Section ES
Executive Summary

INTRODUCTION

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15123, this section summarizes the proposed project, significant impacts, and proposed mitigation measures. The summary is organized around the following topics:

- Purpose of the Environmental Impact Report
- Project Synopsis
- Scope of the EIR
- Summary of Significant Effects
- Issues to Be Resolved by the Decision-Making Body
- Summary Table
- Summary of Project Alternatives

PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

This Environmental Impact Report (EIR) has been prepared for the County of San Bernardino (County), acting as the lead agency under CEQA Guidelines Sections 15050 and 15367, to analyze the potential environmental effects associated with implementation of the proposed Daggett Solar Power Facility Project.

An EIR is a public informational document used in the planning and decision-making process. The purpose of the EIR is to demonstrate that the County has made a good faith effort at disclosing the potential for the project to result in significant impacts to the physical environment. As such, the EIR does not consider potential fiscal impacts, cost-benefit assessment, or social impacts. Nor does the EIR present recommendations to the decision-making bodies for approval or denial of the project based on the environmental findings. Rather, the EIR is intended to provide additional information about the project when, if, and at which time it is reviewed and considered by the County in its discretionary decision-making.

The County will consider the information in the EIR, public and agency comments on the EIR, and testimony at public hearings in their decision-making process. The public review comments will be incorporated and addressed in the Final EIR. The purpose of an EIR is to identify:

- Significant impacts of the proposed project on the environment and indicate the manner in which those significant impacts can be avoided or mitigated.
- Any unavoidable adverse impacts that cannot be mitigated.
- Reasonable and feasible alternatives to the proposed project that would eliminate any significant adverse environmental impacts or reduce the impacts to a less than significant level.

An EIR also discloses cumulative impacts, growth-inducing impacts, and impacts found not to be significant. CEQA requires that an EIR reflect the independent judgment of the lead agency regarding the impacts, disclose the level of significance of the impacts both without and with mitigation, and discuss the mitigation measures proposed to reduce the impacts.

The EIR is circulated to the public and other agencies that may have jurisdiction over affected lands or resources, such as the California Department of Fish and Wildlife. The purposes of public and agency review of an EIR include sharing expertise, disclosing agency analyses, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counter proposals.

This EIR is being distributed to agencies, organizations, and interested groups and persons for a 45-day review period in accordance with CEQA Guidelines Section 15087. The County will consider and respond to all written comments received during the review period prior to any action being taken on the project.

PROJECT SYNOPSIS

Daggett Solar Power 1 LLC, a subsidiary of Clearway Energy Group LLC, proposes constructing and operating a utility-scale, solar photovoltaic (PV) electricity generation and energy storage facility with associated on-site substations, inverters, fencing, roads and supervisory control and data acquisition system that would produce up to 650 megawatts (MW) of power and include up to 450 MW of battery storage capacity on approximately 3,500 acres of land. The proposed project would utilize existing electrical transmission infrastructure adjacent to the existing Coolwater Generating Station, a recently retired natural gas-fired power plant, to deliver renewable energy to the electric grid.

The proposed project site is flat and is generally bounded by the town of Daggett approximately 0.5 mile to the west; the Mojave River, Yermo, and Interstate 15 to the north; Barstow Daggett

Airport, Route 66, and Interstate 40 to the South; and Newberry Springs and Mojave Valley to the east.

SCOPE OF THE EIR

In accordance with CEQA Guidelines Section 15082, the County prepared and distributed a Notice of Preparation (NOP) of Environmental Impact Report for the proposed project that was circulated for public review on March 26, 2018. The NOP comment period is intended to notify responsible agencies, trustee agencies, and the public that the County, acting as the lead agency, would be preparing an EIR for the project. The County determined the scope of the analysis for this EIR as a result of initial project review and consideration of agency and public comments received in response to the NOP.

Section 1.0, Introduction, summarizes issues and areas of concern and/or controversy related to the proposed project, as presented to the County by agencies and the public during the NOP review period. For more information regarding the NOP process, refer to Section 1.0. The NOP and the NOP comments are included as **Appendix A** to this EIR.

As demonstrated in the comments received from state and local agencies and members of the public, issues of concern and/or opposition include concerns regarding: dust impacts from ground disturbance, impacts on airport operations, impacts to biological resources, exposure to Valley Fever from ground disturbance, impacts to water supply and quality, impacts to distant scenic views, visual character of the site and its surroundings, and adverse light and glare impacts.

SUMMARY OF SIGNIFICANT EFFECTS

Based on the analysis within this EIR, all potentially significant environmental impacts can be mitigated to less than significant with exception of Air Quality (construction) and Hydrology and Water Quality (groundwater). Refer to Sections 3.3 and 3.9, respectively, for a detailed discussion of such impacts.

ISSUES TO BE RESOLVED BY THE DECISION-MAKING BODY

An EIR is an informational document intended to inform decision-makers and the public of the significant effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the proposed project. As the lead agency, San Bernardino County must respond to each significant effect identified in this EIR by making “findings” for each significant effect. As part of the decision-making process, the County must determine whether or how to mitigate the associated significant effects of the project, including whether to implement a project alternative. Approval of the project despite identified significant and

unavoidable environmental impacts would require a Statement of Overriding Considerations, explaining why the benefits of the project outweigh the environmental effects, as set forth in this document.

SUMMARY TABLE

Table ES-1, Environmental Impact Summary, identifies the areas of environmental impact the project will generate, and when feasible, mitigation measures to reduce those potential impacts.

Table ES-1:
Environmental Impact Summary

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
Aesthetics and Visual Resources			
3.1-1 Would the project have a substantial adverse effect on a scenic vista?	No Impact	None required	No Impact
3.1-2 Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less than Significant	None required	Less than Significant
3.1-3 Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	Less than Significant	None required	Less than Significant
3.1-4 Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than Significant	None required	Less than Significant
3.1-5 Would the project result in cumulative aesthetic impacts?	Less than Significant	None required	Less than Significant
Agriculture and Forestry Resources			
3.2-1 Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	Less than Significant	None required	Less than Significant

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.2-2 Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?	No impact	None required	No impact
3.3-3 Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No Impact	None required	No Impact
3.2-4 Would the project result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	None required	No Impact
3.2-5 Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use?	Less than Significant	None required	Less than Significant
3.2-6 Would the project result in a cumulative impact related to agricultural and forestry resources?	Less than Significant	None required	Less than Significant

