MITIGATION MEASURE COMPLIANCE CHECKLIST
Bonanza Peak Energy Project

Mitigation Measure	Mitigation Timing	Responsible Party
AES-1: Prepare visual studies that include existing views, scenic vistas, and visual resources and evaluate the potential impacts to existing visual resources. Site-specific visual studies shall be prepared to assess potential visual impacts for all proposed solar energy projects greater than 20 MW (utility scale) and for proposed solar energy projects that are commercial scale or community scale that have been determined by a qualified County planner to have the potential to impact visual resources within the individual SEDAs and the OVSA. The visual study shall include assessment of the existing visual environment, including existing views, scenic vistas, and visual resources, and evaluate the potential of the proposed solar energy project to adversely impact resources and degrade the visual character or quality of the site and its surroundings. The study shall include assessment of public views from key observation points, the locations of which shall be determined in consultation with County staff and, if applicable, other public agencies with jurisdiction over the project site (e.g., BLM). Visual simulations shall be prepared to conceptually depict post-development views from the identified key observation points. The analysis and results of the study shall be documented in a memorandum that will include: (1) an assessment of the existing visual environment, including existing views, scenic vistas, and visual resources and (2) an evaluation of the potential of the proposed solar energy project to adversely impact resources and degrade the visual character or quality of the site and its surroundings. Applicable recommendations from the project-specific visual analysis shall be incorporated into the associated individual project design to address identified potential visual impacts.	This measure has been satisfied by the Addendum and Visual Simulations (Appendix C). No further work is required.	N/A
AES-2: Reduce potential effects of glare by preparing site-specific glare studies that inform project design. Site-specific glare studies shall be prepared for all proposed solar energy projects greater than 20 MW (utility scale) and for proposed solar energy projects that are commercial scale or community scale that have been determined by a qualified County planner to have the potential to impact visual resources within the individual SEDAs and the OVSA to assess potential glare impacts. Applicable results and recommendations from the project specific glare study shall be incorporated into the associated individual project designs to address identified potential visual impacts.	This measure has been satisfied by Glare Analysis Memorandum (Appendix E). No further work is required.	N/A

Mitigation Measure	Mitigation Timing	Responsible Party
AES-4: Install natural screens to protect ground-level views into the project. For all proposed solar energy projects greater than 20 MW (utility scale) and for proposed solar energy projects that are commercial scale or community scale that have been determined by a qualified County planner to have the potential to impact visual resources within the individual SEDAs and the Owens Valley Solar Array (OVSA), and where existing screening topography and vegetation are absent or minimal, natural-looking earthwork landforms (such as berms or contour slopes), vegetative, or architectural screening shall be installed to screen ground-level views into the project site. The shape and height of the earthwork landforms shall be context sensitive and consider distance and viewing angle from nearby public viewpoints.	Prior to/during construction.	Inyo County; Applicant
AES-5: Prepare lighting plan using BMPs consistent with the Renewable Energy Action Team's (REAT's) Best Management Practices and Guidance Manual (REAT 2010) to reduce night lighting during construction and operation. The project applicant shall prepare a lighting plan for all proposed solar energy projects greater than 20 MW (utility scale) and for proposed solar energy projects that are commercial scale or community scale that have been determined by a qualified County planner to have the potential to impact visual resources within the individual SEDAs and the OVSA that documents how project lighting would be designed and installed to minimize night sky impacts during construction and operation. The lighting plan shall include, at minimum, the following lighting design parameters: • Lighting shall be of the minimum necessary brightness consistent with operational safety and security requirements. • Lighting shall incorporate fixture hoods/shielding with light directed downward and toward the area to be illuminated. • Light fixtures that are visible from beyond the project boundary shall have cutoff angles that are sufficient to prevent lamps and reflectors from being visible beyond the project boundary, except where necessary for security. • Project lighting shall be kept off when not in use whenever feasible and consistent with safety and security requirements.	This measure has been satisfied by Basis of Design Report (Appendix A) Lighting Plan. No further work is required.	N/A
AES-6: Treat PV solar panel glass with anti-reflective coating. For proposed PV facilities greater than 20 MW (utility scale) and for proposed solar energy projects that are commercial scale or community scale that have been determined by a qualified County planner to have the	Prior to/during construction.	Inyo County; Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
potential to impact visual resources within the individual SEDAs and the OVSA, glass used to cover solar panels shall be treated with an anti-reflective coating to further decrease reflection and increase the transmission of light through the glass to the cells.		
AES-9: The project will implement BMPs and measures during construction to reduce the visual and aesthetic effects of the construction site. The following measures shall be implemented for all proposed solar energy projects greater than 20 MW (utility scale) and for proposed solar energy projects that are commercial scale or community scale that have been determined by a qualified County planner to have the potential to impact visual resources within the individual SEDAs and the OVSA during construction: • Construction boundaries and staging areas shall be clearly delineated and where appropriate fenced to prevent encroachment onto adjacent natural areas. • Construction staging and laydown areas visible from nearby roads, residences, and recreational areas shall be visually screened using temporary fencing. Fencing shall be of an appropriate design and color to visually blend with the site's surroundings. • Existing native vegetation shall be preserved to the greatest extent possible. • Project grading shall utilize undulating surface edges and contours that repeat the natural shapes, forms, textures, and lines of the surrounding landscape. • Exposed soils shall be restored to their original contour and vegetation. • Stockpiled topsoil shall be reapplied to disturbed surfaces.	During construction.	Inyo County; Construction Contractor
AES-10: Projects requiring overhead electrical transmission connections will consider design and installation techniques that reduce visual impacts. For projects that require overhead electrical transmission connections to existing transmission lines and for the potential off-site transmission corridor to serve the Trona, Chicago Valley, and Charleston View SEDAs, the following shall be considered in the design and alignment of the transmission line connections: • Avoid placing transmission towers and structures along ridgelines, peaks, or other locations where they would silhouette against the sky and affect the horizon. • Place transmission corridor connection alignments along edges of clearings or at transition areas (i.e., natural breaks in vegetation or topography).	This measure has initially been satisfied with the preparation of the Basis of Design Report (Appendix A). Additional implementation to occur during final engineering and prior to construction.	Inyo County; Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
• To the extent practicable, treat transmission towers and structures with color and surfaces to reduce visual contrast with the surrounding visual landscape. Alternative methods to reduce visual impacts may be considered for structures that cannot use conventional methods of painting without impeding electrical conveyance or without causing long-term environmental impacts through the constant reapplication of paint. These methods may include, but shall not be limited to, galvanizing or similar factory applied conductive non-paint treatments. • Use of appropriate and context-sensitive transmission tower types (i.e., lattice structures compared to monopoles) to reduce visual contrast with the surrounding visual landscape.		
AG-3: Invasive plant species or noxious weeds. To prevent the introduction and spread of noxious weeds, a project-specific integrated weed management plan shall be developed for approval by the permitting agencies, which would be carried out for the duration of the entire project. The plan shall include the following measures, at a minimum, to prevent the establishment, spread, and propagation of noxious weeds: • The area of vegetation and/or ground disturbance shall be limited to the absolute minimum and motorized ingress and egress shall be limited to defined routes. • Project vehicles shall be stored on-site in designated areas to minimize the need for multiple washings of vehicles that re-enter the project site. • Vehicle wash and inspection stations shall be maintained on-site and the types of materials brought onto the site shall be closely monitored. • The tires and undercarriage of vehicles entering or re-entering the project site shall be thoroughly cleaned. • Native vegetation shall be re-established as quickly as practicable on disturbed sites. • Weed Monitor and quickly implement control measures to ensure early detection and eradication of weed invasions. • Use certified weed-free straw, hay bales, or equivalent for sediment barrier installations	This measure has been satisfied by the Habitat Restoration, Revegetation, and Weed Management Plan. No further work is required.	N/A
AQ-1: Prepare site-specific air quality technical report. Prior to issuance of Major Use Permits for solar energy projects, a site-specific air quality technical report shall be prepared and approved by the County, which will verify compliance with County and Great Basin Unified Air Pollution Control District standards during construction and operation of the solar project.	This measure has been satisfied by Air Quality and GHG Emissions Report (Appendix F). No further work is required.	N/A

Mitigation Measure	Mitigation Timing	Responsible Party
Mitigation Measures AQ-2 and AQ-3, as defined below, will be incorporated into the site-specific technical report, and will be implemented during construction and operation of future projects. These measures require implementation of dust control practices during construction activities and solar project operations.		
AQ-2: Reduce fugitive dust and particulate matter emissions during construction To control emissions of particulate matter, and to ensure compliance with GBUAPCD Rules 401 and 402 as well as applicable BMPs from Renewable Energy Action Team (REAT) Best Management Practices and Guidance Manual (REAT 2010), solar projects shall implement fugitive dust and particulate matter emissions control measures including, but not limited to the following: • Water and/or coarse rock all active construction areas as necessary and indicated by soil and air conditions; • Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard; • Pave or apply (non-toxic) soil stabilizers on all unpaved access roads unless otherwise addressed through alternative emission control measures (e.g., water); • Sweep daily (with water sweepers) all paved access roads; • Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets; • Suspend excavation and grading activity when sustained winds make reasonable dust control difficult to implement, e.g., for winds over 25 mph. • Limit the speed of on-site vehicles to 15 mph.	During construction	Inyo County; Construction Contractor
BIO-1: Prepare project level biological resources evaluation and mitigation and monitoring plan. Prior to the approval of any solar development projects or related infrastructure under the REGPA with the potential to impact biological resources as determined by a qualified biologist (defined as a biologist with	This measure has been satisfied by Biological Resources Technical Report (Appendix G). No	N/A

Mitigation Measure	Mitigation Timing	Responsible Party
documented experience or training related to the subject species), a project level biological resource evaluation shall be prepared by a qualified biologist for the project. The biological resource evaluation shall include field reconnaissance and focused surveys as determined necessary by a qualified biologist to identify special status species and natural communities present or having the potential to occur on the site, an evaluation of the extent of those habitats, an evaluation of the potential for impacts to each special status species and/or habitat, and shall prescribe specific mitigation measures to avoid impacts to biological resources to the maximum extent practicable. The qualifications of any biologists conducting special status species surveys or focused habitat assessments will be submitted to CDFW prior to conducting fieldwork. The level of biological resource analysis will be based on factors such as the size of the proposed project, the extent of impacts to biological resources, and the sufficiency of existing data to determine impacts. An evaluation of the potential for off-site impacts to special status species and sensitive habitats will be included in the biological resources evaluation, especially for projects involving groundwater pumping. Chapter 2 of the Basin Plan protects beneficial uses for groundwater with respect to groundwater recharge and freshwater replenishment and beneficial uses for wildlife habitats and flora and fauna including cold freshwater habitat, warm freshwater habitat, wildlife habitat, rare, threatened, or endangered species, spawning, reproduction, and development, preservation of biological habitats of special significance, and migration of aquatic organisms (RWQCB 1995). A project-specific evaluation of potential impacts to beneficial uses for groundwater as specified in the Basin Plan will be included in the biological resources evaluation. For projects in the Chicago Valley or Charleston View SEDAs, potential impacts to special status species and/or riparian and other groundwater dependent habitat in the Amargosa Watershed will be evaluated. If any solar development projects are proposed in the Laws SEDA that would require groundwater pumping, a hydrologic study shall be conducted to determine the potential for impacts to the hydrology of Fish Slough and/or populations of Fish Slough milk-vetch. USFWS and CDFW shall be contacted during preparation of the biological resources evaluation to obtain the best available scientific data on such potential impacts including existing hydrologic studies (e.g., the unpublished State of the Basin Report- 2014 prepared by Zdon and Associates, Inc.). For projects with the potential to impact on- or off-site special status species or habitats as determined in the biological resources evaluation, a project-specific biological resources mitigation and monitoring plan shall be prepared that meets the approval of permitting agencies. The plan shall be implemented during all phases of the project and shall identify appropriate mitigation levels to compensate for significant direct, indirect, and cumulative impacts, including habitat, special status plant, and wildlife species losses as well as impacts to groundwater dependent vegetation or off-site	further work is required.	

Mitigation Measure	Mitigation Timing	Responsible Party
impacts to special status species or sensitive habitats due to groundwater pumping. The plan shall address at a minimum: • Biological resource avoidance and minimization measures and mitigation, monitoring and compliance measures required by federal, state, and local applicable permitting agencies. • Documentation (based on surveys) of sensitive plant and wildlife expected to be affected by all phases of the project (project construction, operation, abandonment, and decommissioning). Agencies may request additional surveying, based on the documentation or past experience working with the resources. Include measures to avoid or minimize impacts to species and habitat. • A detailed description of measures to minimize or mitigate permanent and temporary disturbances from construction activities. • All locations on a map, at an approved scale, of sensitive plant and wildlife areas subject to disturbance and areas requiring temporary protection and avoidance during construction. • Aerial photographs or images, at an approved scale, of areas to be disturbed during project construction activities. • Duration for each type of monitoring and a description of monitoring methodologies and frequency. • Performance standards and criteria to be used to determine if/when proposed mitigation is or is not successful. • All standards and remedial measures to be implemented if performance standards and criteria are not met. • A closure/decommissioning or abandonment plan, including a description of funding mechanism(s). • A process for proposing plan modifications to the County project manager.		

Mitigation Measure	Mitigation Timing	Responsible Party
• All locations on a map, at an approved scale, of sensitive plant and wildlife areas subject to disturbance and areas requiring temporary protection and avoidance during construction. • Aerial photographs or images, at an approved scale, of areas to be disturbed during project construction activities. • Duration for each type of monitoring and a description of monitoring methodologies and frequency. • Performance standards and criteria to be used to determine if/when proposed mitigation is or is not successful. • All standards and remedial measures to be implemented if performance standards and criteria are not met. • A closure/decommissioning or abandonment plan, including a description of funding mechanism(s). • A process for proposing plan modifications to the County project manager.		
BIO-2a: Minimize impacts to special status plants. • Prior to the approval of any solar development projects or related infrastructure under the REGPA, a CDFW-approved botanist shall evaluate the potential for special status plant species to occur on the site and conduct surveys, if necessary, to determine presence or infer absence of special status plants on the site following the November 24, 2009 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* or the most current guidelines. When special status plants are found on a site, the project shall be redesigned or modified to avoid direct and indirect impacts on special status plants, to the maximum extent feasible, as determined by the County. In order to avoid direct and indirect impacts to special status plants, the projects should be resisted or re-configured to provide an avoidance buffer of at least 0.25 mile from special status plant populations to account for the physical and biological processes that provide these species with their habitat and pollinator needs.	This measure has been satisfied with the preparation of the Biological Resources Technical Report (Appendix G). No further work is required.	Inyo County; Applicant; Qualified Botanist

