

APPENDIX P
Mitigation Measures

APPENDIX P

Mitigation Measures for the Campo Wind Project

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<i>Biological Resources</i>	
<p>MM-BIO-1 General Avoidance and Minimization Measures.</p> <p>(a) Project Biologist(s). A Project biologist(s) approved by the U.S. Fish and Wildlife Service (USFWS) and the Campo Band of Diegueño Mission Indians (Tribe) shall be designated by the developer. The developer shall submit the names, documented experience, any relevant permit numbers, and resumes for the Project biologist(s) to USFWS and the Tribe for approval prior to initiation of construction. The Project biologist(s) shall be responsible for the following:</p> <ul style="list-style-type: none"> • Providing training to all construction workers (may take the form of any documentable training platform). • Reviewing and/or designating the construction area in the field with the construction contractor in accordance with the final grading plan prior to clearing, grubbing, or grading. • Conducting a field review of the staking to be set by the professional surveyor, designating the limits of all construction activity prior to clearing, grubbing, or grading. • Flushing of non-listed wildlife species (i.e., avian or other mobile species) where possible from occupied habitat areas immediately prior (i.e., within 2 hours) to brush-clearing and earthmoving activities • Regularly monitoring construction activities to verify that construction is proceeding in compliance with all permit requirements specific to biological resources • Overseeing the construction site so that cover and/or escape routes for wildlife from excavated areas is provided on a daily basis. All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and the edges covered with soils and plastic sheeting such that small wildlife cannot access them, and/or excavations shall provide an earthen ramp or boards to allow for a wildlife escape route at the ends and every 30 feet. • Maintaining communication with the appropriate personnel (construction Project manager, resident engineer) so that issues relating to biological resources are appropriately and lawfully managed. • Verifying that grading plans include a stormwater pollution prevention plan. • Reporting any noncompliance issues to the Bureau of Indian Affairs, the resident engineer, and the Tribe. 	<p>Impact BIO-1 Impact BIO-2 Impact BIO-3 Impact PH&S-5</p>
<p>(b) Environmental Training Program. A worker environmental awareness program shall be developed and implemented prior to the start of construction. The Project biologist(s) shall use this program to conduct environmental training for construction personnel. All construction site personnel shall be required to attend the environmental training in conjunction with hazard and safety training prior to working on site.</p>	

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<p>(c) SWPPP. The stormwater pollution prevention plan (SWPPP) or equivalent shall include, at a minimum, the best management practices listed below. The combined implementation of these requirements shall protect adjacent habitats and special-status species during construction to the maximum extent practicable. At a minimum, the following measures and/or restrictions shall be incorporated into the SWPPP and noted on construction plans, where appropriate, to avoid impacts to special-status species, special-status vegetation communities, and/or jurisdictional waters during construction. The Project biologist(s) shall verify the implementation of the following design requirements:</p> <ul style="list-style-type: none"> • No planting or seeding of invasive plant species (per the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the Project region) shall be permitted. • Construction activity shall not be permitted in jurisdictional waters of the United States except as authorized by applicable law and permit(s), including permits and authorizations approved by the U.S. Army Corps of Engineers. • Silt settling basins installed during the construction process shall be located away from areas of ponded or flowing water to prevent discolored, silt-bearing water from reaching areas of ponded or flowing water during normal flow regimes. • Temporary structures, staging, and storage areas for construction equipment and/or materials shall not be located in jurisdictional waters, including wetlands and riparian areas. • Any equipment or vehicles driven and/or operated within a jurisdictional waters of the United States shall be checked and maintained by the operator daily to prevent leaks of oil or other petroleum products that could be deleterious to aquatic life if introduced to the watercourse. • No stationary equipment, such as motors, pumps, generators, and welders, or fuel storage tanks shall be located within 200 feet of jurisdictional waters of the United States. • No debris, bark, slash sawdust, rubbish, cement, concrete, oil, or petroleum products shall be stored where it may be washed by rainfall or runoff into jurisdictional waters of the United States. • When construction operations are completed, any excess materials or debris shall be removed from the work area. • No equipment maintenance shall be performed within 200 feet of jurisdictional waters of the United States where petroleum products or other pollutants from the equipment may enter these areas. • Fully covered trash receptacles that are animal-proof and weather-proof shall be installed and used by the construction contractor(s) to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Littering shall be prohibited and trash shall be removed from construction areas daily. All food-related trash and garbage shall be removed from the construction sites on a daily basis. 	
<p>(d) Fugitive Dust Control Plan. The developer shall develop a Fugitive Dust Control Plan in compliance with San Diego County Air Pollution Control District regulations to reduce particulate matter less than 10 microns (PM₁₀) and fine particulate matter less than 2.5 microns (PM_{2.5}) emissions during construction and decommissioning. The Fugitive Dust Control Plan shall include names, addresses, and phone numbers of the person or persons responsible for the preparation, submission, and implementation of the plan; description and location of operation(s); and listing of all fugitive dust emissions sources included in the operation.</p>	

