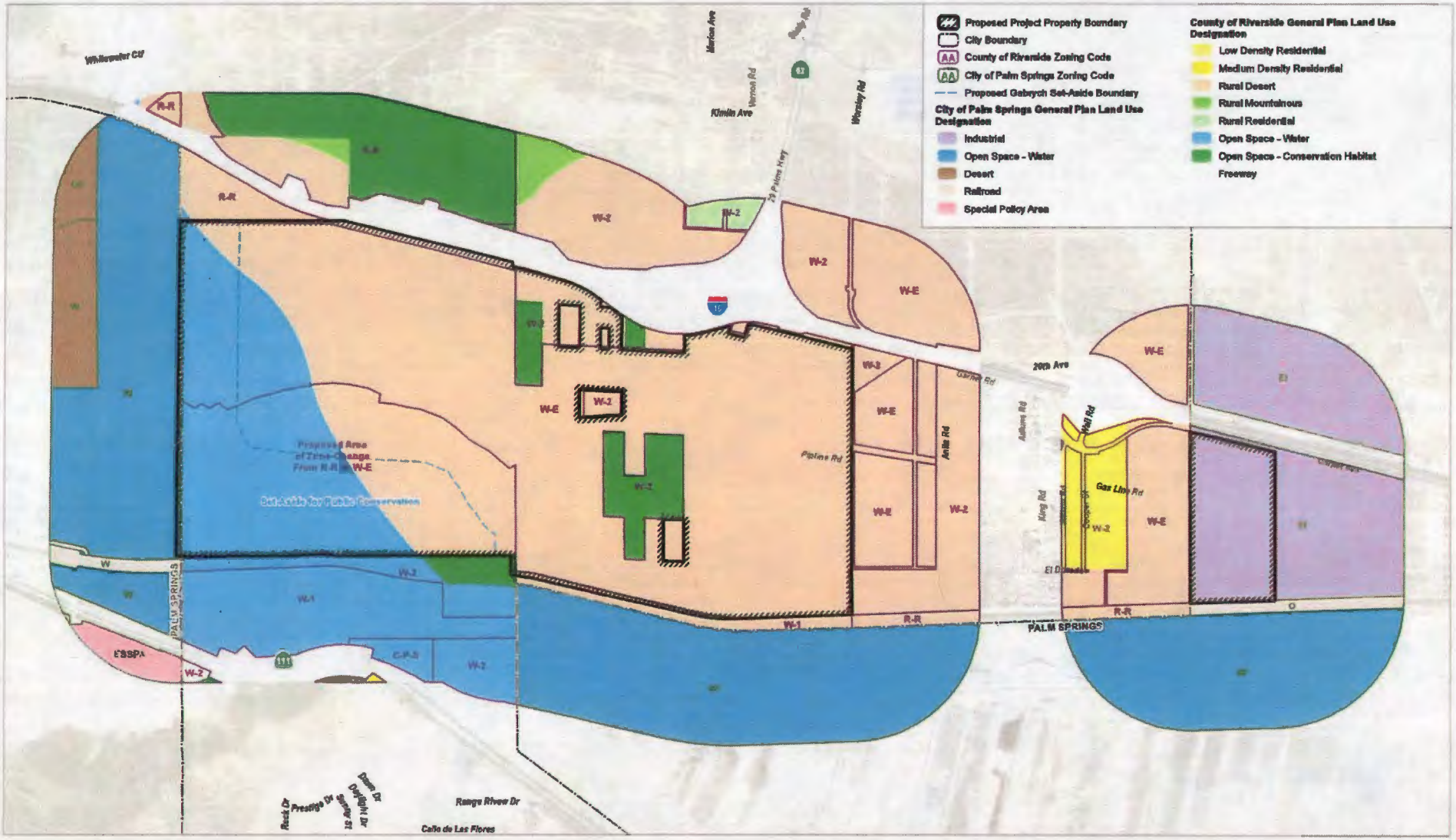
DUDEK

1,000 Feet

EXHIBIT A, SHEET 4

Circulation Plan

Mountain View Power Partners (MVPP) Proposed Wind Energy Repower



SOURCE: SCAG, County of Riverside

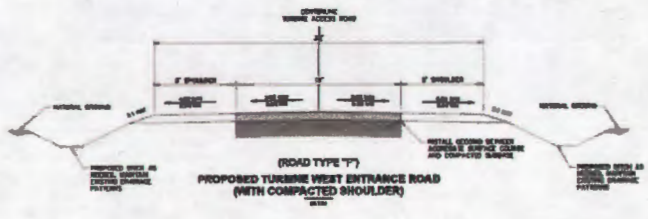
DUDEK

EXHIBIT A, SHEET 6

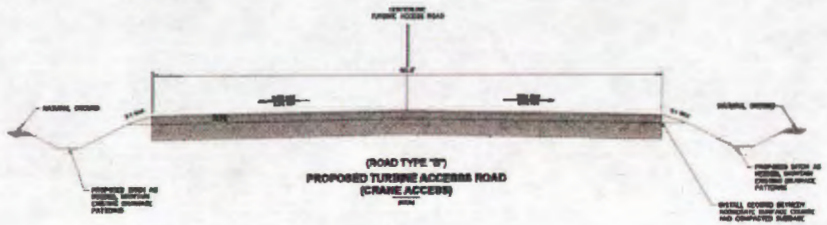
Existing and Proposed Land Use and Zoning Designations

Mountain View Power Partners (MVPP) Proposed Wind Energy Repower

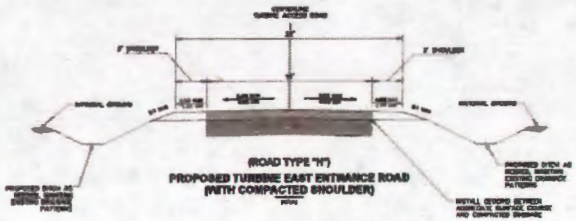
(ROAD TYPE "A")
PROPOSED TURBINE ACCESS ROAD
(NO CRANE ACCESS)



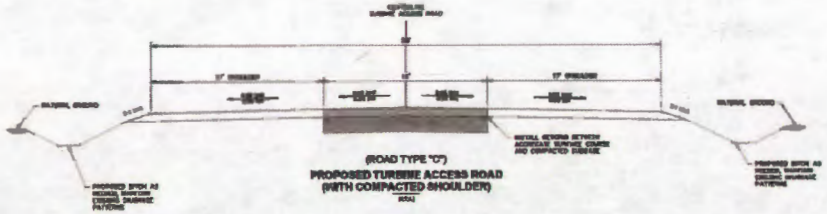
(ROAD TYPE "F")
PROPOSED TURBINE WEST ENTRANCE ROAD
(WITH COMPACTED SHOULDER)



(ROAD TYPE "B")
PROPOSED TURBINE ACCESS ROAD
(CRANE ACCESS)

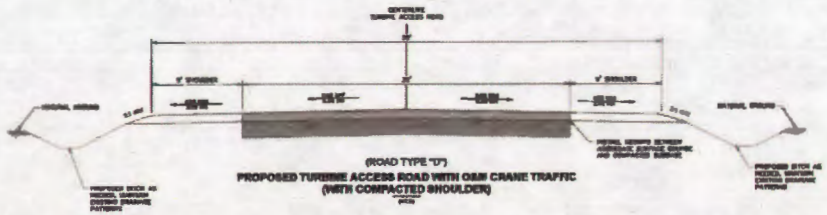


(ROAD TYPE "H")
PROPOSED TURBINE EAST ENTRANCE ROAD
(WITH COMPACTED SHOULDER)



(ROAD TYPE "C")
PROPOSED TURBINE ACCESS ROAD
(WITH COMPACTED SHOULDER)

PROPOSED TURBINE ACCESS ROAD
TYPICAL PAVEMENT SECTION



(ROAD TYPE "D")
PROPOSED TURBINE ACCESS ROAD WITH O&M CRANE TRAFFIC
(WITH COMPACTED SHOULDER)

Exhibit A, Sheet 7B

Construction Details - Road Cross Sections

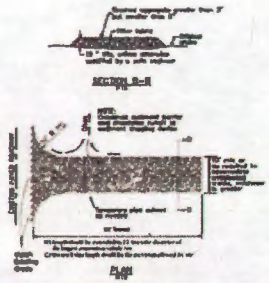
Silt Fence **SE-1**

Check Dams **SE-4**

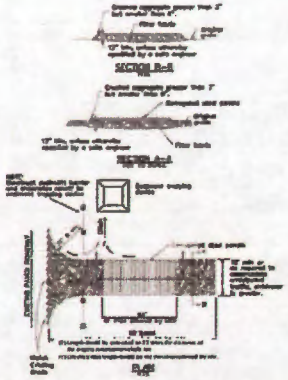
Check Dams **SE-4**

Fiber Rolls **SE-5**

Stabilized Construction Entrance/Exit TC-1



Stabilized Construction Entrance/Exit TC-1



Entrance/Outlet Tire Wash **TC-3**

Exhibit A, Sheet 7D

Construction Details - Erosion Control Details

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TABLES

Acronym/Abbreviation	Definition
met	meteorological
MM	Mitigation Measure
MT	metric ton
MVPP	Mountain View Power Partners
MW	megawatt
MWh	megawatt-hours
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NO_2	nitrogen dioxide
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O&M	operations & maintenance
O_3	ozone
OSHA	Occupational Safety and Health Administration
PM_{10}	particulate matter less than or equal to 10 microns in diameter
$PM_{2.5}$	particulate matter less than or equal to 2.5 microns in diameter
proposed project	Mountain View Power Partners Wind Repower Project
PDF	Project Design Feature
ROW	right-of-way
RR	Regulatory Requirement
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCADA	supervisory control and data acquisition
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SO_x	sulfur oxides
SR-	State Route
SSAB	Salton Sea Air Basin
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VOC	volatile organic compound
WECS	Wind Energy Conversion System
WIMP	Wind Implementation Monitoring Program
WFCA	Whitewater Floodplain Conservation Area
WTG	wind turbine generators

B Revisions to the Draft IS/MND

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

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

Section 1, Introduction

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

Section 2, Project Description

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

Section 3.I, Project Information

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

Section 3.IV.6, Air Quality Impacts

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

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

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

Section 3.IV.46, Mandatory Findings of Significance

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

Section 3.VI, Authorities Cited

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

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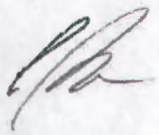
Governor Newsom put it in his April 2017 letter, 'raven overpopulation and its detrimental impact on the broader ecosystem represents an ecological challenge to California.' We agree. And we believe the time is now to act.

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

E-2 Cont.

All the best,



Ron Berger, President
Coalition for a Balanced Environment

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

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

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

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

PROJECT LOCATION

The Mountain View Wind Repower Project site is located near Whitewater and Bonnie Bell communities in Riverside County, California, at South of Garnet Street, approximately 3 miles west of Indian Canyon Drive, and at north of the City of Palm Springs, in the northwestern portion of the Coachella Valley. A portion of the underground electrical collection system and Mount Wind substation improvements are situated within the City of Palm Springs. State Route 111 and the City of Palm Springs are located south of the site, and Interstate 10 is situated at north of the site. The Project site occurs within Section 13 of Township 3 South, Range 3 East, and Sections 17 and 18 of Township 3 South, Range 4 East, of the Desert Hot Springs and Whitewater U.S. Geological Survey (USGS) Quadrangles. The approximate geographic center of the Project site is positioned at 33°54'26.04"N (latitude) and 116°35'32.03"W (longitude). The Project site includes 42 parcels and a portion of two additional parcels. The Project covers 139.1 acres on a 1,255.19-acre site, and of the 1,255.19 acres, 1,202.86 acres occur on private land and 52.34 acres are situated within Bureau of Land Management (BLM) jurisdiction.

F-1 Cont.

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

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

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

F-2

COMMENTS AND RECOMMENDATIONS

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

Assessment of Biological Resources

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

F-3

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

F-4

triple-ribbed milkvetch (*Astragalus tricarinatus*), desert tortoise (*Gopherus agassizii*), Palm Springs ground squirrel, and Le Conte's thrasher (*Toxostoma lecontei*). F-5 Cont.

