IMPACT AVOIDANCE, REDUCTION, AND CONSERVATION MEASURES

The following sections identify design elements that would be implemented to avoid or reduce impacts to sensitive resources, best management practices to reduce impacts, and conservation measures for unavoidable impacts. These measures would be implemented for both WAPA's Proposed Action and the Vidal Energy Project. WAPA's Construction Standards would also be implemented as part of the Proposed Action (WAPA 2021).

Soil/Erosion

- Grading would be minimized to only those areas where necessary to meet the construction and operational requirements.
- Construction and operational activities would be conducted in compliance with a Storm Water Pollution Prevention Plan (SWPPP) that would include Best Management Practices (BMPs) and other erosion-control measures designed to minimize soil erosion and limit sheet flow and downstream sedimentation. The SWPPP would also incorporate adaptive management actions if erosion and sedimentation control measures are found to be insufficient to control surface water at the site.
- To minimize wind erosion, all construction activities shall comply with a Fugitive Dust Control Plan that would be developed and implemented for the projects.
- A Site Restoration Plan would be implemented as needed to restore impacts to temporary disturbance areas as much as practicable.
- Soil-disturbing activities on wet soils would be minimized, except when implemented as a component of the Fugitive Dust Control Plan.
- Temporary disturbance areas that are no longer needed would be recontoured and revegetated in order to increase infiltration and reduce soil compaction.
- Routine site inspections would be performed to assess the effectiveness of maintenance efforts for erosion and sediment control systems. Roadway ditches, and culverts would be regularly maintained.

Hydrology/Water Quality

- The projects would be designed to maintain existing drainage patterns and control the rate and amount of surface water runoff.
- The site would be graded so that downstream flows would not be adversely impacted as a result of proposed changes to natural washes from grading or drainage management measures.
- The number of drainage crossings would be minimized to the extent possible and each would be designed to accommodate adequate flow.
- All large ancillary facilities (e.g., switchyard and substation) would be located outside of the 100year floodplain. Some PV supports could be placed within drainages where technically feasible and in accordance with permit requirements for state-jurisdictional waters.
- A Spill Prevention and Emergency Response Plan would be developed and implemented during
 construction and the O&M phases if a sufficient quantity of regulated substances were to be
 stored on-site. Adequately sized secondary spill containment would be incorporated around the
 transformers at the on-site substation to ensure proper capture and control measures for

- potential spills. The Spill Prevention and Emergency Response Plan would also provide for hazardous material spill prevention and cleanup measures, were a spill to occur.
- No federally jurisdictional waters have been identified within the areas proposed to be disturbed
 by the projects, although construction would adhere to requirements of a General Construction
 Permit to be pursued under the National Pollutant Discharge Elimination System (NPDES) as well
 as any necessary State of California permits (e.g. Streambed Alteration Agreement and Waste
 Discharge Requirements).

Air Quality

- The area of grading and vegetation removal would be limited to only that area required for construction and operation.
- Ground disturbing activities would be undertaken in accordance with a Fugitive Dust Control Plan to minimize the amount of time areas would be exposed to wind erosion.
- Vehicular speeds on unpaved roads would be limited to 25 miles per hour (MPH).
- Grading operations would be phased, where appropriate, to limit the amount of disturbance at any one time, and water or other appropriate chemical suppressant/tackifiers would be used for stabilization of disturbed surfaces under windy conditions.
- Water or an appropriate chemical suppressant/tackifier would be applied to disturbed areas to control dust and facilitate soil compaction, where necessary. If water were to be used, it would be applied using water trucks and application rates would be monitored to prevent runoff and ponding. Alternatively, dust palliatives would be used to control dust and applied per manufacturer's specifications.
- Exposed material stockpile areas would be covered when not in use, and excavation and grading would be suspended during windy conditions (forecast or actual wind conditions of approximately 25 MPH or greater).
- All trucks hauling soil and other loose material would be covered or at least 2 feet of freeboard would be maintained.
- All paved roads would be kept clean of objectionable amounts of mud, dirt, or debris, as necessary. Gravel or other material would be used where unpaved access roads intersect paved roadways to prevent mud and dirt track-out.
- Unnecessary idling of equipment would be limited.
- A Valley Fever Management Plan (VFMP), including a Valley Fever training program, will be implemented during construction to minimize the potential for unsafe dust exposure during construction. The VFMP will identify best management practices including:
 - Development of an educational Valley Fever Training Handout for distribution to onsite workers, which should include general information about the causes, symptoms, and treatment instructions regarding Valley Fever, including contact information of local health departments and clinics knowledgeable about Valley Fever.
 - Conducting Valley Fever training sessions to educate all Project construction workers regarding appropriate dust management and safety procedures, symptoms of Valley Fever, testing, and treatment options. This training will be completed by all workers and visitors (expected to be on-site for more than 2 days) prior to participating in or working

