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<b>Document Title:</b>	Supplemental Data Response Set 1 - Appendix K SUP DR PD-1 Darden Application Mitigation Measures
<b>Description:</b>	Provides a summary of the proposed mitigation measures for the project.
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# Appendix K

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SUP DR PD-1 Darden Application Mitigation Measures

# Darden Clean Energy Project Mitigation Measures

**December 2024**

The following mitigation measures were included in application materials submitted with the Darden Project's Opt-in Certification application package including the original submittal and data request responses, as well as updates due to the removal of the hydrogen facility from the Project.

## AQ-1 Voluntary Emission Reduction Agreement

The Applicant shall enter into a voluntary emissions reduction agreement (VERA) with the SJVAPCD to offset the NOX emissions above the 10 tons per year threshold. The VERA is a mechanism for the Applicant to fund programs to reduce NOX emissions in the SJVAB. The Applicant shall coordinate with SJVAPCD to ensure VERA funds are used for programs near the Project site to the extent feasible. The VERA shall be submitted and approved by the SJVAPCD prior to beginning construction activities.

If available and as feasible, electric equipment could be incorporated into the off-road equipment fleet to reduce NOX emissions that must be offset with the required VERA. In order to reduce the NOX emissions that must be offset with the required VERA, the Applicant shall provide commitment to available electric equipment to the CEC and the SJVAPCD prior to the issuance of a permit to construct and quantify the emissions reductions from the electric equipment. Documentation of the equipment operating on-site, shall be maintained on-site at all times during construction and decommissioning activities.

## AQ-2 Fugitive Dust Control Plan

Prior to construction and decommissioning activities, the Applicant shall prepare a Fugitive Dust Control Plan. At a minimum, the Fugitive Dust Control Plan shall include the following: Control fugitive dust on-site during construction and decommissioning with a minimum of one watering across the site daily with the use of chemical stabilizers during construction activities. Additional water/chemical treatments shall occur as needed based on daily site conditions and ground disturbance activities. Roads and other areas that experience high traffic volumes may be stabilized with water and/or chemicals up to four times a day. The method of monitoring site conditions for additional dust control needs shall be detailed in the plan. Chemical stabilizers shall be used for long-term fugitive dust control on-site. Specific stabilizers proposed for use and their location shall be included in the fugitive dust control plan for the project and records of watering and stabilizer application shall be kept. PM10 reduction quantifications from this measure are to be applied prior to the finalization of a voluntary emissions reduction agreement.

## BIO-1 Construction Worker Environmental Awareness Training and Education Program

Prior to any activity on-site and for the duration of construction activities, all personnel at the Project area (including laydown areas and/or transmission routes) shall attend a Worker Environmental Awareness Program (WEAP) developed and presented by the Qualified Biologist

or authorized designee. New personnel shall receive WEAP training on the first day of work and prior to commencing work on the site. Any employee responsible for the O&M or decommissioning of the Project facilities shall also attend an O&M-specific WEAP training.

1. The program shall include information on the life history of the San Joaquin kit fox, Swainson's hawk, burrowing owl, American badger, San Joaquin coachwhip, and nesting birds as well as other wildlife and plant species that may be encountered during construction activities.
2. The program shall also discuss the legal protection status of each species, the definition of "take" under the Federal Endangered Species Act and California Endangered Species Act, measures the project proponent is implementing to protect the species, reporting requirements, specific measures that each worker shall employ to avoid take of wildlife species, and penalties for violation of the Federal Endangered Species Act or California Endangered Species Act.
3. The program shall include the contact information for the project biologist and on-site environmental compliance manager.
4. The program shall provide information on how and where to bring injured animals for treatment in the case any animals are injured the Project area.
5. An acknowledgement form signed by each worker indicating that WEAP training has been completed shall be kept on record.
6. A sticker shall be placed on hard hats indicating that the worker has completed the WEAP training. Construction workers shall not be permitted to operate equipment within the construction areas unless they have attended the WEAP training and are wearing hard hats with the required sticker.
7. A copy of the training transcript and/or training video, as well as a list of the names of all personnel who attended the WEAP training and copies of the signed acknowledgement forms will be made available upon agency request.

