



CALIFORNIA ENVIRONMENTAL QUALITY ACT
ADDENDUM

to the

MITIGATED NEGATIVE DECLARATION
PREVIOUSLY ADOPTED BY THE
CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE AS LEAD AGENCY

for the

MESA WIND REPOWER PROJECT
(SCH No. 2021030614)

AMENDMENT TO
INCIDENTAL TAKE PERMIT No. 2081-2019-048-06

SEPTEMBER 2021

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I. OVERVIEW

The California Department of Fish and Wildlife (CDFW) is the lead agency under the California Environmental Quality Act (CEQA), Public Resources Code section 21000 et seq., for the Mesa Wind Repower Project (Repower) because of its authority under the Fish and Game Code. As previously approved by CDFW in May 2021 and the Bureau of Land Management in March 2021, the Repower involves the construction, operation, and decommissioning of eight (8) wind turbine generators (WTGs) for a total generation capacity of 30 megawatts (MW). The Repower’s potential impacts to fish and wildlife are subject to CDFW’s regulatory authority under Fish and Game Code sections 1600 through 1617, and 2081. CDFW adopted a Final Initial Study Mitigated Negative Declaration (hereafter, the MND) when it approved the Repower in May 2021 (SCH No. 2021030614). CDFW also issued a Streambed Alteration Agreement (EPIMS-RIV-16205-R6) and Incidental Take Permit (ITP) (No. 2081-2019-048-06) for the Repower under the Fish and Game Code. In August 2021, Mesa Wind Corporation (Mesa Wind), a subsidiary of Brookfield Renewable Energy, submitted an ITP Amendment Application seeking incidental take authorization from CDFW to decommission “legacy” turbines located on the Mesa Wind site. The ITP Application pending before CDFW includes measures to avoid, minimize, and mitigate any potential substantial adverse impacts to wildlife species in connection with the proposed decommissioning activities. CDFW has received and reviewed in its independent judgment information provided by Mesa Wind regarding the proposed decommissioning of the legacy turbines and related environmental effects. The materials Mesa Wind provided to CDFW as part of the ITP Amendment Application are included in CDFW’s administrative record or proceedings.

CDFW has prepared this Addendum pursuant to CEQA as part of its independent lead agency review and consideration of the ITP Amendment Application submitted by Mesa Wind. This addendum documents CDFW’s consideration of the MND for the Repower and the potential environmental effects that may result if that previously approved project is modified to also include the proposed decommissioning of the legacy turbines on the Mesa Wind site. (See generally Pub. Resources Code, § 21166; CEQA Guidelines, §§ 15162-15164.)¹ This addendum documents CDFW’s consideration of those potential effects as a lead and trustee agency under CEQA. (Pub. Resources Code, §§ 21067, 21070; CEQA Guidelines, §§ 15367, 15386.)

II. PROJECT SUMMARY

In September 2019, Mesa Wind filed an ITP Application with CDFW for authorization under Fish and Game Code section 2081, subdivision (b), to “take” the Mojave desert tortoise (*Gopherus agassizii*) incidental to the otherwise lawful construction, operation, and decommissioning of the Repower. The Mojave desert tortoise is a threatened species under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.).² (Cal. Code Regs., tit. 14, § 670.5, subd. (b)(4)(A); Fish & G. Code, § 2067.) As first proposed in September 2019, the Repower would

¹ The “CEQA Guidelines” are found in Title 14 of the California Code of Regulations, commencing with section 15000.

² “Take” under Fish and Game Code section 86, “means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.”

include the construction, operation, and decommissioning of eleven (11) wind turbine generators (WTGs) for a total generation capacity of 30 MW. The ITP application was revised in December 2020 to reduce the number of WTGs to eight (8), but with no change to the 30 MW generation capacity.

CDFW served as the CEQA lead agency for the Repower. CDFW prepared and adopted the MND in that capacity and filed a Notice of Determination with the State Clearinghouse at the Governor's Office of Planning and Research after it approved the Repower on May 21, 2021. Subsequently, CDFW issued an ITP (No. 2081-2019-048-06) and a Streambed Alteration Agreement (EPIMS-RIV-16205-R6) for the Repower. The ITP, subject to various conditions, authorizes incidental take of the Mojave desert tortoise for the Repower.

The Bureau of Land Management (BLM) conducted an independent environmental review of the Repower pursuant to the National Environmental Policy Act (NEPA) (Final Environmental Assessment published September 2020). This NEPA document scoped the Repower to include, in addition to the construction, operation, and decommissioning of the new WTGs, the decommissioning of 460 "legacy" WTGs on the Mesa Wind site. BLM issued amended Right-of-Way (ROW) Grants for the Repower in March 2021 (CACA-13980 and CACA-55718). Finally, the U.S. Fish and Wildlife Service issued a Final Biological Opinion on September 11, 2020 (FWS-ERIV-20B0151-20F0874). The Final Biological Opinion authorized incidental take of several species protected under the federal Endangered Species Act in connection with the Repower, including Mojave desert tortoise.

In August 2021, approximately two (2) months after CDFW's adoption of the MND and issuance of the ITP, Mesa Wind submitted an ITP Amendment Application. Mesa Wind's application seeks to amend CDFW's May 2021 CESA ITP (No. 2081-2019-048-06) to authorize incidental take of Mojave desert tortoise in connection with the proposed decommissioning of the 460 "legacy" wind turbines, which includes the restoration of associated pads and access roads, located on the 401-acre Bureau of Land Management ROW area for the Mesa Wind site. Mesa Wind did not include these activities as part of its initial ITP Application to CDFW for the Repower because decommissioning is authorized under existing ROW Grants from BLM (the issuance of which was evaluated under NEPA). However, after consulting with CDFW following issuance of the CESA ITP for the Repower, Mesa Wind filed the ITP Amendment Application for the proposed decommissioning of the legacy turbines. Mesa Wind's proposed amendment of the ITP is a discretionary approval subject to required review by CDFW under CEQA. (Pub. Resources Code, § 21080, subd. (a).)