- in proximity to any ground disturbing activities. Signed documentation of successful completion of the training is to be kept on-site for the duration of construction.
- Developing a job-specific Job Hazard Analyses (JHA), in accordance with the California Division of Occupational Safety and Health (Cal/OSHA) regulations, to analyze the risk of worker exposure to dust, and maintain and manage safety supplies identified by the JHA.
- Provide and/or require, if determined to be needed based on the applicable JHA, OSHAapproved half-face respirators equipped with a minimum N-95 protection factor for use during worker collocation with surface disturbance activities, following completion of medical evaluations, fit-testing, and proper training on use of respirators.

Biological Resources

- A biological monitor will be present prior to initiation of ground disturbing activities to demark limit of disturbance boundaries. Flagging and/or staking shall be used to clearly define the work area boundaries and avoid impacts to sensitive species with the potential to occur near the projects. The biological monitor will be present to conduct pre-construction sweeps and inspect compliance with project protection measures.
- Desert riparian vegetation shall be avoided to the greatest extent possible within the drainages containing Blue Palo Verde-Ironwood woodland to preserve habitat for the sensitive species with potential to nest and forage in these areas.
- An environmental training program shall be developed and presented to all crew members prior to the beginning of construction. The training shall describe special-status wildlife species and sensitive habitats that could occur within project work areas, protection afforded to these species and habitats, and avoidance and minimization measures required to avoid and/or minimize impacts. The training shall include a discussion on the reduction of trash and the elimination of any food and standing water originating from a human source that may attract wildlife, including ravens, to the site. The training program will be approved by a qualified biologist. Records of training will be kept on-site.
- Vegetation trimming/crushing shall take place outside the general bird breeding season (February 15 to September 1), to the maximum extent practical. Regardless of the time of year, prior to ground-disturbing activities, a qualified biologist shall conduct a nesting bird survey to comply with CDFW Code 3503 and 3503.5 and the Migratory Bird Treaty Act. The survey shall occur no more than three (3) days prior to initiation of construction and shall include any potential nesting habitat (including trees, shrubs, the ground, or nearby structures). Any occupied passerine and/or raptor nests shall be delineated and a no-disturbance buffer zone (as determined by the avian biologist) shall be established and maintained during construction. The buffer zone shall be sufficient in size to prevent impacts to the nest. A qualified biologist shall monitor active nests to determine whether construction activities are disturbing nesting birds or nestlings. If a nest shows signs of disturbance as determined by a qualified biologist, adaptive management methods may be used to ensure that the buffer distances are effective and no nests are disturbed. Once nesting has ceased and the fledglings are no longer using the nest area as confirmed by a qualified biologist, the buffer may be removed. A nesting bird survey report shall be provided to the County of San Bernardino and CDFW. If an active nest is encountered during construction, construction shall stop immediately until a qualified biologist can determine the status of the nest, avoidance buffer and when work can proceed without risking violation to State or federal laws.