BIO-2b: Minimize impacts to special status plants. If special status plants are identified in the project area and complete avoidance of direct and indirect impacts is not feasible as determined by the County, the following measures shall be implemented to avoid and minimize impacts on special status plants: • If feasible, when special status plants are found on a site, the project shall be redesigned or modified to avoid direct and indirect impacts on special status plants, as determined by the County. In order to avoid direct and indirect impacts to special status plants, the projects should be re-sited or re-configured to provide an avoidance buffer of at least 0.25 mile from special status plant populations to account for the physical and biological processes that provide these species with their habitat and pollinator needs. For projects that are determined to have the potential to result in "take" of state or federally listed plant species, consultation shall be conducted with CDFW or USFWS respectively prior to project commencement, and appropriate mitigation measures developed if necessary. • When individuals of a special status species occur within an area proposed for construction and take cannot be avoided mitigation shall be developed in coordination with USFWS and/or CDFW to reduce impacts on the local population of the special status species. Mitigation measures approved by USFWS and/or CDFW may include transplantation under the direction of a CDFW-approved botanist if transplantation of such species is deemed likely to succeed, or seed shall be collected prior to destruction of the plants and dispersed in suitable habitats not impacted by construction, if such habitats exist and seed collection is deemed likely to be successful by a CDFW-approved botanist with experience propagating the species in question. In all cases, CDFW will be notified at least 10 days prior to removal of any special status plant to allow transplantation or collection of seed at their discretion. If transplanting is proposed, the botanist shall coordinate with the appropriate resource agencies and local experts to determine whether transplantation is feasible. If the agencies concur that transplantation is a feasible mitigation measure, the botanist shall develop and implement a transplantation plan through coordination with the appropriate agencies. The special status plant transplantation plan shall involve identifying a suitable transplant site; moving some or all of the plant material and seed bank to the transplant site; collecting seed material and propagating it in a nursery (in some cases it is appropriate to keep plants onsite as nursery plants and sources for seed material); and monitoring the transplant sites to document recruitment and survival rates. Monitoring shall be conducted for a period of five years and transplantation shall be	Coordination with agencies is ongoing. The Special-Status Plant Mitigation and Monitoring Plan has been submitted to CDFW for approval.	Inyo County; Applicant; Qualified Botanist

Mitigation Measure	Mitigation Timing	Responsible Party
considered successful if an 80 percent survival rate has been achieved by the end of the five-year monitoring period. • A mitigation and monitoring plan shall be developed by a qualified botanist/ restoration ecologist and submitted to CDFW for approval prior to approval of the proposed project. The mitigation and monitoring plan will dictate appropriate avoidance and minimization measures, compensatory mitigation, and monitoring requirements as pertinent to the specific species and level of impact(s). Mitigation shall include, but is not limited to 1) protection of special status plant populations not directly impacted by construction or implementation of the project as stated above; 2) transplantation and/or collection of seed from impacted plants if feasible, as stated above; and, 3) the preservation in perpetuity of an equivalent or larger off-site population for every individual or population of special status plant impacted including sufficient land surrounding the preserved population to ensure its survival in perpetuity as determined by a qualified botanist/ restoration ecologist. The qualified botanist/ restoration ecologist shall include plans to restore and enhance the preserved populations to the extent feasible.		
BIO-2c: Minimize impacts to special status plants. • If any solar development projects are proposed in the Laws SEDA that would require groundwater pumping, a hydrologic study shall be conducted to determine the potential for impacts to the hydrology of Fish Slough and/or populations of Fish Slough milk-vetch, pursuant to Mitigation Measure HYD-2 in Section 4.9, Hydrology and Water Quality. If any solar development projects are proposed in the Chicago Valley or Charleston View SEDAs that would require groundwater pumping, a hydrologic study shall be conducted to determine the potential for down-watershed impacts to the habitats for special status plants in the Amargosa Watershed including the portion of the Amargosa River that has been designated by Congress as "Wild and Scenic." If such studies conclude that any project has the potential to result in indirect impacts to the hydrology of off-site habitat for special status plant species (e.g., Fish Slough, marshes, riparian areas, alkaline flats in the Amargosa Watershed and the portion of the Amargosa River that has been designated by Congress as "Wild and Scenic"), a management plan will be prepared in coordination with the County and submitted to the appropriate resource agency with oversight for the species or habitat in question. The plan shall describe any appropriate monitoring, such as vegetation and/or water table monitoring, and prescribe mitigation to offset the impacts of the project on off-site habitat for special status plants	This measure has been satisfied with the preparation of the Hydrology & Water Quality Assessment (Appendix M), the Water Supply Assessment (Appendix N), and the Hydrographic Basin Summary and Groundwater Monitoring Plan (Appendix ~~TBD~~). No further work is required.	Inyo County; Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
such as preservation of suitable habitat or funding of activities to restore, enhance or conserve habitat within the County.		
BIO-3a: Minimize impacts to special status wildlife. Prior to the approval of any solar development projects or related infrastructure under the REGPA with the potential to impact special status wildlife as determined by a qualified biologist, a CDFW-approved wildlife biologist shall conduct a survey to document the presence or absence of suitable habitat for special status wildlife in the project site. The following steps shall be implemented to document special status wildlife and their habitats for each project, as determined by the CDFW-approved wildlife biologist: • Review Existing Information. The wildlife biologist shall review existing information to develop a list of special status wildlife species that could occur in the project area or be impacted by the proposed project, either directly or indirectly (e.g., groundwater pumping could result in indirect impacts to off-site habitats for special status wildlife). The following information shall be reviewed as part of this process: the USFWS special status species list for the project region, CDFW's CNDDB, previously prepared environmental documents, and USFWS issued biological opinions for previous projects. If the project is taking place on BLM or state administered lands (e.g., BLM, State Trust Lands), the list of special status wildlife from that land managing agency shall be obtained and reviewed in addition to the lists previously mentioned. • Coordinate with State and Federal Agencies. The wildlife biologist shall coordinate with the appropriate agencies (CDFW, USFWS, BLM) to discuss wildlife resource issues in the project region and determine the appropriate level of surveys necessary to document special status wildlife and their habitats. • Conduct Field Studies. The wildlife biologist shall evaluate existing habitat conditions and determine what level of biological surveys may be required. The type of survey required shall depend on species richness, habitat type and quality, and the probability of special status species occurring in a particular habitat type. Depending on the existing conditions in the project area and the proposed construction activity, one or a combination of the following levels of survey may be required:	This measure has been satisfied with the preparation of the Biological Resources Technical Report (Appendix G). No further work is required.	Inyo County; Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
• Habitat Assessment. A habitat assessment determines whether suitable habitat is present. The wildlife biologist shall conduct project-specific habitat assessments consistent with protocols and guidelines issued by responsible agencies for certain special status species (e.g., USFWS' 2004 Protocol for Evaluating Bald Eagle Habitat and Populations in California). Habitat assessments are used to assess and characterize habitat conditions and to determine whether return surveys are necessary. If no suitable habitat is present for a given special status species, no additional species-focused or protocol surveys shall be required. • Species-Focused Surveys. Project-specific species-focused surveys (or target species surveys) shall be conducted if suitable habitat is present for special status wildlife and if it is necessary to determine the presence or absence of the species in the project area. The wildlife biologist shall conduct project-specific surveys focusing on special status wildlife species that have the potential to occur in the region. The surveys shall be conducted during a period when the target species are present and/or active. • Protocol-Level Wildlife Surveys. The wildlife biologist shall conduct project specific protocol level surveys for special status species with the potential to be impacted by the proposed project. The surveys shall comply with the appropriate protocols and guidelines issued by responsible agencies for the special status species. USFWS and CDFW have issued survey protocols and guidelines for several special- status wildlife species that could occur in the project region, including (but not limited to): bald eagle, burrowing owl, golden eagle, Swainson's hawk, least Bell's vireo, willow flycatcher, desert tortoise, and desert kit fox. The protocols and guidelines may require that surveys be conducted during a particular time of year and/or time of day when the species is present and active. Many survey protocols require that only a USFWS- or CDFW-approved biologist perform the surveys. The project proponent shall coordinate with the appropriate state or federal agency biologist before the initiation of protocol-level surveys to ensure that the survey results would be valid. Because some species can be difficult to detect or observe, multiple field techniques may be used during a survey period and additional surveys may be required in subsequent seasons or years as outlined in the protocol or guidelines for each species.		

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• Habitat Mapping. The wildlife biologist shall map special status wildlife or suitable habitat identified during the project-specific field surveys. • A Scientific Collecting Permit is required to take, collect, capture, mark, or salvage, for scientific, educational, and non-commercial propagation purposes, mammals, birds and their nests and eggs, reptiles, amphibians, fishes and invertebrates (Fish and Game Code Section 1002 and Title 14 Sections 650 and 670.7). All biologists will be required to obtain a Scientific Collecting Permit that may be required to handle any live or dead animals during construction or operation of a project.		
BIO-3b: Minimize impacts to special status wildlife. In addition, the following measures should be implemented to avoid and minimize impacts on special status species and their habitats if they occur within a site: • For projects that are determined to have the potential to result in "take" of state or federally-listed animal species, consultation shall be conducted with CDFW or USFWS respectively and appropriate mitigation measures developed as necessary, and take authorization shall be obtained prior to project commencement, if relevant. • If ground disturbing activities are required prior to site mobilization, such as for geotechnical borings or hazardous waste evaluations, a CDFW-approved biologist shall be present to monitor any actions that could disturb soil, vegetation, or wildlife. • In areas that could support desert tortoise or any other sensitive wildlife species, a qualified biologist with the appropriate CDFW and/or USFWS approvals for the species being relocated shall be onsite and respond accordingly should an animal need to be relocated. • Vehicular traffic during project construction and operation shall be confined to existing routes of travel to and from the project site, and cross country vehicle and equipment use outside designated work areas shall be prohibited. Vehicles shall not exceed 25 mph on the project site. Vehicles shall abide by posted speed limits on paved roads.	Prior to/during construction and operation. Coordination with agencies is ongoing.	Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
• A CDFW-approved biologist shall be designated to oversee compliance with biological resources avoidance and minimization measures during mobilization, ground disturbance, grading, construction, operation, and closure/decommissioning, or project abandonment, particularly in areas containing or known to have contained sensitive biological resources, such as special status species and unique plant assemblages. The CDFW-approved biologist shall perform biological monitoring during all grading, clearing, grubbing, trenching, and construction activities consistent with monitoring required in any permit issued by the USFWS and CDFW. The boundaries of all areas to be disturbed (including staging areas, access roads, and sites for temporary placement of spoils) shall be delineated with stakes and flagging prior to construction activities in consultation with the biological monitor. Spoils shall be stockpiled in disturbed areas lacking native vegetation and which do not provide habitat for special status species. Parking areas, staging and disposal site locations shall also be located in areas without native vegetation or special status species habitat. All disturbances, vehicles, and equipment shall be confined to the flagged areas. The CDFW-approved biologist shall be responsible for actions including, but not limited to, the following: o Clearly marking sensitive biological resource areas and inspecting the areas at appropriate intervals for meeting regulatory terms and conditions. o Inspecting, daily, active construction areas where wildlife may have become trapped (for example, trenches, bores, and other excavation sites that constitute wildlife pitfalls outside the permanently fenced area) before beginning construction. At the end of the day, conducting wildlife inspections of installed structures that would entrap or not allow escape during periods of construction inactivity. Periodically inspecting areas with high vehicle activity (such as parking lots) for wildlife in harm's way. o Periodically inspect stockpiled material and other construction material and equipment (including within the fenced areas) throughout the day as some species such as desert kit fox may enter the project site at any time. o Overseeing special status plant salvage operations.		

Mitigation Measure	Mitigation Timing	Responsible Party
o Immediately recording and reporting hazardous spills immediately as directed in the project hazardous materials management plan. o Coordinating directly and regularly with permitting agency representatives regarding biological resources issues, and implementation of the biological resource avoidance and minimization measures. o Maintaining written records regarding implementation of the biological resource avoidance and minimization measures, and providing a summary of these records periodically in a report to the appropriate agencies. o Notifying the project owner and appropriate agencies of non-compliance with biological resource avoidance and minimization measures. o At the end of each work day, the biological monitor shall ensure that all potential wildlife pitfalls (trenches, bores, and other excavations) have been backfilled or if backfilling is not feasible, the biological monitor shall ensure that all trenches, bores, and other excavations are sloped at a 3:1 ratio at the ends to provide wildlife escape ramps, or covered completely to prevent wildlife access, or fully enclosed with desert tortoise-exclusion fencing. All trenches, bores, and other excavations outside the areas permanently fenced with desert tortoise exclusion fencing shall be inspected periodically, but no less than three times, throughout the day and at the end of each workday by the CDFW-approved biologist. Should a tortoise or other wildlife become trapped, the CDFW and USFWS-approved desert tortoise biologist shall remove and relocate the individual as described in the project's Desert Tortoise Relocation/Translocation Plan. Any wildlife encountered during the course of construction shall be allowed to leave the construction area unharmed. o Any construction pipe, culvert, or similar structure with a diameter greater than 1 inch, stored less than 8 inches aboveground, and within desert tortoise habitat (i.e., outside the permanently fenced area) for one or more nights, shall be inspected by the biological monitor for desert tortoises or other special status species such as fringe-toed lizard, before the material is moved, buried, or capped. As an alternative, all such structures may be		

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capped before being stored outside the fenced area, or placed on pipe racks. These materials would not need to be inspected or capped if they are stored within the permanently fenced area after the clearance surveys have been completed. • Access roads, pulling sites, storage and parking areas outside of the fenced solar facility area shall be designed, installed, and maintained with the goal of minimizing impacts to native plant communities and sensitive biological resources. Transmission lines and all electrical components shall be designed, installed, and maintained in accordance with the APLIC Suggested Practices for Avian Protection on Power Lines (APLIC 2006) and Mitigating Bird Collisions with Power Lines (APLIC 2004) to reduce the likelihood of bird electrocutions and collisions. • Facility lighting shall be designed, installed, and maintained to direct light downwards towards the project site and avoid light spillover to wildlife habitat. • Construction and operation related noise levels shall be minimized to minimize impacts to wildlife. • All vertical pipes shall be capped to prevent the entrapment of birds and other wildlife. • All vehicles and equipment shall be maintained in proper working condition to minimize the potential for fugitive emissions of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials. The biological monitor shall be informed of any hazardous spills immediately. Hazardous spills shall be immediately cleaned up and the contaminated soil properly disposed of at a licensed facility. Servicing of construction equipment shall take place only at a designated area. Service/maintenance vehicles shall carry a bucket and pads to absorb leaks or spills. • Road surfacing and sealants as well as soil bonding and weighting agents used on unpaved surfaces shall be non-toxic to wildlife and plants. Anticoagulants shall not be used for rodent control. Pre-emergents and other herbicides with documented residual toxicity shall not be used. Herbicides shall be applied in conformance with federal, state, and local laws and according to the guidelines for wildlife- safe use of herbicides in BIO 24 (Weed Management Plan). • The following measures shall be implemented to minimize attractants to wildlife:		

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○ If the application of water is needed to abate dust in construction areas and on dirt roads, use the least amount needed to meet safety and air quality standards and prevent the formation of puddles, which could attract wildlife to construction sites. The biological monitor shall patrol these areas to ensure water does not puddle and attract desert tortoise, common ravens, and other wildlife to the site and shall take appropriate action to reduce water application where necessary. ○ Water shall be prohibited from collecting or pooling for more than 24 hours after a storm event within the project retention basin. Standing water within the retention basin shall be removed, pumped, raked, or covered. Alternative methods or the timeframe for allowing the water to pool may be modified with the approval of the biological monitor. ○ Dispose trash and food-related items in self-closing, sealable containers with lids that latch to prevent wind and wildlife from opening containers. Empty trash containers daily and remove from the project site those associated with construction when construction is complete. ○ To avoid attracting insectivorous birds and bats, prepare a facility vector (such as mosquitoes or rodents) control plan, as appropriate, that meets the permitting agency approval and would be implemented during all phases of the project. • Workers or visitors, while on project property, shall be prohibited from feeding wildlife, bringing domestic pets to the project site, collecting native plants, or harassing wildlife. • To reduce the potential for the transmission of fugitive dust the project proponent shall implement dust control measures. These shall include: ○ The project proponent shall apply non-toxic soil binders, equivalent or better in efficiencies than the CARB- approved soil binders, to active unpaved roadways, unpaved staging areas, and unpaved parking area(s) throughout construction to reduce fugitive dust emissions, unless otherwise addressed through alternative emission control measures (e.g., water).		