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<p>The following dust control measures shall be implemented:</p> <ul style="list-style-type: none"> • All on-site unpaved roads shall be effectively stabilized using soil stabilizers that can be determined to be as efficient, or more efficient, for fugitive dust control than California Air Resources Board-approved soil stabilizers, and shall not increase any other environmental impacts including loss of vegetation. Application of the soil stabilizer shall be undertaken strictly to the manufacturer's directions for application and cognizant of the weather forecast to avoid application immediately before a rain event. • All material excavated or graded shall be sufficiently watered to prevent excessive dust. Watering shall occur as needed with complete coverage of disturbed areas. • All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions). • Soil loads shall be kept below 18 inches of the freeboard of the truck. • Drop heights shall be minimized when loaders dump soil into trucks. • Traffic speeds on unpaved roads shall be limited to 15 miles per hour. • Disturbed areas shall be minimized. • Disturbed areas shall be revegetated or stabilized using soil binders that can be determined to be as efficient, or more efficient, for fugitive dust control than California Air Resources Board-approved soil stabilizers, as soon as possible after disturbance and shall not increase any other environmental impacts including loss of vegetation. 	
<p>(e) Erosion and Runoff Control. During construction, material stockpiles shall be placed such that they cause minimal interference with on-site drainage patterns. This will protect jurisdictional resources from being inundated with sediment-laden runoff. Design of drainage facilities shall incorporate long-term control of pollutants and stormwater flow to minimize pollution and hydrologic changes.</p>	
<p>(f) Weed Management. A weed management plan shall be developed and approved by the Tribe prior to the commencement of construction activities. The plan shall include a variety of measures that may be undertaken during construction and operation and maintenance activities to prevent the introduction of new, and spread of existing, weed species. The plan shall also address monitoring and educating personnel on weed identification and methods for avoiding and treating infestations. Weed control methods may include both physical and chemical control. If mulch is used, it shall be certified as weed free.</p> <p>The application of herbicides shall be in compliance with all state and federal laws and regulations under the prescription of a Pest Control Adviser and implemented by a licensed applicator.</p>	
<p>(g) Fire Protection. To minimize the potential exposure of the Project to fire hazards, a Campo Wind Project Fire Protection Plan shall be prepared and implemented in conjunction with development of the Project.</p>	
<p>MM-BIO-2 Jurisdictional Waters and Wetlands Compensation. Temporary and permanent impacts to jurisdictional waters and wetlands shall be mitigated per the Project's federal Clean Water Act permit conditions. Temporary impacts shall be restored in place to pre-activity functions; permanent impacts shall be mitigated through a U.S. Army Corps of Engineers-approved mitigation bank and/or in-lieu fee program. Either of these mitigation options would result in no net loss of jurisdictional aquatic resources. A functional assessment, such as the California Rapid Assessment Method, of the jurisdictional areas proposed to be impacted and preserved at the mitigation site</p>	<p>Impact BIO-1 Impact BIO-2</p>