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
Air Quality			
3.3-1 Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant	**AIR-1** Prior to the issuance of grading permits, the project applicant shall submit an Air Quality Construction Management Plan to the County for review and approval. The plan shall describe the fugitive dust control measures which would be implemented and monitored at all locations of proposed project construction. The plan shall comply with the mitigation measures described in the Fugitive Dust Control Rules enforced by the Mojave Desert Air Quality Management District (MDAQMD) (Rules 403 and 403.2), San Bernardino County Development Code Sections 83.01.040 and 84.29.035, as well as the existing State Implementation Plan available for PM_{10} and $PM_{2.5}$. The plan shall be incorporated into all contracts and contract specifications for construction work. The plan shall outline the steps to be taken to minimize fugitive dust generated by construction activities by: • Describing each active operation that may result in the generation of fugitive dust. • Identifying all sources of fugitive dust, e.g., earthmoving, storage piles, vehicular traffic. • Describing the control measures to be applied to each of the sources identified. The descriptions shall be sufficiently detailed to demonstrate that the best available control measures required by air districts for solar projects are used. • Providing the following control measures, in addition to or as listed in the applicable rules, but not limited to: o Manage and limit disturbance of ground surfaces from vehicle traffic, excavation, grading, vegetation removal, or other activities to lower the potential for soil detachment and reduce dust transport. Only trim vegetation (mow and roll) in areas where solar panels will be installed, rather than remove vegetation entirely (clear and grub) followed	Significant and Unavoidable (Construction Phase Only)