Mitigation Measure	Mitigation Timing	Responsible Party
○ Water the disturbed areas of the active construction sites at least three times per day and more often if uncontrolled fugitive dust is noted. Enclose, cover, water twice daily, and/or apply non-toxic soil binders according to manufacturer's specifications to exposed piles with a 5 percent or greater silt content. Agents with known toxicity to wildlife shall not be used. ○ Establish a vegetative ground cover (in compliance with biological resources impact mitigation measures above) or otherwise create stabilized surfaces on all unpaved areas at each of the construction sites within 21 days after active construction operations have ceased. ○ Increase the frequency of watering, if water is used as a soil binder for disturbed surfaces, or implement other additional fugitive dust mitigation measures, to all active disturbed fugitive dust emission sources when wind speeds (as instantaneous wind gusts) exceed 25 mph. • A project-specific worker environmental awareness program (WEAP) shall be developed and carried out during all phases of the project (site mobilization, ground disturbance, grading, construction, operation, closure/decommissioning, or project abandonment, and restoration/reclamation activities). The WEAP shall include the biological resources present and the measures for minimizing impacts to those resources. Interpretation for non-English speaking workers shall be provided, and all new workers shall be instructed in the WEAP. The project field construction office files will contain the names of onsite personnel (for example, surveyors, construction engineers, employees, contractors, contractor's employees/ subcontractors) who have participated in the education program. All employees and contractors shall be trained to carry out the WEAP and on their role in ensuring the effectiveness of implementing the Plan. At a minimum, the WEAP shall including the following: ○ Photos and habitat descriptions for special status species that may occur on the project site and information on their distribution, general behavior, and ecology. ○ Species sensitivity to human activities.		

Mitigation Measure	Mitigation Timing	Responsible Party
○ Legal protections afforded the species. ○ Project measures for protecting species. ○ State and federal law violation penalties. ○ Worker responsibilities for trash disposal and safe/ humane treatment of special status species found on the project site, associated reporting requirements, and specific required measures to prevent taking of threatened or endangered species. ○ Handout materials summarizing the contractual obligations and protective requirements specified in project permits and approvals. ○ Project site speed limit requirements and penalties.		
BIO-3c: Minimize impacts to special status wildlife. • A project specific restoration, re-vegetation, and reclamation plan that meets the approval of permitting agencies shall be prepared and carried out for all projects. The plan shall address at a minimum: ○ Minimizing natural vegetation removal and the consideration of cutting or mowing vegetation rather than total removal, whenever possible. ○ Salvage and relocation of cactus and yucca from the site before beginning construction. ○ Identification of protocols to be used for vegetation salvage. ○ Reclaiming areas of temporarily disturbed soil using certified weed free native vegetation and topsoil salvaged from excavations and construction activities.	This measure has been satisfied by the Habitat Restoration, Revegetation, and Weed Management Plan. No further work is required.	Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
○ Restoration and reclamation of temporarily disturbed areas, including pipelines, transmission lines, staging areas, and temporary construction-related roads as soon as possible after completion of construction activities. The actions are recommended to reduce the amount of habitat converted at any one time and promote recovery to natural habitats. ○ Specifying proper seasons and timing of restoration and reclamation activities to ensure success.		
BIO-3d: Minimize impacts to special status wildlife. If any solar development projects are proposed that would require groundwater pumping, a hydrologic study shall be conducted to determine the potential for indirect off-site impacts to special status wildlife species and/or their habitats. If such studies conclude that any project has the potential to result in indirect impacts to the hydrology of off-site habitat for special status wildlife species (e.g., Amargosa vole, Ash Meadows naucorid), a management plan will be prepared in coordination with the County and submitted for approval to the appropriate resource agency with regulatory oversight for the species or habitat in question. The plan shall describe any appropriate monitoring, such as vegetation and/or water table monitoring, and prescribe mitigation to offset the impacts of the project on off-site habitat for special status wildlife such as preservation of suitable habitat or funding of activities to restore, enhance or conserve habitat within the County.	This measure has been satisfied with the preparation of the Biological Resources Technical Report (Appendix G), the Hydrology & Water Quality Assessment (Appendix M), the Water Supply Assessment (Appendix N), and the Hydrographic Basin Summary and Groundwater Monitoring Plan (Appendix TBD). No further work is required.	Applicant
BIO-6a: Minimize impacts to desert tortoise. The following measures shall be implemented for any solar development project(s) or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect desert tortoise in order to avoid, minimize, and mitigate impacts:	. Coordination with the agencies is on-going.	Inyo County; Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
• Consultation shall be conducted with CDFW and USFWS for any projects where desert tortoise or signs of their presence are found on the site and/or the project is determined by a CDFW-approved biologist to have the potential to impact desert tortoise. In such cases, permits under Section 2080 of the Fish and Game Code and Section 7/10 of Federal Endangered Species Act (FESA) authorizing incidental take of desert tortoise will be obtained from CDFW and USFWS respectively prior to implementation of the project, including any project-related ground disturbing activities. All requirements of the 2081/2080.1 permit and the Biological Opinion shall be implemented. • The project proponent shall fully mitigate for habitat loss and potential take of desert tortoise. The project specific mitigation shall be developed in coordination with CDFW and USFWS and would be reflective of the mitigation measures described in the Biological Opinion prepared by the USFWS for the project. • The project developer shall provide funds for regional management of common ravens through the payment of a per-acre fee as determined in consultation with the USFWS. The fee shall be commensurate with current per-acre fees (at the time of project approval) required by the BLM and the CEC for development projects in the desert with the potential to provide subsidies to common ravens such as shelter, perching sites, and food. The fee shall be used by the Desert Managers Group, or other entity or funding mechanism designated by USFWS, to manage common ravens in the California desert with the goal of reducing their predation on desert tortoises. • Unless as noted herein, Projects shall not be sited within areas identified for desert tortoise recovery or conservation according to the Draft Revised Recovery Plan for the Mojave Population of the Desert Tortoise (Gopherus agassizii) (USFWS 2011) (such as designated critical habitat, Area of Critical Environmental Concern [ACEC], Desert Wildlife Management Area [DWMA], priority connectivity areas, and other areas or easements managed for desert tortoises). A small portion (up to 5% of the Developable Area) of the Project may be sited in priority connectivity areas if agreed to by the USFWS and CDFW and all impacts are mitigated.[1]		

[1] Approximately 4.2% of the Bonanza Peak Energy Project's 2,400-acre Developable Area is within a priority connectivity area.

Mitigation Measure	Mitigation Timing	Responsible Party
• On project sites containing desert tortoise, consultation shall be conducted with USFWS and CDFW to determine the need for and/or feasibility of conducting desert tortoise translocation (changing location or position) to minimize the taking of the tortoises, if they are observed within the proposed project area. Federal translocation plan guidance may be accessed at: http://www.fws.gov/ventura/speciesinfo/protocols_guidelines/. Translocation plan development and implementation may require, but not be limited to: additional surveys of potential recipient sites; translocated and resident tortoise disease testing and health assessments; monitoring protocols; and consideration of climatic conditions at the time of translocation. Due to the potential magnitude of proposed renewable energy project impacts on desert tortoises, USFWS and CDFW must evaluate translocation efforts on a project by project basis in the context of cumulative effects.		
BIO-6b: Minimize impacts to desert tortoise. • A desert tortoise authorized biologist approved by CDFW and USFWS shall be contracted to oversee and be responsible for ensuring compliance with desert tortoise avoidance and minimization measures before initiation of and during ground-disturbing activities. The desert tortoise biologist shall conduct clearance surveys, tortoise handling, artificial burrow construction, egg handling, and other procedures in accordance with the Guidelines for Handling Desert Tortoise During Construction Projects (Desert Tortoise Council 1999) or the most current USFWS guidance. The desert tortoise biologist shall be present on site from March 15 through October 31 (active season) during ground disturbing activities in areas outside the tortoise exclusion fencing. It is recommended that the biologist be on call from November 1 to March 14 (inactive season) and checks such construction areas immediately before construction activities begin. • Refer to the Ventura Fish and Wildlife Office website http://www.fws.gov/ventura/endangered/species/surveys-protocol.html for desert tortoise authorized biologist and monitor responsibilities and qualifications, and survey and translocation guidance, and refer to the Nevada Fish and Wildlife Office (desert tortoise recovery office) website http://www.fws.gov/nevada/desert_tortoise/dtro/.html for desert tortoise federal recovery plan documents. Methods for clearance surveys, fence specification and installation, tortoise handling, artificial burrow construction, egg handling and other procedures shall be consistent with those	Prior to/during construction.	Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
described in the 2013 USFWS Desert Tortoise Field Manual available at the Ventura Fish and Wildlife Office website listed above, or more current guidance provided by CDFW and USFWS. All terms and conditions described in the Biological Opinion for the project prepared by the USFWS shall be implemented. • The project owner shall undertake appropriate measures to manage the construction site and related facilities in a manner to avoid or minimize impacts to desert tortoise. These measures include, but are not limited to, the following: o The project applicant shall notify the USFWS and CDFW prior to project commencement and prior to the commencement of any ground disturbing activities. o Before starting project ground disturbing activities, the project proponent shall avoid potential desert tortoise harm by incorporating desert tortoise exclusion fencing into permanent fencing surrounding the proposed facility, and installing desert tortoise exclusion fencing around temporary project construction areas such as staging area, storage yards, excavations, and linear facilities. The tortoise exclusion fencing shall be constructed consistent with the USFWS 2010 Desert Tortoise Exclusion Fence Specifications or the most current guidance provided by USFWS and CDFW, and should be constructed in late winter or early spring to minimize impacts to desert tortoise and accommodate subsequent tortoise surveys. o Within 24-hours before starting tortoise exclusion fence construction, the desert tortoise biologist shall survey the fence alignment and utility right-of-way alignments and clear desert tortoises from the area. The surveys and relocation methods shall be conducted using techniques approved by the CDFW and USFWS. Following construction of the tortoise exclusion fence, the desert tortoise biologist shall conduct clearance surveys within the fenced area to ensure as many desert tortoises as possible have been removed from the site. Burrows and tortoises identified within the project area shall be handled according to the 2013 USFWS Desert Tortoise Field Manual, and tortoises requiring relocation shall be handled in accordance with the project Desert Tortoise Relocation/Translocation Plan.		

Mitigation Measure	Mitigation Timing	Responsible Party
○ Heavy equipment may enter the project site following the completion of project area desert tortoise clearance surveys by the desert tortoise biologist. Monitoring initial clearing and grading activities by the biologist will help ensure that tortoises missed during the initial clearance survey are moved from harm's way. ○ The desert tortoise biologist shall be responsible for appropriate documentation and reporting to the permitting agencies for desert tortoises handled, in accordance with the project Desert Tortoise Relocation/Translocation Plan. ○ Security gates shall be designed with minimal ground clearance to deter ingress by tortoises. The gates shall be kept closed, except for the immediate passage of vehicles, to prevent desert tortoise passage into the project area. ○ Following installation of the desert tortoise exclusion fencing, both the permanent site fencing and temporary fencing in the utility corridors, the fencing shall be regularly inspected by the biological monitor. The biological monitor shall ensure that damage to the permanent or temporary fencing is immediately blocked to prevent tortoise access and permanently repaired within 72-hours between March 15 and October 31, and within seven days between November 1 and March 14. The biological monitor shall inspect permanent fencing quarterly and after major rains to ensure fences are intact and there is no ground clearance under the fence that would allow tortoises to pass. The biologist shall inspect construction pipes, culverts, or similar structures: (a) with a diameter of one inch or greater, (b) stored for one or more nights, (c) less than 8-inches aboveground, and (d) within desert tortoise habitat (outside the permanently fenced area), before the materials are moved, buried, or capped. As an alternative, the materials may be capped before storing outside the fenced area or placing on pipe racks. Inspection or capping is not necessary if the materials are stored within the permanently fenced area after completing desert tortoise clearance surveys.		

Mitigation Measure	Mitigation Timing	Responsible Party
○ The project proponent shall ensure vehicular traffic does not exceed 25 mph within the delineated project areas or on access roads in desert tortoise habitat. On unpaved roads suppress dust and protect air quality by observing a 10-mile per hour speed limit. ○ To avoid vehicle impacts to desert tortoise, workers shall be responsible for inspecting the ground under the vehicle for the presence of desert tortoise any time a vehicle or construction equipment is parked in desert tortoise habitat outside the permanently fenced area. If a desert tortoise is seen, it may move on its own. If it does not move within 15-minutes, the desert tortoise biologist may remove and relocate the animal to a safe location.		
BIO-6c: Minimize impacts to desert tortoise. • The project proponent shall develop and implement a Desert Tortoise Relocation/Translocation Plan that is consistent with current USFWS approved guidelines. The goal of the plan will be to safely exclude desert tortoises from within the fenced project area and relocate/translocate them to suitable habitat capable of supporting them, while minimizing stress and potential for disease transmission. The plan shall be developed in consultation with the USFWS to ensure the document does not conflict with conditions issued under an Incidental Take Statement. The plan will utilize the most recent USFWS guidance on translocation that includes siting criteria for the translocation site and control site, methods for translocation/relocation including the holding pen, and post translocation/relocation monitoring. Development and implementation of a translocation plan may require, but may not be limited to, additional surveys of potential recipient sites; disease testing and health assessments of translocated and resident tortoises; and consideration of climatic conditions at the time of translocation. The plan shall designate a relocation site as close as possible to the disturbance site that provides suitable conditions for long term survival of the relocated desert tortoise and outline a method for monitoring the relocated tortoise. • The Desert Tortoise Relocation/Translocation Plan must be approved by the County, CDFW and USFWS prior to any project-related ground disturbing activity. Plans may also be subject to approval by the County as part of the conditions of approval for future projects.	This measure has been initially satisfied with preparation of the Desert Tortoise Translocation Plan. Coordination with the agencies is on-going.	Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
• Within 30-days after initiation of relocation and/or translocation activities, the Designated Biologist shall provide to the Project Manager for review and approval, a written report identifying which items of the plan have been completed, and a summary of all modifications to measures made during implementation of the plan. Written monthly progress reports shall be provided to the Project Manager for the duration of the plan implementation.		
BIO-6d: Minimize impacts to desert tortoise. The project proponent shall design and implement a Raven Monitoring, Management, and Control Plan that is consistent with the most current USFWS raven management guidelines. The goal of the plan shall be to minimize predation on desert tortoises by minimizing project-related increases in raven abundance. The plan shall be approved by the County, CDFW and USFWS prior to the start of any project-related ground disturbing activities. Plans may also be subject to approval by the County as part of the conditions of approval for future projects.	This measure has been satisfied with the preparation of the Raven Monitoring, Management, and Control Plan (Appendix S). No further work is required.	Inyo County; Applicant; Qualified Biologist
BIO-7: Minimize impacts to special status reptiles (except desert tortoise). The following measures shall be implemented for any solar development project(s) or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect special status reptiles (with the exception of desert tortoise which has separate mitigation measures): • Surveys for special status reptiles including but not limited to northern sagebrush lizard, Panamint alligator lizard, and Mojave fringe-toed lizard shall be conducted by a CDFW-approved biologist with experience surveying for and/or handling these species. If construction is scheduled to commence during the optimal period of identification for these species, then surveys shall be conducted within two weeks prior to the commencement of construction. If construction is not scheduled to commence during the optimal period of identification for these species, then surveys shall be conducted during the optimal period of identification for these species (in the calendar year prior to construction) and again within two weeks prior to the commencement of construction.	This measure has been satisfied with the preparation of the Biological Resources Technical Report (Appendix G). No further work is required.	Inyo County; Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
• If any of these species are found on a project site during the surveys, CDFW will be contacted and avoidance and mitigation measures appropriate to the species will be developed. Avoidance measures could include actions such as waiting to begin construction until the animal passively disperses from the project site, active relocation of the animal, or allowing construction to begin with the institution of an appropriate no disturbance buffer until the animal has passively dispersed. Mitigation measures could include restoration of temporarily disturbed habitats. • If federal or state-listed reptiles not discussed above are determined to have the potential to occur on a project site or otherwise be impacted by the project, consultation shall be conducted with USFWS and CDFW respectively to determine the survey protocol and mitigation measures appropriate to the species.		
BIO-8: Minimize impacts to Swainson's hawk. The following measures shall be implemented for any solar development project(s) or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect Swainson's hawk: • Surveys shall be conducted for Swainson's hawk by a CDFW-approved biologist according to the 2010 Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California (CDFG 2010) or more recent guidance, unless otherwise directed by CDFW. This guidance dictates survey methods for detecting Swainson's hawk nesting in or in the vicinity of a project site and measure to avoid and/or reduce impacts to nesting Swainson's hawk if they are found. The project applicant shall be responsible for coordinating with CDFW and ensuring that the CDFW guidance is implemented.	This measure has been satisfied with the preparation of the Biological Resources Technical Report (Appendix G). No further work is required.	Inyo County; Applicant; Qualified Biologist
BIO-9a: Minimize impacts to burrowing owl. The following measures shall be implemented for any solar development project(s) or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect burrowing owl, unless otherwise directed by CDFW:	Prior to/during construction; required coordination with agencies is ongoing.	Inyo County; Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
• In the calendar year that construction is scheduled to commence, surveys will be conducted by a CDFW-approved biologist to determine presence/absence of burrowing owls and/or occupied burrows in the project site and accessible areas within 500-feet according to the CDFW's Staff Report on Burrowing Owls (CDFG 2012). A winter non-breeding season survey will be conducted between December 1 and January 31 and a nesting breeding season survey will be conducted between April 15 and July 15 according to established protocols (CDFG 2012). Pre-construction surveys will also be conducted within 30-days prior to construction to ensure that no additional burrowing owls have established territories since the initial surveys. If no burrowing owls are found during any of the surveys, no further mitigation will be necessary. If burrowing owls are found, then the following measures shall be implemented prior to the commencement of construction: o During the non-breeding season (September 1 through January 31) burrowing owls should be evicted by passive relocation as described in the Staff Report on Burrowing Owl Mitigations (CDFG 2012). A burrowing owl exclusion plan will be prepared and submitted to CDFW for approval prior to implementation of burrowing owl exclusion or relocation activities. o Occupied burrows shall not be disturbed during the nesting season (February 1 through August 31); occupied burrows shall not be disturbed and shall be provided with a 75-meter protective buffer as stipulated in the Staff Report on Burrowing Owl Mitigation (CDFG 2012), unless a qualified biologist approved by CDFW verifies through non-invasive means that either: (1) the birds have not begun egg laying or, (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. o If on-site avoidance is required, the location of the buffer zone will be determined by a CDFW-approved biologist. The developer shall mark the limit of the 75-meter buffer zone with yellow caution tape, stakes, or temporary fencing. The buffer will be maintained throughout the construction period. o Where on-site avoidance is not possible, CDFW should be consulted regarding the appropriate avoidance and minimization measures to avoid impacts to this species.		