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<p>shall be conducted. The purpose of the functional assessment is to evaluate the existing functions and services within the jurisdictional drainages and ensure that the functions and values of the jurisdictional areas lost are replaced at the mitigation site. The precise mitigation ratio shall depend on the functions and values of the mitigation site and any restoration activities that may be conducted to further increase the functions and values of the mitigation site.</p>	
<p>MM-BIO-3 Implementation of USFWS-Issued Terms and Conditions. All terms and conditions developed as part of the Section 7 consultation process with the U.S. Fish and Wildlife Service (USFWS) and provided in the Project's Biological Opinion shall be implemented. Terms and conditions shall apply to Quino checkerspot butterfly that may be impacted by the Project. Ratios for habitat-based mitigation shall be determined during the Section 7 consultation process. The mitigation shall focus on habitat preservation and creation for long-term conservation of metapopulation dynamics. Habitat mitigation ratios will be determined through the Section 7 consultation. Terms and conditions outlined in the Project's Biological Opinion shall take precedence over the measures outlined herein to the extent there is conflict between the two.</p>	<p>Impact BIO-1 Impact BIO-3</p>
<p>(a) Construction Fencing and Signage. Construction fencing and/or signage shall be installed when construction of the Project occurs immediately adjacent to mapped occupied Quino checkerspot butterfly habitat to prevent unnecessary intrusion into occupied Quino checkerspot butterfly habitat. Signage shall be installed where high-use areas of the lease area border suitable Quino checkerspot butterfly habitat to prevent intrusion into sensitive habitat and remind personnel of restrictions regarding activities within these areas.</p>	
<p>(b) Seasonal Avoidance. To the extent practicable, all construction clearing and grubbing in mapped suitable Quino checkerspot butterfly habitat associated with construction of the Project shall occur when adult and larval activity is reduced and host plants are not generally flowering or germinating, as determined by the USFWS. Vegetation management during the operation and maintenance phase of the Project shall also occur when adult and larval activity is reduced and host plants are not generally flowering or germinating, to the extent practicable.</p>	
<p>MM-BIO-4 Avian-Specific Avoidance, Minimization, and Mitigation Measures.</p> <p>(a) Vegetation Clearing Seasonal Avoidance/Nest Clearance Surveys. It is recommended that vegetation clearing take place outside of the general avian breeding season (February 15 through August 15) when practicable. If not practicable to conduct vegetation clearing outside the general avian breeding season, it is recommended that a Project biologist with a minimum of 3 years' experience conducting migratory bird surveys and conduct a nest-clearance survey within 500 feet (152 meters) of a vegetation clearance area no more than 5 days prior to vegetation clearing. In the case of neotropical migrant riparian species, surveys are pre-construction only. Those species arrive during different times in the spring. Therefore, surveys for these species should occur weekly in conjunction with normal biological monitoring, when working within 500 feet of suitable riparian habitat during the breeding season (March through August). Vegetation clearing crews shall coordinate with the Project biologist prior to the start of construction to verify that the area has been adequately surveyed. If no active nests are discovered, vegetation clearing may proceed. If an active nest is discovered, the nest and an avoidance buffer (at least 300 feet (91 meters) for passerines and at least 500 feet (152 meters) for raptors) shall be flagged or otherwise marked for avoidance. The Project biologist shall monitor any active nest discovered on at least a weekly basis to track the status of each nest. Vegetation clearing shall not take place within the avoidance buffer until nesting is complete (i.e., nestlings have fledged or nest has failed), as determined by the Project biologist. If clearing in a given area ceases for five or more consecutive days during the nesting season, repeat nest clearance surveys shall be required to verify that new nesting locations have not been established.</p>	<p>Impact BIO-1 Impact BIO-3</p>