## BIO-2 Construction Best Management Practices

The following best management practices shall be implemented during construction:

- Designation of a 15 mile per hour speed limit in all construction areas.
- All vehicles and equipment shall be parked on pavement, existing roads, and previously disturbed areas, and clearing of vegetation for vehicle access shall be avoided to the greatest extent feasible.
- The number of access routes, number and size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the goal of the project.
- Designation of equipment washout and fueling areas to be located within the limits of grading at a minimum of 100 feet from any sensitive resources as identified by a Qualified Biologist. Washout areas shall be designed to fully contain polluted water and materials for subsequent removal from the site.
- Drip pans shall be placed under all stationary vehicles and mechanical equipment that show signs of leaking or discharging lubricants or other fluids.

- All carrion shall be removed from the Project site prior to and during construction.
- All trash, including carrion, shall be placed in sealed containers and shall be removed from the project site a minimum of once per week.
- No pets are permitted on the Project site during construction.

### BIO-3 Preconstruction Surveys for Special-Status Species

Preconstruction surveys for burrowing species shall be conducted by a Qualified Biologist for the presence of San Joaquin kit fox, American badger, and burrowing owl prior to commencement of construction activities in all areas with potential to support these species. This survey shall be conducted no more than 30 days prior to ground disturbing activities without prior agency approval. The surveys shall be conducted in areas of suitable habitat for each species. Surveys shall conform to USFWS guidelines for San Joaquin kit fox, CDFW guidelines for burrowing owl, and to industry standards for American badger.

Where special-status species habitat (e.g., burrows or nest trees and vegetation) are known to occur and there is a potential for significant impacts, Qualified Biologist shall monitor construction activities to ensure that impacts to special-status species are avoided and minimized.

### BIO-4 Measures for San Joaquin Kit Fox

In areas of the Project site where San Joaquin kit fox potentially occur (the utility switchyard location), the following measures shall be implemented by a Qualified Biologist:

- Pre-construction surveys for San Joaquin kit fox no more than 30 days prior to ground disturbance
- Construction activity monitoring
- San Joaquin kit fox dens are not expected to occur in project work areas. If San Joaquin kit fox occurs in the Project site, work within 500 feet of the animal shall be halted until the animal leaves the area, as determined by the Qualified Biologist.

### BIO-5 Measures for Burrowing Owl

Superseded, refer to BIO-11 Burrowing Owl Management Plan.

### BIO-6 Measures for American Badger

- Preconstruction surveys for American badger shall be conducted by a Qualified Biologist no more than 30 days prior to ground disturbance.
- If potential American badger dens are observed and avoidance is feasible, buffer distances of 50 feet for occupied dens and 250-foot, no-disturbance buffers for natal dens shall be established by the Qualified Biologist prior to construction activities.
- If avoidance of the potential American badger dens is not feasible, the following measures are recommended to minimize potential adverse effects to the American badger:

- If a Qualified Biologist determines that potential dens are inactive, the biologist shall excavate these dens by hand with a shovel and collapse them to prevent American badgers from re-using them during construction.
- If the Qualified Biologist determines that potential dens may be active, biologist shall conduct remote camera monitoring of the burrow for a period of three consecutive days to confirm occupancy status. If the Qualified Biologist determines that a burrow is an active natal burrow, avoidance buffers shall be established to demarcate no-work areas that shall be maintained until the burrow is no longer an active natal burrow. Burrows that are determined to be non-natal or are active outside of the breeding season shall implement passive eviction procedures through the installation of one-way doors, and the use of remote camera monitoring to document no activity for 3 consecutive days. Dens that are determined to be unoccupied or have become inactive following passive eviction or at the end of breeding season shall be hand-excavated with a shovel and collapsed to prevent re-use during construction.

## BIO-7 Pre-construction Surveys for Nesting Birds and Common Raptors

If construction is scheduled to commence during the non-breeding season (September 1 to January 31), no pre-construction surveys or additional measures for nesting birds or other raptors would be required. Prior to ground disturbing and vegetation removal activities that are initiated during the breeding season (February 1 to August 31), a Qualified Wildlife Biologist shall conduct pre-construction surveys of all potential nesting habitats within the Project area. The raptor survey shall focus on potential nest sites (e.g., owl boxes, large trees, windrows, and shrubs) within 500 feet of the site for common raptors. Nesting bird surveys shall be conducted within 14 days of the start of ground-disturbing or vegetation removal activities. Surveys need not be conducted for the entire Project area at one time and may be conducted in phases consistent with construction activity schedules. The surveying biologist must be qualified to determine the status and stage of nesting by migratory birds and all locally breeding raptor species without causing intrusive disturbance.