III. CDFW'S OBLIGATIONS UNDER CEQA

CESA provides CDFW express authority to issue and amend an ITP. (Fish & G. Code, § 2081, subd. (b); Cal. Code Regs, tit. 14, 783.0 et seq.; see also *Cal. Native Plant Society v. Cnty. of El Dorado* (2009) 170 Cal. App. 4th 1026, 1039; *Env't'l Council of Sacramento v. City of Sacramento* (2006) 142 Cal. App. 4th 1018, 1034.) Under CESA, CDFW may issue permits for the take of endangered, threatened, and candidate species subject, in general, to the following conditions: (1) the take is incidental to an otherwise lawful activity; (2) the impacts of the authorized take are minimized and fully mitigated; (3) the applicant ensures adequate funding to implement and monitor compliance with and the effectiveness of any required mitigation measures; and (4)

issuance of the permit will not jeopardize the continued existence of the covered species. (Fish & G. Code, § 2081, subds. (b)-(c); Cal. Code Regs., tit. 14, § 783.4.) These permitting criteria also govern amendments to ITPs where the amendment would modify the scope or nature of the permitted project or activity or the minimization, mitigation or monitoring measures in the ITP at issue. (*Id.*, § 783.6, subd. (c)(6).) In general, CDFW will serve as a lead agency for purposes of CEQA where issuance and the subsequent amendment of an ITP is the only state or local agency approval required for a proposed project. (*Id.*, tit. 14, §§ 783.3, subd. (b), 783.5, subd. (d).)

This Addendum documents CDFW’s independent lead agency consideration of the environmental effects associated with the Repower, including the proposed decommissioning of the legacy turbines and issuance of the proposed ITP Amendment. As noted, CDFW previously prepared and adopted the MND for the Repower in May 2021. Under CEQA, once a negative declaration has been adopted for a project, no subsequent environmental impact report (EIR) or negative declaration shall be prepared unless the lead agency faced with a subsequent discretionary approval determines based on substantial evidence one or more of the following:

- (1) Substantial changes are proposed in the project, which will require major revisions to the previous environmental document.
- (2) Substantial changes occur with respect to the circumstances under which the project is being undertaken, which will require major revisions to the previous environmental document.
- (3) New information of substantial importance, which was not known and could not have been known at the time the previous environmental document was certified or adopted, becomes available.

(Pub. Resources Code, § 21166; CEQA Guidelines, § 15162, subd. (a); see also *Friends of College of San Mateo Gardens v. San Mateo County Community College Dist.* (2016) 1 Cal. 5th 937, 949.)

Generally speaking, new information and required revisions to a prior environmental document trigger the need to prepare subsequent or supplemental analysis under CEQA only where changes to the project, changed circumstances, or new information reveal:

- (1) A new potentially significant environmental impact not disclosed in the prior analysis;
- (2) A substantial increase in severity of a previously identified potentially significant impact;
- (3) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more of the project’s significant effects, but the project proponent declines to adopt them; or
- (4) New or considerably different mitigation measures or alternatives would substantially reduce one or more of the project’s significant effects, but the project proponent declines to adopt them.

(CEQA Guidelines § 15162(a)(1)-(3); see also *Friends of College of San Mateo Gardens, supra*, 1 Cal. 5th at pp. 951-52.)

A CEQA lead agency may prepare an addendum to a previously adopted negative declaration if the agency determines that only “minor technical changes or additions” to the negative declaration are necessary, or that none of the conditions described above calling for preparation of a

subsequent EIR or negative declaration exists. (CEQA Guidelines §§ 15162, subd. (b), 15164, subd. (b).) In the present case, as explained below, CDFW has determined that there is no substantial evidence that any of the aforementioned conditions may be present or may occur as a result of amending the Repower ITP to include the decommissioning of the legacy turbines. As a result, CDFW may properly prepare, has prepared, and is relying on this Addendum to fulfill its lead agency obligations under CEQA to approve and issue the requested ITP Amendment. (CEQA Guidelines, § 15164.) CDFW shall consider this Addendum along with the MND prior to taking any final action on Mesa Wind's August 2021 ITP Amendment Application.

In considering whether subsequent or supplemental environmental review is required to modify the Repower to include decommissioning of the legacy turbines, CDFW first must determine whether the May 2021 MND retains informational value despite any change in information. (Pub. Resources Code, § 21166; CEQA Guidelines, § 15162; see also *Friends of College of San Mateo Gardens*, *supra*, 1 Cal. 5th. at p. 953; *California Coastkeeper Alliance v. State Lands Com.* (2021) 64 Cal. App. 5th 36, 56-59.) As noted, if “only minor technical changes or additions are necessary or none of the conditions described in [CEQA Guidelines] Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred,” then CDFW may prepare an addendum. (CEQA Guidelines, § 15164; see also Pub. Resources Code, § 21166; CEQA Guidelines, §§ 15162-15164; *Fund for Environmental Defense v. County of Orange* (1988) 204 Cal. App. 3d 1538, 1552; *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal. App. 4th 154, 177.) CDFW has reviewed the May 2021 MND and has determined, based on the substantial evidence summarized in this Addendum and in administrative record, that the MND is relevant and provides informational value to CDFW's CEQA lead agency review and consideration of Mesa Wind's ITP Amendment Application.

This Addendum has been prepared to document the potential environmental effects associated with the proposed decommissioning of legacy turbines and issuance of the requested ITP Amendment in light of the MND adopted in May 2021. Because CDFW is the lead agency under CEQA, this Addendum addresses all potential environmental impacts that may be caused by the proposed amendment to the ITP. (See, e.g., Pub. Resources Code, § 21002.1, subd. (d); Cal. Code Regs., tit. 14, § 783.3, subd. (b).) The remaining sections of this Addendum are organized as follows:

- Section IV provides a description of the Repower, as approved by the BLM and for which CDFW issued the original ITP.
- Section V provides a description of the decommissioning effort, the subject of the ITP Amendment Application.
- Section VI analyzes the environmental impacts of the decommissioning effort and whether the inclusion of these activities in the Repower may result in new or substantially more severe impacts than discussed in the MND. This analysis is based on the MND and information in the administrative record, including technical reports prepared in connection with the Repower and information Mesa Wind provided CDFW regarding the decommissioning of legacy turbines.
- Section VII discusses other required CEQA considerations, including potential significant and unavoidable impacts (none) and cumulative impacts.