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

The IS proposes that the impacts are to be offset with donation of 248.12-acre land, of which 247.48 acres would be conserved, within the WFCA. Revegetation or restoration of temporary impacts is not proposed after Project completion. Typically, the applicant would be required to pay a per acre mitigation fee to Coachella Valley Association of Governments; however, The IS proposes that the Set-aside Parcel donation would offset impacts in lieu of payment of CVMSHCP mitigation fees. The proposed Project would also impact 111.41 acres (40.37 acres of permanent and 98.72 acres of temporary) outside of the CVMSHCP WFCA. Revegetation or restoration of temporary impacts is not proposed after Project completion outside of the WFCA. The Project would be required to adhere to CVMSHCP Land Use Adjacency Guidelines regardless of these areas being outside of the WFCA. F-7

Two CVMSHCP-covered plant species, Coachella Valley milk-vetch (a federally endangered and California Rare Plant species) and triple-ribbed milkvetch (a federally endangered and California Rare Plant species), known to occur within the immediate vicinity of the Project site. Therefore, the proposed Project could result in impacts to federally listed plant species potentially present in off-site areas during construction activities due to generation of fugitive dust, the release of chemical pollutants, and the adverse effect of invasive plant species. The Project site contains 291.73 acres of triple-ribbed milkvetch, of which a total of 4.48 acres would be directly impacted by Project implementation. F-8

The IS indicated occurrence of Class 4 burrows for desert tortoise, a federally and state threatened and CVMSHCP Covered Species within the Project site. The Project site contains 383.39 acres of habitat for desert tortoise, of which a total of 20.22 acres would be directly impacted by Project implementation. There is a plausible concern about the type of structure (lattice or monopole) proposed for the new met tower located just inside of the WFCA. This concern pertains to the tower's potential to facilitate increased perching and nesting opportunities for ravens that could then potentially prey on existing and/or future desert tortoise in the WFCA. F-9

accounted for considering fully mitigated standards. For adequacy of mitigation analysis, there is a need to consider both spatial and temporal effects on habitat as well as cumulative impacts of the activities on habitat biodiversity and microclimate variability for sustaining desert tortoise and other species. F-15 Cont.

Mitigation Measures for Project Impacts to Biological Resources

The MND should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the Project. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following comments. F-16

Fully Protected Species

Several Fully Protected Species (Fish and Game Code § 3511) have the potential to occur within or adjacent to the Project area. Fully protected species may not be taken or possessed at any time. Project activities described in the MND should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the MND fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead Agency include in the analysis appropriate avoidance, minimization and mitigation measures to reduce any possible indirect impacts to fully protected species. F-17

Sensitive Plant Communities

CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in the 2009 or current version of The Manual of California Vegetation. The MND should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts. Minimization measures may include transplanting perennial species, seed collection and dispersal from annual species, and other conservation strategies that will protect the viability of the local population. If minimization measures are implemented, monitoring of plant populations will be conducted annually for 5 years to assess the mitigation's effectiveness. The performance standard for mitigation will be no net reduction in the size or viability of the local population. F-18

Mitigation

CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the MND should include F-19

note that the proposed avoidance, minimization, and mitigation measures must be sufficient for CDFW to conclude that the Project's impacts are fully mitigated and the measures, when taken in aggregate, must meet the full mitigation standard. F-21 Cont.

Desert Tortoise

CDFW recommends inclusion of mitigation measures to avoid potentially significant impacts to desert tortoise, a CESA-listed species as threatened and a candidate for endangered species. The measures need to include specificity on who will perform the survey, what type of survey will be performed, and what actions will be taken should desert tortoise presence be confirmed during the survey. The measures need to address avoidance, minimization, or mitigation measures should desert tortoise enter the Project site during the life of the Project. Take (hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill) is prohibited unless authorized by state law (Fish and Game Code, §§ 2080 & 2085). Project activities have the potential to take desert tortoise. The measure as written does not ensure a qualified biologist, experienced in locating desert tortoise individuals in all life stages and their sign, will complete the survey following CDFW approved protocols. Additionally, should desert tortoise presence be confirmed, the measure needs to include avoidance, minimization and mitigation to avoid take. F-22

If the Project, including the Project construction or any Project-related activity during the life of the Project, may result in take of CESA-listed species, CDFW recommends that the Project proponent seeks appropriate authorization prior to Project implementation through an incidental take permit (ITP). CDFW recommends inclusion of protocol level survey and a measure for a qualified biologist in the environmental document. A qualified biologist shall conduct a protocol level presence or absence survey no more than 14 days prior to initiating Project activities in accordance with the survey methodology described in U.S. Fish and Wildlife Service Desert Tortoise (Mojave Population) Field Manual. In addition, the survey shall utilize perpendicular survey routes and 100-percent visual coverage of the Project area and 50-foot buffer zone for desert tortoise and their sign. If the survey confirms absence, a qualified biological monitor shall remain on-site during all Project activities to confirm desert tortoise do not enter the Project site. If the survey confirms presence, the Project Proponent shall obtain an ITP for desert tortoise prior to the start of Project activities. If the biological monitor during the life of the Project encounters a desert tortoise, work shall be suspended, and the Project Proponent shall obtain an ITP for the species prior to the restarting Project activities. All clearance surveys need to be conducted during the active season for desert tortoise. F-23

Burrowing Owl

Burrowing owls, a CDFW Species of Special Concern and a CVMSHCP Covered Species, were observed during the 2020 field surveys. One occupied burrow within the WFCA and one unoccupied burrow outside of the WFCA were observed. Potential construction-related direct impacts to burrowing owl could result from destruction of F-24

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

F-26 Cont.

Nesting Birds and Migratory Birds

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

F-27

Special Status Plant Species

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

F-28

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

F-29 Cont.

Wildlife in Pipes and Construction Materials

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

F-30

Escape Ramp in Trench

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

F-31

Coachella Valley Multiple Species Habitat Conservation Plan

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

F-32

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

F-35

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

F-36

Sincerely,

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

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

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

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

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

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

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

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

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

F-10 A discussion of the proposed project impacts from lighting, noise, human activity, and wildlife-human interactions, exotic and/or invasive species, and drainage is included in Draft IS/MND Section 3.IV.7 and in BTR Section 5. Impacts specific to drainage and water quality are addressed in BTR Section 5.6. Furthermore, the project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3, for details on the project's JPR findings. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-11 A discussion of the proposed project's indirect impacts to species covered under the CVMSHCP and to species not covered under the CVMSHCP are included in Draft IS/MND Section 3.IV.7 and in BTR Section 5. For the species and their associated habitats covered by the CVMSHCP, the project was determined to be consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project's JPR findings. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-12 An evaluation of the proposed project's impacts to open space lands is included in Draft IS/MND Section 3.IV.7 and in BTR Section 5.9. The project was also determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project's JPR findings. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-13 The cumulative analysis for biological resources used the CVMSHCP coverage area as the geographic scope. The project site is within the CVMSHCP boundaries, and the species and associated habitats affected by construction of new WTGs (and decommissioning of existing WTGs) would be similar to those considered for all projects within the CVMSHCP boundaries. Specific to the CVMSHCP, projects cannot conflict with CVMSHCP as determined through the California Environmental Quality Act (CEQA) review process, and if located within a designated conservation area, projects such as the proposed project, are also subject to the JPR process. Refer to Draft IS/MND Section 3.IV.7(a) for a discussion of the proposed project's consistency with the CVMSHCP as well as how project-specific potential impacts to biological resources are addressed. All other projects are subject to similar reviews for impacts to sensitive biological resources through compliance with CEQA and CESA, or, if on BLM-administered lands, subject to the federal regulations. For projects subject to the CVMSHCP, note that this is an approved regional plan that, during this plan's approval and initiation, inherently considered cumulative impacts to the species and habitats it covers.

Specific to special status bird and bat species, construction and decommissioning activities of the existing WTGs within the project site would not be expected to contribute to bird and bat mortality. Similarly, other repower projects would not be expected to contribute to mortality during construction and decommissioning. Bird and bat impacts from operations were cumulatively considered within the proposed project's BBCS (BTR Appendix D). Biological resource data was compiled from several wind energy facilities with similar site characteristics within the project vicinity (i.e. within 2 miles of the project site) and conducted over the past 20 years in conjunction with the data obtained during the project's 2017-2018 fixed-point avian use surveys. The pre- and post-construction studies compiled from these wind energy facilities were reviewed and are summarized Table 2 and presented in Figure 3 of the BBCS.

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

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

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

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

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

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

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

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

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

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

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

F-28 The proposed underground electrical collection infrastructure would be installed via excavation. Covering trenches overnight and including escape ramps are standard operating procedures and included as part of the standard Worker Environmental Awareness Program used in training on-site employees and construction workers on the sensitive resources potentially found on the project site. Furthermore, to avoid direct impacts to special-status species, the project would implement **PDF-BIO-1**, which states that prior to any grading or other ground-disturbing activities, a Qualified Biologist will complete pre-construction surveys within ground-disturbance areas for all special-status wildlife and plant species with potential to occur in the project. Employees and contractors will also be instructed to look under equipment for the presence of wildlife before movement of equipment. **PDF-BIO-1** has also been revised to include "CDFW-approved" Qualified Biologist (refer to response to comment F-19 above). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-29 Please refer to response to comment E-28 above, which addresses the same issue raised in this comment.

F-30 BTR Section 5.9 includes the CVMSHCP Consistency analysis for the proposed project. The proposed project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project's JPR findings. Furthermore, and relevant to **MM-BIO-1**, the applicant is donating 247.48 acres to conservation in perpetuity that will benefit numerous Covered Species. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-31 BTR Section 5.9 includes the CVMSHCP Consistency analysis for the proposed project. The proposed project was determined consistent with the CVMSHCP through the JPR process. Please refer to response to comment F-3 for details on the project's JPR findings. Furthermore, and relevant to **MM-BIO-1**, the applicant is donating 247.48 acres to conservation in perpetuity that will benefit numerous Covered Species. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft IS/MND.

F-32 As stated in the Draft IS/MND Section 3.IV.7, the results of the jurisdictional delineation conducted in 2020 and 2021 concluded there are approximately 7.24 acres (6,274 linear feet) of non-wetland waters of the state and streambed under the jurisdiction of the Regional Water Quality Control Board (RWQCB) and CDFW, respectively, within the project area (refer to Appendix F of the BTR). The proposed project was designed to avoid direct impacts to jurisdictional waters. However, due to the close proximity of proposed work areas near jurisdictional, non-wetland waters, **RR-BIO-7** would be implemented to avoid/minimize direct and indirect impacts to waters during construction-related ground disturbance. Therefore, construction of the project, as well as Operations & Maintenance (O&M) activities, would not

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The proposed project's draft MND has failed to adequately analyze or fully disclose impacts associated with the proposed project and the avoidance, minimization and mitigation for same. G-2

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

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

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

The MND fails to analyze current bat use of the site, which is likely relatively high due to the project's close proximity to the CVWD percolation ponds (perc ponds). These ponds often contain extensive expanses of water. This water, though intermittent, would serve as an attractant to invertebrates and therefore the birds and especially bats which prey on insects. The MND's biological assessment admits the perc ponds serve as an attractant to bald eagles, but ignores the potential for attracting bats and other insectivorous birds. G-3

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

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

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

The MND and its Bio Technical Report (BTR) variously refer to an Avian and Bat Protection Plan (ABBP) and a Post-Construction Avian and Bat Fatality Monitoring Plan (monitoring plan). The MND also claims that adaptive management will respond to the monitoring plan, which is included in the Bio Technical Report. However, while the monitoring plan requires data gathering and reporting, it does not require any adaptive management to address mortality. Data gathering and reporting do not constitute mitigation. G-5

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

Further, we question the monitoring plan's proposal for a mere two years of monitoring. The norm is three years or more depending on the results of such monitoring. G-6

Clearly, given the use of the San Gorgonio Pass as a migratory corridor on the Pacific Flyway, plus the project's proximity to the perc ponds with their Bald Eagle and bat use, the project requires an ABBP. The County must require same. California Department of Fish and Wildlife regulations provide coverage making "incidental take" illegal in California. The ABBP should outline a minimum of a three-year monitoring regime as well as adaptive management plans if thresholds of mortality merit same. We request that CDFW and/or a Technical Advisory Committee review the monitoring reports generated and that their recommendations regarding adaptive management be mandatory. G-7