## BIO-8 Nest Buffers

If active nests are found, a suitable no-work buffer shall be established around active nests. Buffers shall be determined by the Qualified Biologist and be established based on the species and nest location, to allow for known species' behavior and environmental factors (e.g., line of sight to nest) when establishing avoidance buffers. Standard buffers are typically 200-500 feet for common raptors and 30-50 feet for most common passerines. No access into buffer areas shall be allowed until a Qualified Biologist has determined that the nestlings have fledged and are no longer reliant on the nest or the nest has become otherwise inactive (e.g., depredation). Encroachment into the buffer may occur at the discretion of a Qualified Biologist and with the appropriate biological monitoring; however, for State-listed species, CDFW shall be consulted for approval of buffer encroachment or reduction.

## BIO-9 Swainson's Hawk Conservation Strategy

The Applicant shall prepare a Swainson's Hawk Conservation Strategy to be implemented during Project construction and operations. The goals of the conservation strategy will be to avoid and minimize direct impacts to individuals present within the Project vicinity, and manage nesting and foraging habitat within the Project site to benefit the Swainson's hawk through implementation of both short-term and long-term conservation strategies during Project construction and operation, including specific methodologies, location of specific mitigation and management actions, success criteria, and evaluation of success criteria. The Swainson's Hawk Conservation Strategy will include the items described below.

### *Short-Term Conservation Strategy*

Short term conservation measures are intended to address potential impacts to nesting and temporary loss of foraging habitat during the Project's construction phase, and will include a discussion of:

1. Nesting habitat
  - a. Preservation of nest trees
  - b. Temporary construction buffers
  - c. Temporary nest structure establishment
  - d. Establishment of new nest trees
2. Foraging habitat
  - a. Habitat restoration

### *Long-Term Conservation Strategy*

Long-term conservation measures are intended to address potential cumulative impacts and promote Swainson's hawk population stability and growth, as well as address potential impacts to nesting Swainson's hawks during some O&M phase activities, and will include a discussion of:

1. Implementation of a Vegetation Management Plan
2. Monitoring and management of nest tree plantings and artificial nest structures
3. Implementation of Swainson's hawk management research program

### *Success Criteria and Evaluation*

1. Short-term conservation strategy success criteria
2. Long-term conservation strategy success criteria
3. Success criteria evaluation

## BIO-10 Vegetation Management Plan

### *Revegetation and Vegetation Management Goals and Objectives*

Revegetation and vegetation management of the Project site will occur during the Project construction and operation phases. Revegetation will account for on-site constraints including a lack of irrigation, saline soils, and poor drainage conditions. The Project will facilitate a Before-After- Control-Impact (BACI) research design to test the efficacy of multiple vegetation management regimes on the establishment of Swainson's hawk foraging habitat with the goal of achieving the following success criteria:

- Establish permanent, regenerative vegetative cover that will:
  - Represent high-quality foraging habitat for Swainson's hawks (i.e., appropriate vegetative structure that maintains a sufficient prey base).
  - Provide suitable floral resources for native pollinators.
  - Prevent and control noxious weed infestations.
  - Allows for safe and efficient O&M Project activities.

Additional benefits of a vegetation management plan that achieves these primary goals would be reduced fire risk through management of fuel loads, erosion control, stormwater runoff control, and water quality control during the Project's operational phase.

### *Preparation of a Vegetation Management Plan*

The Applicant shall prepare a Vegetation Management Plan to be implemented during construction and operations Project phases. The plan shall be developed to address the goals and objectives outlined above and will contain the following sections and information:

1. Purpose of the plan
2. List and discussion of target species
3. Prevention methods
  - a. Specifications for completing preconstruction weed survey
  - b. Discussion of control methods including preconstruction, construction, and O&M methods
  - c. Vehicle inspections and cleaning during construction
  - d. Weed free materials
  - e. Preliminary seeding
4. Weed control methods
  - a. Mechanical and manual controls
  - b. Chemical controls
  - c. Grazing controls
5. Revegetation Implementation Plan
  - a. Site preparation methods
    - i. Soil testing
    - ii. Methods



- iii. Timing
  - b. Seed Pallet
- 6. Planting Methods and Guidelines
  - a. Seeding
  - b. Tree container planting
- 7. Vegetation Maintenance and Long-Term Management
- 8. Preliminary Monitoring Plan
  - a. Study Design
    - i. Vegetation Sampling
    - ii. Soils/Phytoremediation
    - iii. Wildlife Sampling
- 9. Success Criteria
- 10. Adaptive Management
- 11. Post Decommissioning Revegetation Plan