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		by excavation or grading where feasible. This process lessens the level of ground disturbance and leaves the root system in place for quicker regeneration of vegetative cover. ○ Maintenance and access vehicular roads and parking areas shall be stabilized with water, chemicals or gravel or asphaltic pavement sufficient to minimize visible fugitive dust from vehicular travel and wind erosion and comply with MDAQMD Rule 403.2. Actions, including sweeping sealed roads, use of stabilized construction/facility entrances, and, if needed, using one or more entrance/exit vehicle tire wash apparatuses, shall be taken to prevent project-related track-out. Any project-related track-out must be cleaned within 24 hours. ○ All perimeter fencing, as applicable, shall be wind fencing or the equivalent, to a minimum of 4 feet of height or the top of all perimeter fencing. The owner/operator shall maintain the wind fencing as needed to keep it intact and remove windblown dropout. Strategically placed wind barrier fencing, to be constructed as part of the construction and operation phases (in locations shown in Exhibit 3.3-1, Wind Fence Locations) would be maintained to minimize dust blowing in the direction of the adjacent residences or the Barstow-Daggett Airport. ○ Use natural vegetation to stabilize disturbed or otherwise unstable surfaces to the extent feasible. A water truck shall be used to maintain most disturbed surfaces and to actively spread water during visible dusting episodes to minimize visible fugitive dust and limit emissions to 20 percent opacity in areas where grading occurs, within the staging areas, and on any unpaved roads. For projects with exposed sand or fines deposits (and for projects that expose such soils through earthmoving), chemical	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		stabilization or covering with a stabilizing layer of gravel may be required to eliminate visible dust/sand from sand/fines deposit, if water application does not achieve stabilization. Other controls could include application of hydromulch (with seed for re-establishment of vegetation), application of soil binders, or even the use of soil cement for particularly unstable areas. ○ Minimize the idling time of diesel-powered construction equipment to two minutes, except in extreme heat events where workers require conditioned air to avoid health and safety issues. ○ All trucks and equipment, including their tires, shall be washed off prior to leaving the site. ○ On-site vehicle speed shall be limited to 15 miles per hour. ○ The following signage shall be erected not later than the commencement of construction: A minimum 48-inch-high by 96-inch-wide sign containing the following information shall be located within 50 feet of each project site entrance, meeting the specified minimum text height, black text on white background, on 1-inch A/C laminated plywood board, with the lower edge between 6 and 7 feet above grade, with the contact name of a responsible official for the site and a local or toll-free number that is accessible 24 hours per day. "Site Name" (4-inch text) "Project Name/Project Number" (4-inch text) IF YOU SEE DUST COMING FROM THIS PROJECT, CALL: (4-inch text) [Contact Name]. PHONE NUMBER: XXX-XXX-XXXX (6-inch text) IF YOU DO NOT RECEIVE A RESPONSE, PLEASE CALL the MDAQMD at 1-800-635-4617. (3-inch text)	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		• The project applicant or its designated representative shall obtain prior approval from the MDAQMD prior to any deviations from fugitive dust control measures specified in the approved Air Quality Construction Management Plan. A justification statement used to explain the technical and safety reason(s) for the substitute dust control measures required shall be submitted to the appropriate agency for review. • The provisions of the Air Quality Construction Management Plan shall also apply to project decommissioning activities. **AIR-2** All off-road construction equipment shall comply with the US Environmental Protection Agency's final Tier 4 exhaust emission standards.	
3.3-2 Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Potentially Significant	Mitigation measures **AIR-1** and **AIR-2**	Significant and Unavoidable (Construction Phase Only)
3.2-3 Would the project expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant	**AIR-3** Prior to the issuance of grading or building permits, the project applicant shall develop a Dust Control Plan (DCP) per the requirements of MDAQMD Rule 403.2. The DCP shall comply with MDAQMD Rules 403 and 403.2 to control fugitive dust, including PM_{10}, by addressing objectives, key contacts, roles and responsibilities, dust sources, and control measures. The DCP shall address the following sources: • Project-created dust sources • Disturbed surfaces • Unstable surfaces • Unpaved roads • Paved roads • Unspecified sources	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		To mitigate each of the sources identified above during facility operation, including post-closure of a facility, there are often multiple mitigation measures available that can feasibly mitigate impacts to less than significant levels. The DCP would include but not be limited to the following measures: • **Limit Ground Disturbance.** Manage and limit disturbance of ground surfaces from vehicle traffic, excavation, grading, vegetation removal, or other activities to lower the potential for soil detachment and reduce dust transport. Only trim vegetation (mow and roll) in areas where solar panels will be installed, rather than remove vegetation entirely (clear and grub) followed by excavation or grading where feasible. This process lessens the level of ground disturbance and leaves the root system in place for quicker regeneration of vegetative cover. • **Vegetation.** Use natural vegetation to stabilize disturbed or otherwise unstable surfaces to the extent feasible. • **Wind Fencing.** Strategically placed wind barrier fencing shall be installed as part of the construction and operation phases (shown in **Exhibit 3.3-1, Wind Fence Locations**) and be maintained to minimize dust blowing in the direction of the adjacent residences or the Barstow-Daggett Airport. Wind barrier fencing should be inspected by the contractor no less than once quarterly and repaired or replaced as needed to maintain full functionality. Any accumulated sediment would be removed and either re-distributed onsite or transferred off-site for use or disposal elsewhere. • **Surface Treatment.** Water trucks shall apply water and/or other controls to minimize the production of airborne dust, and limit emissions to 20 percent opacity in areas where grading occurs, within the staging areas, and on any unpaved roads used during project construction. Other controls could include application of hydromulch (with seed	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		for re-establishment of vegetation), application of soil binders, or even the use of soil cement for particularly unstable areas. • **Vehicle Speed Limits.** Vehicle speed shall be limited speeds to 15 mph. Speed limit signs shall be displayed prominently at all project/facility entrances. • **Street Sweeping.** Sealed roads shall be swept as needed and track out opportunities limited through the use of stabilized construction/facility entrances or, if necessary, with one or more entrance/exit vehicle tire wash apparatuses.	
3.3-4 Would the project create objectionable odors affecting a substantial number of people?	Less than Significant	None required	Less than Significant
3.2-5 Would the project result in cumulative impacts related to air quality?	Potentially Significant	Mitigation measures **AIR-1**, **AIR-2**, and **AIR-3**	Significant and Unavoidable (Construction Phase Only)
Biological Resources			
3.4-1 Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	Potentially Significant	**BIO-1** To avoid construction-level impacts to desert tortoise, not more than 45 days prior to ground-disturbing activities for the construction and/or decommissioning phase(s), qualified personnel shall perform a preconstruction clearance survey for desert tortoise. If the species is present on-site, individual(s) shall be allowed to leave the site on their own, and in consultation with California Department of Fish and Wildlife (CDFW), the applicant may be required to install exclusionary/perimeter fencing, with mesh attached to the fence fabric extending from approximately 12 inches below grade to approximately 24 inches above grade to ensure no tortoises re-enter the work limits. No person(s) shall be allowed	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		to touch a tortoise without authorization from the US Fish and Wildlife Service (USFWS) and CDFW. Disturbance activities shall be monitored, as follows: • Environmental awareness training shall be provided for all construction personnel to educate them on desert tortoise, protective status, and avoidance measures to be implemented by all personnel, including looking under vehicles and equipment prior to moving. If tortoises are encountered, such vehicles shall not be moved until the tortoises have voluntarily moved away from them or a qualified biologist has moved the tortoises out of harm's way. • If a tortoise is present, a biological monitor shall be present during all disturbance activities in the vicinity of exclusionary fencing (if required) and shall have the authority to stop work as needed to avoid direct impacts to tortoises. Periodic biological inspections and maintenance shall be conducted during the construction period to ensure the integrity of exclusionary fencing (if required). Work may proceed within the excluded area when the biologist confirms all tortoises have left the excluded area. • Should tortoises be found during construction activities, the biological monitor shall have the authority to stop work as needed to avoid direct impacts to tortoises, and further consultations with the USFWS and CDFW shall take place. • Trash and food items shall be contained in closed containers and removed daily to reduce attractiveness to opportunistic predators of desert tortoise (e.g., ravens, coyotes, feral dogs). • Employees shall not bring pets to the construction site, which may predate on tortoises.	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		BIO-2 To avoid construction-level impacts to burrowing owl, not more than 45 days prior to project disturbance activities, qualified personnel shall perform a preconstruction clearance survey for burrowing owl in accordance with CDFW guidelines. If the species is present on-site and/or within 500 feet of the site, the biologist shall prepare and submit a passive relocation plan to the CDFW for review/approval and shall implement the approved plan to allow commencement of disturbance activities on-site. Fencing or flagging shall be installed at a 250-foot radius from occupied burrows to create a non-disturbance buffer area where no work activities may be conducted. Through consultation with the CDFW, the non-disturbance buffers/fence lines may be reduced to 160 feet if all project-related activities that might disturb burrowing owls would be conducted during the nonbreeding season (i.e., September 1 through January 31). If avoidance of an occupied burrow is infeasible, the owls may be passively relocated by a qualified biologist during the non-breeding season, in accordance with the passive relocation plan. (Note: Occupied burrows may not be disturbed during the breeding season [February 1 to August 31].) At a minimum, the plan shall include the following performance standards: • Excavation shall require hand tools. Sections of flexible plastic pipe or burlap bag shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. One-way doors shall be installed at the entrance to the active burrow and other potentially active burrows within 160 feet of the active burrow and monitored for at least 48 hours after installation. If burrows will not be directly impacted by the project, one-way doors shall be installed to prevent use and shall be removed after ground-disturbing activities have concluded in the area.	