Mitigation Measure	Mitigation Timing	Responsible Party
BIO-9b: Minimize impacts to burrowing owl. Impacts to occupied burrowing owl habitat as defined by CDFW will be mitigated in compliance with the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012) including restoration of temporarily disturbed habitats to pre-project conditions and compensatory mitigation for permanent impacts. A burrowing owl mitigation plan will be prepared and submitted to CDFW for approval prior to commencement of any ground disturbing activities. The plan will describe potential impacts to burrowing owl resulting from the proposed project and prescribe mitigation measures in accordance with CDFW guidelines.	Prior to/during construction; required coordination with agencies is ongoing.	Inyo County; Applicant; Qualified Biologist
BIO-12: Minimize impacts to bald and golden eagle. Prior to the approval of any solar development projects or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect bald and golden eagles, the project proponent shall implement the following measures to avoid and offset impacts: • Site specific surveys and monitoring of known or suspected eagle nesting and foraging habitat in areas where eagles occur (i.e., all of California) shall be conducted to provide background information related to bald eagle take permits (golden eagle is fully protected pursuant to Fish and Game Code and no permits may be issued for their take). Surveys shall be conducted using (at least) methods and qualified personnel as recommended by CDFW and USFWS. Surveys shall be conducted according to the USFWS's 2010 *Interim Golden Eagle Inventory and Monitoring Protocols; and Other Recommendations* (available online at http://www.fws.gov/southwest/es/oklahoma/documents/te_species/wind%20power/usfws_interim_goea_monitoring_protocol_10march2010.pdf), the USFWS's 2004 *Protocol for Evaluating Bald Eagle Habitat and Populations in California* and CDFW's 2010 *Bald Eagle Breeding Survey Instructions* (both documents are available online at http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html) or the most recent guidance regarding non-breeding season surveys for winter, migratory, and floating populations of eagles determined in coordination with CDFW and USFWS. • Where proposed projects may result in take of bald or golden eagles, the USFWS shall be consulted to determine the standards and requirements for the permit titled "Eagle Take – Necessary to	This measure has been satisfied with the preparation of the Biological Resources Technical Report (Appendix G). No further work is required.	Inyo County; Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
Protect Interests in a Particular Locality." Bald Eagle take permits are performance based and will hinge on the merits of the application. The permit application form and related information are on the USFWS website: http://www.fws.gov/migratorybirds/baldeagle.htm. The final rule (Federal Register / Vol. 74, No. 175, September 11, 2009), Environmental Assessment (http://www.fws.gov/migratorybirds/CurrentBirdIssues/BaldEagle/FEA_EagleTakePermit_Final.pdf), implementation and protocol documents, and consultations with USFWS will provide additional guidance. • Projects shall avoid, to the extent needed to comply with state and federal requirements, siting project facilities and infrastructure in a location or manner that would cause bald and golden eagle mortality, injury, and/or disturbance, i.e., locate facilities outside of eagle breeding home ranges as well as important breeding, wintering, and dispersal foraging areas, migration stopovers and corridors, and areas used by eagles for thermal or orographic lift. • Projects shall incorporate actions to avoid eagle disturbance (refer to the USFWS National Bald Eagle Management Guidelines, May 2007 and Interim Golden Eagle Technical Guidance: Inventory and Monitoring Protocols; and Other Recommendations in Support of Golden Eagle Management and Permit Issuance, Attachment II) in consultation with the USFWS to obtain the most current guidance and measures.		
BIO-14: Minimize impacts to bighorn sheep. Prior to the approval of any solar development projects or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect bighorn sheep, the project applicant shall retain a qualified biologist, approved by the USFWS and CDFW, to conduct preconstruction surveys for Sierra Nevada bighorn sheep and/or Peninsular and Mojave bighorn sheep depending on the location of the project. Due to low detection probabilities, the following data shall be used when evaluating potential projects impacts to the species: data relative to historic ranges of bighorn sheep; known and potential wildlife corridors (such as, those identified in the BLM Mojave and Colorado deserts land use plans); point location data; and existing literature. If bighorn sheep or their migration routes exist, are known or likely to occur on or in the vicinity of the project site, and may be affected by project-related activities, the consultation shall be conducted with USFWS, CDFW,	This measure has been satisfied with the preparation of the Biological Resources Technical Report (Appendix G). No further work is required.	Inyo County; Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
and other stakeholders, as appropriate, regarding avoidance, minimization, compensatory mitigation, or site abandonment.		
BIO-17: Minimize impacts to American badger and kit fox. Prior to the approval of any solar development projects or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect American badger and/or kit fox, the following measures shall be implemented to avoid, minimize, and mitigate for impacts to these species: • The project proponent shall prepare and implement an American badger and/or kit fox management plan. The plan shall be prepared in accordance with the most current CDFW guidelines for these species. The plan shall be approved by CDFW prior to implementation. The plan shall include the following components: o Preconstruction surveys and mapping efforts: biological monitors shall perform preconstruction surveys for badger and kit fox dens in the project area, including areas within 250 feet of all project facilities, utility corridors, and access roads. If dens are detected, each den shall be classified as inactive, potentially active, or definitely active, including characterization of den type for kit fox (natal, pupping, likely satellite, atypical) per CDFW guidance, and mapped along with major project design elements. o Inactive dens that would be directly impacted by construction activities shall be excavated by hand and backfilled to prevent reuse by badgers or kit fox. Excavation and filling activities shall be performed by a CDFW-approved biologist. Potentially and confirmed active dens shall not be disturbed during the whelping/pupping season (February 1 to September 30). o Monitoring requirements. Potentially and definitely active dens that would be directly impacted by construction activities shall be monitored by the CDFW-approved biologist for three consecutive nights (during weather conditions favorable for detection) using a tracking medium (such as diatomaceous earth or fire clay) and/or infrared camera stations at the entrance. If no tracks are observed in the tracking medium or no photos of the target	This measure has been satisfied with the preparation of the Desert Kit Fox and American Badger Management Plan, which will be implemented prior to/during construction.	Inyo County; Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
species are captured after three nights, the den shall be excavated and backfilled by hand. If tracks are observed, the den shall be progressively blocked with natural materials (rocks, dirt, sticks, and vegetation piled in front of the entrance) for the next three to five nights to discourage the badger or kit fox from continued use. After verification that the den is unoccupied it shall then be excavated and backfilled by hand to ensure that no badgers or kit fox are trapped in the den. o Passive relocation strategies. The management plan shall contain, at a minimum, several strategies to passively relocate animals from the site. These methods may involve strategic mowing, fencing, or other feasible construction methods to assist in moving animals offsite toward desirable land. The plan shall address location of preferred offsite movement of animals, based on CDFW data and land ownership. Private Even with permission from the landowner, private land is to be avoided to the maximum extent practicable. o Escape dens shall be installed along the perimeter fencing to reduce predation risk. o Kit fox disease prevention measures. The CDFW-approved biologist shall notify the County project manager and CDFW within 24-hours if a dead kit fox is found or appears sick. The plan must also detail a response to a kit fox injury, including a necropsy plan, reporting methods, and scope of adaptive methods in the event of a known or suspected outbreak. The project owner will pay for any necropsy work.		
BIO-18a: Minimize impacts to other special status birds, raptors, migratory birds, nesting birds and bats. The following measures apply to all projects developed under the REGPA that are determined during the project level biological resource evaluation to have the potential to impact nesting birds and/or bats and shall be implemented to avoid, minimize, and mitigate impacts to birds and bats. These measures are for bird species without established protocols and non-listed bird species that lack species-specific mitigation measures (not applicable to the common raven). For future development proposed to be located on or near land with old mines, specific survey protocols and mine closure considerations shall be developed.	Prior to construction.	Inyo County; Applicant; Qualified Biologist

Pre-Construction Bird Surveys and Avoidance Measures If project construction occurs between roughly February 1 and August 31, a CDFW-approved biologist shall conduct preconstruction surveys for nesting birds. The biologist(s) conducting the surveys shall be experienced bird surveyors and familiar with standard nest-locating techniques. Surveys shall be conducted in accordance with the following guidelines: • CDFW and/or USFWS (depending on the avian species in question) shall be contacted to obtain approval of pre-construction survey methodology prior to commencement of the surveys. • Surveys shall cover all potential nesting habitat in the project site and within 500-feet of the project site and linear facilities boundaries – inaccessible areas outside of the project boundary may be surveyed from within the project site or publicly accessible land with the aid of binoculars. • Vegetation removal or other ground disturbing activities should be avoided between February 1 and August 31; however if it cannot be avoided, the CDFW-approved avian biologist shall survey breeding/nesting habitat within the survey radius described within one week prior to the start of project activities. • CDFW and/or USFWS must provide concurrence with the survey findings prior to the start of construction. Site preparation and construction activities may begin after receiving the concurrence and if no breeding/nesting birds are observed. Additional follow up surveys shall be conducted if periods of construction inactivity exceed one week in any given area, an interval during which birds may establish a nesting territory and initiate egg laying and incubation. If active nests are detected during the survey, a no-disturbance buffer zone (protected area surrounding the nest, the size of which is to be determined by the project biologist in consultation with CDFW and /or USFWS) and a monitoring plan shall be developed. The nesting bird plan shall identify the types of birds that may nest in the project area, the proposed buffers, monitoring requirements, and reporting standards that will be implemented to ensure compliance with the Migratory Bird Treaty Act (MBTA) and Fish and Game Codes 3505 and 3505.3. The CDFW-approved biologist shall monitor the nest until he or she determines that nestlings have fledged and dispersed. **Pre-Construction Bat Surveys and Avoidance Measures**		

Mitigation Measure	Mitigation Timing	Responsible Party
Preconstruction bat surveys shall be conducted by a CDFW-approved biologist(s) familiar with standard bat survey techniques. If night or day roosting bats are identified in project structures they shall not be disturbed and a 100-foot non-disturbance buffer shall be placed between the roost and the construction activities until a determination is made whether the roost is a maternity roost or a non-breeding roost. Maternity colonies shall not be disturbed until coordination with CDFW is conducted to determine appropriate measures including an appropriate no-disturbance buffer. If the CDFW-approved bat biologist determines roosting bats consist of a non-breeding roost, the individuals shall be safely evicted under the direction of a CDFW-approved bat biologist. CDFW shall be notified of any bat evictions within 48-hours.		
BIO-18b: Minimize impacts to other special status birds, raptors, migratory birds, nesting birds and bats. **Bird and Bat Conservation Strategy** A bird and bat conservation strategy (BBCS) shall be prepared to reduce potential project impacts on migratory birds. The BBCS shall describe proposed actions to avoid, minimize, and mitigate adverse effects to migratory birds protected under the Migratory Bird Treaty Act (MBTA) during construction and operations of the proposed project. The BBCS shall be submitted to USFWS and CDFW for approval prior to the start of ground disturbing activities. The BBCS shall address buffer distances for specific bird species and include a robust, systematic monitoring protocol to document mortality and habitat effects to birds. The monitoring protocol should incorporate the following objectives at a minimum: (1) ~~a minimum of weekly monitoring for mortality and immediate necropsy to determine cause of death~~ monitoring for bird and bat mortality conducted in conjunction with routine operations and maintenance activities, with additional monitoring conducted where required by applicable wildlife agency permits or authorizations, both during construction and throughout the life of the project; (2) systematic data collection and reporting of bird mortality including data on the following: species, date, time, how the animal died, if feasible, (e.g., exhaustion, trauma), as well as any information on what might be attracting animals to the photovoltaic cells (light, insects, etc.); (3) to the extent feasible, a method to estimate the overall annual avian mortality rate associated with the facility, including mortality associated with all the features of the project that are likely to result in injury and mortality (e.g., fences, ponds, solar panels); and, (4) to the extent feasible, methods to determine whether there is spatial differentiation within the solar field in the rates of mortality (i.e., panels on the edge of the field versus	This measure has been satisfied by the preparation of the Avian and Bat Protection Plan. No further work is required.	Inyo County; Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
interior of the field), (5) conducting necropsy where required by the applicable wildlife agency (i.e., CDFW, USFWS) or permit. If collection of birds is required, b~~B~~iologists performing this work would be required to have a Scientific Collecting Permit from CDFW. ~~Standardized and systematic d~~Data on bird and bat mortalities will be collected to contribute to the improvement of the scientific communities' understanding of both baseline and photovoltaic related mortality that occurs in solar projects in the desert and is needed in order to identify improved methods to minimize adverse effects on migrating birds and bats. In the absence of a permit from the USFWS, the temporary or permanent possession of protected migratory birds and their carcasses is a violation of the MBTA. Because of the need for carcass collection to adequately monitor avian impacts during BBCS implementation and to reduce the food subsidy that carcasses may provide to common ravens (*Corvus corax*) and other predators, developers shall be required to obtain a special purpose utility permit from the USFWS allowing the collection of migratory birds and/or their carcasses prior to implementation of the monitoring protocol.		
BIO-18c: Minimize impacts to other special status birds, raptors, migratory birds, nesting birds and bats. General Bird Mortality Avoidance Measures The following measures are recommended by the USFWS Forensics Laboratory and shall be implemented to minimize bird mortality from birds attracted to solar facilities: • All potential nesting vegetation (e.g., trees, shrubs) shall be removed within the fenced area of the facility to decrease attractive habitat unless alternative vegetation management is required as part of permits issued by the CDFW and USFWS. • The most current science regarding visual cues to birds that the solar panel is a solid structure shall be implemented. This may include but is not limited to UV-reflective or solid, contrasting bands spaced no further than 28 centimeters from each other. An adaptive management approach for reducing bird collisions with solar panels shall be implemented in coordination with the USFWS so that measures used are systematically tested and modified as appropriate. • Projects with documented avian mortality shall work with the USFWS to conduct additional research to test measures for reducing avian mortality. Such measures could include, but are not	This measure was initially satisfied by the Basis of Design (Appendix A) and the Biological Resources Technical Report (Appendix G). Further implementation will occur during construction and operation.	Inyo County; Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
limited to, experimental lighting within the solar field and use of detection and deterrent technologies. • Developers of power tower operations shall implement adaptive management in consultation with the USFWS should mortality monitoring indicate that suspension of power tower operations during certain periods is necessary to reduce impacts on local or regional bird populations. Such measures may include, but are not limited to, suspending or reducing project operations during peak migration seasons. • Vertical orientation of mirrors shall be avoided whenever possible (for example, mirrors shall be tilted during washing). • Perch deterrent devices shall be placed on tower railings. • Exclusionary measures shall be employed to prevent bats from roosting in and around the facility. **Avoid Impacts from Electric Lines and Lights** The following design measures shall be implemented for applicable projects to minimize impacts to bats and birds: • Transmission lines and electrical components shall be installed and maintained in accordance with the Avian Power Line Interaction Committee's (APLIC) *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* (APLIC 2006) or the most recent guidance to reduce the likelihood of electrocutions of raptors and other large birds. • Transmission lines and electrical components shall be installed and maintained in accordance with the APLIC's *Reducing Avian Collisions with Power Lines: The State of the Art in 2012* (Edison Electric Institute and APLIC 2012) or the most recent guidance to reduce the likelihood of bird collisions. • Low and medium voltage connecting power lines shall be placed underground, if feasible. If burial of the lines is not feasible due to cost or other logistical reasons (for example in shallow bedrock		