## BIO-11 Burrowing Owl Management Plan

The Applicant shall prepare a Burrowing Owl Management Plan that will address the following topics to fully minimize and mitigate potential impacts to the species. The management plan will include the following:

1. Burrowing owl existing conditions, including site conditions and burrowing owl observations
2. Management Strategy
  - a. Qualified Biologist
  - b. Pre-construction surveys
  - c. Determination of occupancy
  - d. Nesting deterrence
  - e. Construction monitoring
  - f. Burrow avoidance and activity buffers
  - g. Sound or visual barriers
  - h. Passive relocations and exclusion, including installation of artificial burrows if necessary
  - i. Burrow excavation
3. Reporting
4. Mitigation
5. Operations and Maintenance Measures

## BIO-12 Operations and Maintenance Biological Resources Management Plan

The Applicant shall prepare an Operations and Maintenance Biological Resources Management Plan to be implemented during Project operations that incorporates elements of final Project layout and design and baseline conditions. The plan will address the following topics to avoid and minimize potential impacts to sensitive biological resources including San Joaquin kit fox, American badger, and Swainson's hawk, including from vehicle use; solar panel, facility, and equipment maintenance and repair; and vegetation management activities; among other operations activities. The management plan will be prepared prior to initiation of Project operations and will include the following:

1. Existing conditions, including sensitive biological resources
2. Management Strategy
  - a. Worker Environmental Awareness Program
  - b. Avoidance and minimization measures
  - c. Surveys
  - d. Monitoring
3. Reporting

The plan will be reviewed and updated every 5 years to incorporate changed conditions and adaptive management, as needed.

## CUL-1 Designated Cultural Resources Specialist

The Applicant shall retain a designated Cultural Resources Specialist (CRS) who will be available to carry out mitigation measures related to cultural resources for the Project. The CRS shall meet or exceed the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983). The CRS shall be qualified in site detection, evaluation of deposit significance, consultation with regulatory agencies, and plan site evaluation and mitigation activities.

## CUL-2 Collection of Darden-ISO-CJ-68

Prior to the start of construction, Darden-ISO-CJ-68 shall be collected under the direction of the CRS. A Native American representative shall also be contacted to participate in the collection of the find. Once collected, Darden-ISO-CJ-68 shall be sketched and photographed. The isolate shall be collected and final disposition will be determined by the lead agency and any Native American tribes who choose to consult on the Project.

## CUL-3 Archaeological Monitoring and Discovery Plan

Prior to the start of permitted ground disturbing activities, an Archaeological Monitoring and Discovery Plan shall be prepared by the CRS. The monitoring plan shall include a description of the monitoring methodology, including when monitoring will be required, the authority of the monitor to halt construction should a discovery be made, contact information should a discovery

be made, definition of site types typically present within the area, define the types of resources that would require that work be halted or redirected, provide the protocols for unanticipated discoveries (e.g., who to call and next steps for documentation and coordination), methodology for establishing an Environmentally Sensitive Area (ESA) should one be required, review and approval protocols (e.g., define review periods for agencies and stakeholders), and dispute resolution.

## CUL-4 Worker Environmental Awareness Program (WEAP)

Prior to the start of ground disturbance, the construction crew shall participate in on-site training on the proper procedures to follow if cultural resources are uncovered during the Project excavations, site preparation, or other related activities. This Worker Environmental Awareness Program shall include a comprehensive discussion of applicable laws and penalties under the law, samples or visuals of artifacts that might be found in the vicinity of the Project site, a discussion of what such artifacts may look like when partially buried or wholly buried and then freshly exposed, a discussion of what prehistoric and historic-period archaeological deposits look like at the surface and when exposed during construction, instruction that employees are to halt work in the vicinity of a discovery (within 50 feet) and requirements for working within 50 feet of an ESA. This information shall be provided in an informational brochure that outlines reporting procedures in the event of a discovery and shall be provided to all individuals working on-site.

## CUL-5 Archaeological Monitoring

Archaeological monitor(s) working under the direction of the CRS shall be on-site during permitted ground disturbing activities described herein that occur within the moderate to high sensitivity locations identified in Figure 5.1-2. Activities that shall require an archaeological monitor include mass grading that exposes previously undisturbed soils (approximately 18 inches below ground surface based on previous agricultural practices), and open trench excavation with mechanical equipment. Activities that do not expose soil profiles, such as pile driving, ditch witch trenching, and the use of hand tools, will not require monitoring unless they occur within 50 feet of an ESA.