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		Only burrows that will be directly impacted by the project shall be excavated and filled. • Detailed methods and guidance for passive relocation of burrowing owls to off-site "replacement burrow site(s)" consisting of a minimum of two suitable, unoccupied burrows for every burrowing owl or pair to be passively relocated. • Monitoring and management of the replacement burrow site(s) and a reporting plan. The objective shall be to manage the replacement burrow sites for the benefit of burrowing owls (e.g., minimizing weed cover), with the specific goals of maintaining the functionality of the burrows for a minimum of 2 years. If preconstruction surveys indicate construction activities would occur within 500 feet of off-site occupied burrows during the breeding season (February 1 through August 31), qualified personnel shall monitor project disturbance activities and the off-site active burrows to ensure they are not being adversely affected. If so, the biologist in consultation with the CDFW shall implement additional measures to avoid such disturbances of active nesting efforts. **BIO-3** To avoid construction level impacts to desert kit fox, at least 45 days prior to project ground disturbance activities during the construction phase, a Desert Kit Fox Management Plan shall be prepared and submitted to the County and the CDFW that (1) incorporates pre-approval survey data of the desert kit fox population; (2) identifies preconstruction survey methods for kit foxes; (3) describes preconstruction and construction-phase biological monitoring and passive relocation methods, or outlines any identified CDFW permit and Memorandum of Understanding requirements for active relocation, if either are necessary; and (4) includes contingency measures if canine distemper is documented in any individuals on-site.	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		BIO-4 To avoid construction-level impacts to desert kit fox, not more than 45 days prior to project disturbance activities, qualified personnel shall perform a preconstruction clearance survey for desert kit fox in accordance with CDFW guidelines. Surveys shall also consider the potential presence of active dens within 100 feet of the boundaries of the on-site disturbance footprint, access roads, and selected alignment for the gen-tie line. If dens are detected, each shall be classified as either inactive, potentially active, or definitely active, and the following actions taken: • Inactive dens that would be directly impacted shall be excavated by hand and backfilled to prevent reuse by kit fox. • Potentially and definitely active dens that would be directly impacted shall be monitored by a biologist for 3 consecutive nights using a tracking medium (e.g., diatomaceous earth, fire clay) and/or infrared camera stations at the den entrance. • If no tracks are observed or no photos of the species are captured after 3 nights, the den shall be excavated and backfilled by hand. • If tracks are observed, the den entrance shall be progressively blocked with natural materials (e.g., rocks, dirt, sticks, vegetation) for the next 3 to 5 nights to discourage the fox from continued use of the den. After verification that the den is unoccupied, it shall then be excavated and backfilled by hand to ensure no foxes are trapped in the den. • If an active natal den (i.e., with pups) is detected on-site, per the procedures above, the CDFW shall be contacted within 24 hours to determine the appropriate course of action to minimize the potential for harm or mortality. The course of action shall depend on the age of the pups, on-site location of the den (e.g., central area, perimeter), status of the	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		perimeter fence (completed or not), and pending construction activities proposed near the den. A 500-foot non-disturbance buffer shall be maintained around all active natal dens. The following measures are required to reduce the likelihood of distemper transmission: • No pets shall be allowed on-site prior to or during construction, with the possible exception of kit fox scat detection dogs during preconstruction surveys, and then only with prior CDFW approval. • If the biological monitor deems it necessary to repel foxes attempting to enter the construction zones, animal repellents such as coyote urine shall be used only with prior CDFW approval. • Any sick or diseased fox, or documented fox mortality, shall be reported to the CDFW within 24 hours of identification. If a dead fox is observed, it shall be protected from scavengers until the CDFW determines whether the collection of necropsy samples is justified. **BIO-5** To avoid construction-level impacts to nesting birds, no earlier than 3 days prior to commencement of scheduled ground disturbance during the nesting bird breeding season (February 1 through August 31), qualified personnel shall perform a nest survey within 500 feet of the disturbance footprint, as accessible. If active nests are found, project disturbance activities shall be postponed or halted within a non-disturbance buffer surrounding each active nest (to be established by the biologist) that is suitable to the particular bird species and nest location(s) until the nest(s) are vacated and juveniles have fledged, as determined by the biologist. Any such buffer(s) shall be clearly demarcated in the field with highly visible construction fencing or flagging, and construction personnel shall be instructed on the sensitivity of nest areas. A biologist	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		shall monitor construction activities near all such buffer(s) to ensure no inadvertent impacts on active nest(s). If listed species are involved, the CDFW and/or USFWS shall be notified immediately for consultation on how to proceed. **BIO-6** The following best management practices shall be implemented during project grading and construction and decommissioning activities to address potential indirect impacts: • The potential for wildlife entrapment shall be avoided as follows: ○ **Backfill trenches.** At the end of each workday, all potential wildlife pitfalls (e.g., trenches, bores, excavation pits) shall be backfilled, covered, or sloped to allow wildlife egress. Should wildlife become trapped, a qualified biologist shall be notified by construction personnel to remove and relocate the individual(s). ○ **Cover materials**. All open ends of pipes, culverts, or other hollow materials temporarily installed in open trenches or stored in staging/laydown areas shall be covered/capped at the end of each workday. Any such materials that have not been capped shall be inspected by construction personnel for wildlife before being moved, buried, or handled. Should wildlife become trapped, a qualified biologist shall be notified by construction personnel to remove and relocate the individual(s). • Minimize construction impacts. The construction limits shall be flagged prior to ground-disturbing activities. All construction activities, including equipment staging and maintenance, shall be conducted within the flagged disturbance limits. • Avoid toxic substances on road surfaces. Soil binding and weighting agents used on unpaved surfaces shall be nontoxic to wildlife and plants.	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		• Minimize spills of hazardous materials. All vehicles and equipment shall be maintained in proper condition to minimize the potential for fugitive emissions of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials. Hazardous spills shall be immediately cleaned up and the contaminated soil shall be properly handled or disposed of at a licensed facility. Servicing of construction equipment shall take place only at a designated staging area. • Worker guidelines. All trash and food-related waste shall be placed in self-closing containers and removed regularly from the site to prevent overflow. Workers shall not feed wildlife or bring pets to the project site. • Best management practices/erosion/runoff. The project shall incorporate methods to control runoff, including a stormwater pollution prevention plan to meet National Pollutant Discharge Elimination System (NPDES) regulations. Implementation of stormwater regulations is expected to substantially control adverse edge effects (e.g., erosion, sedimentation, habitat conversion) during and following construction, both adjacent to and downstream from the project area. Typical construction best management practices specifically related to reducing impacts from dust, erosion, and runoff generated by construction activities shall be implemented. During construction, material stockpiles shall be placed such that they cause minimal interference with on-site drainage patterns, which will protect sensitive vegetation from being inundated with sediment-laden runoff. Dewatering shall be conducted in accordance with standard regulations of the Colorado River Regional Water Quality Control Board. An NPDES permit, issued by the RWQCB to discharge water from dewatering activities, shall be required prior to the start of dewatering. This permit will	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		minimize erosion, siltation, and pollution in sensitive vegetation communities.	
3.4-2 Would the project have a substantial impact on special-status riparian habitats or have a substantial adverse effect on sensitive or other special-status natural vegetation communities identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	Potentially Significant	**BIO-7** Prior to commencement of the decommissioning phase, the project applicant shall prepare a revegetation plan as part of the Decommissioning Plan to identify performance standards necessary for revegetation of the site with native plants. The Decommissioning Plan shall specify success criteria, including, but not limited to, site preparation methods, installation specifications, maintenance requirements, and monitoring/report measures to ensure certain botanical thresholds are met such as adequate cover, density, and species richness. Standards of success shall include at least a 50 percent revegetation success rate compared to baseline conditions and shall include annual monitoring for 2 years. If 50 percent revegetation has not been achieved within 2 years due to lack of water or other environmental factors, the applicant shall work with the County to identify and implement an alternate solution to achieve the identified success rate.	Less than Significant with Mitigation
3.4-3 Would the project have a substantial adverse effect on federally protected wetlands as defined by Clean Water Act Section 404 (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	None required	No Impact