Based on the environmental impact analysis of the decommissioning effort as described in Section VI below, CDFW finds no new or substantially more severe significant impacts have been identified and no changes to prior impact significance conclusions detailed in the MND are needed. Additionally, implementation of the mitigation measures identified in the MND and the Mitigation Monitoring and Reporting Program (MMRP) will reduce or avoid the significant effects from decommissioning the legacy turbines, and no new or different mitigation is required for the revised Repower. Therefore, no additional CEQA review beyond the analysis documented in this Addendum is required under CEQA for CDFW to amend the Repower ITP to include decommissioning of the legacy turbines on the Mesa Wind site.

IV. SUMMARY OF THE APPROVED REPOWER

The Mesa Wind site is located on 401 acres of BLM-administered lands in Riverside County, 11 miles northwest of the City of Palm Springs in Southern California. The already-approved Repower includes construction, operation and maintenance, and eventual decommissioning of eight (8) new wind turbine generators (WTGs). The project would produce approximately 30 MW of wind energy, which is the same as the capacity of the existing Mesa Wind energy facility. The new facilities would be decommissioned at the end of their estimated 30-year useful life (2053). Figure 1 (Attachment A) shows the locations of the existing legacy WTGs, the proposed locations for the eight (8) news WTGs, and one (1) meteorological (met) tower.

The total overall potential ground disturbance for the Repower would be 98.0 acres. Of those 98.0 acres, 18.2 acres would remain permanently disturbed, while the remaining 79.8 acres would be temporarily disturbed. Temporarily disturbed areas would be revegetated and restored to their natural condition upon completion of the Repower. In order to provide a conservative estimate of potential impacts, temporarily disturbed areas (the “temporary impact area”) include areas where ground disturbance is anticipated as well as buffer areas. Of the 79.8 acres included in the temporary impact area, ground disturbance is anticipated on 44.7 acres. Disturbances in these areas include grading and vegetation removal associated with road improvements, construction of wind turbine generator (WTG) pads, a laydown yard, and cut/fill activities. No vegetation removal is anticipated in the 35.1-acre buffer area; however, ground disturbance may occur as a result of construction activities, such as trucks backing up, or a pickup truck driving outside the graded area.

A complete description of the already-approved Repower is provided in Section 2.0 of the MND.

V. SUMMARY OF DECOMMISSIONING

Decommissioning would include the removal of approximately four hundred sixty (460) existing turbines and either the partial or complete removal of their foundations.³ The legacy turbines include a mix of 80-foot (380 turbines) and 140-foot (80 turbines) lattice-steel structures, with one nacelle and three 7.5 meter blades installed on each. The concrete foundations associated with each turbine are approximately 15 feet by 15 feet. At the time of original installation, a 50-foot radius

³ Nineteen (19) turbine towers have already been removed, and the blades and/or nacelles have already been removed from approximately one hundred twenty (120) of the remaining turbines.

around each turbine was utilized for construction, which consisted of site leveling, vegetation removal, foundation installation, and operation of equipment associated with turbine erection. During operations and maintenance (O&M) a 20-foot vegetation removal radius has been maintained for operational turbines for fire abatement purposes.

Decommissioning is a step-by-step deconstruction process that involves careful and safe removal, salvage, recycling and disposal of the turbine lattice towers, nacelles, blades, and appurtenant facilities. This process involves the following actions:

- Assess turbine condition and establish preliminary drop zone.
- Mobilize shear to turbine pad.
- Shear tower legs closest to established drop zone.
- Shear tower legs on the opposite side of the drop zone.
- During the cut of the last tower leg, use excavator to direct felling of tower to established drop zone.

As shown on Figure 1 (Attachment A), 32 legacy foundations within the 98-acre footprint of the Repower (the “Repower footprint”) would be completely removed and all other foundations would be removed to a foot below the ground surface and backfilled with native soil. Disassembled turbine components would be recycled to the extent feasible, and all legacy turbines and debris that cannot be resold, refurbished, or recycled would be hauled off to appropriate disposal facilities for scrap or waste. Nacelles would be lowered onto and then disassembled in areas covered with secondary containment to prevent release of any residual oil.

The Mesa Wind site contains approximately 41 acres of existing disturbance areas, of which 24 acres would be included in the 98-acre Repower footprint. These existing disturbance areas include existing access/spur roads leading to the legacy turbines and the turbine pads/foundations. The proposed decommissioning of legacy turbines (i.e., the physical removal, disassembly, and salvaging, recycling, or disposal of component parts) will not involve any ground disturbance outside of the existing access/spur roads and the turbine pads.

Ground disturbance associated with turbine decommissioning will be limited to roadway maintenance/repair, as is current O&M practice, and foundation removal. Limited vegetation clearing may also be required; however, these activities will be located entirely within the existing disturbance areas (i.e., turbine pads and roadways where turbines have not been in operation since 2015) and will be subsequently revegetated as described below. Turbine decommissioning activities will be conducted 10 hours per day, 6 days per week (Monday through Saturday), and are anticipated to take up to 5 months to complete (mid-September 2021 through February 2022). All relevant Applicant Proposed Measures (APMs) and mitigation approved for the Repower, including ITP Conditions of Approval, will be implemented during decommissioning and revegetation.

Following the completion of decommissioning, ground disturbance would occur as part of the restoration and revegetation of existing disturbance areas. These activities will involve ground disturbance across all 17.4 acres of existing disturbance areas (spur/access roads and turbine pads) that are located outside of the Repower footprint. Restoration and revegetation of these areas would either occur immediately following decommissioning or post-construction of the 8 new

turbines, with the timing being dependent upon seasonal rain conditions and construction activities.