Mitigation Measure	Mitigation Timing	Responsible Party
areas) or may cause unacceptable impacts to biological habitats and their dependent species, overhead lines may be installed in compliance with the following requirements: o low and medium voltage overhead lines shall be sited away from high bird crossing locations, such as between roosting and feeding areas or between lakes, rivers, and nesting areas; and/or o low and medium voltage overhead lines shall be installed parallel to tree lines or be otherwise screened so that collision risk is reduced. • Permanent communication towers and permanent meteorological towers shall not be constructed with guy wires, if feasible. If guy wires are necessary for permanent or temporary towers, bird flight diverters or high visibility marking devices shall be used. In such cases a monitoring plan shall be developed and carried out to determine the diverters'/devices' effectiveness in reducing bird and bat mortality. • Facility lighting shall be installed and maintained to prevent upward and side casting of light towards wildlife habitat and motion sensors shall be used. If the FAA requires turbine or tower lighting to alert aircraft, red or white strobe lights shall be used on the structures to minimize avian collision risks. The strobes shall be on for as brief of a period as possible and the time between strobe or flashes shall be the longest allowable. Strobes shall be synchronized so that a strobe effect is achieved and towers are not constantly illuminated. • Lights with sensors and switches shall be used to keep lights off when not required. • The use of high-intensity lighting, steady-burning, or bright lights such as sodium vapor or spotlights shall be minimized.		
BIO-18d: Minimize impacts to other special status birds, raptors, migratory birds, nesting birds and bats. **Compensatory Mitigation for the Cumulative Loss of Migratory Bird Habitat along the Pacific Flyway** The County shall require solar development projects implemented under the REGPA to mitigate for the loss of habitat by funding activities to restore, enhance, or conserve important habitat for migratory birds or to	Coordination with agencies is ongoing.	Inyo County; Applicant; Qualified Biologist

Mitigation Measure	Mitigation Timing	Responsible Party
remove other mortality sources from the Pacific Flyway. Such funding may be directed to the Sonoran Joint Venture (http://sonoranjv.org), Central Valley Joint Venture (http://www.centralvalleyjointventure.org), or Intermountain West Joint Venture (http://iwjv.org), or other groups able to implement conservation of migratory birds within the Pacific Flyway. The amount of funding will be determined by the County in coordination with USFWS and shall be commensurate with the level of impact.		
BIO-19: Minimize impacts to special status natural communities and protected natural areas. Solar development authorized under the REGPA will not be sited within any special status natural communities or protected natural areas. If solar development is sited adjacent to any special status natural communities or protected natural areas or is determined to have the potential to impact any off-site special status natural communities or protected natural areas during the project level biological resources evaluation (e.g., projects in the Laws SEDA could impact the hydrology of critical habitat for Fish Slough milk-vetch; projects in the Chicago Valley SEDA could negatively impact off-site mesquite bosque by altering drainage patterns or altering groundwater levels; projects in the Charleston View and Chicago Valley SEDAs could impact down-watershed habitats in the Amargosa Watershed (including habitats within the portion of the Amargosa River that has been designated by Congress as "Wild and Scenic."), a management plan will be developed in consultation with CDFW and/or USFWS. The management plan will address the potential offsite effects of the construction and on-going operations of the facility on special status species including but not limited to the effects of human disturbance, noise, nighttime maintenance activities, increased lighting, increased traffic on desert roads, and barriers to movement for special status species. The management plan will also address potential mechanisms of offsite habitat degradation such as introduction of invasive weeds, introduction or attraction of feral animals or other species attracted to areas with anthropogenic disturbance, hydrologic disruption due to groundwater impacts or alteration of surface drainage patterns, and increased risk of wildfires. The management plan will also outline the specific measures to be undertaken to avoid and/or minimize indirect effects of the solar development on the adjacent sensitive habitat and special status species and include a plan for long term monitoring of the adjacent habitat as well as an adaptive management plan. If riparian communities (other than water birch riparian scrub which is a special status natural community that must be avoided) are present in a project area, impacts to riparian communities shall be avoided or minimized by implementing the following measures:	This measure has been satisfied with the preparation of the Biological Resources Technical Report (Appendix G). No further work is required.	Inyo County; Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
• The project shall be redesigned or modified to avoid direct and indirect impacts on riparian communities, if feasible. • Riparian communities adjacent to the project site shall be protected by installing environmentally sensitive area fencing, if necessary, in coordination with the project biologist. • The potential for long-term loss of riparian vegetation shall be minimized by trimming vegetation rather than removing the entire shrub. Shrub vegetation shall be cut at least 1 foot above ground level to leave the root systems intact and allow for more rapid regeneration of the species. Cutting shall be limited to a minimum area necessary within the construction zone. This type of removal shall be allowed only for shrub species (all trees shall be avoided) in areas that do not provide habitat for special status species (e.g., willow flycatcher). • If riparian vegetation is removed as part of a project, the loss of riparian vegetation shall be mitigated to ensure no net loss of habitat functions and values. Compensation ratios shall be based on site-specific information and determined through coordination with state and federal agencies (including CDFW and USFWS). Compensation shall be provided at a minimum 1:1 ratio (1 acre restored or created for every 1 acre removed) and may be a combination of on-site restoration/creation, off-site restoration, or mitigation credits. A restoration and monitoring plan shall be developed and implemented that describes how riparian habitat shall be enhanced or recreated and monitored over a minimum period of time, as determined by the appropriate state and federal agencies.		
BIO-20a: Minimize impacts to waters of the US/State, including wetlands. The following measures apply to all projects developed under the REGPA that are determined during the project level biological resource evaluation to have the potential to impact waters of the US or waters of the State, including wetlands, and shall be implemented to avoid, minimize, and mitigate for such impacts. These measures shall be incorporated into contract specifications and implemented by the construction contractor. In addition, the project proponent shall ensure that the contractor incorporates all state and federal permit conditions into construction specifications.	This measure has been satisfied with the preparation of the Basis of Design (Appendix A), the Biological Resources Technical Report (Appendix G), and the Jurisdicitional Determination (Appendix	Inyo County; Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
• Wetlands and other waters of the US/state shall be delineated on the project site using both USACE and CDFW definitions of wetlands. USACE jurisdictional wetlands shall be delineated using the methods outlined in the USACE 1987 Wetlands Delineation Manual and the Arid West Manual, or the most recent guidance. This information shall be mapped and documented as part of the CEQA documentation, as applicable, and in wetland delineation reports. All applicable permits shall be obtained prior to impacting waters of the US/State including CWA Section 404 and 401 permits from the USACE and the RWQCB respectively and a Streambed Alteration Agreement from CDFW. • The project shall be redesigned or modified to avoid direct and indirect impacts on waters of the U.S./State, if feasible.	R). No further work is required.	
BIO-20b: Minimize impacts to waters of the US/State, including wetlands. • Standard erosion control measures shall be implemented for both regions of construction and operation where sediment runoff from exposed slopes threatens to enter waters of the State and/or waters of the US. Sediment and other flow-restricting materials shall be moved to a location where they shall not be washed back into the stream. All disturbed soils and roads within the project site shall be stabilized to reduce erosion potential, both during and following construction. Areas of disturbed soils (access and staging areas) with slopes trending towards a drainage shall be stabilized to reduce erosion potential. • Wetland habitats that occur near the project site shall be protected by installing environmentally sensitive area fencing if necessary, in coordination with the project biologist. • All construction vehicles and equipment shall use existing roadways to the extent feasible to avoid or reduce impacts to waters of the U.S./State. • Installation activities shall be avoided in saturated or ponded wetlands during the wet season (spring and winter) to the maximum extent possible. Where such activities are unavoidable, protective practices, such as use of padding or vehicles with balloon tires, shall be used.	Prior to/during construction.	Inyo County; Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
• Where determined necessary by resource specialists, geotextile cushions and other materials (e.g., timber pads, prefabricated equipment pads, or geotextile fabric) shall be used in saturated conditions to minimize damage to the substrate and vegetation. • Exposed slopes and stream banks shall be stabilized immediately on completion of installation activities. Other waters of the US shall be restored in a manner that encourages vegetation to reestablish to its pre-project condition and reduces the effects of erosion on the drainage system. • In highly erodible stream systems, banks shall be stabilized using a non-vegetative material that will bind the soil initially and break down within a few years. If the project engineers determine that more aggressive erosion control treatments are needed, geotextile mats, excelsior blankets, or other soil stabilization products shall be used. • During construction, trees, shrubs, debris, or soils that are inadvertently deposited below the ordinary high-water mark of drainages shall be removed in a manner that minimizes disturbance of the drainage bed and bank.		
BIO-20c: Minimize impacts to waters of the US/State, including wetlands. • If wetlands are filled or disturbed as part of the highway solar project, compensation will be implemented for the loss of wetland habitat to ensure no net loss of habitat functions and values. Compensation ratios shall be based on site-specific information and determined through coordination with state and federal agencies (including CDFW, USFWS, and USACE). The compensation shall be at a minimum 1:1 ratio (1-acre restored or created for every 1-acre filled) and may be a combination of on-site restoration/creation, off-site restoration, or mitigation credits. A restoration and monitoring plan shall be developed and implemented if on-site or offsite restoration or creation is chosen. The plan shall describe how wetlands shall be created and monitored for the duration established by the regulatory agency.	Coordination with agencies is ongoing.	Inyo County; Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
BIO-20d: Minimize impacts to waters of the US/State, including wetlands. For solar projects proposing groundwater pumping, hydrological studies shall be performed to assess the potential for off-site impacts to jurisdictional waters that depend on groundwater. Projects shall be designed to avoid and/or minimize impacts to groundwater-dependent jurisdictional resources off-site, and all proposed impacts to such resources shall be reviewed by the agencies with jurisdiction over the affected resources and mitigated according to those agencies' requirements.	This measure has been satisfied with the preparation of the Hydrology Water Quality Assessment (Appendix M), the Water Supply Assessment (Appendix N), and the Hydrographic Basin Summary and the Groundwater Monitoring Plan (Appendix TBD). Coordination with agencies is ongoing.	Inyo County; Applicant
BIO-21: Minimize impacts to movement or migratory corridors or native wildlife nursery sites. The following mitigation measures will be implemented to minimize impacts to movement or migratory corridors or native wildlife nursery sites: • Solar development authorized under the REGPA shall not be sited in or within 1,000-feet of any areas determined by the County in consultation with responsible and trustee agencies to be Important Bird Areas, essential connectivity areas or linkages identified in the 2001 Missing Links in California's Landscape Project (Penrod et al. 2001), or tule elk and mule deer movement corridors unless potentially significant impacts are avoided. The appropriate buffer distance shall be determined on a project-by-project basis as determined by the County in consultation with responsible and trustee agencies. • Any proposed solar development projects in the OVSA shall be required to study the potential impact of the project on tule elk and mule deer movement corridors prior to project approval. If a proposed project is determined to be located within an important tule elk and mule deer movement corridor, the applicant shall be responsible for the preparation of a plan to avoid and/or minimize impacts to such corridors in coordination with CDFW.	This measure has been satisfied with the preparation of the Basis of Design (Appendix A) and Biological Resources Technical Report (Appendix G). No further work is required.	Inyo County; Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
• As stated in Mitigation Measure BIO-6, ~~projects shall not~~ a small portion (up to 5% of the Developable Area) of the Project may be sited within areas identified for desert tortoise recovery or conservation according to the Draft Revised Recovery Plan for the Mojave Population of the Desert Tortoise (USFWS 2011) (such as designated critical habitat, ACECs, DWMAs, priority connectivity areas, and other areas or easements managed for desert tortoises) if agreed to with the USFWS and CDFW and all impacts are mitigated.[2]		
BIO-22: Minimize spread of invasive plant species or noxious weeds. For projects implemented under the REGPA that are determined during the project level biological resource evaluation to have the potential to result in the spread of invasive plant species or noxious weeds, the following mitigation measures shall be implemented: To prevent the introduction and spread of noxious weeds, a project-specific integrated weed management plan shall be developed for approval by the permitting agencies, which would be carried out on both regions of the project. The plan shall include the following measures, at a minimum, to prevent the establishment, spread, and propagation of noxious weeds: • The area of vegetation and/or ground disturbance shall be limited to the absolute minimum and motorized ingress and egress shall be limited to defined routes. • Project vehicles shall be stored on-site in designated areas to minimize the need for multiple washings of vehicles that re-enter the project site. • Vehicle wash and inspection stations shall be maintained on-site and the types of materials brought onto the site shall be closely monitored. • The tires and undercarriage of vehicles entering or reentering the project site shall be thoroughly cleaned. • Native vegetation shall be re-established quickly on disturbed sites. • Weed Monitor and quickly implement control measures to ensure early detection and eradication of weed invasions. • Use certified weed-free straw, hay bales, or equivalent for sediment barrier installations	This measure has been satisfied with the preparation of the Habitat Restoration, Revegetation, and Weed Management Plan. No further work is required.	N/A

[2] Approximately 4.2% of the Bonanza Peak Energy Project's 2,400-acre Developable Area is within a priority connectivity area.