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.4-4 Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No Impact	None required	No Impact
3.4-5 Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Potentially Significant	Mitigation measures **BIO-1** through **BIO-7**	Less than Significant with Mitigation
3.4-6 Would the project conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	No Impact	None required	No Impact
3.4-7 Would the project result in cumulative impacts related to biological resources?	Potentially Significant	Mitigation measures **BIO-1** through **BIO-7**	Less than Significant with Mitigation
Cultural, Tribal Cultural, and Paleontological Resources			
3.5-1 Would the project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?	Potentially Significant	**CUL-1** Fencing shall be installed and maintained along the 50-foot buffer around the known boundaries of historical resources (P-36-001961, P-36-005067, Coolwater HDR-23, Coolwater HDR-57, Coolwater HDR-58, Coolwater HDR-61, Coolwater HDR-45 [a component of P-36-07883], and Coolwater ISO-56) to protect them in place during construction and decommissioning.	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.5-2 Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5?	Potentially Significant	**CUL-2** The project proponent/operator shall conduct a Worker Education Awareness Program (WEAP) for relevant construction personnel working on the proposed project and conducting subsurface activities. Development of the WEAP shall include consultation with an archaeologist. The training shall include an overview of known historical resources and potential cultural resources that could be encountered during ground disturbing activities to facilitate worker recognition, avoidance, and subsequent immediate notification to the qualified archaeologist. **CUL-3** In the event that previously unknown historic era archaeological resources (sites, features, or artifacts) are exposed during grading and/or construction activities for the proposed project, all work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist can evaluate the significance of the find and determine whether or not additional study is warranted, in consultation with the County. Pursuant to CEQA Guidelines Section 15126.4(b)(3), proposed project redesign and preservation in place shall be the preferred means to avoid impacts to significant historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with the County, which may include data recovery or other appropriate measures. The qualified archaeologist shall prepare a report documenting evaluation and/or additional treatment of the resource. A copy of the report shall be provided to the County. Protocol for discovery and treatment of pre-contact resources is outlined in **CUL-8**.	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.5-3 Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or contain rock formations indicating potential paleontological resources?	Potentially Significant	**CUL-4** The project proponent/operator shall conduct a Worker Education Awareness Program (WEAP) for relevant construction personnel working on the proposed project on subsurface activities. Development of the WEAP shall include consultation with an archaeologist and an expert with expertise in paleontology. The training shall include an overview of potential significant paleontological resources that could be encountered during ground disturbing activities, including how to identify subsurface evidence of "older" sediment or fossils that may potentially be encountered during excavation, to facilitate worker recognition, avoidance, and subsequent immediate notification to the qualified paleontologist. Prior to any ground-breaking activities, the San Bernardino County Land Use Services Department shall ensure that construction personnel partake in the WEAP. **CUL-5** In the event that paleontological resources are exposed during grading and/or construction activities for the proposed project, all work occurring within 100 feet of the find shall immediately stop until a qualified paleontologist can evaluate the significance of the find and determine whether or not additional study is warranted, in consultation with the County. If it is demonstrated that resources cannot be avoided, the qualified paleontologist shall develop additional treatment measures in consultation with the County, which may include recovery or other appropriate measures. The qualified archaeologist shall prepare a report documenting the treatment of the resource. A copy of the report shall be provided to the County.	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.5-4 Would the project disturb any human remains, including those interred outside of formal cemeteries?	Potentially Significant	**CUL-6** In accordance with California Health and Safety Code Section 7050.5, if human remains are found, the County Coroner shall be notified within 24 hours of the discovery. The project lead/foreman shall designate an Environmentally Sensitive Area (ESA) physical demarcation/barrier 100 feet around the resource and no further excavation or disturbance of the site shall occur while the County Coroner makes his/her assessment regarding the nature of the remains. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with Public Resources Code Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant (MLD) from the deceased Native American. The MLD shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative will then determine, in consultation with the property owner, the disposition of the human remains. Reburial of human remains and/or funerary objects (those artifacts associated with any human remains or funerary rites) shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The MLD in consultation with the landowner, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects. All parties are aware that the MLD may wish to rebury the human remains and associated funerary objects on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The applicant/developer/landowner should accommodate on-site reburial in a location mutually agreed upon by the Parties. It is understood by all Parties that unless otherwise required by law, the site of any reburial of Native American human remains	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code §6254 (r).	
3.5-5 Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Potentially Significant	Mitigation measure **CUL-6.** **CUL-7** Due to the potential impact to a significant archaeological site (CA-SBR-1961), subsurface archaeological testing shall be conducted by at least one archaeologist, with at least 3 years of regional experience in archaeology, within the area of concern identified by the San Manuel Band of Mission Indians during consultation. Prior to any ground-disturbing activity, testing shall be conducted to confirm presence or absence of subsurface material and to delineate site boundaries. Testing may employ a number of subsurface investigative methods, including shovel test probes, and/or deep testing via controlled units, augers or trenching. The area of concern will be determined in the testing plan and shall be dug and dry-sifted through 1/8-inch mesh screens. A Testing Plan shall be created by the archaeologist and submitted to the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) and the Lead Agency for review at least 10 business days prior to implementation in order to provide time to review/modify the Plan, if needed. The Plan shall outline the protocol of presence/absence testing and contain a treatment protocol detailing that 1) no collection of artifacts or excavation of features shall occur during testing, and 2) all discovered resources shall be properly recorded and reburied *in situ* (see mitigation measure **CUL-8**). The results of testing shall be presented to the applicant, Lead Agency, and SMBMI in the format of a report, which shall include details regarding testing methodology, soil assessment,	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		and photographs. If the results of testing, as approved by SMBMI, are positive, then SMBMI and the Lead Agency shall, in good faith, consult concerning appropriate treatment of the resource(s), guidance for which is outlined in mitigation measure **CUL-8**. If the results of testing, as approved by SMBMI, are negative, then SMBMI will conclude consultation unless additional discoveries are made during project implementation in which consultation would resume. All discoveries made during project implementation shall be subject to the treatment protocol outlined within the Testing Plan, as well as the treatment guidelines within mitigation measures **CUL-6** and **CUL-8**. **CUL-8** If a pre-contact tribal cultural resource is discovered during archaeological presence/absence testing, the discovery shall be properly recorded and then reburied *in situ*. If a pre-contact tribal cultural resource is discovered during project implementation, ground disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. Representatives from the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI), a qualified archaeologist/applicant, and the Lead Agency shall confer regarding treatment of the discovered resource(s). As outlined in CEQA, the applicant shall make a good faith effort to redesign the project area in such a way that impacts to the identified resource(s) can be avoided/preserved in place. Should any resource(s) not be a candidate for avoidance/preservation in place, and therefore the removal of the resource(s) is necessary to mitigate impacts, a research design shall be developed in consultation with SMBMI. The research design will include a plan to formally evaluate the resource(s) for significance under CEQA criteria, as well as to formally address the resource(s) place within the landscape	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		identified as a Tribal Cultural Resource (TCR) by the San Manuel Band of Mission Indians. Additionally, the research design shall include a comprehensive discussion of sampling strategies, resource processing, analysis, and reporting protocols/obligations. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal Monitor representing the Tribe, unless otherwise decided by SMBMI. All plans for analysis shall be reviewed and approved by the applicant, Lead Agency, and SMBMI prior to implementation, and all removed material shall be temporarily curated on-site. It is the preference of SMBMI that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by SMBMI, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in the case of a single reburial area, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all cataloguing and basic recordation of cultural resources have been completed, and a final report has been approved by SMBMI and the Lead Agency. All reburials are subject to a reburial agreement that shall be developed between the landowner and SMBMI outlining the determined reburial process/location and shall include measures and provisions to protect the reburial area from any future impacts (i.e. project plans, conservation/preservation easements, etc.). Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with SMBMI to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the project developer/applicant to pay for those fees. All draft archaeological records/reports created throughout the life of the project shall be prepared by the archaeologist and submitted to the applicant, Lead Agency, and SMBMI for their review and approval. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and SMBMI.	
3.5-6 Would the project result in cumulative impacts related to historical, archaeological, paleontological, or tribal cultural resources?	Potentially Significant	Mitigation measures **CUL-1** through **CUL-8**	Less than Significant with Mitigation
Geology and Soils			
3.6-1a Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map?	Less than Significant	None Required	Less than Significant