The proposed decommissioning of legacy turbines and subsequent revegetation and restoration of approximately 17.4 acres of existing disturbance areas would provide several important benefits to resident desert tortoises. For example, the removal and restoration of existing spur/access roadways would eliminate O&M vehicle travel within areas of the Mesa Wind site outside of the 98-acre Repower footprint. The removal of the 460 legacy turbines would also eliminate the majority of raven perching opportunities on the Mesa Wind site. The net result of decommissioning would be the defragmentation and enhancement of up to 300 acres of desert tortoise habitat in the Bureau of Land Management ROW area. Further, after completion of Repower construction, 79.6 acres of temporary disturbance associated with Repower construction will be revegetated, leaving 18.2 acres of permanent disturbance associated with the Repower, plus existing substation and O&M facilities. Figures 2A/2B (Attachment A) provide representations of the Mesa Wind site before and after the decommissioning of the legacy turbines and construction of the 8 new WTGs.

With the inclusion of the decommissioning and subsequent restoration and revegetation activities, the total overall potential ground disturbance for the Repower would be 115.4 acres (the “total project footprint”). As noted, approximately 98 acres will be used for the Repower purposes of the construction, operation, and decommissioning of the 8 new WTGs (Repower footprint). Subsequent to construction of the 8 new WTGs, temporary disturbance areas (79.8 acres) would be revegetated, while the remaining permanent disturbance areas (18.2 acres) would be used for operation of the 8 new WTGs. The 18.2 acres of permanent disturbance areas would be revegetated upon final decommissioning. The impacts associated with these Repower ground disturbances, including the 79.8 acres of temporary disturbance and 18.2 acres of permanent disturbance, were evaluated in the MND.

VI. EVALUATION OF DECOMMISSIONING

In connection with the August 2021 ITP Amendment Application, Mesa Wind submitted a preliminary environmental assessment for the proposed decommissioning activities. CDFW has independently reviewed that document as lead agency and Mesa Wind’s preliminary environmental assessment is included in the administrative record. As explained in this Addendum and supported by materials in the administrative record, including the Mesa Wind preliminary environmental assessment, the proposed decommissioning of the legacy turbines would not result in the occurrence of any conditions requiring major revisions to the MND. (See Pub. Resources Code, § 21166; CEQA Guidelines, § 15126, subd. (a).) Instead, CDFW has determined that the proposed decommissioning of legacy turbines does not involve any new or substantially more severe significant impacts than were previously identified, analyzed, and mitigated in the MND. (*Id.*, § 15162, subd. (a)(1)-(2).) CDFW has also determined that no new information of substantial importance shows that the proposed decommissioning will have a new or substantially more severe significant effect than what is identified in the MND. (*Id.*, § 15162, subd. (a)(3)(A)-(B).) Further, no new or considerably different mitigation is required because implementation of the mitigation measures identified in the MND (including during decommissioning of the legacy turbines) would substantially reduce or avoid each of the project’s significant effects. (*Id.*, § 15162(a)(3)(C)-(D).)

Therefore, CDFW has determined in its independent lead agency discretion under CEQA that no subsequent or supplemental review beyond this Addendum is required to inform CDFW's meaningful review and consideration of the Mesa Wind August 2021 ITP Amendment Application. (*Id.*, § 15164(b).)

Section VI below evaluates the potential impacts from the decommissioning of legacy turbines. Mesa Wind, as part of CDFW's evaluation, has committed to implement all identified APMs. The evaluation below also recognizes that Mesa Wind is bound by and must implement all the mitigation measures identified in the MND, and all the ITP Conditions of Approval as required by CDFW through the exercise of its regulatory authority under the Fish and Game Code. That is, Mesa Wind will implement the APMs during decommissioning of the legacy turbines, and it is obligated to implement all applicable mitigation measures identified in the MND and the ITP Conditions of Approval as CDFW conditions of approval for the requested ITP amendment.

The analysis in Section VI is based on CDFW's independent lead agency review of the MND, the ITP Amendment Application and associated materials received from Mesa Wind, and other materials included in the administrative record. Table 1 (Attachment B to this Addendum) compares the potential impacts of the proposed decommissioning of legacy turbines with the impacts of the Repower as set forth in the MND adopted by CDFW. As shown in Table 1 (Attachment B) and explained below, the proposed decommissioning of legacy turbines will have no new or substantially more severe environmental effects than those identified in the MND. Further, as shown in Table 1, decommissioning of legacy turbines compared to the Repower as originally approved will, in many instances, further avoid or substantially lessen potentially significant effects identified in the MND for the whole of the action.

The only impact associated with decommissioning that was found to be "Less than Significant with Mitigation Incorporated" (see Section VI.A below) is for biological resources. However, this is not a new significant or more severe impact than previously identified in the MND and no new or different mitigation beyond what is already identified in the MND is required. As summarized below in Section VI.B, all other impacts from decommissioning were either "Less than Significant" or "No Impact," and no impacts were determined to be "Potentially Significant." The MND likewise concluded that the Repower would have no potentially significant impacts. (See MND, Section 3.) Based on the environmental impact evaluation of the decommissioning effort as described below, no new significant or substantially more severe impacts have been identified, no changes to the MND impact significance conclusions are needed, and no new additional or different mitigation is necessary. Therefore, preparation of a subsequent EIR or negative declaration or a supplement to the MND is not required. (See Pub. Resources Code, § 21166; CEQA Guidelines, §§ 15162, subd. (a), 15164, subd. (a).)

VI.A Less than Significant with Mitigation Incorporated

Decommissioning activities will have one potentially significant impact on Biological Resources, namely that decommissioning may have a "*substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species.*" (See CEQA Guidelines, Appendix G, § IV(a).) This refers to potential impacts to the Mojave desert tortoise, the subject of the ITP Amendment. The potential impact to desert tortoise

due to decommissioning is summarized below. This analysis is supported by the administrative record, including the MND and materials submitted to CDFW by Mesa Wind in support of the ITP Amendment Application. The potential impacts to desert tortoise associated with the construction, operation, and decommissioning of the 8 new WTGs are evaluated in the MND (Section 3.4).