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<p>(b) Construction Seasonal Avoidance/Pre-Construction Surveys. Construction (non-vegetation-clearing activities; see MM-BIO-3(a) for vegetation clearing restrictions) that cannot occur outside the general avian breeding season (February 15 through August 15) shall proceed under the following recommended protocols. If nest clearance surveys (see MM-BIO-3(a)) have not been conducted within 5 days of the start of construction, the Project biologist shall conduct a pre-construction nest survey within 500 feet (152 meters) of the construction area no more than 5 days prior to the start of construction in a given area of the construction footprint. In the case of neotropical migrant riparian species, surveys are pre-construction only. Those species arrive during different times in the spring. Therefore, surveys for these species should occur weekly in conjunction with normal biological monitoring, when working within 500 feet of suitable riparian habitat during the breeding season (March through August). Construction crews shall coordinate with the Project biologist prior to the start of construction to verify that the area has been adequately surveyed. If no active nests are discovered, construction may proceed. If an active nest is discovered, the nest and an avoidance buffer (at least 300 feet (91 meters) for passerines and at least 500 feet (152 meters) for raptors) shall be flagged or otherwise marked prior to the start of construction. The Project biologist shall coordinate with construction crews to determine the types of construction activities that may take place within the avoidance buffer. The following shall be taken into consideration when determining whether a construction activity may take place within the avoidance buffer: (1) location of nest; (2) status of nesting; (3) species-specific sensitivity to potential disturbances associated with an activity; (4) type, duration, and timing of construction activity; (5) existing level of disturbances; and (6) influence of other environmental factors on potential disturbances. The Project biologist shall be responsible for monitoring any active nests discovered on at least a weekly basis to track the status of each nest. Should the Project biologist determine that construction activities may disturb the nesting activity, then construction activities shall cease within the avoidance buffer until nesting is complete. If construction in a given area ceases for 5 or more consecutive days during the nesting season, repeat pre-construction surveys shall be required to verify that new nesting locations have not been established.</p>	
<p>(c) Avian Monitoring Plan. To address concerns pertaining to avian and bat collisions, and inform potential future adaptive management actions if necessary, the Project shall conduct the following bat and avian monitoring during construction and operations:</p> <ul style="list-style-type: none"> • Implementation of a Worker Response Reporting System (WRRS). The WRRS shall provide a means of recording and collecting information on incidental discoveries of dead or injured birds and bats within the Project Site by site personnel. The WRRS shall be used by site personnel who discover bird and bat carcasses during construction and routine maintenance activities. Site personnel shall be provided a set of standardized instructions to follow in response to wildlife incidents in the Project area. • Notification and Implementation Activities. In accordance with the WRRS, during construction, site personnel shall notify the Project biologist to collect the following data on the incidentally detected avian and bat wildlife: species, date, time, location (e.g., nearest Project structure), and how the animal died, if known. Results shall be reported to the Tribe and Terra-Gen on a quarterly basis unless listed species are involved. During operations, a procedure shall be developed for site personnel to collect the same data, take photographs, and notify the Project's environmental manager, who shall then notify the Tribe and Terra-Gen unless listed species are involved, in which case USFWS shall be notified within 48 hours. In the event of an injury to listed species, USFWS shall be contacted for instruction on how to handle the situation. Workers shall be trained on the WRRS during Worker Environmental Awareness Program training. The WRRS shall be used for the life of the Project. To accommodate these requirements, a Project biologist shall be on retainer throughout the construction period, and one shall be available during the life of the Project to assist in avian and bat identifications, data collection, determination of cause of death or injury, and implementing the WRRS. 	

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	(d) Removal of Carcasses. All large animal carcasses (e.g., any domestic livestock, feral animal, or big game) incidentally found within the Project site during operation and maintenance activities shall be removed from the site to prevent attraction of carrion-consuming birds of prey.	
	(e) APLIC Standards. The Project shall implement 2006 and 2012 recommendations by the Avian Power Line Interaction Committee (APLIC) to protect raptors and other birds from electrocution. When properly designed and implemented, these measures can be sufficient to protect even the largest birds that may perch or roost on transmission lines or towers from electrocution. Specifically, these measures will include design specifications regarding proper pole and crossmember dimensions, phasing, and insulator design and dimensions to preclude wire-to-wire contact with a goal of providing appropriate separation between energized conductors and energized hardware and ground wire. In addition, bird diverters or other means to make lines more visible to birds will be installed where appropriate to help avoid collisions.	
<i>Visual Resources</i>		
MM-VIS-1	Temporary Screening. If visible from nearby roads, residences, public gathering areas, recreational areas, or trails, stationary construction sites and staging areas shall be visually screened (to the extent feasible) using temporary screening fencing. Temporary screening fencing shall be of an appropriate design and color intended to compliment the surrounding landscape. Where practical, construction staging and storage shall be screened with opaque fencing.	Impact VIS-1 Impact VIS-2
MM-VIS-2	Activity Limits Signposting Guidelines. No paint or permanent discoloring agents shall be applied to rocks or vegetation to indicate survey or construction activity limits.	Impact VIS-1 Impact VIS-2
MM-VIS-3	Minimization of Views of Graded Terrain. Permanent access or spur roads shall be constructed at appropriate angles from the originating primary travel facilities to minimize extended in-line views of newly graded terrain, when feasible. Contour grading should be used where feasible to better blend graded surfaces with existing terrain.	Impact VIS-1 Impact VIS-2
MM-VIS-4	Revegetation of Disturbed Areas. All graded roads and areas not required for ongoing operation, maintenance, or access shall be returned to preconstruction conditions.	Impact VIS-1 Impact VIS-2
MM-VIS-5	Minimization of Vegetation and Topsoil Removal. To the extent feasible and wherever the limits of grading areas are adjacent to sensitive vegetation communities or other biological resources, the minimum amount of vegetation necessary for construction of structures and facilities shall be removed.	Impact VIS-1 Impact VIS-2
MM-VIS-6	Color Mitigation. Substation components and fencing shall be painted Shadow Gray from the BLM Standard Environmental Colors Chart CC-00, or similar gray color. Color treatment shall not be required on facilities that are treated in accordance with safety and engineering concerns.	Impact VIS-1 Impact VIS-2
MM-VIS-7	Conductor Design Requirements. All new transmission line conductors are to be non-specular in design to reduce conductor visibility and visual contrast.	Impact VIS-1 Impact VIS-2
MM-VIS-8	FAA-Approved Lighting. The developer would implement a lighting plan in accordance with current Federal Aviation Administration (FAA) standards. These lights would have the minimum number of flashes per minute and the briefest flash duration allowable per current FAA standards. The number of wind turbines that would be lit would be minimized to the extent allowable by the FAA,	Impact VIS-4