Met tower

The MND claims that a monopole tower is infeasible and that the new nearly 400 foot high met tower will be lattice. It acknowledges that lattice towers are problematic in that they may provide perching for raptors depending on the size of the lattice, and may actually attract ravens, but that the project will be required to remove raven nesting materials prior to and post nesting season. This does not address the potential for protected raptors to use the lattice for perching and G-8

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

Very truly yours,

Joan Taylor, Conservation Chair
Tahquitz Group of the Sierra Club

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Bat (and Insectivorous Birds) Risk Analysis

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1.3 Document Organization

Section 1 Introduction

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

Section 2 Project Overview

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

Section 3 Environmental Assessment Form: Initial Study Checklist

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

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

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

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

2.3 Project Description

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

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

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

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

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

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

2.4 Project Components

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

2.4.1 Wind Turbine Generators

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

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

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

Wind Turbine Generator Pad

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

Safety Features

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

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

Overhead Electrical Infrastructure

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

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

Table 2-3. Overhead Electrical Collection System Upgrades

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

2.4.3 Meteorological Tower

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

2.4.4 Access Roads

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

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

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

2.4.5 Laydown Yard and Parking

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

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

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
WTG Foundation Installation	2064	26	6601,820	Excavators	2	10
				GradersPumps	1	10
				Rollers	1	10
				Rubber-tired dozers	21	10
WTG / Met Tower Erection	1068	28	7200	ForkliftsAerial lifts	31	125
				Cranes	42	1610
				Generator sets	1	105
				GradersRough terrain forklifts	13	10
Overhead Electrical Collection System Improvements	12	12	24	Crane	1	10
				Tractor/Loader/ Backhoe	31	105
				Trenchers	1	10
Tower Wiring, Mechanical Completion	32	2	0	Generator sets	2	10
Commissioning	12	2	0	Generator sets	2	10
Restoration	126	2	3500	Skid steer loaders	31	10
				Graders	1	10
				Rubber-tired Dozers	1	10
				Tractor/Loader/ Backhoe	1	10

Note: WTG = wind turbine generator.

2.5.1 Decommissioning of Existing Wind Turbine Generators and Meteorological Towers

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

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

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

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

2.5.3 Clearing and Grading

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

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

2.5.4 Foundation Construction and Tower Erection

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

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

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

2.5.5 Construction of Electrical Collection System

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

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

2.7 Final Decommissioning and Reclamation

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

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

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

2.8 Land Use Considerations and Approvals

The project applicant has submitted applications to the County for a WECS permit, Change of Zone, and Variance to support the proposed project, as identified in Section 3.I. Other permits, authorizations, and approvals for the project would include, but may not be limited to, the following: Building and Grading permits, FAA Determinations of No Hazard, State Water Resources Control Board Construction General Permit, Riverside County Airport Land Use Commission Review, and a Building Permit from the City of Palm Springs for the proposed underground electrical collection system replacement and storage of a spare transformer at the Mount Wind Substation. Based on the project location within the CVMSHCP WFCA, the project would also be subject to CVMSHCP requirements.

2.8.1 Land Use and Zoning Designations

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

Development of the proposed project would result in 20.22 acres[3] of new disturbance (permanent and temporary) within the WFCA.

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

2.8.3 Federal Aviation Administration Obstruction Evaluation

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

2.8.4 Riverside Airport Land Use Consistency Review

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

2.9 Design Considerations

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

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

Table 2-3. Safety Setbacks

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

Notes:

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

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

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

Wind Access Setbacks

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

The applicant has also requested a Wind Access Setback Variance (VAR210001) for 4 ~~11~~ WTGs that are within five rotor diameters of six ~~seven~~ parcels outside of the project area and for which MVPP does not possess setback waiver agreements. The affected parcels and justification for a variance are summarized in Table 2-5 and shown on Figure 2-8.

Table 2-5. Wind Access Setback Variances

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

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

Table 2-6. Scenic Setbacks

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

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

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

C. **Assessor's Parcel No(s):**

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

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

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

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

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

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

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

feet from I-10, or approximately 2.03 times the total WECS height. The requested setback reduction could be approved by Planning Commission, subject to making findings in conformance with the ordinance. The project applicant will have a total of 23 Wind Access Setback waivers in place before the Planning Commission Hearing in conformance with the County's wind access setback requirements. In addition, the applicant has requested a Wind Access Setback Variance (VAR2100001) for 4 ~~11~~ WTGs that are within five rotor diameters of seven parcels outside the project site. The affected parcels and justification for a variance are summarized in Table 2-5. As such, the proposed project would comply with all setbacks required pursuant to Section 17.224.040(A) of the County's Zoning Code.

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

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

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

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

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

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

b. WTGs should be set back from scenic highways and viewpoints; set back individual WTGs far enough from scenic highways and key viewpoints so they do not obscure or overwhelm distinctive skylines; set back large WTGs from small important landmarks so that they do not overwhelm the landform.

c. Coordinate color schemes for all developments; avoid mixing colors within a particular array unless to subordinate a particular turbine type or to provide safety markings; limit use of color patterns as accent for key clusters or individual WTGs; consider aviation safety coloration and lighting as may be required by the FAA.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Jay T Olivas

Signature

6-24-21

Date

Jay Olivas
Project Planner
Printed Name

For: John Hildebrand
Planning Director

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

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

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

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

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

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

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

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

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

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

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3. Other Lighting Issues				
a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
b) Expose residential property to unacceptable light levels?	☐	☐	☒	☐

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

Findings of Fact:

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

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

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

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

Findings of Fact:

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

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

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

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Air Quality

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

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

Findings of Fact:

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

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

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

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

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

Construction Emissions

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

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

Implementation of the proposed project would generate air pollutant emissions from entrained dust, off-road equipment, and vehicle emissions. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. The proposed project would be required to comply with SCAQMD Rules 403 and 403.1 to control dust emissions generated during the grading activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites three times per day depending on weather conditions. The proposed project would also employ an off-road speed limit of 15 miles per hour. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of volatile organic compounds (VOCs), oxides of nitrogen (NO_x), carbon monoxide (CO), PM_{10}, and $PM_{2.5}$.

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

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

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
2053	2.431.51	7.855.98	21.1615.94	0.070.05	7.559.68	2.131.51
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Air Quality and Greenhouse Gas Emissions Technical Report (Appendix A of this Initial Study)
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
Refer to Appendix A for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect CalEEMod "mitigated" output, which accounts for compliance with SCAQMD Rules 403 and 403.1 (Fugitive Dust), including watering of the project site and unpaved roads three times per day and restricting vehicle speed on unpaved roads to 15 miles per hour.

As shown in Table 3-2, daily decommissioning emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$. Emissions generated during decommissioning would be temporary and would not represent a long-term source of criteria air pollutant emissions. As such, impacts related to construction would be less than significant. As discussed in Section 2.6, the proposed project would not create any new impacts during operation.

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

The SSAB has been designated as a federal and state nonattainment area for O_3 and PM_{10}. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SSAB including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction of the proposed project would generate VOC and NO_x emissions (which are precursors to O_3) and emissions of PM_{10}. As indicated in Tables 3-1 and 3-2, project-generated construction and decommissioning emissions would not exceed the SCAQMD emission-based significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$. Similarly, the proposed project would not generate an increase in emissions during operation.

Regarding potential cumulative localized impacts, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation if the proposed project would exceed SCAQMD thresholds. Criteria air pollutant emissions associated with construction activity of future proposed projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} emissions would be reduced because all future proposed projects would be subject to SCAQMD Rules 403 and 403.1 (Fugitive Dust), which set forth general and specific requirements for all construction sites in the SCAQMD.

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

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

Health Impacts of Toxic Air Contaminants

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

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

The greatest potential for TAC emissions impacts during construction would be DPM emissions from heavy equipment operations and heavy-duty trucks during construction of the proposed project and the associated health impacts to sensitive receptors. The closest sensitive receptors would be residents approximately 690 feet from the closest area of disturbance. As shown in Table 3-1, maximum daily particulate matter (PM_{10} or $PM_{2.5}$) emissions generated by construction equipment operation and from hauling of soil during grading (exhaust particulate matter, or DPM), combined with fugitive dust generated by equipment operation, would be well below the SCAQMD significance thresholds. The proposed project would also not emit any new TAC emissions during operation. Therefore, the impact would be less than significant.

Health Impacts of Carbon Monoxide

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

The proposed project would have trip generation associated with construction worker vehicles and vendor trucks. Title 40 of the California Code of Regulations, Section 93.123(c)(5), Procedures for Determining Localized CO, PM_{10}, and $PM_{2.5}$ Concentrations (hot-spot analysis), states that "CO, PM_{10}, and $PM_{2.5}$ hot-spot analyses are not required to consider construction-related activities, which cause

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

Exposure to Valley Fever

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

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

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

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Findings of Fact:

a) **Less-Than-Significant Impact with Mitigation Incorporated.** The project site is located on approximately 1,255.19 acres of existing energy facilities within the County and the entire project site is located within the CVMSHCP. The proposed project is considered a Covered Activity under Section 7.3 of the CVMSHCP. Approximately 383.39 acres of the project site overlap the CVMSHCP WFCA, and the project would permanently and temporarily impact a total of 20.22 acres[4] within the CVMSHCP WFCA. Therefore, the project is required to complete a JPR process through the County, with concurrence by CVCC, the California Department of Fish and Wildlife (CDFW), and the U.S. Fish and Wildlife Service (USFWS). A pre-JPR meeting with CVCC, the County, CDFW, USFWS, and the project applicant was conducted on September 28, 2020. A formal JPR application package was submitted on October 7, 2020. CVCC issued its JPR findings for the project on January 22, 2021. The JPR findings determined that with the donation of the Set-aside Parcel, and with implementation of CVMSHCP Section 4.4 Required Avoidance, Minimization, and Mitigation Measures, and adherence to CVMSHCP Section 4.5 Land Use Adjacency Guidelines, the project is consistent with the CVMSHCP (refer to Appendix E of the BTR for details).

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

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

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

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

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

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

Mitigation:

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

Monitoring: No monitoring required.

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

Plants

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

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

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

Swainson's Hawk

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

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

- Gravel will be placed at least 5 feet around each WTG foundation to discourage small mammals and reptiles from burrowing under or near WTG bases.
- An environmental consulting firm will be retained as an on-call service provider throughout construction of the project to ensure compliance with environmental construction measures (e.g., spill prevention, control, and countermeasures plan).
- Prior to any grading or other ground-disturbing activities, a CDFW-approved Qualified Biologist[7] will complete pre-construction surveys within ground-disturbance areas for all special-status wildlife and plant species with potential to occur in the project.
- Sensitive resources (e.g., nests) identified during pre-construction surveys will be flagged; all site personnel will be notified of their presence; and the necessary avoidance buffers will be established.
- If an injured or dead federally or state-protected species is encountered during construction, all work within the immediate vicinity will stop, and the CDFW-approved Qualified Biologist and appropriate agencies will be notified before construction is allowed to proceed (refer to Appendix D of the BTR).
- Employees and contractors will be instructed to look under vehicles and equipment for the presence of wildlife, including desert tortoise, before movement of vehicle or equipment.
- All employees and contractors working on the project during construction and operation will be required to participate in the Wildlife Incident Reporting Program (WIRP). The WIRP will include training for identifying and responding to encounters with sensitive biological resources, including but not limited to desert tortoise and golden eagles (reporting form included in Appendix D of the BTR).
- Wildfire potential will be minimized by implementing safety measures in accordance with the applicable requirements of the California Fire Code (California Code of Regulations, Title 24, Chapter 4, Emergency Planning and Preparedness).
- Outdoor lighting during construction will be minimized. The project will reduce outdoor lighting impacts by ensuring that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project, vicinity, and nighttime sky is minimized. Outdoor lighting during operations will be limited to that necessary for project safety and security. All internal turbine nacelle and tower lighting will be extinguished when unoccupied. The proposed lattice tower would be equipped with applicable Federal Aviation Administration-compliant marking or lighting for aviation safety. Preferred lighting color has not yet been finalized, but in order to lower increased predation risk on small mammals. the lighting color is anticipated to be warm tones (e.g., reds or oranges) versus LED or bright lighting. Lighting would be emitted as a flashing display versus being a solid display.
- During construction and operations, the entire project site will be kept free of trash to prevent attraction of prey and predators, including removing any road-killed animals and carcasses. Nuisance animals will be brought to the attention of the California Department of Fish and Wildlife for control or relocation.