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.6-1b Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?	Potentially Significant	**GEO-1** Prior to the issuance of grading permits, the project proponent/operator shall retain a California registered and licensed engineer to design the proposed project facilities to withstand probable seismically induced ground shaking at the project site. All grading and construction on site shall adhere to the specifications, procedures, and site conditions contained in the final design plans, which shall be fully compliant with the seismic recommendations of the California-registered and licensed professional engineer and consistent with the recommendations in the *Preliminary Geotechnical Engineering Report* prepared by Terracon Consultants, Inc. (2018).	Less than Significant with Mitigation
3.6-1c Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?	Potentially Significant	Mitigation measure **GEO-1**	Less than Significant with Mitigation
3.6-1d Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?	Less than Significant	None Required	Less than Significant
3.6-2 Would the project result in substantial soil erosion or the loss of topsoil?	Less than Significant	None Required	Less than Significant
3.6-3 Would the project site 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, subsidence, liquefaction, or collapse?	Less than Significant	None Required	Less than Significant

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.6-4 Would the project be located on expansive soil, creating substantial risks to life or property?	Potentially Significant	Mitigation measure **GEO-1**	Less than Significant with Mitigation
3.6-5 Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Less than Significant	None Required	Less than Significant
3.6-6 Would the project would not result in cumulative impacts related to geology and soils?	Potentially Significant	Mitigation measure **GEO-1**	Less than Significant with Mitigation
Greenhouse Gas Emissions			
3.7-1 Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (or conflict with applicable greenhouse gas emissions thresholds) or otherwise conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	None Required	Less than Significant
3.7-2 Would the project result in cumulative impacts related to greenhouse gases?	Less than Significant	None Required	Less than Significant

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
Hazards and Hazardous Materials			
3.8-1 Would the project a create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	None Required	Less than Significant
3.8-2 Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or would it 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?	Potentially Significant	**HM-1** The following actions shall be taken to address the potential RECs associated with the project site. • Perform a review of relevant environmental documents of the properties associated with the RECs (Barstow-Daggett Airport) to validate the REC conclusion and further evaluate potential contaminants and areas of concern in order to inform locations where shallow soil sampling may be required and any soil disposal requirements prior to issuance of the grading permit for Phase 2. • Perform shallow soil sampling along the project site boundaries that are immediately adjacent to the Barstow-Daggett Airport in locations determined by the review required above and where grading is planned to screen the soils for elevated contaminant prior to issuance of the grading permit for Phase 2. • Prior to issuance of a grading permit, prepare a Soil Management Plan to provide background information regarding the project site, highlight areas of concern that the grading contractor should be aware of during grading activities, and define the procedures for addressing suspected contaminated materials or subsurface anomalies that may be encountered during grading activities.	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.8-3 Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Impact	None Required	No Impact
3.8-4 Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than Significant	None Required	Less than Significant
3.8-5 Would the project result in a safety hazard for people residing or working in the project area and located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, or would it result in a safety hazard for people residing or working in the project area in the vicinity of a private airstrip?	Potentially Significant	**HM-2** Prior to issuance of building and grading permits, the Applicant shall provide to the County a Determination of No Hazard issued by the Federal Aviation Association (FAA).	Less than Significant with Mitigation
3.8-6 Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	Less than Significant	None Required	Less than Significant

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.8-7 Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas and where residences are intermixed with wildlands?	Less than Significant	None Required	Less than Significant
3.8-8 Would the project result in cumulative impact related to hazards and hazardous materials?	Less than Significant	None Required	Less than Significant
Hydrology and Water Quality			
3.9-1 Would the project violate any water quality standards or waste discharge requirements?	Less than Significant	None Required	Less than Significant
3.9-2 Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a new deficit in aquifer volume or a lowering of the local groundwater table level?	Potentially Significant	No feasible mitigation measures are available.	Significant and Unavoidable
3.9-3 Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Less than Significant	None Required	Less than Significant

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.9-4 Would the project substantially alter the existing drainage pattern in the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	Less than Significant	None Required	Less than Significant
3.9-5 Would the project 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?	Less than Significant	None Required	Less than Significant
3.9-6 Would the project substantially degrade water quality?	Less than Significant	None Required	Less than Significant
3.9-7 Would the project be placed within a 100-year flood hazard area structures which would impede or redirect flows?	Less than Significant	None Required	Less than Significant
3.9-8 Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	Less than Significant	None Required	Less than Significant
3.9-9 Would the project result in inundation by seiche, tsunami, or mudflow?	No Impact	None Required	No Impact
3.9-10 Would the project result in cumulative impacts to hydrology and water quality?	Potentially Significant	No feasible mitigation measures are available.	Significant and Unavoidable