Activities associated with decommissioning of legacy turbines and their impacts may result in the incidental take of individual desert tortoises. These activities include maintenance and repair of access roads for decommissioning equipment, limited vegetation clearing within existing disturbance areas, disassembly of turbines and towers, removal of concrete foundations, fluid and material disposal, and revegetation of existing disturbance areas.

Without avoidance, minimization, and mitigation measures, decommissioning could cause mortality or injury to desert tortoises or eggs present in the potential disturbance areas. Direct effects could include vehicle strikes, individual tortoises or eggs being crushed or entombed in their burrows, disruption of tortoise behavior during decommissioning activities, and disturbance by noise or vibrations from heavy equipment. Desert tortoises may also be attracted to the construction area by shade beneath vehicles, equipment, or materials, or the application of water to control dust, placing them at higher risk of injury or mortality. Decommissioning activities could create “subsidies” (human resources that aid in the dispersal or proliferation of a species) such as food, water, or nest sites, for common ravens that prey on juvenile desert tortoises, contributing to the overall decline in tortoise recruitment.

Decommissioning activities would be temporary, completed over a period of up to 5 months. The following measures will be taken throughout the entire decommissioning process to minimize impacts to desert tortoise and other wildlife, including implementation of Applicant Proposed Measures (APMs) and mitigation approved as part of the Repower,⁴ as well as ITP Conditions of Approval (COAs), as noted below:

- Decommissioning is scheduled to start in mid-September 2021 and continue through February 2022. After completion of initial pre-decommissioning activities (see below), removal of turbines would begin within the southwestern portion of the Mesa Wind site since no individuals or sign of desert tortoise have been identified in previous surveys in that area (see Figure 3 in Attachment A). Decommissioning would then likely move to the eastern portion of the northern site since no individuals or sign of desert tortoise were identified in this area of the Mesa Wind site. Decommissioning would then proceed to the remainder of the northern site; however, winter conditions would likely preclude any desert tortoise activity. Decommissioning would be completed in February 2022, well in advance of the active spring period for desert tortoise. Mesa Wind scheduled the decommissioning by design to minimize potential impacts to desert tortoise.
- All work will be confined to existing legacy disturbance areas (turbine pads, 20-foot O&M vegetation-clearance areas immediately surrounding the turbines, and access and spur roads),

⁴ For complete APM text, refer to Section 3.4.1 of the MND.

with the exception of the 4-acre staging area⁵ which will be located in an area of the site without previous observations of individuals or sign (see Figure 3 of Attachment A). (ITP COA 6.11, 6.15, 6.20, 8.17)

- All crew members will receive Worker Environmental Awareness Program (WEAP) training prior to working on the Mesa Wind site. (APM BIO-3; ITP COA 6.6)
- Prior to use of the staging area, desert tortoise exclusion fencing shall be installed and prior to use of the staging area, required clearance surveys will be conducted after exclusion fencing installation (APM BIO-6; ITP COA 8.14, 8.15). Fencing will be inspected and maintained throughout decommissioning. A desert tortoise guard will be installed at the right-of-way entrance (ITP COA 8.13)
- Approved Authorized Biologist and/or Biological Monitor(s) will conduct the following monitoring and reporting activities (APM BIO-2, Biological Monitoring; APM BIO-6, Desert Tortoise Protection; APM BIO-9, Monitoring and Reporting Schedule; ITP COA 6.3 thru 6.5, 6.7, 7.1 thru 7.6 thru 7.10, 8.5, 8.6, 8.23)
 - Conduct preconstruction surveys and sweep decommissioning work areas prior to work each day.
 - Monitor decommissioning activities.
 - Escort all decommissioning vehicle travel within the Mesa Wind site.
 - Reporting to BLM, USFWS, and CDFW regarding desert tortoise monitoring efforts and observations.
 - Maintain daily journals documenting compliance activities.
- As required by the USFWS Biological Opinion, no handling or relocations of desert tortoise shall occur during decommissioning; all work will be monitored by a desert tortoise monitor who will stop work if a tortoise enters decommissioning work areas. All tortoises will be allowed time to move safely out of a work area before work activities may proceed, as determined by the Authorized Biologist. (APM BIO-6, Desert Tortoise Protection; ITP COA 8.7)
- Potential burrows will be examined in accordance with USFWS protocols by the Authorized Biologist. (APM BIO-6, Desert Tortoise Protection.) If a burrow is determined to be occupied, no work will be conducted until agency consultation is completed. For burrows at foundation locations that are confirmed to be unoccupied by the Authorized Biologist and are determined to be suitable for later use by desert tortoise, the tower will be removed but the foundation will be left in place, unless the foundation is located within the Repower footprint⁶. All other burrows determined to be unoccupied will be collapsed within the Repower footprint but will be left in place outside of the Repower footprint.

⁵ The staging area has been approved under the Repower and its disturbance was included within the 98 acres of total disturbance for the Repower.

⁶ Foundations located within the Repower footprint 35 acre buffer area will be left in place if a suitable burrow for future desert tortoise use is identified by the Authorized Biologist.