During monitoring, the monitors shall examine the work areas for the presence of prehistoric artifacts (e.g., chipped stone tools and production debris, stone milling tools, ceramics), historic-period debris (e.g., metal, glass, ceramics), and/or soil discoloration that might indicate the presence of a cultural midden. Each monitor shall maintain a daily log documenting ground disturbing activity, work locations, description, and provenience of any archaeological discoveries (if any), and any necessary action items for monitoring.

The archaeological monitor shall have the authority to halt and redirect work in the event of a discovery. If archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall be halted and/or redirected, and the find evaluated for listing in the CRHR. Should an unanticipated resource be found as CRHR eligible and avoidance is infeasible, additional analysis (e.g., testing) may be necessary to determine if project impacts would be significant.

Archaeological monitoring may be reduced or terminated at the discretion of the CRS in consultation with the lead agency, as warranted by conditions such as encountering bedrock, the presence of fill soil, or negative findings during initial ground disturbance. If monitoring is reduced to spot-checking, spot-checking shall occur when ground-disturbance moves to a new location or when ground disturbance will extend to depths not previously excavated (unless those depths are within bedrock).

## CUL-6 Unanticipated Discovery of Cultural Resources

In the event archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and the project CRS be contacted immediately to evaluate the resource. If the resource is determined by the CRS to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the CRS and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via Project redesign, the CRS shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the CCR Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the CRS and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The lead agency shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the CHRIS, per CCR Guidelines Section 15126.4(b)(3)(C).

## CUL-7 Human Remains

No human remains are known to be present within the Project site. However, the discovery of human remains is always a possibility during ground-disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance.

## PAL-1 Paleontological Resources Specialist

Prior to the start of construction, the Project Applicant shall submit the name and resume of an individual to the CEC for review and approval as the Project's Paleontological Resources Specialist. The PRS shall be an individual with a degree in paleontology or geology and at least

three years of paleontological resource mitigation and field experience in California, including at least one year of leading paleontological resource mitigation and field activities. The PRS shall be responsible for directing all paleontological mitigation efforts for the Project.

## **PAL-2 Paleontological Worker Environmental Awareness Program**

The PRS or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel.

## **PAL-3 Paleontological Monitoring**

Full-time paleontological monitoring shall be conducted during trenching, excavation, grading, and drilling (if borehole is 2 feet or more in diameter) when ground disturbing depths exceed 18 inches, within previously undisturbed sediments with high paleontological sensitivity (i.e., Quaternary older alluvium) to mitigate for potential impacts to currently unknown paleontological resources. Full-time paleontological monitoring shall also be conducted during trenching, excavation, grading, and drilling (if borehole is 2 feet or more in diameter) activities reaching deeper than 5 feet below current grade in sediments assigned a low paleontological sensitivity from 0 to 5 feet and high paleontological sensitivity below 5 feet (i.e., Quaternary basin deposits and Quaternary fan deposits). Pile driving and drilling for boreholes less than 2 feet in diameter do not require paleontological monitoring as the data required to accompany scientifically valuable paleontological resources cannot be collected under the conditions of typical drilling and pile driving activity.

Monitoring shall be conducted by a paleontological monitor with experience with collection and salvage of paleontological resources and who meets the minimum standards of the Society of Vertebrate Paleontology (2010) for a Paleontological Resources Monitor. The PRS in coordination with the CEC may recommend that monitoring be reduced in frequency or ceased entirely based on geologic observations.

In the event of the discovery of a previously unknown paleontological resource by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease, and the PRS shall evaluate the find. If the fossil(s) is (are) not scientifically significant, then construction activity may resume. If it is determined that the fossil(s) is (are) scientifically significant, Mitigation Measure PAL-4 shall be enacted.

## **PAL-4 Paleontological Resource Salvage and Curation**

If a paleontological resource is determined to be potentially scientifically significant, the paleontological monitor shall salvage (i.e., excavate and recover) the fossil to protect it from damage/destruction. Typically, fossils can be safely salvaged quickly by a single paleontological monitor with minimal disruption to construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrates from within paleontologically sensitive deposits. After the fossil(s) is (are) salvaged, construction activity may resume.

Fossils shall be identified to the lowest (i.e., most-specific) possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the PRS.