[7] Also referred to as Acceptable Biologist in the CVMSHCP.

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

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

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

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

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

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

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

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

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

Plants

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

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

Wildlife

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

California Glossy Snake and Red Diamond Rattlesnake

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

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

Golden Eagle

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

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

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

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

LeConte's Thrasher

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

Other Nesting Birds

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

Other Measures:

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

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

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

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

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

Mitigation:

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

Monitoring: No monitoring is required.

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

Project impacts would total 139.09 acres (permanent and temporary), including 20.22 acres[8] within the CVMSHCP WFCA and 111.40 acres outside the WFCA (refer to Table 10 of Appendix B for impact acreage for each vegetation community). None of the vegetation communities, whether inside or outside of the WFCA, are considered sensitive by CDFW or USFWS. However, the project does contain vegetation communities identified as natural communities covered under the CVMSHCP, including Sonoran creosote bush scrub (which also includes the creosote bush scrub and Creosote bush–white bursage scrub communities). These communities are not subject to any specific conservation objectives required under the CVMSHCP. Therefore, impacts to natural communities occurring outside the WFCA would be less than significant. For impacts occurring within the WFCA, to comply with the CVMSHCP, donation of the Set-aside Parcel will be required to mitigate habitat loss. Therefore, with CVMSHCP consistency (**MM-BIO-1**), there would be no significant impacts to sensitive vegetation communities from project implementation.

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

Mitigation:

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

Monitoring: No monitoring is required.

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

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

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

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Cultural Resources

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

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

Findings of Fact:

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

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

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

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

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

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
9. Archaeological Resources a) Alter or destroy an archaeological site?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☒	☐	☐

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

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

Mitigation:

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

The CRMP shall contain at a minimum the following:

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

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

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

Energy

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

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

Findings of Fact:

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

Energy Consumption

Electricity

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

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

Fuel consumption from worker, vendor, and haul truck trips was estimated by converting the total CO_2 emissions from the construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline fueled, whereas vendor and haul trucks are assumed to be diesel fueled. The estimated fuel use for worker vehicles, vendor trucks, and haul trucks is presented in Table 3-5.

Table 3-5. Construction Vehicle Fuel Demand

Phase	Trips	Vehicle CO_2 (MT)	kg CO_2/ Gallon	Gallons
Construction Worker Vehicle Gasoline Demand				
WTG Removal	2,850	12.58	8.78	1,433.01
~~Restoration~~	~~240~~	~~0.640~~	~~8.78~~	~~72.67~~
Grading and Road Upgrades	360~~600~~	1.59~~2.12~~	8.78	181.01~~241.34~~
WTG Foundation Installation	1,920~~1,600~~	8.48~~14.13~~	8.78	965.40~~1,608.99~~
WTG/Met Tower Erection	4,080~~3,400~~	17.79~~14.63~~	8.78	2,026.51~~1,665.89~~
Overhead Electrical Collection System Improvements	360~~300~~	1.53~~1.02~~	8.78	174.41~~116.28~~
Tower Wiring, Mechanical Completion	800~~640~~	3.40	8.78	387.57
Commissioning	300	1.28	8.78	145.34
Restoration	150	0.64	8.78	0.00
Future WTG Removal	2,850~~1,950~~	0.00	8.78	0.00
Restoration	150~~132~~	0.00	8.78	0.00
			Subtotal	5,385.92~~5,671.08~~
Construction Vendor Truck Diesel Demand				
WTG Removal	380	4.30	10.21	421.08
~~Restoration~~	~~80~~	~~0.56~~	~~10.21~~	~~54.93~~
Grading and Road Upgrades	60~~100~~	0.68~~0.91~~	10.21	66.48~~88.65~~
WTG Foundation Installation	180~~150~~	2.04~~3.39~~	10.21	199.46~~332.43~~
WTG/Met Tower Erection	480~~400~~	5.42~~4.50~~	10.21	530.36~~440.56~~
Overhead Electrical Collection System Improvements	360~~300~~	4.04~~2.69~~	10.21	395.48~~263.65~~
Tower Wiring, Mechanical Completion	50~~40~~	0.56	10.21	54.93
Commissioning	50	0.56	10.21	54.93
Restoration	50	0.56	10.21	54.93
Future WTG Removal	380~~260~~	0.00	10.21	0.00
Restoration	50~~44~~	0.00	10.21	0.00
			Subtotal	*1,711.15*
Construction Haul Truck Diesel Demand				
WTG Removal	2,268	313.46~~166.24~~	10.21	30,701.11~~16,281.62~~
~~Restoration~~	~~0~~	~~0.00~~	~~10.21~~	~~0.00~~
Grading and Road Upgrades	0	0.00	10.21	0.00
WTG Foundation Installation	1,820	65.29	10.21	6,394.89
WTG/Met Tower Erection	0	0.00	10.21	0.00
Overhead Electrical Collection System Improvements	242	0.85	10.21	83.36

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

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Geology and Soils

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

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

Findings of Fact:

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

withstand strong seismic ground shaking likely to occur within the design life of the project. Thus, impacts would be less than significant with mitigation incorporated.

Mitigation:

MM-GEO-1 Site design and engineering shall be conducted in conformance with all recommendations as specified in the County Geotechnical Design Report No. 200044 and applicable recommendations specified in any subsequently prepared geotechnical/soils reports for the proposed project.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
14. Landslide Risk a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?	☐	☐	☐	☒

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

Findings of Fact:

a) **No Impact.** The project site encompasses desert terrain that ranges in elevation from 975 to 1,260 feet above mean sea level. In addition, the project site is not adjacent to any steep slopes. Due to the relatively flat topography and the absence of significant slopes the potential for landslides or rockfalls is not considered a hazard for the site, and there would be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
15. Ground Subsidence a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?	☐	☒	☐	☐

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. Slopes				
a) Change topography or ground surface relief features?	☐	☐	☐	☒
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	☐	☐	☐	☒
c) Result in grading that affects or negates subsurface sewage disposal systems?	☐	☐	☐	☒

Source(s): Kimley Horn 2020.

Findings of Fact:

a-c) No Impact. The project site is generally flat with elevations gradually sloping from 1,260 feet above mean sea level in the northwest to approximately 975 feet above mean sea level in the southeast. Based on the current design of the project, mass grading of the site would not be required. Grading activities would be limited to proposed WTG sites, access roads, the met tower site, and temporary construction areas. As such, no major changes would be made to existing topography or ground surface relief; cut or fill slopes greater than 2:1 or higher than 10 feet would not be required. Therefore, there would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. Soils				
a) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

Sources: USDA Soil Conservation Service Soil Surveys; County Geotechnical Design Report No. 200044 (Appendix D of this Initial Study).

Findings of Fact:

a) Less-Than-Significant Impact with Mitigation Incorporated. The Coachella Valley is subjected to frequent wind events throughout each year. One of the windiest locations coincides

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
19. Wind Erosion and Blowsand from project either on or off site. a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?	☐	☒	☐	☐

Source(s): County of Riverside 2019b; Riverside County Ordinance No. 460, Article XV, and Ordinance No. 484; County Geotechnical Design Report No. 200044 (Appendix D of this Initial Study).

Findings of Fact:

a) **Less-Than-Significant Impact with Mitigation Incorporated.** The project site is located at the eastern end of the Banning Pass, which funnels the coastal flow into the Coachella Valley. Wind erosion is common within the project site due to the presence of sandy soils. The proposed project would be influenced by wind erosion and blowsand issues during project construction, primarily associated with earth moving activities during the grading phase. Project operations, when compared with the existing O&M activities that already occur on the project site, would not result in additional workers being located on site for additional durations of time. Thus, the safety and quality of life issues associated with blowsand are not relevant to the proposed project.

Implementation of **RR-GEO-3**, which requires preparation of a Dust Control Plan for the proposed project and adherence with the County's Fugitive Dust and Erosion Control Ordinance, would serve to reduce the effects of wind erosion. In addition, Riverside County Ordinance No. 484 requires protective actions from landowners disturbing sandy or sandy loam soils to prevent substantial quantities of soil from being deposited on public roads and private property. The project applicant would adhere to Ordinance No. 484, implementing protection actions described herein to prevent soil deposition as a result of excavating, leveling, or removing natural or planted vegetation or root crops; by depositing or spreading a substantial quantity of similar soil on said land; by any other act likely to cause or contribute to wind erosion of said land; or to aggravate an existing wind erosion condition.

As previously addressed, the proposed project would be required to comply with SCAQMD Rules 403 and 403.1 to control dust emissions generated during the grading activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites three times per day depending on weather conditions. In addition, the project is required to comply with a project-specific Dust Control Plan prepared by the project applicant and approved by the County. In addition, consistent with **MM-GEO-1**, the site design and engineering shall be conducted in conformance with all recommendations as specified in the County Geotechnical Design Report No. 200044 (Appendix D). such, impacts associated with wind erosion and blowsand would be less than significant with mitigation incorporated.

Table 3-6. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.
Refer to Appendix A for complete results.

As shown in Table 3-6, the estimated total GHG emissions during construction of would be approximately 1,314~~848~~ MT carbon dioxide equivalent (CO_2e) over the construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 44~~28~~ MT CO_2e per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the proposed project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Decommissioning Emissions

Decommissioning of the proposed project would result in GHG emissions, which are primarily associated with use of off-road equipment, on-road vendor trucks, and worker vehicles.

CalEEMod was used to calculate the annual GHG emissions based on the decommissioning scenario described in Section 2.7. Decommissioning of the proposed project is anticipated to commence in January 2053 and would last approximately 5 months. On-site sources of GHG emissions include off-road equipment and off-site sources, including trucks and worker vehicles. Table 3-7 presents decommissioning emissions for on-site and off-site emission sources associated with the proposed project.

Table 3-7. Estimated Annual Decommissioning Greenhouse Gas Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2053	334.15~~130.49~~	0.01~~0.00~~	0.00	334.40~~130.59~~
30-Year Amortization of Construction Emissions				*11.15~~4.35~~*

Source: Air Quality and Greenhouse Gas Emissions Technical Report (Appendix A of this Initial Study)
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.
Refer to Appendix A for complete results.

As shown in Table 3-7, the estimated total GHG emissions during decommissioning of the proposed project would be approximately 334~~131~~ MT CO_2e over the decommissioning period. Estimated project-generated decommissioning emissions amortized over 30 years would be approximately 11~~4~~ MT CO_2e per year.

The combined amortized construction and decommissioning GHG emissions would be approximately 55~~30~~ MT CO_2e per year. Therefore, the total annual emissions would not exceed the County's GHG significance threshold of 3,000 MT CO_2e per year. As such, the GHG emissions generated by the proposed project would be considered less than significant.

GHG Emissions Benefits

In keeping with the renewable energy target under the Scoping Plan and as required by Senate Bill (SB) 100, the proposed project would provide a source of renewable energy to achieve the Renewables Portfolio Standard of 100% by 2045. Renewable energy, in turn, potentially offsets GHG emissions generated by fossil-fuel power plants. The current site produces

not listed in Table 3-8 as they do not apply to the proposed project. Therefore, impacts would be less than significant.

Consistency with the Southern California Association of Governments' 2016–2040 RTP/SCS

SCAG's 2016 RTP/SCS is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2016 RTP/SCS incorporates local land use proposed projections and circulation networks in city and county General Plans (SCAG 2016). The 2016 RTP/SCS is not directly applicable to the proposed project because the underlying purpose of the 2016 RTP/SCS is to provide direction and guidance by making the best transportation and land use choices for future development. As the proposed project does not alter the current use of the property and does not induce growth during operation, development of the proposed project would not conflict with the critical goals of the 2016 RTP/SCS.

On September 3, 2020, SCAG's Regional Council adopted Connect SoCal (2020–2045 RTP/SCS) and the addendum to the Connect SoCal Program Environmental Impact Report. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern (SCAG 2020). It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, planning strategies, and the people whose collaboration can improve the quality of life for Southern Californians. Because the proposed project is not growth inducing, this type of consistency analysis does not apply. However, the major goals of Connect SoCal are outlined in Table 3-9, along with the project's consistency with them.