- Watering for dust control and weed and trash management will be implemented in such a manner as to not attract desert tortoise to work areas or impact desert tortoise habitat. (APM BIO-6, Desert Tortoise Protection; APM BIO-8, APM BIO-10, Trash Management; ITP COAs 6.8, 6.9, 6.18, 8.18). No firearms or dogs will be allowed onsite (ITP COA 6.12); no erosion control materials containing monofilament netting or similar material will be used (ITP COA 6.10, 8.20, 8.21); pipes and culverts will be inspected for entrapment (ITP COA 8.3); no herbicides, rodenticides, or insecticides will be used (ITP COA 8.1, 8.2); and hazardous material leaks, spills, and disposal will be conducted in accordance with regulatory requirements (ITP COA 6.17).
- Use of the existing 17.4 acres of disturbance associated with legacy turbine pads and access and spur roads during decommissioning will be further mitigated through offsite compensation of 8.7 acres. (MND Mitigation Measure BIO-1 and ITP Conditions of Approval No. 8.26 and 9)

Subsequent to decommissioning, the 17.4 acres, which includes existing disturbance areas associated with the legacy turbine pads and approximately 9 miles of access and spur roads leading to the legacy turbines, all of which are located outside of the Repower disturbance footprint, would be revegetated and restored. CDFW shall review and approve seed mixes prior to any revegetation activities. Monitoring of restoration efforts will be conducted in accordance with the Revegetation Plan, including adherence to success criteria. The Revegetation Plan has been approved by BLM, is currently under review by U.S. Fish and Wildlife Service. Once approved by U.S. Fish and Wildlife Service, the Revegetation Plan will be submitted to CDFW for review and approval. The restoration of existing access/spur roadways would eliminate O&M vehicle travel within areas of the project site outside of the Repower disturbance footprint, while removal of the 460 legacy turbines would eliminate the majority of raven perching opportunities on the Mesa Wind site.

In summary, with implementation of all APMs and mitigation previously provided in the Repower during decommissioning of legacy turbines, decommissioning would only cause minimal and temporary affects to desert tortoise movement routes and access to habitat. Decommissioning would be limited to a five-month period, and work would be scheduled to avoid areas with pre-identified desert tortoise observations or signs until desert tortoise inactive periods (November through February).⁷ The work areas, other than the staging area, would not be fenced and would continue to allow desert tortoise movement throughout the area. No desert tortoise will be relocated as part of decommissioning activities and occupied burrows would be avoided. Furthermore, post-decommissioning revegetation of legacy disturbance areas outside of the 98-

⁷ Decommissioning is scheduled to start in mid-September 2021 and continue through February 2022. After completion of initial pre-decommissioning activities, removal of turbines would begin within the southwestern portion of the Mesa Wind site, where no individuals or sign of desert tortoise have been identified in previous surveys. See Appendix C1 to the MND (Biological Resources Technical Report). Decommissioning would then likely move to the eastern portion of the northern site since no individuals or sign of desert tortoise were identified in this area of the Mesa Wind site during 2019 surveys. Decommissioning would then proceed to the remainder of the northern site; however, winter conditions would likely preclude any desert tortoise activity because desert tortoise hibernate underground at this time. Clearance surveys will be conducted prior to commencement of any work activities to identify and avoid any occupied burrows. Decommissioning would be completed in February 2022, well before the active spring period for desert tortoise.

acre footprint required for construction of new WTGs would enhance desert tortoise habitat on the Mesa Wind site by reducing habitat fragmentation and O&M vehicle travel and eliminating most of the existing raven perches on the Mesa Wind site. With implementation of the APMs and mitigation presented above, impacts to protected, sensitive, and special-status species would remain less than significant.

VI.B Less than Significant or No Impact

The MND found that the Repower will have no potentially significant adverse environmental effects with the incorporation of APMs and identified mitigation measures. Modifying the Repower project to include the decommissioning of legacy turbines will not alter this conclusion. As described above, the proposed decommissioning activities will have only one potentially significant impact on desert tortoise. However, that impact is less than significant with the implementation of APMs and mitigation measures identified in the MND. The MND reached a similar conclusion, finding that the proposed construction, operation, and future decommissioning of 8 new WTGs would have a less than significant impact on desert tortoise with the implementation of proposed APMs and mitigation measures. (Final IS/MND, Section 3.4.2.) Therefore, no major revisions to the MND are required because there is no evidence that the inclusion of legacy turbine decommissioning may result in new significant or substantially more severe environmental effects than previously disclosed in the MND. (Pub. Resources Code, § 21166; CEQA Guidelines, §§ 15162-15164.) CDFW has prepared this Addendum to provide minor technical changes and additions to the MND to address the modification of the Repower project to include decommissioning of the legacy turbines. (CEQA Guidelines, §§ 15164, 15162, subd. (b).)

A summary of the potential environmental effects associated with the decommissioning of legacy turbines that CDFW has determined to be “No Impact” or “Less than Significant” follows below. These determinations are substantiated in CDFW’s administrative record, including the Mesa Wind preliminary environmental analysis provided to CDFW in support of the ITP Amendment Application. The determinations below are based in part on CDFW’s independent lead agency review of and judgment regarding this preliminary environmental analysis, among other evidence in CDFW’s administrative record.

Decommissioning of legacy turbines would result in “No Impacts” for the following issue areas.

- Aesthetics (see CEQA Guidelines, Appendix G, subdivision I)
- Agriculture & Forestry Resources (see CEQA Guidelines, Appendix G, subdivision II)
- Air Quality (see CEQA Guidelines, Appendix G, subdivision III(d))
- Biological Resources (see CEQA Guidelines, Appendix G, subdivision IV(c) through (f))
- Cultural Resources (see CEQA Guidelines, Appendix G, subdivision V)
- Energy (see CEQA Guidelines, Appendix G, subdivision VI)
- Geology and Soils (see CEQA Guidelines, Appendix G, subdivision VII)
- Hazards and Hazardous Materials (see CEQA Guidelines, Appendix G, subdivision IX(c) through (f))

- Hydrology and Water Quality (see CEQA Guidelines, Appendix G, subdivision X(b) through (e))
- Land Use/Planning (see CEQA Guidelines, Appendix G, subdivision XI)
- Mineral Resources (see CEQA Guidelines, Appendix G, subdivision XII)
- Noise (see CEQA Guidelines, Appendix G, subdivision XIII)
- Population and Housing (see CEQA Guidelines, Appendix G, subdivision XIV)
- Public Services (Police protection, Schools, Parks, Other public facilities) (see CEQA Guidelines, Appendix G, subdivision XV)
- Recreation (see CEQA Guidelines, Appendix G, subdivision XVI)
- Transportation (see CEQA Guidelines, Appendix G, subdivision XVII(a), (c), and (d))
- Tribal Cultural Resources (see CEQA Guidelines, Appendix G, subdivision XVIII)
- Utilities and Service Systems (see CEQA Guidelines, Appendix G, subdivision XIX(a) through (c))
- Wildfire (see CEQA Guidelines, Appendix G, subdivision XX(a), (c), and (d))

Decommissioning of legacy turbines would result in “Less than Significant” impacts for the following issue areas.