- If a sensitive species is found, the species shall be relocated out of harm's way according to an approved capture/relocation plan. Any mortalities shall be reported to the agencies and County of San Bernardino. A final monitoring report will be submitted to CDFW and County of San Bernardino. The annual report shall include a summary of pre-construction surveys, biological monitoring, avoidance measures implemented, and whether the avoidance measures were effective.
- A Burrowing Owl Mitigation and Monitoring Plan shall be developed and submitted to CDFW for review 60 days prior to the start of ground disturbing activities. No less than 14 days prior to any ground disturbance activities, a burrowing owl (Athene cunicularia) Take Avoidance Survey shall be conducted by a qualified biologist according to methods outlined in the CDFW's 2012 (or most recent) Staff Report on Burrowing Owl Mitigation (CDFG 2012). If burrowing owls are determined to be present where Project activities will occur site-specific non-disturbance buffer zones shall be established by the qualified biologist. If it is not possible to avoid active burrows during the nonbreeding season, passive relocation shall be implemented once approved through coordination with CDFW.
- A Desert Kit Fox Monitoring and Mitigation Plan shall be prepared and submitted to CDFW for review 60 days prior to the start of ground disturbing activities. Prior to commencing ground-disturbing activities, a qualified biologist shall conduct a focused survey for desert kit fox (*Vulpes macrotis*), including assessment of all burrows in the Proposed Action and Vidal Energy Projects areas. If potential burrows are located in the Proposed Action and/or Vidal Energy Project areas, they shall be monitored by the qualified biologist. If any burrow/burrow complex is determined to house desert kit fox and the burrow/burrow complex is unavoidable, exclusionary devices (e.g., one-way doors) shall be fitted on the active burrow openings, and once the burrow has been confirmed vacant as determined by the qualified biologist and in consultation with CDFW, the burrow shall be carefully excavated to prevent re-entry/re-use of the burrow. These exclusion/excavation activities shall only occur during the non-breeding season (July 2 to January 15). If construction will occur during the breeding season, any active burrow/burrow complex that is unavoidable shall be provided a 500-foot no work buffer until the end of breeding season (July 1) or until the burrow has been determined to be inactive (and does not contain pups) by the qualified biologist.
- Temporary and permanent impacts to all state waters shall be compensated through a combination of habitat creation (i.e., establishment), enhancement, preservation, and/or and restoration at a minimum of a 1:1 ratio or as required by a Streambed Alteration Agreement and/or Waste Discharge Requirement. Any creation, enhancement, preservation, and/or restoration effort shall be implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications, and shall be approved by the permitting agencies and County of San Bernardino. A habitat restoration specialist will be designated and approved by the permitting agencies and will determine the most appropriate method of restoration.
- Temporarily impacted drainage features shall be recontoured to pre-construction conditions.
 Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary impact areas is not possible to the satisfaction of the appropriate agency, the temporary impact shall be considered a permanent impact and compensated accordingly.

- A biological monitor shall be present prior to initiation of ground disturbing activities to demark limit of disturbance boundaries. Flagging and/or staking will be used to clearly define the work area boundaries and avoid impacts to adjacent drainage features.
- Graded areas shall be stabilized to promote infiltration and reduce run-off potential.
- Pre-construction surveys for desert tortoise (Gopherus agassizii) shall be conducted by a qualified biologist no more than 30 days prior to construction activities. If desert tortoise are observed within the Project Site, the Applicant shall consult with CDFW and US Fish and Wildlife Service (USFWS) to determine compliance with State (CESA) and federal (FESA) law. Additionally, if desert tortoise are determined to be present, a Raven Management Plan shall be prepared, approved by CDFW and USFWS, and implemented to offset potential predatorial impacts to tortoises.
- Transmission lines, poles, and associated structures:
 - As recommended by Avian Power Line Interaction Committee (APLIC 2006), any new overhead transmission lines will have at least 60 inches of horizontal separation and a vertical separation of 40 inches between phase conductors, which is greater than the physical dimensions of all large birds and bats that could potentially use the structures for perching.
 - o In situations where particular hardware would present an electrocution risk (e.g., jumpers, cutouts, arrestors, transformers, etc.), perch guards and/or insulators would be installed per APLIC (2006) guidelines to minimize electrocution risk.
 - Line marking devices would be installed if any areas are identified as high risk for avian collisions (APLIC 2012).