## PAL-5 Paleontological Mitigation Report

Upon completion of ground-disturbing activities (or laboratory preparation and curation of fossils, if necessary), the PRS shall prepare a final report describing the results of the paleontological monitoring efforts. The report shall include a summary of the field and laboratory methods employed; an overview of Project geology; and, if fossils were discovered, an analysis of the fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to the CEC and, if fossil curation is required, the designated scientific institution.

## PH-1 Minimize Personnel and Public Exposure to Valley Fever

Prior to site preparation, grading activities, or ground disturbance, the Applicant shall prepare a Fugitive Dust Control Plan for the Project. The Fugitive Dust Control Plan shall include the following at a minimum:

- Equipment, vehicles, and other items shall be cleaned thoroughly of dust before they are moved off-site to other work locations.
- Wherever possible, grading, and trenching work shall be phased so that earth-moving equipment works well ahead or down-wind of workers on the ground.
- The area immediately behind grading or trenching equipment shall be sprayed with water before ground workers move into the area.
- If a water truck runs out of water before dust is dampened sufficiently, ground workers exposed to dust are to leave the area until a full truck resumes water spraying.
- All heavy-duty earth-moving vehicles shall be closed-cab and equipped with a High Efficiency Particulate Arrestance (HEPA) filtered air system.
- N95 respirators shall be provided to onsite workers for the duration of the construction period.
- Workers shall receive training to recognize the symptoms of Valley Fever and shall be instructed to promptly report suspected symptoms of work-related Valley Fever to a supervisor. Evidence of training shall be provided to the Fresno County Planning and Community Development Department within 24 hours of the training session.
- A Valley Fever informational handout shall be provided to all on-site construction personnel. The handout shall provide, at a minimum, information regarding the symptoms, health effects, preventative measures, and treatment.

## SOC-1 Emergency Service Agreement

In coordination with Fresno County, the Applicant would prepare an agreement to support emergency services personnel in the Project area to minimize Project demand on local sheriff, fire, and EMS providers and maintain their ability to respond to other emergencies. The agreement would allow for adequate training and coordination with local fire and law enforcement responders to become familiar with the risks and procedures needed to respond to potential emergencies associated with Project facilities. The Applicant would also develop and implement a private security system with which local law enforcement could integrate and coordinate response and deterrent measures.

## TRA-1 Construction Traffic Carpool and Trip Reduction Plan

Prior to the start of construction, the Applicant shall submit a Construction Traffic Carpool and Trip Reduction Plan for review and approval by CEC, which shall include, but not be limited to:

- Feasible methods that encourage or provide ridesharing opportunities for construction workers.
- Feasible methods to reduce VMT by both construction employees and construction-related truck trips, such as encouraging hiring of local construction workers.
- Use of rail transport for specialized equipment that may originate from ports or other long distances to reduce VMT associated with vehicle delivery to the Project site, if feasible.
- Define potential methods to coordinate with adjacent solar project developers where Project construction may overlap to potentially provide group ridesharing opportunities for construction workers.
- Means for local hiring practices of operations workers and local procurement of maintenance supplies in efforts to reduce VMT of operations and maintenance trips.

## VIS-1 Surface Treatment Plan

To reduce potential significant impacts associated with color contrast and glare for components of the Project, the applicant will prepare and implement a Surface Treatment Plan for new above-ground structural elements associated with the solar facility, step-up substation, BESS, and gen-tie line. The Surface Treatment Plan will require that the finishes on all new transmission and other structures with metal surfaces shall be non-reflective, and new conductors shall be non-specular. The Surface Treatment Plan will also address non-steel structural elements associated with Project components, such as buildings and storage tanks. Colors will be selected according to their ability to reduce the aesthetic impact associated with contrast with the surrounding landscape. Color finishes will be flat and non-reflective. The Surface Treatment Plan will include an evaluation of the final location of the step-up substation and BESS to evaluate structure finishes and color in the appropriate landscape context.

## VIS-2 Utility Switchyard Surface Treatment Plan

To reduce potential significant impacts associated with contrast and glare for components of the utility switchyard, the applicant will prepare and implement a Utility Switchyard Surface

Treatment Plan. The Utility Switchyard Surface Treatment Plan will require that the finishes on all new transmission and other structures with metal surfaces shall be non-reflective, new conductors shall be non-specular, and the plan will be prepared consistent with PG&E's surface treatment standards.