- Air Quality (see CEQA Guidelines, Appendix G, subdivision III(a) through (c))
- Greenhouse Gases (see CEQA Guidelines, Appendix G, subdivision VIII)
- Hazards and Hazardous Materials (see CEQA Guidelines, Appendix G, subdivision IX(a), (b), and (g))
- Hydrology and Water Quality (see CEQA Guidelines, Appendix G, subdivision X(a))
- Public Services (Fire protection) (see CEQA Guidelines, Appendix G, subdivision XV(a))
- Transportation (see CEQA Guidelines, Appendix G, subdivision XVII(b))
- Utilities and Service Systems (see CEQA Guidelines, Appendix G, subdivision XIX(d) and (e))
- Wildfire (see CEQA Guidelines, Appendix G, subdivision XX(b))

VII. OTHER CEQA CONSIDERATIONS

VII.A Significant Unavoidable Impacts

No significant unavoidable impacts were identified for the Repower or decommissioning.

VII.B Cumulative Impact Analysis

A CEQA document must discuss a project’s cumulative impacts when the project’s incremental effect is cumulatively considerable. (CEQA Guidelines, § 15130.) Cumulative impacts include impacts created as a result of the combination of the proposed project together with other past, present, and reasonably foreseeable future projects in the area (collectively, “related projects”). (*Id.*, §§ 15130, 15355.) A project’s incremental effect on cumulative impacts is considered

cumulatively considerable if the incremental effect is significant when viewed in connection with the effects of related projects. (*Id.*, §§ 15130, 15065, subd. (a)(3).)

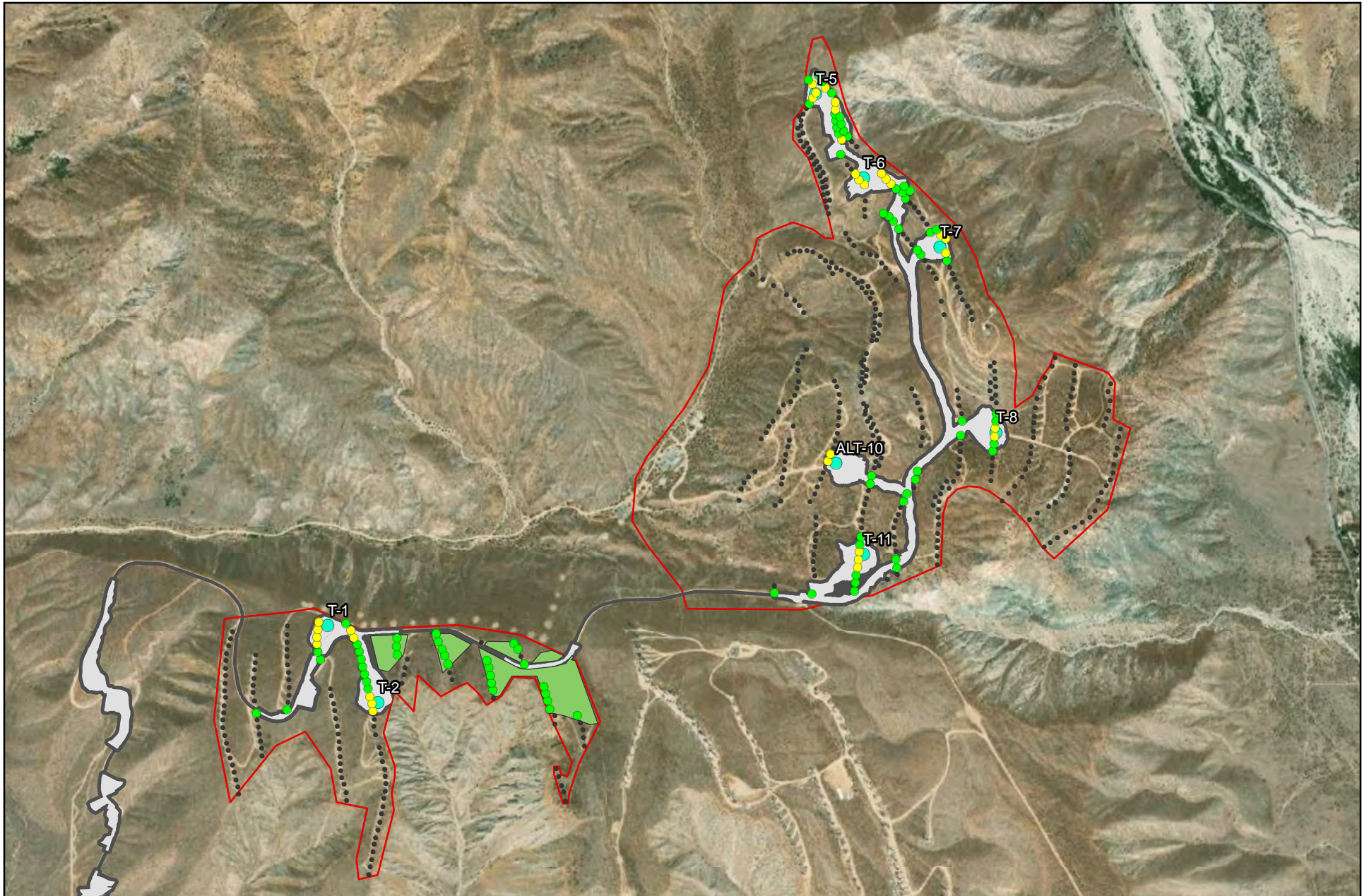
Section 3.21b of the MND presents CDFW's lead agency analysis of whether the Repower's incremental contribution to the cumulative baseline would be cumulatively considerable and significant in the short and long-term. Short-term (temporary) impacts are generally associated with construction of a project, while long-term (permanent) impacts are generally associated with ongoing operation and maintenance of the project.