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
Land Use and Planning			
3.10-1 Would the project physically divide an established community?	Less than Significant	None Required	Less than Significant
3.10-2 Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Potentially Significant	Mitigation measure **HM-2**	Less than Significant with Mitigation
3.10-3 Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?	No Impact	None Required	No Impact
3.10-4 Would the project result in cumulative impacts to land use and planning?	Less than Significant	None Required	Less than Significant
Noise			
3.11-1 Would the project result in exposure of people to, or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant	**NOI-1** The following noise mitigation measures are required to minimize noise impacts: • Maintain all construction tools and equipment in good operating order according to manufacturers' specifications. • Limit use of major excavating and earthmoving machinery to daytime hours. • To the extent feasible, schedule construction activity during normal working hours on weekdays when higher sound levels are typically present and are found acceptable. Some	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		limited activities, such as concrete pours, may occur continuously until completion. • Equip any internal combustion engine related to the job with a properly operating muffler that is free from rust, holes, and leaks. • For construction devices that utilize internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible. • Limit possible evening shift work to low noise activities such as welding, wire pulling, and other similar activities, together with appropriate material handling equipment. • Utilize a complaint resolution procedure to address any noise complaints received from residents. • Post signage showing the overall construction schedule. • Deploy temporary sound barrier or other engineering solution when construction activities are located within 200 feet of a residence so that the noise level at the residents' property line is less than the federal transit authority threshold of 80 dBA. The sound barriers should be placed so that the construction equipment is blocked with a buffer of approximately 20 feet from the equipment to edges of the barrier. This reduction in noise can also be accomplished using a comparable engineering solution to minimize noise. **NOI-2** Battery storage containers located in the eastern portion of the project shall be rotated so that the heating, ventilation and air conditioning units are pointed away from receptors; or a comparable engineering solution to minimize noise from this equipment shall be implemented, such that noise levels do not exceed the County daytime threshold of 55 dBA.	

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.11-2 Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant	Mitigation measure **NOI-2**	Less than Significant with Mitigation
3.11-3 Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant	Mitigation measure **NOI-1**	Less than Significant with Mitigation
3.11-4 Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant	None Required	Less than Significant
3.11-5 Would the project be located within an airport land use plan or, where such a plan has not been adopted, within two 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?	Less than Significant	None Required	Less than Significant
3.11-6 Would the project be located in the vicinity of a private airstrip and expose people residing or working in the project area to excessive noise levels?	Less than Significant	None Required	Less than Significant
3.11-7 Would the project result in cumulative noise impacts?	Potentially Significant	Mitigation measures **NOI-1** and **NOI-2**	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
Transportation and Traffic			
3.12-1 Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Potentially Significant	**TRA-1** Prior to commencement of construction activities, the applicant shall prepare and submit a Construction Traffic Control Plan to the County in accordance with both the Caltrans (2014) California Manual on Uniform Traffic Control Devices (CA MUTCD) and the Work Area Traffic Control Handbook for review and approval by the County, which will include: • Timing the delivery of heavy equipment and building materials under the contractors' control during non-peak commute hours, to the extent feasible. • Directing construction traffic with a flag person. • Placing temporary signing, lighting, and traffic control devices if required, including but not limited to appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic. • Ensuring access for emergency vehicles to the project site. • Temporarily closing travel lanes or delaying traffic during materials delivery, transmission line stringing activities, or any other utility connections. • Designating bicycle and pedestrian detour plans if/where applicable. • Maintaining access to adjacent property. • Specifying both construction-related vehicle travel and oversize load haul routes, minimizing construction traffic during the a.m. and p.m. peak hours, distributing construction traffic flow across alternative routes to access the project site in a way that maintains level of service conditions at the time of construction, and avoiding residential neighborhoods to the maximum extent feasible. • Coordinating the traffic control plan with the County, as well as potential traffic control plan adjustments, in the event of	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		concurrent projects generating potentially overlapping traffic effects. • Conducting additional traffic control plan coordination with Caltrans regarding the SR-58 Hinkley Expressway Project if construction of the proposed project occurs concurrently with construction of the expressway project.	
3.12-2 Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	Less than Significant	None Required	Less than Significant
3.12-3 Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Potentially Significant	Mitigation measure **HM-2**	Less than Significant with Mitigation
3.12-4 Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant	None Required	Less than Significant
3.12-5 Would the project result in inadequate emergency access?	Potentially Significant	Mitigation measure **TRA-1**	Less than Significant with Mitigation

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.12-6 Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	Less than Significant	None Required	Less than Significant
3.12-7 Would the project result in cumulative traffic impacts?	Less than Significant	None Required	Less than Significant
Utilities and Service Systems			
3.13-1 Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Less than Significant	None Required	Less than Significant
3.12-2 Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities in which the construction would cause significant impacts?	Less than Significant	None Required	Less than Significant
3.13-3 Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities in which construction would cause significant impacts?	Less than Significant	None Required	Less than Significant
3.13-4 Would the project have sufficient water supplies available to serve the project from existing entitlements and resources?	Less than Significant	None Required	Less than Significant

Table ES-1, continued

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
3.13-5 Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that is has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	None Required	Less than Significant
3.13-6 Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less than Significant	None Required	Less than Significant
3.13-7 Would the project comply with federal, state, and local statutes and regulations related to solid waste?	Less than Significant	None Required	Less than Significant
3.17-8 Would the project result in cumulative impacts related to utilities and service systems?	Less than Significant	None Required	Less than Significant

SUMMARY OF PROJECT ALTERNATIVES

CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to a project that could feasibly attain the basic objectives of a project and avoid or lessen the environmental effects of a project. Further, CEQA Guidelines Section 15126.6(e) requires that a "no project" alternative be evaluated in an EIR as well as any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. Section 4.0, Alternatives to the Proposed Project, of this EIR includes a detailed discussion and a qualitative analysis of alternatives that have been rejected by the County, as well as the following scenarios considered to be feasible alternatives to the project as proposed.

ALTERNATIVES TO THE PROPOSED PROJECT

As noted previously, the CEQA Guidelines (Section 15126.6I(2)) require that the alternatives discussion include an analysis of the No Project Alternative. Pursuant to CEQA, the No Project Alternative refers to the analysis of existing conditions (i.e., implementation of current plans) and what would reasonably be expected to occur in the foreseeable future if the project was not approved. Potential environmental impacts associated with the No Project Alternative, and two project alternatives are compared below to assess impacts from the proposed project. These alternatives include: (1) No Project Alternative, (2) Reduced Footprint Alternative, and (3) Kramer Junction Alternative.