Mitigation Measure	Mitigation Timing	Responsible Party
BIO-23: Implement general design guidelines to minimize impacts to biological resources.[3] All projects authorized under the REGPA will incorporate the following design guidelines as applicable in coordination with the County: • Design and site the project, in consultation with the permitting agencies, to avoid or minimize impacts to sensitive and unique habitats and wildlife species. Locate energy generation facilities, roads, transmission lines, and ancillary facilities in the least environmentally sensitive areas (such as away from riparian habitats, streams, wetlands, vernal pools, drainages, sand dunes, critical wildlife habitats, wildlife conservation, management, other protected areas, or unique plant assemblages). o Design facilities to use existing roads and utility corridors as much as possible to minimize the number and length/size of new roads, laydown, and borrow areas. o Design transmission line poles, access roads, pulling sites, storage, and parking areas to avoid special status species or unique plant assemblages adjacent to linear facilities. o Locate and/or design facilities to minimize or mitigate wildlife movement disruptions. o Locate and/or design facilities to minimize or mitigate wildlife movement disruptions. o Design facilities to discourage their use as bird perching, drinking, or nesting sites. o Design facility lighting to prevent side casting of light toward wildlife habitat and skyward protection of light that may disorient night-migrating birds. o Avoid using or degrading high value or large intact habitat areas, such as areas identified as sensitive natural habitat, Wilderness Areas, Areas of Critical Environmental Concern, critical habitat; riparian, sand dunes. o Avoid severing movement and connectivity corridors. Consider existing conservation investments such as protected areas and lands held in trust for conservation purposes. o Locate facilities so they do not disrupt sand transport processes nor remove some or all of a sand source that contributes to sand dune systems harboring listed or otherwise sensitive species. Avoid armoring nearby dune system.	This measure has been satisfied through project design, as documented in the Basis of Design Report (Appendix A) and Biological Resources Technical Report (Appendix G). No further work is required.	N/A

[3] The title and text of MM BIO-23 are identical to those in the 2015 REGPA PEIR MMRP; no changes have been made to the mitigation measure. The text is underlined solely because MM BIO-23 was not included in an earlier publicly released draft of this Mitigation Measure Compliance Checklist for the Bonanza Peak Energy Project.

Mitigation Measure	Mitigation Timing	Responsible Party
BIO-25: Minimize potential indirect impacts due to groundwater pumping.[4] Mitigation measures for potential indirect impacts due to groundwater pumping are included in Mitigation Measure BIO-1, Mitigation Measure BIO-2, Mitigation Measure BIO-3, and Mitigation Measure BIO-4. Prior to approval of any project under the REGPA requiring groundwater pumping, the potential effects of the groundwater pumping on biological resources will be evaluated during preparation of the project-specific biological resources evaluation and will be based on the results of the hydrologic study conducted as a requirement of Mitigation Measure HYD-2 in Section 4.9, Hydrology and Water Quality. If groundwater pumping is determined to have the potential to result in off-site impacts to biological resources, measures will be included in the project-specific biological resources mitigation and monitoring plan to avoid, minimize, and mitigate for any such impacts. The measures will be commensurate with the resource and level of impact and may include but are not limited to vegetation and/or water table monitoring, preservation of suitable habitat or funding of activities to restore, enhance or conserve habitat within the County, and a requirement for the project applicant to purchase and retire currently exercised water rights along the same flowpath as the water being used by the facility at a minimum 1:1 ratio.	This measure has been satisfied with the preparation of the Biological Resources Technical Report (Appendix G), the Water Supply Assessment (Appendix N), and the Hydrographic Basin Summary and Groundwater Monitoring Plan (Appendix TBD). No further work is required.	N/A
CUL-1: Minimize impacts to cultural resources. Adverse effects to historical resources (CRHRP-eligible cultural resources) would be resolved on a project-specific level. As part of this process, resource identification efforts including pedestrian surveys, formal government-to-government tribal consultation with state lead agencies, and engagement with Native American communities would be necessary. Examples of ways to resolve adverse effects include: • Plan ground disturbance to avoid cultural resources. • Deed cultural resources into permanent conservation easements. • Cap or cover archaeological resources with a layer of soil before building on the location. • Plan parks, greenspace, or other open space to incorporate cultural resources. • Write synthetic documents summarizing the current understanding of the history and prehistory of the project area and vicinity. • Recover data for archaeological resources.	This measure has been satisfied with the preparation of the Cultural Resources Assessment (Appendix H). No further work is required.	N/A

[4] The title and text of MM BIO-23 are identical to those in the 2015 REGPA PEIR MMRP; no changes have been made to the mitigation measure. The text is underlined solely because MM BIO-23 was not included in an earlier publicly released draft of this Mitigation Measure Compliance Checklist for the Bonanza Peak Energy Project.

Mitigation Measure	Mitigation Timing	Responsible Party
• Develop interpretive material to correspond with recreational uses to educate the public about protecting cultural resources and avoiding disturbance of sensitive resources. • Develop partnerships to assist in the training of groups and individuals to participate in site stewardship programs. • Coordinate with visual resources staff to ensure visual management standards consider cultural resources and tribal consultation to include landmarks of cultural significance to Native Americans (e.g., TCPs, trails). • Measures to address visual impacts to the setting of built-environment resources include: o Existing mature plant specimens shall be used for screening during construction, operation, and decommissioning phases. The identification of plant specimens that are determined to be mature and retained shall occur as part of the design phase and mapped/identified by a qualified plant ecologist or biologist and integrated into the final design and project implementation. o Revegetation of disturbed areas within the project area shall occur as various activities are completed. Plans and specifications for revegetation shall be developed by a qualified plant ecologist or biologist before any extant vegetation is disturbed. The revegetation plan shall include specification of maintenance and monitoring requirements, which shall be implemented for a period of 5 years after project construction or after the vegetation has successfully established, as determined by a qualified plant ecologist or biologist. Plant material shall be consistent with surrounding native vegetation. o The color of the wells, pipelines, storage tanks, control structures, and utilities shall consist of muted, earth-tone colors that are consistent with the surrounding natural color palette. Matte finishes shall be used to prevent reflectivity. For example, integral color concrete should be used in place of standard gray concrete. o The final revegetation and painting plans and specifications shall be reviewed and approved by an architect, landscape architect, or allied design professional licensed in the State of California to ensure that the design objectives and criteria are being met. o Specific impact identification and adjustments to finish specifications shall occur during project design. Implementation of the revegetation and coloration plans shall occur during oilfield development. Maintenance and monitoring requirements shall be implemented after initial project construction for a period of 5 years, or after the vegetation has successfully established, as determined by a qualified plant ecologist or biologist.		

Mitigation Measure	Mitigation Timing	Responsible Party
• Protective measures and monitoring protocols can be implemented for built environment resources located in close proximity to a project but that are not anticipated to be directly impacted by demolition or development but which may be subject to other direct impacts such as change in historic setting, vibration, noise, or inadvertent damage include: o Historic Structures Reports (HSR) shall be prepared for buildings and structures adjacent to the project area for which detailed information is required to develop protection measures. Reports shall be completed for buildings and structures that appear to be in poor condition and, therefore, potentially sensitive to development-related activities such as vibration. These reports shall determine if predevelopment stabilization through temporary shoring and bracing of these buildings is warranted. o Predevelopment condition assessments shall be prepared for buildings and structures that qualify as historical resources that are adjacent to the project area and are structurally stable, but could be unintentionally damaged during development. Should there be any question as to whether the project caused damage, these condition assessments will provide confirmation of the predevelopment condition. o Precautions to protect built environment historical resources from construction vehicles, debris, and dust may include fencing or debris meshing. Temporary mothballing, and fire and intrusion protection may be needed if the buildings are unoccupied during oil and gas field development. o Protective measures shall be field checked as needed during development by a qualified architectural historian with demonstrated experience conducting monitoring of this nature. Vibration monitoring may be required for buildings determined susceptible to vibration damage located in close proximity to development activities or machinery that cause vibration. o These measures are designed to avoid direct impacts such as vibration that may result in structural damage or inadvertent direct impacts. Structural damage or demolition would otherwise potentially result in a significant impact because character-defining features and aspects of historic integrity that convey the resource's significance could be materially impaired. Redesign of relevant facilities shall be used to avoid destruction or damage where feasible.		

• For built resources that will be directly and significantly impacted, mitigation typically includes:
  ○ Historic American Building Survey (HABS), Historic American Engineering Record (HAER), and Historic American Landscape Survey (HALS) records will be prepared for historical resources that will be demolished. The HABS/HAER/HALS documentation will be prepared as appropriate for the impacted historical resource with HABS normally completed at Level II. These reports will include written and photographic documentation of the significant and character-defining features of these properties. While this documentation will not reduce impacts to a less than a significant level, it is needed to capture and preserve a description of the significant information and characteristics associated with the resource.
  ○ All HABS/HAER/HALS reports are subject to review and approval by the NPS. Following approval, the lead agencies will produce sufficient copies for distribution to identified repositories, including the Library of Congress, the California State Library, the University of California Water Resources Center Archives, and any local repositories, as appropriate and agreed upon with the County Planning Department and interested parties. Distribution will ensure the formal documentation is retained and conveyed to a wide audience.
  ○ Deconstruction and salvage of materials from demolished buildings will be performed to the extent feasible to enable the restoration of similar buildings and structures outside of the area of direct impact. Deconstruction and salvage will not reduce impacts to a less than significant level, but will help to ensure that similar resources are restored and maintained in manner that will ensure that examples of the resource type are preserved.
  ○ Relocate historically significant resources for which demolition cannot be feasibly avoided by development. In such circumstances, relocation must meet the requirements for the Special Criteria Consideration for Moved Buildings, Structures, and Objects to ensure the significance of the building is retained. Require that the preservation or reuse of an eligible structure follow Department of the Interior (DOI) Standards and Guidelines for Archeology and Historic Preservation. If the building is considered a historic resource under CEQA, the local building inspector must grant code alternatives under the State Historic Building Code.
  ○ In a case where HABS/HAER documentation does not provide adequate mitigation to reduce impacts to a less than significant level, projects would normally be required to take additional steps to capture the history and memory of the resource and share this information with the public using various methods such as Web media, static displays, interpretive signs, use of on-site volunteer docents, or informational brochures.
• Avoidance and minimization are the preferred means by which the County would prevent potential impacts to cultural resources, including cultural landscapes. Preservation in place is the preferred		

Mitigation Measure	Mitigation Timing	Responsible Party
manner to avoid and minimize impacts to historical and archaeological resources. All impacts to cultural resources that are eligible or potentially eligible for listing on the CRHR shall be avoided, to the greatest extent possible. Preservation in place may be accomplished by, but is not limited to, the following: Avoidance of significant or potentially significant cultural resources through project redesign and the relocation of project element. • Following avoidance and minimization, measures to address impacts to cultural resources at a landscape scale should follow the guidance in A Strategy for Improving Mitigation Policies and Practices of the Department of the Interior (DOI 2014) and the National Park Service Preservation Brief 36 - Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes, including but not limited to: o Document the individual landscape characteristics and features in the context of the landscape as a whole in a Cultural Landscape Report, including contributing and non-contributing features. o Develop compensatory mitigation. o Coordinate with other agencies. o Monitor and evaluate the progress of long-term mitigation. o Develop and maintain geospatial information systems for use in identifying existing and potential conservation strategies and development opportunities.		
CUL-1a: Designate project cultural resources staff. <u>Project Cultural Resources Specialist.</u> Prior to the approval of a Renewable Energy Permit, Renewable Energy Development Agreement, or Renewable Energy Impact Determination by the County Planning Department, a cultural resources specialist whose training and background conforms to the US Secretary of Interior's Professional Qualifications Standards, as published in Code of Federal Regulations Title 36, part 61 shall be retained by the project owner to conduct a cultural resources inventory, evaluate any resources, produce a Cultural Resources Management and Treatment Plan and other related plans for the approved project and to implement any required plans and mitigation, as necessary as determined by the cultural resource specialist. Their qualifications shall be appropriate to the needs of the project and shall include local knowledge. If the project primarily impacts resources archaeological in nature, the cultural resources specialist shall have a background in archaeology, anthropology or cultural resource management. If the project impacts primarily built environment resources, the cultural resources specialist shall have a background in architectural history. Resumes of the proposed cultural resources staff shall be submitted to	This measure has been satisfied with the preparation of the Cultural Resources Assessment (Appendix H). No further work is required.	Inyo County; Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
the County Planning Department or other CEQA lead agency for review and approval. The Monitoring and Treatment Plan (Mitigation Measure CUL-1c) shall be prepared and implemented under the direction of the cultural resources specialist and shall address and incorporate CUL-1a through CUL-1g. Additional Cultural Resources Staff. The project's cultural resources specialist may obtain the services of specialists, cultural resources monitors and field crew if needed, to assist in identification, evaluation, mitigation, monitoring, and curation activities. Cultural resources staff shall have a Bachelor's degree in anthropology, archaeology, history, architectural history or related field, and demonstrated field experience. These individuals must also meet local lead agency qualifications, and their resumes must be reviewed and approved by local lead agency staff prior to beginning work.		
CUL-1b: Draft a Historical Resources Treatment Plan. To mitigate the potential impacts on historical resources identified during inventory of the project area, a treatment plan for historical resources shall be developed by, depending on the nature of the resources identified, an archaeologist and/or architectural historian who meets the Secretary of Interior's Professional Qualifications Standards. This treatment plan would include data recovery plans that would address NRHP/CRHR-eligible cultural resources that would be impacted by the project by requiring some level of extracting the scientific value and analysis of the resources prior to development.	Prior to/during construction.	Inyo County; Applicant; Secretary of the Interior-Qualified Archaeologist
CUL-1c: Draft a Monitoring and Treatment Plan. To mitigate the potential impacts related to inadvertent discovery of archaeological resources during construction, the project proponents shall have a Secretary of the Interior-qualified archaeologist implement a monitoring program and an unanticipated archaeological resource treatment plan. The qualified archaeologist will evaluate any resources uncovered during ground disturbing activities and implement appropriate treatment as specified in the archaeological resource treatment plan. During all activities related to the project that include ground disturbance, these ground-disturbing activities will be observed by an archaeological monitor, as determined necessary by the archaeologist. a) If, during the course of monitoring, a potentially significant resource is discovered, the qualified archaeologist will have the authority to stop or redirect ground disturbing activities away from the resource until it can be evaluated.	Prior to/during construction.	Inyo County; Applicant; Secretary of the Interior-Qualified Archaeologist

Mitigation Measure	Mitigation Timing	Responsible Party
b) If previously unknown cultural deposits are discovered during the course of construction, such as previously undiscovered stratified cultural deposits, a testing program will be implemented to evaluate the stratified cultural deposit. c) A separate Native American monitor shall be retained by the project proponent to monitor ground disturbing activities in and around archaeological resources. The Native American monitor shall be selected through consultation with Native American tribal groups. The Native American monitor shall work in conjunction with the qualified archaeologist.		
CUL-1d: Grant authority to halt project activities. Prior to the approval of a Renewable Energy Permit, Renewable Energy Development Agreement, or Renewable Energy Impact Determination by the County or the relevant CEQA lead agency, the project owner shall submit a written document granting authority to halt project related activities to the project's cultural resources specialist (as defined in Mitigation Measure CUL-1a) and cultural resources monitors in the event of a discovery or possible damage to a cultural resource. Redirection of project related activities shall be accomplished under the direction of the project supervisor in consultation with the cultural resources specialist. The details of this agreement shall be stipulated in the Cultural Resources Management and Treatment Plan as required in Mitigation Measure CUL-1b.	During construction.	Inyo County; Construction Contractor; Secretary of the Interior-Qualified Archaeologist
CUL-1e: Develop a Cultural Resources Worker Environmental Awareness Program. Prior to and for the duration of project activities, the project owner shall provide WEAP training to all new workers within their first week of employment at the project site. The training shall be prepared by the project's cultural resources specialist (as defined in CUL-1) in consultation with local Native Americans and shall incorporate the traditions and beliefs of local Native American groups into the presentation. The presentation may be conducted by any qualified cultural resources specialist and a Native American, if possible, and may be presented in the form of a video. A consulting fee or honorarium shall be negotiated with the local Native American consultants and presenter and paid to them for their participation. The training may be discontinued when project activities are completed or suspended but must be resumed when project activities resume. The training shall include: 1. A discussion of applicable laws and penalties under the law; 2. Samples or visuals of artifacts that might be found in the project vicinity;	Prior to/during construction.	Inyo County; Applicant; Secretary of the Interior-Qualified Archaeologist