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<i>Public Health and Safety</i>	
<p>MM-PH&S-1 Hazardous Materials Management Plan. Prior to approval of final construction plans, it is recommended that the developer and/or contractor(s) prepare a Hazardous Materials Management Plan (HMMP) for the construction phase of the Project, which would be reviewed and approved by the coordinating agencies. The HMMP would be included as part of all contractor specifications and final construction plans to the satisfaction of the appropriate agency. The HMMP would include the following components:</p> <ul style="list-style-type: none"> • The HMMP would identify all hazardous materials that will be present on any portion of the construction site, including, but not limited to, fuels, solvents, and petroleum products. The HMMP would address storage, use, transport, and disposal of each hazardous material anticipated to be used at the site. The HMMP would establish inspection procedures, storage requirements, storage quantity limits, inventory control, nonhazardous product substitutes, and disposition of excess materials. • The HMMP would identify secondary containment and spill prevention countermeasures, as well as a contingency HMMP to identify potential spill hazards, how to prevent their occurrence, and responses for different quantities of spills that may occur. Secondary containment and countermeasures would be in place throughout construction so that if any leaks or spills occur, response would be immediate. Emergency spill supplies and equipment would be clearly marked and located adjacent to all areas of work and in construction staging areas. • The HMMP would identify adequate safety and fire-suppression devices for construction-related activities involving toxic, flammable, or explosive materials (including refueling construction vehicles and equipment). Such devices would be readily accessible on the Project Site, as specified by the Campo Reservation Fire Protection District and per the Uniform Building Code and Uniform Fire Code. • Prior to construction, the developer/all contractor and subcontractor personnel would receive training regarding the components of the HMMP, as well as applicable environmental laws and regulations related to hazardous materials handling, storage, and spill prevention and response measures. • The developer or developer's contractor would designate a qualified environmental field representative who would be on-site to observe, enforce, and document adherence to the plan for all construction activities. The HMMP would be submitted to the appropriate agencies at least 30 days prior to construction. 	<p>Impact PH&S-1 Impact PH&S-2 Impact PH&S-3</p>
<p>MM-PH&S-2 Health and Safety Program. Prior to approval of final construction plans, it is recommended that the developer or developer's contractor(s) prepare a Health and Safety Program (HSP) for each phase of the Project (i.e., construction, operation, and decommissioning). The HSP would be developed to protect both workers and the general public during all phases of the Project and would be implemented to educate construction workers about the hazards associated with the particular Project Site and the safety measures that must be taken to prevent injury. The HSP would include standards regarding occupational safety, safe work practices for each task, hazard training requirements for workers, and mechanisms for documentation and reporting.</p> <p>Regarding occupational health and safety, the HSP would identify all applicable federal and Tribal occupational safety standards; establish safe work practices for each task (e.g., requirements for personal protective equipment and safety harnesses; follow OSHA standard practices for safe use of explosives and blasting agents; identify measures for reducing occupational electromagnetic field exposures); establish fire safety evacuation procedures; and define safety performance standards. The HSP would include a training program to identify hazard training requirements for workers and establish procedures for providing required training to all workers. The</p>	<p>Impact PH&S-1 Impact PH&S-2 Impact PH&S-3 Impact PH&S-4 Impact PH&S-5 Impact PH&S-8</p>