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

RTP/SCS Measure	Project Consistency
Reduce greenhouse gas emissions and improve air quality.	**Consistent**. The proposed project would result in criteria air pollutant and GHG emissions during construction and operation. However, emissions would not exceed the SCAQMD significance thresholds. The proposed project would also generate renewable energy.
Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent**. The proposed project would generate additional renewable energy, supporting the adaptation to a changing climate.
Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent**. The proposed project would not impact natural lands during construction or operation.

Source: SCAG 2020.
Notes: SCAG = Southern California Association of Governments; RTP/SCS = Regional Transportation Plan/Sustainable Communities Strategy; GHG = greenhouse gas; SCAQMD = South Coast Air Quality Management District.

As shown in Table 3-9, the proposed project would be consistent with all applicable measures within the SCAG Connect SoCal RTP/SCS.

Consistency with the California Air Resources Board's Scoping Plan

The CARB Scoping Plan (approved by CARB in 2008 and updated in 2014 and 2017) provides a framework for actions to reduce California's GHG emissions and requires CARB and other

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

Scoping Plan Measure	Measure	Project Consistency
Ship Electrification at Ports (Shore Power)	T-5	**Not applicable**. The proposed project would not prevent CARB from implementing this measure.
Goods Movement Efficiency Measures 1. Port Drayage Trucks 2. Transport Refrigeration Units Cold Storage Prohibition 3. Cargo Handling Equipment, Anti-Idling, Hybrid, Electrification 4. Goods Movement Systemwide Efficiency Improvements 5. Commercial Harbor Craft Maintenance and Design Efficiency 6. Clean Ships 7. Vessel Speed Reduction	T-6	**Not applicable**. The proposed project would not prevent CARB from implementing this measure.
Heavy-Duty Vehicle GHG Emission Reduction 1. Tractor-Trailer GHG Regulation 2. Heavy-Duty Greenhouse Gas Standards for New Vehicle and Engines (Phase I)	T-7	**Not applicable**. The proposed project would not prevent CARB from implementing this measure.
Medium- and Heavy-Duty Vehicle Hybridization Voucher Incentive Proposed Project	T-8	**Not applicable**. The proposed project would not prevent CARB from implementing this measure.
Medium and Heavy-Duty GHG Phase 2	N/A	**Not applicable**. The proposed project would not prevent CARB from implementing this measure.
High-Speed Rail	T-9	**Not applicable**. The proposed project would not prevent CARB from implementing this measure.
Electricity and Natural Gas Sector		
Energy Efficiency Measures (Electricity)	E-1	**Not applicable**. The proposed project would not prevent CARB from implementing this measure.
Energy Efficiency (Natural Gas)	CR-1	**Not applicable**. The proposed project would not prevent CARB from implementing this measure.
Solar Water Heating (California Solar Initiative Thermal Program)	CR-2	**Not applicable**. The proposed project would not prevent CARB from implementing this measure.
Combined Heat and Power	E-2	**Not applicable**. The proposed project would not prevent CARB from implementing this measure.
Renewables Portfolio Standard (33% by 2020)	E-3	**Consistent.** The proposed project would replace existing aged WTGs with new WTGs to support the Renewables Portfolio Standard.
Renewables Portfolio Standard (50% by 2050)	N/A	**Consistent.** The proposed project would replace existing aged WTGs with new WTGs to support the Renewables Portfolio Standard.
SB 1 Million Solar Roofs (California Solar Initiative, New Solar Home Partnership, Public Utility Programs) and Earlier Solar Programs	E-4	**Not applicable**. The proposed project would not prevent CARB from implementing this measure.

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

Scoping Plan Measure	Measure	Project Consistency
Recycling and Waste Management Sector		
Landfill Methane Control Measure	RW-1	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
Increasing the Efficiency of Landfill Methane Capture	RW-2	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
Mandatory Commercial Recycling	RW-3	**Consistent.** The proposed project would recycle the maximum extent that is feasible in accordance with state and local regulations.
Increase Production and Markets for Compost and Other Organics	RW-3	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
Anaerobic/Aerobic Digestion	RW-3	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
Extended Producer Responsibility	RW-3	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
Environmentally Preferable Purchasing	RW-3	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
Forests Sector		
Sustainable Forest Target	F-1	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
High GWP Gases Sector		
Motor Vehicle Air Conditioning Systems: Reduction of Refrigerant Emissions from Non-Professional Servicing	H-1	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
SF_6 Limits in Non-Utility and Non-Semiconductor Applications	H-2	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
Reduction of Perfluorocarbons (PFCs) in Semiconductor Manufacturing	H-3	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
Limit High GWP Use in Consumer Products	H-4	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
Air Conditioning Refrigerant Leak Test During Vehicle Smog Check	H-5	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
Stationary Equipment Refrigerant Management Program – Refrigerant Tracking/Reporting/Repair Program	H-6	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
Stationary Equipment Refrigerant Management Program – Specifications for Commercial and Industrial Refrigeration	H-6	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
SF_6 Leak Reduction Gas Insulated Switchgear	H-6	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
40% reduction in methane and hydrofluorocarbon (HFC) emissions	N/A	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.
50% reduction in black carbon emissions	N/A	**Not applicable.** The proposed project would not prevent CARB from implementing this measure.

The proposed project would not interfere with implementation of any of the previously described GHG reduction goals for 2030 or 2050 because the proposed project would not exceed the County's threshold of 3,000 MT CO_2e per year. This threshold was established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. Because the proposed project would not exceed the threshold, this analysis provides support for the conclusion that the proposed project would not impede the state's trajectory toward the previously described statewide GHG reduction goals for 2030 or 2050.

In addition, as discussed previously, the proposed project is consistent with the GHG emission reduction measures in the Scoping Plan and would not conflict with the state's trajectory toward future GHG reductions. In addition, given that the specific path to compliance for the state regarding the long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the proposed project would be speculative and cannot be identified at this time. The project's consistency would assist in meeting the County's contribution to GHG emission reduction targets in California. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation is that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet SB 32's 40% reduction target by 2030 and EO S-3-05's 80% reduction target by 2050; this legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets. The proposed project would increase renewable energy production compared to the existing WTGs and thus would support the goals in SB 32 and EO S-3-05. Based on the considerations previously outlined, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and no mitigation is required. This impact would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS Would the project:				
21. Hazards and Hazardous Materials a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

case of accidental release. As such, impacts associated with handling of hazardous materials would be less than significant.

b) **No Impact.** A Phase I Environmental Site Assessment (ESA) was completed for the project site in January 2021 and updated in April 2021 (Appendix E). ~~Three~~ One recognized environmental concerns (REC) ~~were~~ was noted during the site reconnaissance:

- ~~A historic dump site was observed in the southern portion of the site, west of the existing overhead electrical collector system. Various construction materials including scrap wood, scrap metal, concrete blocks, rubber tires, bricks, and metal canisters of unknown contents were observed. No ground disturbance is proposed near the historic dump site.~~
- An automobile junk yard containing concrete debris and with evidence of a previous fire was observed on the adjacent property, north of the overhead electrical collection system, between the western and eastern portions of the project site. The proposed project would affect the junk yard.

The Phase I ESA also identified one Historical REC during the site reconnaissance:

- The substation located in the northeast portion of the site was listed as a on the Emergency Response Notification System database with a spill of approximately 218 gallons of non-polychlorinated biphenyl transformer fluid on January 11, 2005 due to a pad mounted transformer being involved in a flash flood causing a release into the soil and the Whitewater River. The California Office of Emergency Services documented the spill as contained (Cal OES 2005).

In addition, the Phase I ESA identified the following ~~two~~ three Business Environmental Risks within the project site:

- Cement/concrete foundation pads and footings: Thirteen concrete pads were observed throughout the project site. The pads range in size from 192 to 490 square feet. Two of the pads had pipes of unknown origin sticking out of them which may or may not be suggestive of an underlying structure. The project improvements would not affect the subject two pads. The remainder of the existing pads are not considered business environmental risks.
- Vacant concrete block structures: Three vacant concrete structures were observed onsite. Two of the structures, located west of the proposed laydown yard, were single room 17 feet by 13 feet concrete tilt-up structures. The third vacant structure, located west of the existing WTGs that will remain as part of the project, appeared to be approximately five rooms, was constructed out of concrete block with footings, and was possibly used as a residence. Various piping was observed in and around the multiroom structure. The project improvements would not affect any of the identified structures onsite.
- A historic dump site was observed in the southern portion of the site, west of the existing overhead electrical collector system. Various construction materials including scrap wood, scrap metal, concrete blocks, rubber tires, bricks, and metal canisters of unknown contents were observed. Incremental shallow soil sampling was within the entire historic dump site and seven discrete soil samples were taken in areas of high concern. All soil results were below the U.S. Environmental Protection Agency's regional screening level for industrial/commercial soil except for arsenic taken at sample location Tt-DS-3, west

Tank Cleanup Site. The status of the site is "completed -- case closed" as of March 2004 and October 2007. This site does not pose a threat to the project site due to its distance and case closed status.

No indication of the project site was found when consulting the ECHO database; however, the registry did list three sites within 1 mile of the project site. The results of the ECHO database search are listed as follows:

- California Department of Transportation District 8 Palm Springs, 59871 Route 111. Approximately 0.60 miles southwest of the project site, this site is listed in Resource Conservation and Recovery Act as a Small Quantity Generator.
- Whitewater Rock & Supply Co., 58645 Old Highway 60. Approximately 0.47 miles northwest of the project site, this site is listed in Resource Conservation and Recovery Act as a Miscellaneous Store Retailer (other).
- Conditional Use Permit No. 2885 R4, 58500 Old Highway 60. Approximately 0.59 miles northwest of the project site, this site is listed under the Clean Water Act as a general permit covered facility. The general permit expired in 2014.

Each of these sites registered within the ECHO database currently hold the status of "no violation." Although the ECHO registry listed six sites within 1 mile of the project site, the distance of each site and their status as no violation signifies that there would be less-than-significant impacts related to the project site.

The EnviroStor database did not register a federal Superfund, a State Response, Voluntary Cleanup, School Cleanup, Evaluation, School Investigation, Military Evaluation, Tiered Permit, or Corrective Action Site within close proximity to the project site. The closest site is the Torney General Hospital, at 555 East Tachevah Drive, approximately 5.7 miles southeast of the project site; therefore, this is not a threat to the project property.

As a result of the database searches, it was concluded that the project property is not listed within the three search registries pursuant to Government Code Section 65962.5. The registries listed multiple sites within 1 mile of the project site; however, their distance and current status as either "completed-case closed" or "no violation" do not render them a threat to the proposed project. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
22. Airports				
a) Result in an inconsistency with an Airport Master Plan?	☐	☒	☐	☐
b) Require review by the Airport Land Use Commission?	☐	☒	☐	☐
c) For a project located within an airport land use plan or, where such a plan has not been	☐	☒	☐	☐

- In order to ensure proper conspicuity of WTGs at night during construction, all WTGs must be lit with temporary lighting once they reach a height of 200 feet or greater until such a time the permanent lighting configuration is turned on. As the height of the structure continues to increase, the temporary lighting must be relocated to the uppermost part of the structure. The temporary lighting must be turned off for periods when they would interfere with construction personnel. If practical, permanent obstruction lights should be installed and operated at each level as construction progresses. An FAA Type L-810 steady red light fixture shall be used to light the structure during the construction phase. If power is not available, WTGs shall be lit with self-contained, solar powered LED steady red light fixture that meets the photometric requirements of an FAA Type L-810 lighting system. The lights should be positioned to ensure that a pilot has an unobstructed view of at least one light at each level. The use of Notice to Airmen NOTAM (D) to not light WTGs within a project until the entire project has been completed is prohibited.
- Any failure or malfunction that lasts more than thirty minutes and affects a top light or flashing obstruction light, regardless of its position, must be reported immediately to (877) 487-6867 so a NOTAM can be issued. As soon as normal operation is restored, the same number must be notified.
- The maximum top point elevations shall not be amended without further review by the ALUC and FAA; provided, however, that reduction in structure height or elevation shall not require further review by the ALUC.
- Temporary Construction equipment used during actual construction of the structures shall not exceed 492 feet in height and a maximum elevation (amsl) not to exceed the maximum elevation reviewed, unless separate notice is provided to the FAA through the Form 7460-1 process.
- Within 5 days after construction reaches its greatest height, FAA Form 7460-2 (Part II), Notice of Actual Construction or Alteration, shall be completed by the applicant and e-filed with the FAA. This requirement is also applicable in the event the project is abandoned or a decision is mode not to construct the structure.
- To the maximum extent possible, in compliance with FAA guidelines regarding lighting, mitigation measures shall be incorporated into the project that would minimize light pollution to the people on the ground.