Vegetation:

- Desert trees and shrubs should be avoided to the greatest extent possible including: Dalea spinosa (smoke tree), all species of the genus Prosopis (mesquites) with stems greater than 2 inches in diameter or greater than 6 feet in height; Creosote Rings, 10 feet or greater in diameter; Any part of any of the following species, whether living or dead: Olneya tesota (desert ironwood), all species of the genus Prosopis (mesquites), all species of the genus Cercidium (synonym: Parkinsonia, palo verde). If any of the preceding plants will be unavoidable during construction a permit for removal from the County of San Bernardino shall be obtained prior to removal.
- O Herbicides and pesticides may be used, as needed, to control invasive/noxious weeds and/or pests on site. Only EPA-registered pesticides and/or herbicides that also comply with State and local regulations would be used. Herbicide and pesticide use shall be limited to non-persistent immobile herbicides/pesticides and shall only be applied in accordance with label and application permit directions and stipulations for terrestrial applications.
- O WAPA and the Proponent would implement controls at entry locations to facilitate weed management and invasive species control and to minimize infestation of disturbed areas from outside sources. A controlled inspection and cleaning area would be established to visually inspect construction equipment arriving at the construction area and to remove and collect seeds that may be adhering to tires and other equipment surfaces.

Restoration:

- Prior to construction, a qualified restoration specialist should evaluate the habitats within the areas to be temporarily disturbed/impacted to determine if habitat restoration is possible. Habitat restoration may not be possible given prevailing winds and the potential inoculation of additional invasive species from adjacent areas. If the specialist determines restoration is possible, then a Habitat Restoration Plan (HRP) for the temporarily impacted area should be prepared. The plan should include sufficient detail to address all aspects of the restoration effort (further site evaluation, site preparation, planting, maintenance, and monitoring to determine success (i.e., plant survival, etc.) and additional maintenance needs. In general restoration of temporarily impacted areas involves recontouring the land, decompaction, replacing the topsoil (if collected), planting seed and/or container stock, maintaining (i.e., weeding, replacement planting, supplemental watering, etc.). Monitoring the restored area for a period of up to 5 years and/or until year 5 success criteria are met is normally what is required by the regulatory agency(ies). The Habitat Restoration Plan that shall be subject to approval by the CDFW and County of San Bernardino.
- o If restoration and/or enhancement of the Vidal Energy Project Area is not feasible, enhancement of habitat within the Vidal Energy Project Area (i.e., removal of exotic plant species within Drainages 5 and 6 and within the Vidal Energy Project area (Tamarisk Thickets, Disturbed habitat, exotics within native communities) may be considered suitable on-site, but out-of-kind conservation. Another conservation option would be off-site acquisition and preservation of the vegetation communities. Conservation ratios shall be developed through consultation with CDFW and County of San Bernardino.
- A biological monitor shall be present prior to initiation of ground disturbing activities to demark limit of disturbance boundaries. Flagging and/or staking will be used to clearly define the work area boundaries and avoid impacts to adjacent native communities.
- A biological monitor will be present prior to initiation of ground disturbing activities to demark limit of disturbance boundaries. Flagging and/or staking will be used to clearly define the work area boundaries and avoid impacts to sensitive plant species with the potential to occur near the proposed Project boundaries.