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<p>HSP would include worker training regarding how to identify potentially contaminated soils and/or groundwater. Documentation of training and a mechanism for reporting serious accidents to appropriate agencies would be established.</p> <p>The HSP would identify requirements for temporary fencing around staging areas, storage yards, and excavation areas during construction or decommissioning activities. Such fencing would be designed to restrict transient traffic, off-highway vehicle use, and the general public from accessing areas under construction and would be removed once construction or decommissioning activities are complete. The HSP would also identify appropriate measures to be taken during operation of the Project to limit public access to hazardous facilities (e.g., permanent fencing, locked access).</p>	
<p>MM-PH&S-3 Safety Assessment. Prior to commencing construction activities, it is recommended that the developer or developer's contractor(s) prepare a safety assessment to describe potential safety issues associated with the Project, how safety prevention measures would be implemented, where medical aid kits would be located, the appropriate response action for each safety hazard, and procedures for notifying the appropriate authorities and agencies involved. The safety assessment would address issues such as site access/hazards, construction hazards, safe work practices, security, heavy equipment transportation, traffic management, emergency procedures, and fire control.</p>	Impact PH&S-4
<p>MM-PH&S-4 Wind Turbine Safety Zone and Setbacks. Prior to approval of final construction plans and as part of the Health and Safety Program (MM-PH&S-2), it is recommended that the developer demonstrate to the Tribe adequate setbacks for wind turbine generators from residents and occupied buildings, roads, right-of-ways, transmission lines, and other public access areas, consistent with the Tribe's Land Use Code and sufficient to prevent accidents from the operation of wind turbine generators. Plans detailing the proposed setbacks would be submitted to the Tribe for review and approval prior to construction.</p>	Impact PH&S-5 Impact PH&S-8 Impact PH&S-9
<i>Cultural Resources</i>	
<p>MM-CUL-1 Monitoring and Treatment Plan. A post-environmental review cultural resources monitoring and discoveries treatment plan (Monitoring and Treatment Plan) will be prepared prior to the start of construction and shall outline the specific requirements for monitoring at the conclusion of stakeholder consultation. The Monitoring and Treatment Plan shall clearly identify roles and responsibilities of Project personnel, and lines of communication and authority for reporting and management. The Monitoring and Treatment Plan shall include the procedures to be followed when construction results in an inadvertent discovery including work stoppage, protection of the discovery to allow for inspection by a qualified archaeologist, significance evaluation if the resource is not an isolated find, coordination with the Bureau of Indian Affairs (BIA) and developer to attempt avoidance of further effects if the resource is found to be significant, and the procedures for data recovery mitigation if avoidance is not feasible. The Monitoring and Treatment Plan shall be prepared by the developer's Secretary of the Interior-qualified archaeologist and submitted to the BIA for review and approval prior to the start of construction.</p>	Impact CUL-2
<p>MM-CUL-2 Archaeological and Native American Monitoring. It is anticipated that monitoring will be required for all primary ground disturbance and for extended excavations when construction encroaches on historic properties that are avoided but are near to ground-disturbing activities, and at those locations where sensitive remains or significant deposits are more likely to be unearthed during construction-related ground disturbance.</p> <p>Ground-disturbing activities include, but are not limited to, brush clearance, grubbing, excavation, trenching, grading, and drilling. Any archaeological monitors shall be qualified archaeologists or work under the direct supervision of a qualified archaeologist, defined as an</p>	Impact CUL-2