Mitigation Measure	Mitigation Timing	Responsible Party
3. A discussion of what such artifacts may look like when partially buried, or wholly buried and then freshly exposed; 4. A discussion of what prehistoric and historical archaeological deposits look like at the surface and when exposed during ground-disturbance, and the range of variation in the appearance of such deposits; 5. A discussion of what local Native American beliefs are, how those beliefs are related to cultural resources that may be found in the area, and the appropriate respectful behavior towards sacred places and objects; 6. Instruction that all cultural resources specialists have the authority to halt ground disturbance in the area of a discovery to an extent sufficient to ensure that the resource is protected from further impacts, as determined by the project cultural resources specialist (as defined in CUL-1); 7. Instruction that employees are to avoid areas flagged as sensitive for cultural resources; 8. Instruction that employees are to halt work on their own in the vicinity of a potential cultural resources discovery and shall contact their supervisor and the project cultural resources specialist (as defined in CUL-1), and that redirection of work would be determined by the project supervisor and the project cultural resources specialist; 9. An informational brochure that identifies reporting procedures in the event of a discovery; 10. An acknowledgement form signed by each worker indicating that they have received the training which shall be submitted to the County Planning Department and any other CEQA lead agency; and, 11. A sticker that shall be placed on hard hats indicating that environmental training has been completed.		
CUL-1f: Conduct cultural resources reporting. The project cultural resources specialist shall document results in interim and final reports as necessary. The contents and timing of these reports shall be stipulated in the Cultural Resources Management and Treatment Plan (CUL-1b). Final reports for archaeological resources, human remains, and some landscapes, shall be written by or under the direction of a Secretary of the Interior qualified archaeologist or architectural historian as appropriate for the project. Reports shall be provided in the California Office of Historic Preservation Archaeological Resource Management Reports: Recommended Contents and Format and local agency formats. Final documents shall report on all field activities including dates, times and locations, results, samplings, and analyses. All survey reports, Department of Parks and Recreation 523	During construction.	Inyo County; Applicant; Secretary of the Interior-Qualified Archaeologist

Mitigation Measure	Mitigation Timing	Responsible Party
forms, data recovery reports, and any additional research reports not previously submitted to the CHRIS and the State Historic Preservation Officer shall be included as appendices.		
CUL-1g: Proper curation of cultural resources collections. All archaeological materials retained as a result of the cultural resources investigations (survey, testing, data recovery) shall be curated in accordance with the California State Historical Resources Commission's Guidelines for the Curation of Archaeological Collections, into a retrievable storage collection in a public repository or museum. Additionally, all collection and retention of archaeological materials as a result of cultural resources investigations must comply with the regulations and policies of the land managing agency or property owner.	During construction.	Inyo County; Applicant; Secretary of the Interior-Qualified Archaeologist
CUL-2: Implement actions in the event of the incidental discovery of human remains. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be notified within 24-hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie potential remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are or are believed to be Native American, the Coroner shall notify the NAHC within 24-hours. In accordance with California PRC Section 5097.98, the NAHC must immediately notify those persons it believes to be the ~~m~~Most ~~l~~Likely ~~d~~Descendant of the deceased Native American. The descendant~~s~~ shall complete their inspection within 48-hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the County, the disposition of the human remains. Should human remains be discovered at any time during construction of the project, construction in the vicinity would halt and the County Coroner would be contacted immediately. If the Coroner determines that the remains do not require an assessment of cause of death and are probably Native American, then the NAHC would be contacted to identify the Most Likely Descendant.	During construction.	Inyo County; Applicant; County Coroner
PALEO-1a: Protect paleontological resources. Project developers shall document in a paleontological resources assessment report whether paleontological resources exist in a project area on the basis of the following: the geologic context of the region and site and its potential to contain paleontological resources (including the fossil yield potential), a records search of institutions holding paleontological collections from California desert regions, a review of	This measure has been satisfied with the preparation of the Paleontological Resources Assessment (Appendix I). No further work is	Inyo County; Construction Contractor

Mitigation Measure	Mitigation Timing	Responsible Party
published and unpublished literature for past paleontological finds in the area, and coordination with paleontological researchers working locally in potentially affected geographic areas (or studying similar geologic strata).	required.	
PALEO-1b: Protect paleontological resources. If paleontological resources are present at the site or if the geologic units to be encountered by the project (at the surface or the subsurface) have a high/very high or moderate/unknown fossil yield, a Paleontological Resources Management Plan shall be developed. The plan shall include the following types of requirements: 1. The qualifications of the principal investigator and monitoring personnel. 2. Construction crew awareness training content, procedures, and requirements. 3. Any measures to prevent potential looting, vandalism, or erosion impacts. 4. The location, frequency, and schedule for on-site monitoring activities. 5. Criteria for identifying and evaluating potential fossil specimens or localities. 6. A plan for the use of protective barriers and signs, or implementation of other physical or administrative protection measures. 7. Collection and salvage procedures. 8. Identification of an institution or museum willing and able to accept any fossils discovered. 9. Compliance monitoring and reporting procedures. If the geologic units that would be affected by the project have been determined to have low fossil yield potential, paleontological resources shall be included as an element in construction worker awareness training. The training shall include measures to be followed in the event of unanticipated discoveries, including suspension of construction activities in the vicinity. The Paleontological Resources Management Plan shall evaluate all of the construction methods proposed, including destructive excavation techniques. Where applicable, the principal investigator shall include in the plan an evaluation of the potential for such techniques to disturb or destroy paleontological resources, an evaluation of whether loss of such fossils	Prior to/during construction.	Inyo County; Construction Contractor

Mitigation Measure	Mitigation Timing	Responsible Party
would represent a significant impact, and discussion of mitigation or compensatory measures (such as recordation/recovery of similar resources elsewhere on the site) that are necessary to avoid or substantially reduce the impact.		
GEO-1: Conduct site-specific geotechnical investigations. Site-specific geotechnical investigations will be completed for all applicable proposed development within the individual SEDAs and the OVSA, and the potential off-site transmission corridors associated with the Charleston View, Chicago Valley, and Trona SEDAs (if applicable), prior to final project design approval. These investigations will identify site-specific criteria related to considerations such as grading, excavation, fill, and structure/facility design. All applicable results and recommendations from the geotechnical investigations will be incorporated into the associated individual project design documents to address identified potential geologic and soil hazards, including but not necessarily limited to: ground rupture; ground acceleration (ground shaking); soil liquefaction (and related issues such as dynamic settlement and lateral spreading); landslides/slope instability; geologic and soil instability (including compressible/collapsible soils, subsidence, and corrosive soils); and expansive soils. The final project design documents will also encompass applicable standard design and construction practices from sources including the California Building Code (CBC), International Building Code (IBC), and County standards, as well as the results/recommendations of County plan review and on the-ground geotechnical observations and testing to be conducted during project excavation, grading and construction activities (with all related requirements to be included in applicable engineering/design drawings and construction contract specifications). A summary of the types of remedial measures typically associated with identified potential geologic and soil hazards, pursuant to applicable regulatory and industry standards (as noted), is provided below. The remedial measures identified/recommended as part of the described site-specific geotechnical investigations will take priority over the more general types of standard regulatory/industry measures listed below. • Ground Rupture: (1) locate (or relocate) applicable facilities away from known active (or potentially active) faults and outside of associated CGS Earthquake Fault Zones; and (2) require appropriate (typically 50-foot) building exclusion buffers on either side of applicable fault traces. • Ground Acceleration (Ground Shaking): (1) incorporate applicable seismic loading factors (e.g., IBC/CBC criteria) into the design of facilities such as structures, foundations/slabs, pavement, utilities, manufactured slopes, retaining walls and drainage facilities; (2) use remedial grading	This measure has been satisfied with the preparation of the Geotechnical Recommendation Report (Appendix J). No further work is required.	N/A

Mitigation Measure	Mitigation Timing	Responsible Party
techniques where appropriate (e.g., removing/replacing and/or reconditioning unsuitable soils); and (3) use properly engineered fill per applicable industry/regulatory standards (e.g., IBC/CBC), including criteria such as appropriate fill composition, placement methodology, compaction levels, and moisture content. • Liquefaction and Related Effects: 1) remove unsuitable soils and replace with engineered fill (as previously described), per applicable regulatory/industry standards (e.g., IBC/CBC); (2) employ measures such as deep soil mixing (i.e., introducing cement to consolidate loose soils) or use of subsurface structures (e.g., stone columns or piles) to provide support (i.e., by extending structures into competent underlying units); (3) use subdrains in appropriate areas to avoid or reduce near-surface saturation; and (4) design for potential settlement of liquefiable materials through means such as use of post-tensioned foundations and/or flexible couplings for utility connections. • Landslides/Slope Instability: (1) construct properly drained shear keys and/or replace susceptible deposits with manufactured buttress fills where appropriate; (2) employ applicable slope laybacks (i.e., shallower slopes) and/or structural setbacks; (3) incorporate structures such as retaining walls and stability fills where appropriate to provide support; and (4) implement proper slope drainage and landscaping where applicable per established regulatory/industry standards (e.g., IBC/CBC). • Geologic and Soil Instability: (1) use standard efforts such as over-excavation and recompaction or replacement of unsuitable soils with engineered fill, and enhanced foundation design in applicable areas (e.g., post-tensioned or mat slab foundations); (2) use engineered fill, subdrains, surcharging (i.e., loading prior to construction to induce settlement) and/or settlement monitoring (e.g., through the use of settlement monuments) in appropriate areas; (3) implement groundwater withdrawal monitoring/restrictions per established legal/regulatory/industry standards (if applicable); and (4) remove unsuitable deposits and replace with non-corrosive fill, use corrosion-resistant construction materials (e.g., corrosion-resistant concrete and coated or non-metallic facilities), and install cathodic protection devices (e.g., use of a more easily corroded “sacrificial metal” to serve as an anode and draw current away from the structure to be protected) per established regulatory/industry standards (e.g., IBC/CBC). • Expansive Soils: (1) replace and/or mix expansive materials with non-expansive fill; and (2) cap expansive soils in place with an appropriate thickness of non-expansive fill per established regulatory/industry standards (e.g., IBC/CBC).		

Mitigation Measure	Mitigation Timing	Responsible Party
GHG-1: Prepare site-specific Greenhouse Gas Report. Prior to approval of a Renewable Energy Permit, Renewable Energy Development Agreement, or Renewable Energy Impact Determination for a solar energy project, a site-specific greenhouse gas technical report will be prepared and approved by the County. The site-specific technical report will identify project-specific emissions to ensure compliance with the interim SCAQMD GHG thresholds, as well as measures to reduce operational greenhouse gas emissions. The technical report will be completed and approved by the County prior to the County's action.	This measure has been satisfied with the preparation of the Air Quality and Greenhouse Gas Report (Appendix F). No further work is required.	N/A
HAZ-1: Conduct site-specific Phase I ESA. Site-specific Phase I Environmental Site Assessments (ESAs) shall be completed for all proposed development projects within the nine individual SEDAs and the OVSA, as well as the potential off-site transmission corridors associated with the Trona, Chicago Valley, and Charleston View SEDAs (if applicable), prior to final project design approval. Specifically, Phase I ESA investigations shall be conducted for the noted areas to identify the potential occurrence of hazardous materials and Recognized Environmental Conditions, (RECs, as defined in ASTM International E1527-05, Section 1.1.1), potentially involving the presence of contaminated soil or groundwater, and/or structures or facilities containing hazardous materials such as asbestos insulation, lead-based paint and polychlorinated biphenyls. Phase I investigations shall include: (1) appropriate regulatory database records review; (2) site reconnaissance; (3) review of appropriate maps, aerial photographs and other pertinent documents; (4) interviews with current/previous property owners, local government/industry officials, and other individuals with knowledge of the property and/or local environmental conditions; (5) documentation of known or potential RECs; and (6) identification of recommendations to address RECs or other concerns, if applicable (including Phase II ESA investigations, as outlined below). Depending on the results of the described Phase I ESAs, one or more Phase II ESA investigations shall be conducted if identified as part of the Phase I recommendations. Phase II ESAs consist of "intrusive" investigations, in which original samples of soil, groundwater and/or building materials are collected and submitted for laboratory analysis to identify applicable contaminates. Based on the results of this testing, the Phase II ESAs shall identify the type and extent of REC (or other) contamination, and provide appropriate remedial measures to address associated hazards. Typical remedial measures may include efforts such as removal and proper disposal of contaminated materials (or on-site treatment and reuse, if	This measure has been satisfied with the preparation of the Phase I Environmental Site Assessment (Appendix K). No further work is required.	N/A

Mitigation Measure	Mitigation Timing	Responsible Party
applicable), or in situ treatments such as oxidation (use of aerobic bacteria to accelerate natural attenuation of organic contaminants) or bioremediation (e.g., using bacteria to remove contaminates from groundwater). All ESAs conducted for the proposed project shall be prepared in conformance with applicable regulatory and industry standards, including ASTM International E1527-05 Standard Practice for Environmental Site Assessments, and Code of Federal Regulations Part 312, Standards and Practices for All Appropriate Inquiries. Applicable results and recommendations from the described Phase I and Phase II investigations shall be incorporated into the associated individual final project design documents to address identified potential hazardous material concerns.		
HAZ-4: Conduct site-specific Wildfire Safety Investigations. Site-specific Wildfire Safety Investigations shall be completed for all proposed projects within the nine individual SEDAs and the OVSA, as well as the potential off-site transmission corridors associated with the Trona, Chicago Valley, and Charleston View SEDAs (if applicable), that are in areas rated as moderate or high for wildfire hazards by California Department of Forestry and Fire Protection prior to final project design approval. Specifically, the Wildfire Safety Investigations shall be conducted for the noted areas to identify site-specific fire hazard ratings and associated risks to people and structures at proposed development sites. The Wildfire Safety Investigations shall include assessment of the following criteria for the noted areas and surrounding environments: (1) fire history; (2) fuel (vegetation) types; (3) climatic conditions (including wind patterns); (4) projected fire behavior (including flame lengths) from computer modeling (e.g., BehavePlus Fire Modeling System 5.0.4); (5) documentation of known or potential wildfire hazards to on-site people and structures; and (6) identification of remedial measures, if applicable (per applicable regulatory standards such as the California Building, Fire, and Residential Codes), potentially including efforts such as the use of fuel modification, structural features (e.g., non-combustible materials and fire/ember/smoke barriers), alarm systems, and/or automatic sprinklers. Applicable results and recommendations from the described Wildfire Safety Investigations shall be incorporated into the associated individual final project design documents to address identified potential wildfire-related concerns.	This measure has been satisfied with the preparation of the Wildfire Safety Investigations Memorandum (Appendix L). No further work is required.	N/A