Lighting:

- Lighting shall comply with Table 83-7 "Shielding Requirements for Outdoor Lighting in the Mountain Region and Desert Region" (County Development Code, 2007) (i.e. "Dark Sky" requirements). All lighting shall be limited to that necessary for maintenance activities and security purposes. This is to allow minimum obstruction of night sky remote area views. No light shall project onto adjacent roadways in a manner that interferes with oncoming traffic. All signs proposed shall only be lit by steady, stationary, shielded light directed at the sign, by light inside the sign, by direct stationary neon lighting or in the case of an approved electronic message center sign, an alternating message no more than once every five seconds.
- Lighting shall be shielded away from adjacent sensitive uses, including the adjacent residential development, to minimize light spillover. The glare from any luminous source, including on-site lighting, shall not exceed 0.5 foot-candle at the property line.

 Any lights used to illuminate the site shall include appropriate fixture lamp types as listed in San Bernardino County Development Code Table 83-7 and be hooded and designed so as to reflect away from adjoining properties and public thoroughfares and in compliance with San Bernardino County Development Code Chapter 83.07, "Glare and Outdoor Lighting" (i.e. "Dark Sky Ordinance).

Cultural Resources

- Prior to the initiation of ground-disturbing activities, a Worker Education Awareness Program (WEAP) will be conducted to alert field personnel to the possibility of buried prehistoric or historic cultural deposits. Development of the WEAP will include consultation with a Qualified Archaeologist meeting the Secretary of the Interior standards and approved by the CRIT. The WEAP will provide an overview of potential significant archaeological resources that could be encountered during ground disturbing activities, including how to identify prehistoric or historic cultural deposits, to facilitate worker recognition, avoidance, and subsequent immediate notification to the Qualified Archaeologist.
- Prior to the start of ground-disturbing activities, a Monitoring and Treatment Plan (MTP) will be created by a Qualified Archaeologist meeting the Secretary of the Interior standards in coordination with the CRIT that outlines process for identification and treatment of inadvertently discovered cultural resources.
- An archaeological monitor will be present for all ground-disturbing activity. In the event that new unevaluated cultural resources are discovered, all work within 60 feet of the find will cease, and a Qualified Archaeologist meeting the Secretary of the Interior standards shall assess the find. The Qualified Archaeologist shall have the authority to stop or divert construction as necessary. Work outside of the buffered area may continue during this assessment period. The CRIT would be contacted regarding any pre-contact and/or historic-era finds and be provided information after the Qualified Archaeologist makes their initial assessment of the nature of the find, so as to provide Tribal input with regard to significance and treatment. A research design will be implemented that includes a plan to evaluate the find's eligibility for listing in the NRHP, in consultation with WAPA, County of San Bernardino, California State Historic Preservation Office (SHPO), and CRIT, as appropriate. Work must not resume in this area without approval of WAPA. Following the completion of evaluation efforts, all parties shall confer regarding the resource's archaeological significance, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource. Should any significant resource and/or TCR not be a candidate for avoidance or preservation in place, and the removal of the resource(s) is necessary to lessen impacts, the research design shall include a comprehensive discussion of sampling strategies, resource processing, analysis, and reporting protocols. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the CRIT unless otherwise decided by the CRIT. The CRIT shall indicate if it is their preference that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location not be feasible, then a reburial location shall be decided upon in consultation with CRIT. All reburials are subject to a reburial agreement that shall be developed between the landowner and the CRIT outlining the determined reburial process/location and shall include measures and provisions to protect the reburial area from any future impacts.
- A Tribal monitor representing the CRIT will be offered the opportunity to be present for all grounddisturbing activity conducted during construction. The CRIT shall be contacted if any pre-contact

and/or historic-era cultural resources are discovered during construction and be provided information regarding the nature of the find so as to provide Tribal input with regards to significance and treatment. The Native American monitor will follow the processes outlined in the Monitoring and Treatment Plan (MTP) drafted by a Qualified Archaeologist in coordination with the CRIT.