The project applicant would be required to implement the above conditions through implementation of MM-HAZ-1. As such, impacts associated with airport hazards would be less than significant with mitigation incorporated.

The FAA uses level and sloping imaginary surfaces to determine if a proposed structure is an obstruction to air navigation. Structures that are identified as obstructions are then subject to a full aeronautical study and increased scrutiny. However, exceeding a Part 77 imaginary surface does not automatically result in the issuance of a determination of hazard. Proposed structures must have airspace impacts that constitute a substantial adverse effect in order to warrant the issuance of a determination of hazard (14 CFR Part 77.17[a][2] and 77.19/21/23). As discussed in Section 2.8.3, the FAA issued Determinations of No Hazard to Air Navigation for all proposed and existing WTGs and proposed met tower.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY Would the project:				
f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
g) Impede or redirect flood flows?	☐	☐	☒	☐
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	☐	☐	☐	☒
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Source(s): County of Riverside 2019b, n.d.; FEMA 2008a, 2008b.

Findings of Fact:

a) **Less-Than-Significant Impact.** Construction of the proposed project would be subject to local and state requirements for erosion control and grading. Because construction activities would disturb 1 or more acres, the project applicant would be required to adhere to the provisions of the NPDES Construction General Permit, implemented through **RR-GEO-1**. Construction activities subject to this permit include clearing, grading, and disturbances to the ground, such as stockpiling and excavating. The NPDES Construction General Permit requires implementation of a SWPPP, implemented through **RR-GEO-2**, which would include BMPs designed to prevent erosion and protect the quality of stormwater runoff. Collectively, these construction BMPs would help retain stormwater and any constituents, pollutants, and sediment contained therein, on the project site, which, in turn, would help prevent water quality impacts to downstream receiving waters during project construction.

During the life of the project, facility operations will primarily involve routine maintenance activities, which are not expected to result in waste discharge nor water quality violations. Thus, impacts would be less than significant.

b) **Less-Than-Significant Impact.** Water usage would be minimal and primarily take place during the construction phase of the project. Water would be brought on site using water trucks for dust control and other on-site construction-related uses. In addition, the proposed project would remove more WTGs than would be constructed and would not include the addition of any buildings or parking lots. Therefore, there would not be an increase in impervious surfaces or any activity that would interfere with groundwater recharge, and impacts would be less than significant.

c) **Less-Than-Significant Impact.** Project construction would only minimally alter existing topography and impede existing drainage flows. The proposed project would involve construction of new WTGs, permanent access roads, collection lines, and other improvements, any of which could potentially impede drainage flows through the project area compared with existing conditions. However, the

Mitigation and Other Measures: The project applicant would implement **RR-GEO-1** and **RR-GEO-2.**

Monitoring: No monitoring is required.

Land Use/Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
LAND USE/PLANNING Would the project:				
24. Land Use				
a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐
b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?	☐	☐	☐	☒

Source(s): County of Riverside 2020a, n.d.; ALUC 2005; CVAG 2016.

Findings of Fact:

a) **Less-Than-Significant Impact with Mitigation Incorporated.**

General Plan Land Use and Zoning Ordinance

Under existing conditions, the project site operates as a commercial wind energy facility. The existing zoning designations within the project site include Wind Energy Resource Zone (W-E), Rural Residential (R-R), and Controlled Development Area (W-2). The project site is within a wind energy corridor, surrounded by existing wind energy development. The proposed project includes decommissioning and removal of 93 existing WTGs and installation of 16 new WTGs up to 492 feet in height. Seven existing WTGs would remain on site.

Change of Zone

A portion of the proposed development area is within the R-R zoning designation, which does not allow development of commercial WTGs. The County's Official Zoning Map shows nine of the existing WTG's permitted by the WECS Permit No. 103 on lands zoned R-R. It appears that the EIR certified prior to approval of Permit No. 103 may have erroneously represented the boundary between the R-R and W-E zoned lands as following the 2/3-mile scenic setback from SR-111.

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

The project applicant is therefore requesting a Change of Zone (CZ2000032) for that southwest portion of the project site that is mapped as zoned R-R, to be rezoned to W-E, as shown on Figure 2-7. Upon approval of the Change of Zone, the proposed area of development within the

site to decrease the scenic setback from 1,320 feet to 1,000 feet from I-10, or approximately 2.03 times the total WECS height. The incremental setback reduction of two WTGs would not be easily perceptible by motorists traveling on I-10 due to presence of other nearby WTGs that make up the primary viewshed along the San Gorgonio Pass corridor.

The WECS, Change of Zone, and Variance applications and the proposed scenic setback reduction would be subject to County plan check review in order to ensure compatibility with on-site and surrounding zoning designations. The process would ensure compliance with all applicable regulations pertaining to height limits, setbacks, design standards, and other specifics.

Public Outreach

The project is located within the Sphere of Influence of both the City of Desert Hot Springs and City of Palm Springs. The project applicant will host three virtual public outreach meetings via Zoom for the proposed project. The first two meetings were held on March 30 and April 13, 2021. Hard copy notices for the first public outreach meeting were mailed to stakeholders, including property owners within 2 miles of the project site, on March 10 and March 16, 2021. An additional hard copy notice was mailed to stakeholders for the two April virtual meetings. In addition, six quarter-page ads will be published in the Desert Sun to advertise the planned virtual meetings to the public.

Coachella Valley Multiple Species Habitat Conservation Plan

The project site is located within the CVMSHCP; 383.39 acres are located within a CVMSHCP Conservation Area, specially the WFCA. The proposed project would result in approximately 20.22 acres of disturbance (permanent and temporary) within the WFCA. As discussed in Section 3.IV.7(a), impacts to biological resources associated with ground disturbance within the CVMSHCP WFCA would be reduced to less-than-significant through implementation of mitigation (**MM-BIO-1**) and project design features as well as compliance with standard regulatory requirements. Furthermore, the project is required to complete a JPR process through the County, with review and concurrence by CVCC, CDFW, and USFWS. A pre-JPR meeting with CVCC, the County, CDFW, USFWS, and the project applicant was held on September 28, 2020. The formal JPR application package was submitted on October 7, 2020. CVCC issued its JPR findings for the project on January 22, 2021 and determined the project is consistent with the CVMSHCP.

Riverside County Airport Land Use Compatibility Plan

As discussed in Section 3.IV.22, the proposed project requires review by the ALUC because the proposed WTGs would exceed 200 feet in height. The FAA Obstruction Determinations are pivotal in providing a basis for ALUC's consistency determination for proposed structures with a height above 200 feet. The project applicant has received FAA Determinations of No Hazard to Air Navigation for all existing and proposed WTGs and the proposed met tower. The project applicant applied for Major Land Use Action Review to the ALUC, and the ALUC found the project consistent with the Airport Land Use Compatibility Plan at a hearing on January 14, 2021, subject to the conditions outlined in Section 3.IV.22(a-c), required to be implemented by **MM-HAZ-1**. Therefore, potential conflicts with the Airport Land Use Compatibility Plan would be avoided through implementation of **MM-HAZ-1**.

In addition, according to Figure 3 of the Western Coachella Valley Area Plan Land Use Plan, the project site is not identified as a mineral extraction and processing facility, nor an area reserved for future mineral extraction and processing. The project site is approximately 25 miles west of a mineral resource designation identified within the Western Coachella Valley Area Plan. Therefore, no impacts associated with mineral resources would occur.

c) **No Impact.** A historic era mining site was identified within the project site during the reconnaissance level survey conducted for the Cultural Resources Report (Appendix C). The mining site is very small, encompassing an area of approximately 175 square feet. The historic mining site is an isolated occurrence and there is no evidence that mining site was part of a larger mining operation or quarry. As such, the proposed project would not expose people or property to hazards from a quarry or mine. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
NOISE Would the project result in:				
26. Airport Noise				
a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Source(s): ALUC 2005.

Findings of Fact:

a) **No Impact.** The project site is not within a designated Noise Compatibility Contour for the Palm Springs International Airport (ALUC 2005). The project site is located approximately 6.1 miles northwest of the airport. As such, the proposed project would not expose people residing or working in the area to excessive airport noise levels.

b) **No Impact.** The project site is not within the vicinity of a private airstrip.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

local general plan or noise ordinance or applicable standards of other agencies would be less than significant.

Long-Term Operational Noise

Pursuant to Section D.12 of Riverside County Ordinance No. 348, a project-specific acoustical study is not required for the proposed project because the nearest habitable structure is greater than 3,000 feet from the nearest proposed WTG. The proposed project is not expected to result in a substantial permanent increase in ambient noise levels in the project vicinity, in comparison to operational noise levels generated by the existing wind energy facility within the project site. WTGs currently operating within the project site would be replaced with new technology that is anticipated to generate less noise. Noise generated during operation of the proposed project is anticipated to be primarily attributed to mobile sources along the public off-site access roadways and on-site access roads. The vehicle mix would be comparable with vehicles that access the current operational wind energy facility within the project site. Therefore, no substantial increase in noise generated during O&M of the proposed project is anticipated. As such, long-term operational impacts associated a substantial permanent increase in ambient noise levels in the project vicinity would be less than significant.

b) **Less-Than-Significant Impact.** Groundborne vibration, also referred to as earthborne vibration, can be described as perceptible rumbling, movement, shaking or rattling of structures and items within a structure. Although groundborne vibration is sometimes perceptible in an outdoor environment, it is not generally deemed a problem unless this form of disturbance is experienced inside a building.

The proposed project is not anticipated to include equipment or activities capable of producing substantial long-term groundborne vibration or groundborne noise levels. The only groundborne vibration potential that would be associated with the proposed project would be with the short-term decommissioning and construction phase. Groundborne vibration from construction and decommissioning activities is typically felt over short distances. The heavier pieces of construction equipment used on site could include cranes, excavators, bulldozers, graders, loaded trucks, and rollers. Additionally, backhoe-mounted impact hammers (hoe rams) or jackhammers may be utilized to remove existing turbine foundations during decommissioning of the existing WTGs. Based on published vibration data, the anticipated construction equipment would generate a maximum root mean square vibration level of approximately 94 vibration decibels at 25 feet from the source (DOT 2006). The closest existing residences are approximately 3,400 feet east of the nearest proposed WTG. For reference, the root mean vibration level for a property over 1,600 feet away resulting from the use of the anticipated construction equipment would be approximately 39.8 vibration decibels. This would be far less than the recommended threshold of 80 vibration decibels for human response within residential structures. Thus, impacts related to groundborne vibration would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Mitigation:

MM-PAL-1 A Paleontological Resources Impact Mitigation Program (PRIMP) shall be prepared and implemented to reduce any potential impacts to significant paleontological resources. The PRIMP shall outline where monitoring is required within the project site based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring (below a depth of 10 feet below the original ground surface) and discoveries treatment, and paleontological methods, reporting, and collections management.

MM-PAL-2 If excavations below a depth of 10 feet below the original ground surface (i.e., 10 feet below the depth of documented artificial fill) are planned for the project, a qualified paleontologist or a qualified paleontological monitor meeting the Society of Vertebrate Paleontology standards must be present to monitor the excavations for paleontological resources. The qualified paleontologist shall determine if the sediments are old enough and fine-grained enough to warrant continued monitoring. If the qualified paleontologist determines paleontological monitoring is not necessary at the 10-foot depth due to subsurface geological conditions, then paleontological spot-checking shall occur at 5-foot increments below 10 feet to determine the suitability for fossil preservation. The qualified paleontologist must produce a final paleontological monitoring report that discusses the paleontological monitoring program, any paleontological discoveries, and the preparation, curation, and accessioning of any fossils into a suitable paleontological repository.

MM-PAL-3 Prior to construction-related excavations, a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP 2010) standards should be retained, attend the pre-construction meeting, and present a worker environmental awareness program (WEAP) to the construction crew. The WEAP should discuss the types of fossils that may potentially be uncovered during project excavations, regulations protecting paleontological resources, and appropriate actions to be taken when fossils are discovered.