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<p>archaeologist meeting the Secretary of the Interior's standards for professional archaeology, and shall be approved by the Bureau of Indian Affairs (BIA). The monitors shall be familiar with the types of historical and prehistoric resources that could be encountered on the Project Site.</p> <p>The archaeological monitors shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis. The archaeological monitors shall be present on the Project Site according to a schedule as detailed in the Monitoring and Treatment Plan and shall maintain a daily log of activities, which will be appended to a final monitoring report that shall be submitted to the BIA and South Coastal Information Center at the conclusion of monitoring. Specific monitoring reporting procedures shall be detailed in the Monitoring and Treatment Plan.</p> <p>In the event of inadvertent discovery of human remains, all work shall immediately be halted within a 100-foot radius and temporary protective measures shall be implemented. The developer shall immediately contact the Tribe, and follow the Native American Graves Protection and Repatriation Act (NAGPRA) plan of action provided in the Monitoring and Treatment Plan. The NAGPRA plan of action will minimally include coordination with the San Diego County Coroner (Coroner) for formal determination of the remains. If the Coroner determines that the remains are Native American, the Coroner shall contact the Native American Heritage Commission, in accordance with California Health and Safety Code, Section 7050.5c, and California Public Resources Code, Section 5097.98 (as amended by Assembly Bill 2641). The Native American Heritage Commission shall coordinate with the Tribe to identify a Most Likely Descendant for the remains per California Public Resources Code, Section 5097.98, unless the Tribe has already made such a determination. If the remains are determined to be neither of forensic value to the Coroner, nor of Native American origin, provisions of the California Health and Safety Code (7100 et seq.) directing identification of the next of kin will apply.</p>	
<p>MM-CUL-3 Significance Evaluation and Data Recovery. Requirements for treatment of inadvertent discoveries that occur during construction, operation and maintenance, and decommissioning, shall be detailed in the Monitoring and Treatment Plan (MM-CUL-1), and shall minimally include stoppage of all activity within 100 feet of the find until a qualified archaeologist can assess the significance of the find. The Bureau of Indian Affairs (BIA) shall also be contacted. If the qualified archaeologist, in consultation with the BIA, determines the resource is significant (i.e., qualifies as a historic property), then the archaeologist shall determine appropriate avoidance measures or other appropriate mitigation. Preservation in place shall be the preferred manner of mitigation to avoid effects on significant cultural resources. If it is demonstrated that resources cannot be feasibly avoided, the qualified archaeologist shall implement the provisions for mitigation detailed in the Monitoring and Treatment Plan. Work shall not resume within 100 feet of the discovery until permission is received from the BIA.</p> <p>Where preservation in place of a significant archaeological resource is not feasible, a qualified archaeologist, in consultation with the BIA, and the Project developer shall complete archaeological data recovery. The standard for completion of data recovery may vary for individual archaeological sites, but is understood herein to be collection of a statistically representative sample of the archaeological deposits such that data redundancy is achieved and the unique properties of the archaeological sites are addressed. Implementation of data recovery mitigation shall include the following steps:</p>	Impact CUL-2

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<ol style="list-style-type: none"> 1. The Monitoring and Treatment Plan (MM-CUL-1) will include a research design and archaeological data recovery plan prior to ground disturbance for the recovery of resources in unavoidable sites that will capture those categories of data for which the site is significant, and implement the data recovery plan. 2. The data recovery phase shall focus on recovering archaeological data sufficient to mitigate the destruction of a portion of the site or the entire site within the area of direct impacts. 3. If, in the opinion of the qualified archaeologist and in light of the data available, the significance of the site is such that data recovery cannot capture the values that qualify the site for inclusion on the National Register of Historic Places (NRHP), the developer shall reconsider Project plans in light of the high value of the cultural resource, and implement more substantial modifications to the proposed Project that shall allow the site to be preserved intact, such as Project redesign or capping the site with fill soil. 4. Standard archaeological collection and/or excavation units may be used, with methods consistent with those employed during previous investigations in the region. Following completion of the excavations, all cultural materials shall be washed, cataloged, and analyzed. Technical analyses may include artifact analysis, radiocarbon dating, obsidian hydration, pollen and protein residue, and other analyses as needed to describe the cultural materials and archaeological deposits. A data recovery report shall be prepared and filed with the BIA and the South Coastal Information Center. 5. The developer shall provide for the permanent curation of recovered materials during construction at a federally recognized archaeological repository, such as the San Diego Archaeological Center or the Imperial Valley Desert Museum. <p>For archaeological sites considered significant and eligible for NRHP listing that can be avoided, reasonable protective measures shall be provided, including protective fencing around an avoided resource with an appropriate buffer, silt fencing to avoid indirect effects through Project-related runoff, and other measures as applicable. In certain instances, avoidance through capping using sterile fill matrix, use of rubber mats, or other measures may be deemed appropriate to achieve avoidance.</p>	
<i>Noise</i>	
<p>MM-NOI-1 Construction Noise Best Management Practices.</p> <ul style="list-style-type: none"> • Ensure that all construction equipment driven or powered by internal combustion engines is equipped with a factory-approved or recommended muffler. If traffic control and construction signs that require power for lighting or flashing are located near residences, the source of power should be batteries, solar cells, or another quiet source. • Where and when construction activity is expected to occur within 200 feet of an Off-Reservation noise-sensitive land use (NSLU), provide the owner/occupant at least one week's advance notice of anticipated construction schedule and activities. Information should include a contact phone number so that noise concerns can be brought to the contractor's attention. • Restrict the use of engine exhaust compression braking (a.k.a., "jake braking") on all trucks. • All stationary construction equipment (especially pieces that are expected to operate frequently, or in a continuous or otherwise "steady-state" manner) should be located as far as practicable from NSLUs. • Vehicles should observe limitations on duration of engine idling, as defined by applicable standards (e.g., air quality regulations and policies). 	<p>Impact NOI-1 Impact NOI-4</p>