- All draft records/reports containing the significance and treatment findings and data recovery
 results shall be prepared by the qualified archaeologist and submitted to the CRIT and WAPA,
 concurrently, for their review and comment. After approval from all parties, the final reports and
 site/isolate records are to be submitted to the local CHRIS Information Center and the CRIT.
- Any WAPA vehicular travel outside the Vidal Energy Project boundary will be restricted to existing
 access roads and overland travel within the existing transmission line ROW.
- Project-related vehicular traffic within NRHP-eligible, recommended-eligible, or indeterminate archaeological site boundaries will be restricted to established access roads, a 5 MPH speed limit, and only during dry conditions.
- Any work done by WAPA outside the Vidal Energy Project boundary, but within WAPA's existing HDR-BLY transmission right of way, would include flagging site boundaries of NRHP-eligible or indeterminate sites prior to any construction-related activities. Site boundaries will be flagged only where they intersect the transmission line ROW. Flagged lath would be staked along the edge of the ROW approximately every 80 feet (25 m), more or less, depending on conditions affecting visibility of the demarcation. Flagging would buffer the resource boundary approximately 65 feet (20 m) from the edge of the site boundary where the ROW transects the resource. Where work areas have previously encroached on resources, and continued work is permitted, flagged lath shall be installed at intervals to adequately demarcate limits of work.
- During the required WEAP training it shall be explained to work crews that the flagged lath denotes the limited work area(s) near or within Environmentally Sensitive Areas (ESA).
- If human remains are encountered during ground-disturbing activities, all work must immediately cease within 100 feet (30m) of the discovery. The County, WAPA, SHPO, and appropriate Tribes must be notified of the discovery within 24 hours (following County and/or WAPA protocol). All discoveries will be treated in accordance with Native American Graves Protection and Repatriation Act ([NAGPRA] Public Law 101-601; 25 United States Code [U.S.C.] 3001-3013) and California State laws, as appropriate, and work must not resume in this area without proper authorization.
- Any historic properties that cannot be avoided should be subjected to appropriate treatment, conservation measures, or data recovery, or if unevaluated, subjected to an archaeological testing program to determine potential listing in the California Register of Historic Resources (CRHR) and/or the NRHP.

Geology

WAPA and the Proponent shall retain a California registered and licensed engineer to design
facilities in agreement with geologic conditions identified at the site. A Final Geotechnical Report
shall be produced to account for variations likely occurring in the subgrade which were not
detected in the preliminary boring program. All grading and construction shall adhere to the
specifications, procedures, and site conditions contained in the final design plans, which shall be
fully compliant with the recommendations of the California-registered and licensed professional

engineer and consistent with the recommendations in the Preliminary Geotechnical Engineering Report prepared by Terracon Consultants, Inc. in 2022.

- In areas of documented or inferred paleontological resource presence, WAPA and the Proponent shall consult with a qualified paleontologist meeting the standards of the Society for Vertebrate Paleontology (SVP). The initial consultation may be provided by a qualified paleontologist on staff at the County Museum. The qualified paleontologist will determine the degree of paleontological resource sensitivity, as outlined below, and will recommend a paleontological resource monitoring and mitigation plan (PRMMP). This plan will address specifics of monitoring and conservation measures, and will take into account updated geologic mapping, geotechnical data, updated paleontological records searches, and any changes to the regulatory framework. The PRMMP will also account for construction methods and their levels of disturbance. For example, solar PV racks are often driven directly into the ground with no excavation occurring. Construction activities such as these for which there is no opportunity to physically inspect subsurface conditions would not require monitoring. This PRMMP would meet the standards of the SVP. The following provisions would be typical for units mapped with the different levels of paleontological sensitivity:
 - High (SVP)/Class 4–5 (BLM)—All activities involving the exposure of sediments mapped as having high paleontological sensitivity will be monitored by a qualified paleontological monitor (BLM, 2009; SVP, 2010) on a full-time basis under the supervision of the Qualified Paleontologist. Undisturbed sediments may be present at the surface, or present in the subsurface, beneath earlier developments. This monitoring will include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor will have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined to be significant, professionally and efficiently recover the fossil specimens and collect associated data. Paleontological monitors will use field data forms to record pertinent location and geologic data, will measure stratigraphic sections (if applicable) and collect appropriate sediment samples from any fossil localities.
 - Low to High (SVP)/Class 2 to Class 4–5 (BLM)—All activities involving the exposure of sediments mapped as having low-to-high paleontological sensitivity will only require monitoring if construction activity will exceed the depth of the low sensitivity surficial sediments. The underlying sediments may have high paleontological sensitivity, and therefore work in those units might require paleontological monitoring, as designated by the Qualified Paleontologist in the PRMMP. When determining the depth at which the transition to high sensitivity occurs and monitoring becomes necessary, the Qualified Paleontologist should take into account:
 - o the most recent local geologic mapping,
 - depths at which fossils have been found in the vicinity of the project area, as revealed by the museum records search, and
 - o geotechnical studies of the project area, if available.
 - Low (SVP)/Class 2–3 (BLM)—All activities involving ground the exposure of sediments mapped as having low paleontological sensitivity should incorporate worker training to make construction workers aware that while paleontological sensitivity is low, fossils might still be encountered. The Qualified Paleontologist should oversee this training as well as remain on-call in the event fossils are found.