Monitoring: Paleontological monitoring is required for ground disturbance greater than 10 feet below the original ground surface, as detailed in **MM-PAL-2.**

Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
POPULATION AND HOUSING Would the project:				
29. Housing				
a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	☐	☐	☐	☒

Findings of Fact:

a) **No Impact.** The Riverside County Fire Department provides fire protection services to the existing wind energy facility within the project site. The fire station nearest the project site is the Riverside County/Desert Hot Springs Station 36, approximately 4.5 miles to the northeast. The proposed project would neither directly nor indirectly induce population growth in the project area. In addition, the project site is already served by the Riverside County Fire Department and the proposed land use would be the same as the existing land use. For these reasons, calls for service originating from the project site are not expected to increase following implementation of the proposed project. Nevertheless, the proposed project would be required to pay applicable development impact fees in compliance with County Ordinance No. 659.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
31. Sheriff Services	☐	☐	☐	☒

Source(s): County of Riverside 2019b; Riverside County Code of Ordinances.

Findings of Fact:

a) **No Impact.** The Riverside County Sheriff's Department provides law enforcement services to the existing wind energy facility within the project site. The nearest patrol station to the project site is the Cabazon Station, located at 50290 Main Street, Cabazon, approximately 8.5 miles to the west. The proposed project would neither directly nor indirectly induce population growth in the project area. In addition, the project site is already served by the Riverside County Sheriff's Department and the proposed land use would be the same as the existing land use. As such, calls for service originating from the project site are not expected to increase following implementation of the proposed project. Nevertheless, the proposed project would be required to pay applicable development impact fees in compliance with County Ordinance No. 659.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
32. Schools	☐	☐	☐	☒

Source(s): County of Riverside n.d.; Riverside County Code of Ordinances.

Findings of Fact:

a) **No Impact.** The Banning Valley Unified School District provides public education services for the project area. As previously discussed, the proposed project would not directly or indirectly induce any population growth in the area, and thus, an increase in school-age children requiring public education is not expected to occur as a result of the proposed project.

Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
RECREATION Would the project:				
35. Parks and Recreation a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	☐	☐	☐	☒

Source(s): County of Riverside 2019a; Riverside County Ordinance No. 460.

Findings of Fact:

a-b) **No Impact.** The proposed project would include decommissioning of 93 existing WTGs within the project site and installation of 16 new WTGs. No recreational facilities are required or proposed within the project site. In addition, the proposed project would not result in an increase in population that would increase the use of existing recreational facilities or generate a need for new recreational services.

c) **No Impact.** The project site is not within the boundaries of any public agency designated to receive land dedication or fees pursuant to Section 10.35 of Ordinance No. 460.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
36. Recreational Trails d) Include the construction or expansion of a trail system?	☐	☐	☐	☒

Source(s): County of Riverside 2019a.

Findings of Fact:

a) **No Impact.** The Western Coachella Valley Area Plan, Figure 8, identifies a historic trail south of the project site that runs northwest–southeast. The nearby historic trail is located off site and

The existing wind energy facility within the project site is maintained by 10 employees for inspection and maintenance of the 100 WTGs. The reduction of WTGs from 100 to 23 would result in reduced frequency of trips to the project site for maintenance purposes. As such, the proposed project would not result in a permanent increase in traffic numbers on nearby local roadways, such as North Indian Canyon Drive.

Ultimately, the proposed project has potential to reduce impacts to the existing roadway system. In addition, the project applicant would be required to pay Transportation Uniform Mitigation Fees prior to issuance of any future building permits. Therefore, the proposed project would not conflict with an applicable plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant.

b) **Less Than Significant Impact.** As discussed in CEQA Guidelines Section 15064.3(b.3), a qualitative analysis of construction traffic VMT was determined to be the appropriate approach for the proposed project. Implementation of the project would result in temporary traffic trips during construction. The majority of truck trips associated with materials and equipment deliveries would likely come from within the Palm Springs and/or Riverside–San Bernardino area because materials and equipment are readily available in the region and acquiring them locally would be more cost-effective than purchasing from more distant locations. Some materials trips would potentially originate from the Ports of Long Beach and Los Angeles, or potentially from other states, due to the specialized nature of the WTG equipment and the limited number of providers. Many temporary workers needed for construction of the project would reside within a 60- to 90-minute drive of the project site. This assumption is based on observations regarding worker commuting habits during construction monitoring efforts for other renewable energy and transmission projects in the California desert. However, it is likely that some specialized construction workers would come from outside a reasonable commute area and would therefore seek temporary housing near the work area.

While some construction truck trips may require high VMT to reach the project site, such trips would be necessary to deliver specialized equipment and materials that are not available locally. Due to the availability of rail lines from the ports and from out of state to the general project area, VMT during construction may be reduced by equipment and materials being hauled via rail to closer locations before being trucked to work sites. Upon completion of construction, all worker commuter trips and truck trips would cease. O&M of the project is expected to generate minimal daily traffic volumes, and VMT is anticipated to be similar to, or less than, that occurring under O&M of the existing wind energy facility. At this time, there are no known applicable VMT thresholds of significance for temporary construction trips that may indicate a significant impact. Project-related construction trips are not considered to require a substantial or sustained increase in VMT compared to regional averages for rural construction projects, nor would they result in temporary emissions increases that could impact plans and policies related to the reduction of GHG emissions by reducing VMT. Therefore, while the project may generate temporary construction trips with VMT from outside the immediate project area, these trips would not affect existing transit uses or corridors and would result in a less-than-significant transportation impact.

Once operational, the proposed project would generate approximately 16 trips per day (8 roundtrips from employees), which would be slightly reduced compared to the existing wind energy facility. Because these trips would be permanent worker trips, it is assumed they would come from within the local area. As such, this nominal number of operational trips would not

Based on the rural nature of Garnet Road, the current average daily trips along the project access route is likely low, and any short-term increase in average daily trips along the access route due to construction traffic would have little impact on the ability of the access road system to handle the traffic load.

Consistent with **MM-TRA-1**, prior to issuance of grading permits, a Traffic Control Plan to minimize traffic flow interference from construction activities would be submitted by the project applicant for review and approval by the County. This Traffic Management Plan would include measures designed to reduce the impact of temporary construction traffic and any necessary lane or street closures. Such measures may include, but are not limited to, providing early notification of closures to the fire and police services, residents, and nearby businesses; the use of signage before and during construction activities that clearly delineates detour routes around the lane and street closures; and use of flaggers to direct traffic in the vicinity of the closure. With the incorporation of mitigation, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.

f) **Less-Than-Significant Impact.** The proposed project would not alter emergency access to, from, or in the vicinity of the project site. Where feasible, the existing network of permanent access roads would be retained and reused for the proposed project. In addition to the existing roads, new segments of permanent access roads would be constructed to accommodate the updated WTG layout. The new permanent access road layout would incorporate applicable federal and local standards regarding internal road design and circulation, particularly those provisions related to emergency vehicle access. In addition, the proposed circulation plan will be reviewed by the Riverside County Fire Department and Riverside County Sheriff's Department as a standard part of the County's review process. Review and approval of the proposed project by these agencies will ensure that the project site has adequate emergency access and that impacts would be less than significant.

Mitigation:

MM-TRA-1 Prior to finalization of plans and specifications, a Traffic Control Plan shall be prepared by the County of Riverside and/or their construction contractor with the purpose of addressing any construction activities that encroach into the public right-of-way. The Traffic Control Plan shall include measures designed to reduce the impact of temporary construction traffic and any necessary lane or street closure. Such measures may include, but are not limited to, providing early notification of closures to the Riverside County Fire Department and Sherriff's Departments, residents, and nearby businesses; the use of signage before and during construction activities that clearly delineates detour routes around the lane and street closures; and use of flaggers to direct traffic in the vicinity of the closure.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
38. Bike Trails	☐	☐	☐	☒

Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places. The appropriate treatment of tribal cultural resources is determined through consultation with tribes. Under existing law, environmental documents must not include information about the location of an archeological site or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act. (Cal. Code Regs. § 15120[d]; Clover Valley Foundation v. City of Rocklin [2011] 197 Cal.App.4th 200, 220). Further, cemeteries, and sacred places and records of Native American places, features, and objects are also exempt from disclosure. (Pub. Resources Code, §5097.9, §5097.993.)

In compliance with Assembly Bill 52 (AB 52), notices regarding the proposed project were mailed to all requesting tribes on December 08, 2020. No response was received from the Colorado River Indian Tribes (CRIT), Morongo Band of Mission Indians, San Manuel, Twenty-Nine Palms, the Cabazon Band or the Torres Martinez Desert Cahuilla Indians. The Quechan deferred to tribes closer to the project area.

Consultations were requested by the Agua Caliente Band of Cahuilla Indians and the Soboba Band of Luiseño Indians. Both Soboba and Agua Caliente were provided with the cultural report. During a meeting held on January 27, 2021 Soboba provided the County Planning Department specific information that the project is situated within a Cultural Landscape which may be considered a Tribal Cultural Resource. In addition, Agua Caliente identified TCR's within and adjacent to the project site.

Both consulting tribes expressed concern that the project area is sensitive for cultural resources and there is the possibility that previously unidentified resources might be discovered during ground disturbing activities. Recommendations were made that would require a Tribal Monitor from the consulting Tribe(s) to be present during grading activities so that any potential Tribal Cultural Resources found during project construction activities will be handled in a culturally appropriate manner. The project will also be required to adhere to State Health and Safety Code Section 7050.5 in the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made.

CEQA requires the Lead Agency to address any unanticipated cultural resources discoveries during Project construction. Therefore, a condition of approval/mitigation measure that dictates the procedures to be followed should any unanticipated cultural resources be identified during ground disturbing activities has been placed on this project. Implementation of **MM-TCR-1 through MM-TCR-4** would ensure that any potential impacts to any previously unidentified Tribal Cultural Resources are reduced to less-than significant levels.

Mitigation:

MM TCR 1 **Unanticipated Resources.** The project applicant or any successor in interest shall comply with the following for the life of the permit. If during ground disturbance activities,

One of the following treatments shall be applied:

1. Preservation–in-place, if feasible is the preferred option. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.
2. Reburial of the resources on the project property. The measures for reburial shall be culturally appropriate as determined through consultation with the consulting Tribe(s)and include, at least, the following measures to protect the reburial area from any future impacts in perpetuity:
   - Reburial shall not occur until all required cataloguing (including a complete photographic record) and analysis have been completed on the cultural resources, with the exception that sacred and ceremonial items, burial goods, and Native American human remains are excluded.
   - No cataloguing, analysis, or other studies may occur on human remains grave goods, and sacred and ceremonial items.
   - Any reburial processes shall be culturally appropriate and approved by the consulting Tribe(s).
   - Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.

MM TCR 4 **Human Remains.** Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant". The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains and any associated items as provided in Public Resources Code Section 5097.98.

Monitoring: Native American monitoring is required all initial ground disturbing activities, as detailed in **MM-TCR-2**.

Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS Would the project:				
40. Water				
a) Require or result in the relocation or construction of new or expanded water, wastewater	☐	☐	☐	☒

b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒

Source(s): Kimley Horn 2020.

Findings of Fact:

a-b) **No Impact.** The proposed project would not generate wastewater that would require treatment at public wastewater treatment facilities. Portable restroom facilities would be used during construction and operation of the project in accordance with County regulations. The proposed project would not necessitate connection to the municipal sewer system, and no on- or off-site wastewater treatment would be required. Therefore, no impacts associated with the wastewater treatment capacity or facilities would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
42. Solid Waste a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	☐	☐	☒	☐

Source(s): CalRecycle 2016, 2018.

Findings of Fact:

a-b) **Less-Than-Significant Impact.** As part of project construction activities, 93 existing WTGs would be decommissioned, and 43 existing utility poles would be replaced along the proposed overhead electrical collection system. As a result, some solid waste, such as metal, fiberglass, and concrete, would be generated. Consistent with applicable County regulations, a portion of construction waste would be recovered and salvaged as designated recyclable and reusable materials. As such, some demolition debris would be diverted from the landfill.