HYD-1: Conduct site-specific hydrologic investigations. Site-specific hydrologic investigations will be completed for proposed utility scale solar facility development projects within the individual SEDAs and the OVSA (i.e., those with grading, excavation or other activities potentially affecting hydrologic conditions, as determined by the County), as well as the potential off site transmission corridors associated with the Trona, Chicago Valley, and Charleston View SEDAs (if applicable), prior to final project design approval. All applicable results and recommendations from these investigations will be incorporated into the associated individual final project design documents to address identified potential hydrologic concerns, including but not necessarily limited to: drainage alteration, runoff rates and amounts, flood hazards, and existing/planned storm drain system capacity. The final project design documents will also encompass applicable standard design and construction practices from sources including NPDES, Basin Plan and County standards, as well as the results/recommendations of County plan review (with all related requirements to be included in applicable engineering/design drawings and construction contract specifications). A summary of the types of remedial measures typically associated with identified potential hydrologic concerns, pursuant to applicable regulatory and industry standards (as noted), is provided below. The remedial measures identified/recommended as part of the described site-specific hydrologic investigations will take priority over the more general types of standard regulatory/industry measures listed below. • Drainage Alteration: (1) locate applicable facilities and activities (e.g., staging areas and soil/material stockpiles) outside of surface drainage courses and drainage channels; (2) re-route surface around applicable facilities, with such rerouting to be limited to the smallest area feasible and re-routed drainage to be directed back to the original drainage course at the closest feasible location (i.e., the closest location to the point of diversion); and (3) use drainage structures to convey flows within/through development areas and maintain existing drainage patterns. • Runoff Rates and Amounts: (1) minimize the installation of new impervious surfaces (e.g., by surfacing with pervious pavement, gravel or decomposed granite); and (2) use flow regulation facilities (e.g., detention/retention basins) and velocity control structures (e.g., riprap dissipation aprons at drainage outlets), to maintain pre-development runoff rates and amounts. • Flood Hazards: (1) work to locate proposed facilities and activities outside of mapped 100 year floodplain boundaries; (2) based on technical analyses such as Hydrologic Engineering Center-River Analysis System (HEC-RAS) studies, restrict facility locations to avoid adverse impacts related to impeding or redirecting flood waters; and (3) based on HEC-RAS studies, use measures such as raised fill pads to elevate proposed structures above calculated flood levels, and/or utilize	This measure has been satisfied with the preparation of the Hydrology & Water Quality Assessment (Appendix M) and the Water Supply Assessment (Appendix N). No further work is required.	N/A

Mitigation Measure	Mitigation Timing	Responsible Party
protection/containment structures (e.g., berms, barriers or waterproof doors) to avoid flood damage. • Storm Drain System Capacity: (1) implement similar measures as noted above for runoff rates and amounts; and (2) utilize additional and/or enlarged facilities to ensure adequate on- and off-site storm drain system capacity.		
HYD-2: Conduct site-specific groundwater investigations. Site-specific groundwater investigations will be completed for all proposed solar facility development projects within the individual SEDAs and the OVSA proposing to utilize groundwater resources, prior to final project design approval. These investigations will identify site-specific criteria related to considerations such as local aquifer volumes and hydrogeologic characteristics, current/proposed withdrawals, inflow/recharge capacity, and potential effects to local aquifer and well levels, as well as effects to groundwater-dependent surface water features including springs, marshes and bosques, from proposed project withdrawals. All applicable results and recommendations from these investigations will be incorporated into the associated individual project design documents to address identified potential impacts to groundwater resources (per applicable regulatory standards), with all related requirements to be included in associated engineering/design drawings and construction contract specifications. A summary of the types of remedial measures typically associated with identified potential effects to groundwater and related surface water resources is provided below. The remedial measures identified/recommended as part of the described site-specific groundwater investigations will take priority over the more general types of standard measures listed below. • Aquifer/Well drawdown: (1) monitor local aquifer and private/production well levels to verify the presence or absence of project-related effects during pre-construction, construction, and operation periods (based on a methodology and monitoring schedule approved by the RWQCB and County); (2) document background and pre-construction groundwater conditions and comparable project-related construction and operation trends, along with related factors such as precipitation levels and groundwater budgets; (3) prepare scaled maps depicting the associated site(s), existing and proposed monitoring well locations, relevant natural (e.g., springs and groundwater-dependent vegetation) and other features (e.g., reservoirs), and pre-post-project groundwater contours, along with a description of cumulative water level changes; (4) restrict project-related groundwater withdrawals to appropriate levels to avoid significant adverse effects to local aquifers/wells and/or	This measure has been satisfied with the preparation of the Hydrology & Water Quality Assessment (Appendix M), the Water Supply Assessment (Appendix N), and the Hydrographic Basin Summary and the Groundwater Monitoring Plan (Appendix TBD). No further work is required.	Inyo County; Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
other groundwater-dependent uses (e.g., vegetation, springs or other related surface water features), based on thresholds approved by the RWQCB and County; and, (5) provide mitigation for affected wells or other uses/resources where applicable, potentially including well modifications (e.g., deepening pumps or wells), and/or financial compensation, and compensatory mitigation for impacts to groundwater dependent surface water features and habitats. • Groundwater Recharge Capacity: (1) reduce the area of on-site impervious surface if appropriate, through increased use of surfacing materials such as gravel, decomposed granite, or pervious pavement; and, (2) use facilities such as retention/percolation basins and unlined drainage facilities to increase local infiltration and groundwater recharge. The County may employ water injection as a method of groundwater recharge as deemed appropriate on a case by case basis. This decision would be made during project specific CEQA analysis for a given solar energy development proposal.		
HYD-3: Conduct site-specific water quality investigations. Site-specific water quality investigations will be completed for long-term solar facility operations associated with applicable proposed development projects within the individual SEDAs and the OVSA (i.e., those with activities potentially affecting water quality conditions, as determined by the County), as well as the potential off site transmission corridors associated with the Trona, Chicago Valley, and Charleston View SEDAs (if applicable), prior to final project design approval. All applicable results and recommendations from these investigations will be incorporated into the associated individual final project design documents to address identified potential long-term water quality issues related to conditions such as: anticipated and potential pollutants to be used, stored or generated on-site; the location and nature (e.g., impaired status) of on-site and downstream receiving waters; and project design features to avoid/address potential pollutant discharges. The final project design documents will also encompass applicable standard design practices from sources including NPDES, Basin Plan and County standards, as well as the results/recommendations of project-related hazardous materials investigations and regulatory standards (with all related requirements to be included in applicable engineering/design drawings and construction contract specifications). A summary of the types of BMPs typically associated with identified potential water concerns, pursuant to applicable regulatory and industry standards (as noted), is provided below. The BMPs identified/recommended as part of the described site-specific water quality investigations will take priority over the more general types of standard regulatory/industry measures listed below.	This measure has been satisfied with the preparation of the Hydrology & Water Quality Assessment (Appendix M) and Water Supply Assessment (Appendix N). No further work is required.	N/A

Mitigation Measure	Mitigation Timing	Responsible Party
• Low Impact Development (LID)/Site Design BMPs: LID/site design BMPs are intended to avoid, minimize and/or control post development runoff, erosion potential and pollutant generation to the maximum extent practicable by mimicking the natural hydrologic regime. The LID process employs design practices and techniques to effectively capture, filter, store, evaporate, detain and infiltrate runoff close to its source through efforts such as: (1) minimizing developed/disturbed areas to the maximum extent feasible; (2) utilizing natural and/or unlined drainage features in on-site storm water systems; (3) disconnecting impervious pervious to slow concentration times, and directing flows from impervious surfaces into landscaped or vegetated areas; and (4) using pervious surfaces in developed areas to the maximum extent feasible. • Source Control BMPs: Source control BMPs are intended to avoid or minimize the introduction of pollutants into storm drains and natural drainages to the maximum extent practicable by reducing on-site pollutant generation and off-site pollutant transport through measures such as: (1) installing no dumping" stencils/tiles and/or signs with prohibitive language (per current County guidelines) at applicable locations such as drainages and storm drain inlets to discourage illegal dumping; (2) designing trash storage areas to reduce litter/pollutant discharge through methods such as paving with impervious surfaces, installing screens or walls to prevent trash dispersal, and providing attached lids and/or roofs for trash containers; (3) designing site landscaping (if applicable) to maximize the retention of native vegetation and use of appropriate native, pest-resistant and/or drought-tolerant varieties to reduce irrigation and pesticide application requirements; and (4) providing secondary containment (e.g., enclosed structures, walls or berms) for applicable areas such as trash or hazardous material use/storage. • Treatment Control/LID BMPs: Treatment control (or structural) BMPs are designed to remove pollutants from runoff to the maximum extent practicable through means such as filtering, treatment or infiltration. Treatment control and/or LID BMPs are required to address applicable pollutants, and must provide medium or high levels of removal efficiency for these pollutants (per applicable regulatory requirements). Based on the anticipated pollutants of concern, potential LID and treatment control BMPs may include (1) providing water quality treatment and related facilities such as sediment basins, vegetated swales, infiltration basins, filtration devices and velocity dissipators to treat appropriate runoff flows and reduce volumes prior to off-site discharge (per applicable regulatory requirements); and (2) conducting regular inspection, maintenance and as-needed repairs of pertinent facilities and structures.		

Mitigation Measure	Mitigation Timing	Responsible Party
PUB-1: Analyze public safety and protection response times and staff levels for each project. Site specific analysis of fire and police protection service response times and staffing levels shall be completed for proposed future solar development projects, as deemed appropriate by the County, at the cost of the project applicant, prior to final project design approval of each project. The analysis shall include a determination regarding a project's impact to fire and police protection services and outline feasible measures to maintain adequate response times for fire and police protection services.	This measure has been satisfied with the preparation of the Addendum. No further work is required.	N/A
PUB-2: Provide on-site security during the construction and long-term operation of the project. For project sites associated with proposed future solar development projects that are determined through mitigation measure PUB-1 to have insufficient law enforcement protection services or significant impacts to law enforcement services, project proponents shall be required to provide adequate, on-site private security for the duration of construction activities and during the long-term operation of the project to the satisfaction of the County. The actual size and configuration of the security details shall be determined by the County during preparation of the Development Agreement for the future solar energy project.	Prior to/during construction and operations.	Inyo County; Applicant
PUB-3: Pay mitigation fees for public safety and protection services. The County shall require project proponents to pay development mitigation fees for fire and police protection services, pursuant to ICC Title 21. Said fees shall be used to maintain proper staffing levels for fire, police protection, and emergency services and to sustain adequate response times as required by the County.	Prior to final project design approval.	Inyo County; Applicant
SOC-2: Minimize Impacts on County Public Services. To further off-set potential negative effects on County public services, General Plan Policy ED 4.4, Offset the Cost to the County for Service Provision, shall be supplemented with the following: • Cooperative agreements between project applicants and the County shall be secured prior to issuance of a building permit or project-specific entitlement to ensure the following: • Unless property taxation of a renewable energy installation is deemed sufficient by the County, project applicants shall pay a fair-share public service impact fee. A potential method for estimating a fair-share contribution could be calculated by:	This measure has been satisfied through the Development Agreements. No further work is required.	N/A

Mitigation Measure	Mitigation Timing	Responsible Party
• [annual service budget] X [estimated number of temporary workers temporarily in-migrating ÷ County population served]. • The public service fee (and formula used for calculating fair-share) shall be adjusted based on the duration of project construction (e.g., a project only lasting 9 months would utilize 75 percent of the annual budget, one lasting 1.5 years would utilize 150 percent of the annual budget, etc.); and • Project applicants shall maximize the County's receipt of sales and use taxes paid in connection with construction of the project by methods such as including language in construction contracts identifying jobsites to be located within the County and requiring construction contractors to attribute sales and use taxes to the County in their Board of Equalization filings and permits.		
TRA-1: Prepare site-specific traffic control plans for individual projects. Site-specific traffic control plans shall be prepared for all proposed solar energy projects within the individual SEDAs and the OVSA to ensure safe and efficient traffic flow in the area of the solar energy project and within the project site during construction activities. The traffic control plan shall, at minimum, contain project specific measures to be implemented during construction including measures that address: (1) noticing; (2) signage; (3) temporary road or lane closures; (4) oversized deliveries; (5) construction times; and, (6) emergency vehicle access.	Prior to construction.	Inyo County; Applicant
TRA-2: Implement recommendations from traffic impact analysis on surrounding roadways and intersections. Site-specific construction traffic impact analyses shall be prepared for all proposed solar energy projects within the individual SEDAs and the OVSA to evaluate potential traffic impacts on surrounding roadways and intersections during the construction period. Applicable results and recommendations from the project-specific construction traffic impact analysis shall be implemented during the appropriate construction phase to address identified potential construction traffic impacts.	This measure has been satisfied with the preparation of the Transportation Analysis (Appendix P). No further work is required.	N/A
General Condition of Approval A: Compliance with the Conditions of Approval identified in the Staff Report (as amended by the Board of Supervisors). The project shall comply with all applicable mitigation measures identified in the Staff Report prepared for the Board of Supervisors hearing. The final Conditions of Approval requirements will be determined by the Board of Supervisors during the hearing; the Board of Supervisors may modify, add, or remove measures compared to those listed in the Staff Report.	Throughout project lifecycle.	Applicant
	Throughout project	Applicant

Mitigation Measure	Mitigation Timing	Responsible Party
General Condition of Approval B: Compliance with the PEIR and CEQA Addendum including all PEIR MMRP Requirements. The project shall comply with all applicable mitigation measures identified in the Addendum and PEIR in compliance with the PEIR MMRP requirements. Failure to comply may result in the suspension or termination of REDAs 2026-01/2026-02.	lifecycle.	
General Condition of Approval C: Le Conte's Thrasher Avoidance and Minimization Measures The following measures are proposed as project COAs to reduce potential impacts to LeConte's thrasher. Additionally, the project applicant is in the process of obtaining an Incidental Take Permit (ITP) from CDFW for LeConte's thrasher. Coordination with CDFW is currently ongoing at the time this IS/Addendum was prepared. <u>Pre-Construction Nesting Birds Surveys</u> If construction occurs during the nesting bird season (1 February through 31 August), a qualified biologist will conduct pre-construction nesting bird surveys within the work area and applicable buffer areas no more than 5 days prior to ground disturbance. If active nests are identified, species-appropriate avoidance buffers will be established and maintained until nesting activities are complete or the nest is otherwise determined to be inactive by a qualified biologist. Buffer distances may be adjusted based on site conditions, construction activities, and observed bird behavior. <u>Worker Environmental Awareness Training</u> Prior to construction, all project personnel will receive Worker Environmental Awareness Training from a qualified biologist. Training will cover LeConte's thrasher, other special-status species that may occur in the project site, applicable regulatory protections, and required avoidance and minimization measures. All personnel will be required to complete training before beginning work on the project. A log will be maintained of all personnel who receive training. <u>Biological Monitor</u> A CDFW-approved biological monitor will be present during initial ground-disturbing activities and other construction activities that have potential to take LeConte's thrasher. The biological monitor will ensure implementation of avoidance and minimization measures, monitor for special-status wildlife, document observations and compliance, and have authority to stop work if activities have the potential to affect LeConte's thrasher or other special-status species until appropriate measures are implemented.	Prior to/during construction.	Applicant; Inyo County

Mitigation Measure	Mitigation Timing	Responsible Party
<u>Avian Power Line Interaction Committee Guidelines</u> Transmission lines and electrical components will be designed, installed, and maintained to reduce the likelihood of bird electrocutions and collisions and to comply with the Migratory Bird Treaty Act, Bald Eagle and Golden Eagle Protection Act, and CESA. Avian Power Line Interaction Committee guidelines will be implemented as appropriate, such as line marking and/or other bird deterrents (spikes, reflectors, owl deterrents). <u>Compensatory Mitigation</u> The project applicant proposes to provide compensatory mitigation through habitat preservation at the Kingston View mitigation site, an approximately 1,859-acre property owned by the applicant and located approximately 2 miles southeast of the project site. Habitat assessments determined that approximately 1,594.8 acres (86 percent) of the site consists of potentially suitable Le Conte's thrasher habitat. Le Conte's thrasher surveys conducted at the mitigation site in May 2026 confirmed both occupancy and breeding activity. Surveyors documented two individuals and an active nest containing three eggs within suitable desert scrub habitat. These observations indicate that the mitigation site supports occupied LeConte's thrasher habitat and conservation values relevant to the species. The final compensatory mitigation requirements for LeConte's thrasher will be determined through coordination with CDFW as part of the ITP process and may include additional measures beyond those currently proposed.		