- Paleontological monitoring is usually not required for sediments with low (Low / Class 2--3) paleontological sensitivity.
- None (SVP)/Class 1 (BLM)—Activities determined by the Qualified Paleontologist to involve ground-disturbing activities in areas mapped as having no paleontological sensitivity (i.e., plutonic igneous or high-grade metamorphic rocks) will not require further paleontological conservation measures.
- In the event of any fossil discovery, regardless of depth or geologic formation, construction work will halt within a 50-ft radius of the find until its significance can be determined by a Qualified Paleontologist. Significant fossils will be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the SVP (2010) and BLM (2009). A repository will be identified, and a curatorial arrangement will be signed prior to collection of the fossils. Although the San Bernardino County Museum is specified as the repository for fossils found in the county in the current General Plan, the museum may not always be available as a repository. Therefore, any accredited institution may serve as a repository.

Transportation

- Deliveries of materials would be scheduled for off-peak hours, when practical, to reduce effects during periods of peak traffic.
- Truck traffic would be phased throughout construction, as much as practical.
- Carpooling or mass transportation options for construction workers would be encouraged.
- The Proponent and WAPA would obtain the applicable permits needed to transport equipment and materials (e.g., oversized transformers, lightning protection pole) and coordinate closely with the California Department of Transportation (Caltrans) and other State transportation departments, as appropriate.

Public Health and Safety

- The projects would be designed in accordance with all applicable Federal and industrial standards including the American Society of Mechanical Engineers, National Engineering Services Corporation, International Energy Conservation Code, International Building Code, Uniform Plumbing Code, Uniform Mechanical Code, National Fire Protection Association, and Occupational Safety and Health Administration regulations.
- The Proponent and WAPA would develop and maintain a Spill Prevention and Emergency Response Plan. A copy of the plan would be kept onsite at all times and facility staff would be trained on the procedures outlined in the plan.

Wastes and Hazardous Materials

- The Proponent and WAPA would design and operate systems containing hazardous materials in a manner that limits the potential for their release.
- Vehicles and equipment would be kept in proper working condition to reduce the potential for leaks of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials.

• The containment and disposal of hazardous waste would be outlined in a Spill Prevention and Emergency Response Plan developed by the construction contractor to reduce the likelihood of substantial spills.

Visual Resources

- Areas of surface disturbance would be minimized, controlling erosion, using dust suppression techniques, and, if applicable, restoring exposed soils as closely as possible to their original contour and vegetation.
- Solar energy facilities shall be designed to preclude daytime glare on any abutting residential land
 use zoning district, residential parcel, or public right-of-way by using darkly colored matte PV solar
 panels featuring an anti-reflective coating. The solar panels will also be designed to track the sun
 to maximize panel exposure to the sun, which would direct the majority of any small amount of
 reflected light back toward the sun in a skyward direction.