Table ES-2, Comparison of Alternatives and Environmental Considerations, summarizes the impact of each alternative on the environmental resources evaluated in the EIR when compared with the impact of the proposed project. Several criteria are considered for each resource topic and the conclusion considers the aggregate impact of each alternative relative to the impacts of the proposed project.

Table ES-2:
Comparison of Alternatives and Environmental Considerations

Topic	1: No Project Alternative	2: Reduced Footprint Alternative	3: Kramer Junction Alternative
Aesthetics and Visual Resources	<	<	>
Agriculture and Forestry Resources	<	<	<
Air Quality	<	<	>
Biological Resources	<	<	>
Cultural, Tribal Cultural, and Paleontological Resources	<	<	>
Geology and Soils	<	<	>

Table ES-2, continued

Topic	1: No Project Alternative	2: Reduced Footprint Alternative	3: Kramer Junction Alternative
Greenhouse Gas Emissions	>	<	>
Hazards and Hazardous Materials	<	<	<
Hydrology and Water Quality	>	<	>
Land Use and Planning	<	<	>
Noise	<	<	<
Utilities and Service System	>	<	>
Transportation and Traffic	<	<	<
Attains Most Project Objectives	No	Yes	Yes

ALTERNATIVE 1: "NO PROJECT" ALTERNATIVE

Description of Alternative

Under the No Project Alternative, the proposed solar energy and storage facility would not be constructed. The existing conditions in the project site would remain. The No Project Alternative does not achieve any of the basic project objectives.

Under the No Project Alternative, impacts associated with construction and operation of the solar energy and storage facility would be avoided.

Alternative 1 Summary and Feasibility

Implementation of Alternative 1, the No Project Alternative, would avoid the environmental impacts of the proposed project because no solar energy and storage facility would be constructed. The baseline environmental conditions on the project site would remain under the No Project Alternative. The No Project Alternative would not retire the existing agricultural operations on the site, which would continue to use groundwater resources and produce greenhouse gas emissions from agricultural equipment use. The No Project Alternative would have fewer impacts than the proposed project on most environmental resources because no construction would occur and land use patterns of the site would remain. The No Project Alternative would have greater impacts on water resources and greenhouse gases due to continued agricultural operation on the site under the No Project Alternative. The No Project Alternative is inherently feasible as it represents no change from existing conditions. However, it would not meet any of the basic project objectives.

ALTERNATIVE 2: REDUCED FOOTPRINT ALTERNATIVE

Description of Alternative

Alternative 2, the Reduced Footprint Alternative, would substantially reduce the footprint of the solar energy facility to reduce significant air quality impacts to a less than significant level. The Alternative 2 solar facility would encompass approximately 1,015 acres, approximately 29 % of the 3,500 acres required for the proposed project. Alternative 2 would produce up to 185 MW of energy. Alternative 2 construction would occur over 13.5 months for Phase 1 (57.5 MW), 13.5 months for Phase 2 (57.5 MW) and 19 months for Phase 3 (70-MW). The phases and stages within each phase would not overlap. An average of 85 workers would be on site during each stage of construction, depending on the activities.

A conceptual layout and reduced footprint for the Alternative 2 solar energy and storage facility is provided on **Exhibit 4-1, Reduced Footprint Alternative (Concept)**.

Alternative 2 Summary and Feasibility

Implementation of Alternative 2 would result in reduced impacts on aesthetics, agricultural resources, air quality, biological resources, cultural, tribal cultural, and paleontological resources, geology and soils, greenhouse gases, hydrology and water quality, hazards and hazardous materials, land use, noise, transportation and traffic, and utilities when compared to the proposed project. Alternative 2 attains most project objectives (refer to **Table 4-3**) and is potentially feasible.

ALTERNATIVE 3: KRAMER JUNCTION SOLAR SITE ALTERNATIVE

Description of Alternative

Alternative 3, the Kramer Junction Solar Site Alternative, would include 650 MW of electric generation solar PV panels, battery storage, on-site substations, and a gen-tie line. Given the land area, Alternative 3 could have a similar generation capacity as the proposed project. The Alternative 3 site includes approximately 3,913 acres on Bureau of Land Management (BLM) administered land, located west of Interstate 395 (I-395) and north of U.S. Route 58, just north of the community of Boron as shown on **Exhibit 4-2, Kramer Junction Solar Site Alternative.** The northern two-thirds of the Alternative 3 site is designated as a Development Focus Area (DFA) in the Desert Renewable Energy Conservation Plan (DRECP) and the remainder of the site is undesignated in the DRECP.

The DRECP requires California Department of Fish and Game (CDFW) to develop a county-wide conservation strategy that addresses Mohave ground squirrel, prior to developing land in DFA-

designated areas. The time it would take to development the conservation strategy would likely delay any solar development in the area, however; the Alternative 3 site is considered a feasible location for solar development because it is an allowable use under the DRECP. Although the Alterative 3 solar site covers approximately 3,913 acres, the actual area of development would be similar to the proposed project (approximately 3,500 acres).

The anticipated route of the Alternative 3 gen-tie is shown on **Exhibit 4-2** but has not been fully determined at this time. It is assumed that the gen-tie line would require an approximately 5-mile long gen-tie line and associated right-of-way. The point of interconnection would be at the Kramer Substation. Upgrades to the Kramer Substation may be required to allow for the interconnection. Depending on the final location of the gen-tie, existing rights-of-way may be required for the entirety, or a portion, of the gen-tie line.

An off-site alternative was recommended by the public to reduce impacts on the Daggett community. Alternative 3 would locate the proposed solar facility farther from residences than the proposed project and would avoid potential land use and air traffic safety impacts associated with location of a solar facility in proximity to an airport.

Alternative 3 Summary and Feasibility

Implementation of Alternative 3 would result in reduced impacts on agricultural resources, hazards, noise, and transportation and traffic. Implementation of Alternative 3 would result in greater impacts on aesthetics, air quality, biological resources, cultural and tribal resources, geology and soils, greenhouse gas emissions, hydrology and water quality, land use and planning and utilities and service systems than the proposed project.

Alternative 3 is located wholly on BLM-administered land and would require a BLM right-of-way grant for development, in addition to a CUP from the County for development of an overhead gen-tie line. Obtaining BLM approval would require CDFW to develop a conservation strategy for Mohave ground squirrel, which would substantially increase the cost and length of time required for permitting the project. Alternative 3 would meet some of the project objectives and is considered potentially feasible because it is located within DRECP land use areas that are suitable for solar development.

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