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<ul style="list-style-type: none"> For Off-Reservation NSLUs closer than 100 feet to construction activity, the contractor should temporarily erect or install a sound barrier having sufficient vertical height, solidity, and horizontal extent to occlude direct sound paths between the construction activity and the receiving land use. The sound barrier should be composed of material(s) that can exhibit a sound transmission loss (TL) of at least 20 dB. 		
<i>Traffic and Transportation</i>		
MM-TRA-1	<p>Use of Traffic Flagger during PM Peak Hour. The Project shall utilize a trained and qualified traffic flagger for the duration of the peak construction phase of the Project construction (i.e., approximately 27 days during the overlap of Phases 2, 3, and 8) at the Project access roads at the end of the day shift (PM peak hour) to stagger outbound Project traffic to minimize delays at the impacted intersection of Crestwood Road/Interstate 8 westbound ramps.</p>	Impact TRA-1
MM-TRA-2	<p>Repair and Restoration of Roads. It is recommended that the Tribe and the BIA Roads Branch perform site inspection before Project start and again after Project completion to ensure that the quality of roadways is not compromised by construction traffic. If damage to roads is found to have resulted from construction activities, it is recommended that the developer coordinate repairs with the affected Tribal and public agencies to ensure that any impacts to area roads are adequately repaired at the developer's cost, pursuant to the Campo Lease and all applicable permits. It is recommended that roads disturbed by construction activities or construction vehicles be properly restored to ensure long-term protection of road surfaces. This would include consideration of damage to roadside drainage structures. BIA streets would be repaired, resurfaced, and restriped by the contractor after completion of the Project construction.</p>	Impact TRA-2
MM-TRA-3	<p>Traffic Control and Management Plan. Implementation of a traffic control and management plan including following measures is recommended:</p> <ul style="list-style-type: none"> Temporary traffic control devices in accordance with the California Department of Transportation (Caltrans) California Manual on Uniform Traffic Control Devices to identify locations/sections where construction is ongoing. This may include slow-moving-vehicle warning signs, signage to warn of merging trucks, barriers for separating construction and non-construction traffic, use of traffic control flagmen, and any additional measures required for the sole convenience of safely passing non-construction traffic through and around construction areas. Coordination with Caltrans in order to secure the necessary encroachment and trip permits necessary for specialized haul trucks. Also, any excessive height/length vehicles should use pilot car services to provide safe over-the-road operations and overhead height warnings, if necessary. Notification of California Highway Patrol in order to facilitate slowing freeway traffic to ensure safe access for motorists. Coordination with Caltrans, California Highway Patrol, and County officials, including the Sheriff's Department. Employment of a contract transport company that would be responsible for surveying the route to determine how turns on existing roads would be accomplished, and ensuring that this is reflected in the traffic control and management plan. Establishment of procedures for coordinating with local emergency response agencies to ensure dissemination of information regarding emergency response vehicle routes affected by construction activities. Encouragement of carpooling among workers to reduce worker commute trips entering and exiting the study area. 	Impact TRA-3

APPENDIX P (Continued)

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