Solid waste that cannot be diverted would likely be taken to the landfills operated by the County. Based on proximity to the project site, the solid waste generated by the proposed project may be disposed of at the Edom Hill Transfer Station, located approximately 9.5 miles east of the project site. Solid waste deposited at the Edom Hill Transfer Station would ultimately be disposed of at the Lamb Canyon Landfill or the Badlands Landfill, located approximately 22

Utility easements of record would be reviewed, and unauthorized disturbance would be prohibited by law.

The proposed project would not result in increased demand for electricity, natural gas, communication systems, street lighting, or other government services, nor physically impact utility infrastructure to a level that construction of new or expansion of existing facilities and services are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
WILDFIRE If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:				
44. Wildfire Impacts a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

Source(s): County of Riverside 2019b; CAL FIRE 2007.

Findings of Fact:

a) **Less-Than-Significant Impact.** The proposed project would not alter emergency access in or out of the project site, nor within the surrounding vicinity. The majority of the vehicle and truck transports would be standard sized and would not result in blockages of local roadways. Construction could require temporary detours or blockages of local roadways during the

on all WTGs within the project site, the project would not increase wildfire risk over existing conditions. Therefore, implementation of the proposed project would not exacerbate wildfire risks in the project area.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:				
45. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Source(s): All sources previously identified in Section 3.IV.1 through Section 3.IV.44.

Findings of Fact:

a) **Less-Than-Significant Impact with Mitigation Incorporated.** As concluded in Sections 3.IV.7 and 3.IV.8 of this document, all potential impacts discussed can be mitigated to a less-than-significant level for these resources.

As described in Section 3.IV.7(a), the proposed project would require ground disturbance within the CVMSHCP WFCA. To reduce impacts to modeled habitat in the WFCA, the project applicant will convey a 248.12-acre parcel, identified herein as the Set-aside Parcel, to the CVCC as a contribution to the CVMSHCP through implementation of **MM-BIO-1** for conservation of modeled species habitats, fluvial and aeolian sand transport, and biological corridors acreage. Furthermore, as described in this same section, the project is subject to a number of regulatory requirements and will implement other project design features to avoid or reduce potential impacts to biological resources.

As described in Section 3.IV.8, the proposed project would not result in impacts to any known historic or archaeological resources. Nonetheless, it is possible that archaeological resources would be encountered at subsurface levels during ground-disturbing construction activities. To reduce potential adverse effects to unknown archaeological deposits during project implementation, the County has determined conditions of approval are required, through implementation of **MM-CUL-1 through MM-CUL-3**.

The County determined the project has potential to affect Tribal Cultural Resources based on information provided to the County during Native American consultation, pursuant to AB 52.

~~public services, recreation,~~ utilities and service systems, and wildfire. Impacts would be minimized or avoided through project design and compliance with existing policies or regulations. ~~Mitigation would be required to reduce potentially significant impacts related~~ Specific to biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, paleontological resources, ~~and~~ transportation, and Tribal Cultural Resources, implementation of project design features, compliance with regulatory requirements, and mitigation would be required to reduce potentially significant impacts to less than significant levels. The information and analysis below includes cumulative impacts for projects whose impacts have potential to combine or overlap within those of the project, including wind projects within the already established San Gorgonio Pass Wind Energy Policy Area. The cumulative information is also provided with the understanding that for repower projects, the reasonable metric used includes a comparison of the change between existing baseline conditions (existing wind energy projects) and the proposed repowering of these existing projects, and where information, if any, is known or can be assumed.

Aesthetics. As discussed in Section 3.IV.1 of the Draft IS/MND, project impacts associated with scenic vistas, scenic resources, and visual character were determined to be less than significant. Recently constructed and proposed wind energy projects within the San Gorgonio Pass area are wind repower projects that would replace existing legacy WTGs with modern energy-efficient WTGs. While larger WTGs would replace existing WTGs, each would require their own assessment to determine significance as compared to the baseline (existing conditions). The established San Gorgonio Pass is intended to be developed with wind energy projects, but the total number of WTGs would be substantially reduced with repower projects and the layout of WTGs would result in greater spacing and less visual clutter. In addition, despite the increased scale and blade length, operation of the new WTGs and blades would display similar vertical lines and light gray colors as the existing WTGs and modern WTGs on nearby parcels. All construction/decommissioning activities for the proposed project would be of short duration, if observed from any one viewpoint. As such, in the context of, and in combination with, past, present, and reasonably foreseeable future projects, the proposed project would not incrementally contribute to a cumulatively considerable visual impact during construction, operation, or decommissioning.

Air Quality. As discussed in Section 3.IV.6(b) of the Draft IS/MND, project emissions associated with construction, operation, and future decommissioning would not exceed applicable SCAQMD regional thresholds for daily or annual pollutant emissions and would be less than significant. Potential fugitive dust impacts associated with other projects in the area would also be minimized through compliance with SCAQMD regulatory requirements. Per SCAQMD criteria, less-than-significant impacts at the project level are not cumulatively considerable (SCAQMD 2003) in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Biological Resources. The cumulative analysis for biological resources used the CVMSHCP coverage area as the geographic scope. The project site is within the CVMSHCP boundaries, and the species and associated habitats affected by construction of new WTGs (and decommissioning of existing WTGs) would be similar to those considered for all projects within the CVMSHCP boundaries. Specific to the CVMSHCP, projects cannot conflict with CVMSHCP as determined through the CEQA review process, and if located within a designated conservation area, projects such as the proposed project, are also subject to the JPR process.

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

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

Cultural Resources. The majority of ground disturbance associated with the proposed project and other wind repower projects would occur within already disturbed areas. Ultimately, these wind repower projects include decommissioning of existing legacy WTGs and installation of fewer energy-efficient WTGs, which would result in an overall reduction in ground disturbance. As discussed in Section 3.IV.9, no known cultural resources were identified within the proposed area of disturbance. Potential inadvertent impacts to cultural resources would be avoided/minimized through preparation of a Cultural Resource Monitoring Program (CRMP) prior to ground disturbance; implementation of the CRMP, including construction monitoring; and, if necessary, artifact disposition prior to Grading Permit Final Inspection. Other wind repower projects in the vicinity include similar measures to avoid/minimize inadvertent impacts to cultural resources during ground-disturbing construction activities. Given that any recorded (known) cultural resources on other project sites are generally confidential, it's not possible to fully evaluate cumulative impacts in the area. Nevertheless, based on standard requirements for all projects to address these resources, known or unknown, the project's incremental contribution to impacts on cultural resources would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Energy. As discussed in Section 3.IV.10 of the Draft IS/MND, the proposed project would not result in wasteful consumption of energy during construction/decommissioning activities, and would generate an additional 25,794 MWh of energy per year during operations compared to the existing conditions. All cumulative wind repower projects in the area would result in energy efficient generation due to replacement of legacy turbines with modern energy-efficient WTGs. As such, the project would not contribute to a cumulatively considerable impact to energy resources.

Geology and Soils. Seismic hazards are rarely project-related. Implementation of the proposed project would not increase the likelihood of seismic events within the project area. Nevertheless, as discussed in Section 3.IV.11 through 3.IV.19 of the Draft IS/MND, the proposed project would minimize potential for seismic hazards to affect the proposed WTGs through compliance with the recommendations in the project-specific geotechnical design report. In addition, potential impacts associated with soil erosion would be minimized through compliance with applicable regulations, including the Construction General Permit. Other wind repower projects in the San Gorgonio Pass would be assumed to include similar measures and engineering/design, thus reducing the effects of any potential impacts associated with seismic hazards and soils. The proposed project, in combination with other past, present or reasonably foreseeable future projects, would not result in a cumulatively significant impact associated with geology and soils.

the vicinity are similarly required to analyze the specific site conditions and implement measures to minimize impacts to paleontological resources. Therefore, the project's contribution to impacts on paleontological resources would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Transportation. As discussed in Section 3.IV.37, project operations would not generate new vehicle trips during operation. During project construction, temporary transportation impacts would be mitigated through implementation of a Traffic Control Plan approved by the County. In addition, other wind energy projects in the vicinity generally do not generate traffic during operation but must adhere to similar measures to avoid transportation impacts during construction activities. As such, the proposed project would not incrementally contribute to a cumulatively considerable impact.

Tribal Cultural Resources. The proposed project and other wind energy projects in the area, considered in the cumulative analysis are repower projects that generally reduce ground disturbance by removing more WTGs than are subsequently replaced. As discussed in Section 3.IV.39 of the Draft IS/MND, the proposed project would minimize impacts to unknown buried TCRs with implementation of Native American construction monitoring; compliance with procedures for inadvertent discovery of TCRs; appropriate artifact disposition; and correct handling of human remains pursuant to PRC Section 5097.98. All of these types of discretionary projects are subject to AB 52 Tribal consultation. Therefore, the project's incremental contribution to impacts on TCRs would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Utilities and Service Systems. The proposed project would have no impact on water, wastewater and stormwater infrastructure. As discussed in Section 3.IV.42 of the Draft IS/MND, solid waste generated during decommissioning of existing WTGs and construction activities would be minimized through implementation of a Recycling Plan approved by the County. The proposed project and other cumulative projects would be required to comply with applicable federal, state and local regulations pertaining to solid waste. Therefore, the project's contribution to impacts on solid waste resources would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Wildfire. As discussed in Section 3.IV.42 of the Draft IS/MND, the project site is not within a fire hazard severity zone. As such, the project's short-term contribution to wildfire risk during construction activities would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Summary. Based on the analysis in this document, the project's contribution to environmental impacts would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects. As such, cumulatively considerable impacts associated with the proposed project would be less than significant with mitigation incorporated.

Mitigation and Other Measures: Implementation of **MM-BIO-1**, **PDF-BIO-1 through PDF-BIO-3**, **RR-BIO-1 through RR-BIO-7**, **MM-CUL-1 through MM-CUL-3**, **MM-GEO-1**, **RR-GEO-1**, **RR-GEO-2**, **MM-HAZ-1**, **MM-PAL-1 through MM-PAL-3**, and **MM-TRA-1**, and **MM-TCR-1 through MM-TCR-4** are required.

Monitoring: Implementation of **PDF-BIO-3**, **MM-CUL-1**, **MM-PAL-2**, and **MM-TCR-2** are required.

V. EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

Earlier Analyses Used, if any: Commercial WECS Permit Nos. 103 and 107

Location Where Earlier Analyses, if used, are available for review:

County of Riverside Planning Department
4080 Lemon Street 12th Floor
Riverside, California 92501

County of Riverside. n.d. "Map My County GIS Database." Accessed November 2020.

County of Riverside. 2015a. *Riverside County General Plan. Circulation Element.* December 8, 2020.

County of Riverside. 2015b. *Riverside County General Plan. Multipurpose Open Space Element.* December 8, 2015.

County of Riverside. 2015c. *Riverside County General Plan. Noise Element.* December 8, 2015.

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County of Riverside. 2019a. *Western Coachella Valley Area Plan.* December 2019.

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County of Riverside. 2019c. *Climate Action Plan Update.* November 2019. Accessed October 2020. https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf.

County of Riverside. 2020. *Riverside County General Plan. Land Use Element.* August 4, 2020.

County of Riverside. 2020b. Business Plans. Accessed November 11, 2020. https://www.rivcoeh.org/OurServices/HazardousMaterials/HazardousMaterialsDisclosure .

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Curlee, E. 2020. "Valley Fever." Email between E. Curlee (County of Riversides) and A. Poll (Dudek). October 29, 2020.

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CVAG. 2017a. *Transportation Project Prioritization Study.* Prepared by Michael Baker International. https://www.cvag.org/library/pdf_files/trans/Transportation_Documents/CVAG%20TPPS%202017-04-27%20rev2017-06-26.pdf.

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McCary et al. 1984. McCrary, M. D., R. L. McKernan, R. E. Landry, W. D. Wagner, and R. W. Schreiber. 1984. (As cited in Anderson et al. 2005.) Nocturnal avian migration assessment of the San Gorgonio wind resource study area, fall 1982. Report prepared for Research and Development, Southern California Edison Company.

McCary et al. 1986. McCrary, M. D., R. L. McKernan, and R. W. Schreiber. 1986. (As cited in Anderson et al. 2005.) San Gorgonio wind resource area: Impacts of commercial wind turbine generators on birds, 1985 data report. Prepared for Southern California Edison Company. 33 pp.

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SCAG (Southern California Association of Governments). 2016. *The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. April 2016. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf.

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