CDFW determined as set forth in the MND, Section 3.21b, that the Repower would have no impact to agriculture and forestry, energy, mineral resources, population and housing, or recreation. CDFW determined for the same reason in the MND that the Repower's incremental contribution was not cumulatively considerable and, accordingly, that no significant cumulative impact on these resources would occur. For greenhouse gas emissions, public services, transportation, and utilities and service systems, CDFW determined in the MND that the Repower would have a less than significant impact and that no significant cumulative impact would result on these resources. The vehicle use considered in the Transportation section of the MND includes the vehicles that would be used for the adjacent Alta Mesa Wind project and no additional cumulative projects would use the same access route from I-10. For aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use, noise, tribal cultural resources, and wildfire, the Repower's incremental contribution would not be cumulatively considerable in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

The potential impacts of decommissioning legacy turbines would be less (either in magnitude, impact classification, or both) than those of the construction and operation of the 8 new WTGs as described in the MND. Decommissioning of the legacy turbines would also occur prior to the start of Repower construction, which would avoid any cumulative impacts that could result from performing construction and decommissioning activities simultaneously. When the incremental contribution of the proposed decommissioning activities is considered in conjunction with the construction and operation of the 8 new WTGs, the incremental contribution of these activities would remain the same as that identified in the MND (less than cumulatively considerable). Therefore, neither the construction and operation of the 8 new WTGs nor the proposed decommissioning of legacy turbines, whether considered together or separately, would have an incremental effect that is significant when viewed in the context of, or in combination with, past, present, and reasonably foreseeable future projects.

Attachment A

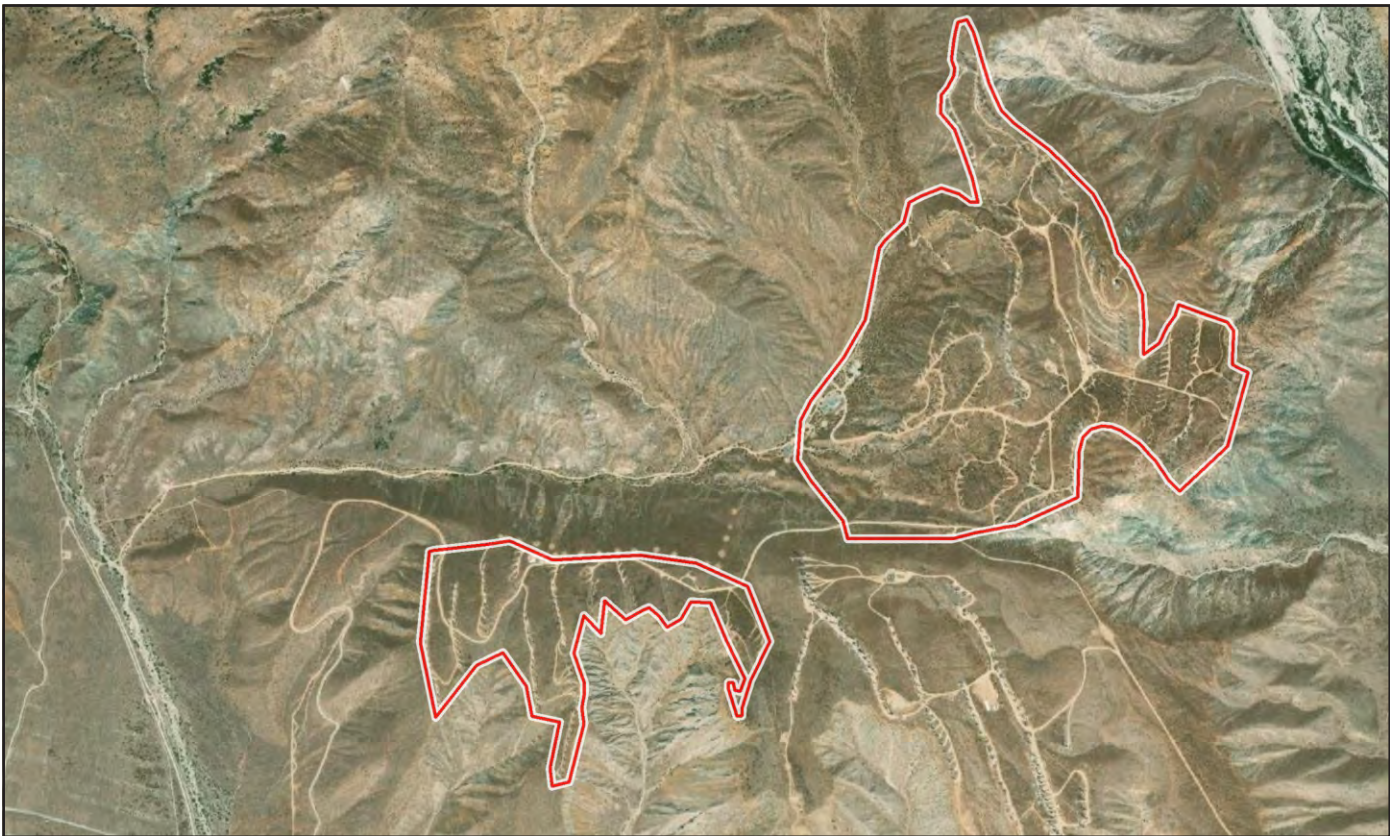
Figures



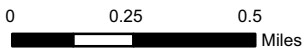
- Impact Area of Approved Repower
- Potential Disturbance Buffer
- Temporary Construction Facility
- Proposed Wind Turbine
- Mesa Wind Existing ROW (CACA-55718)

- Legacy turbines and complete foundations to be removed as part of repower (32)
- Legacy turbines and foundations to be removed 12" below grade (82)
- Legacy turbines to be removed at a future date, including 17.4 ac of restoration

Figure 1
Legacy Turbine
Removal

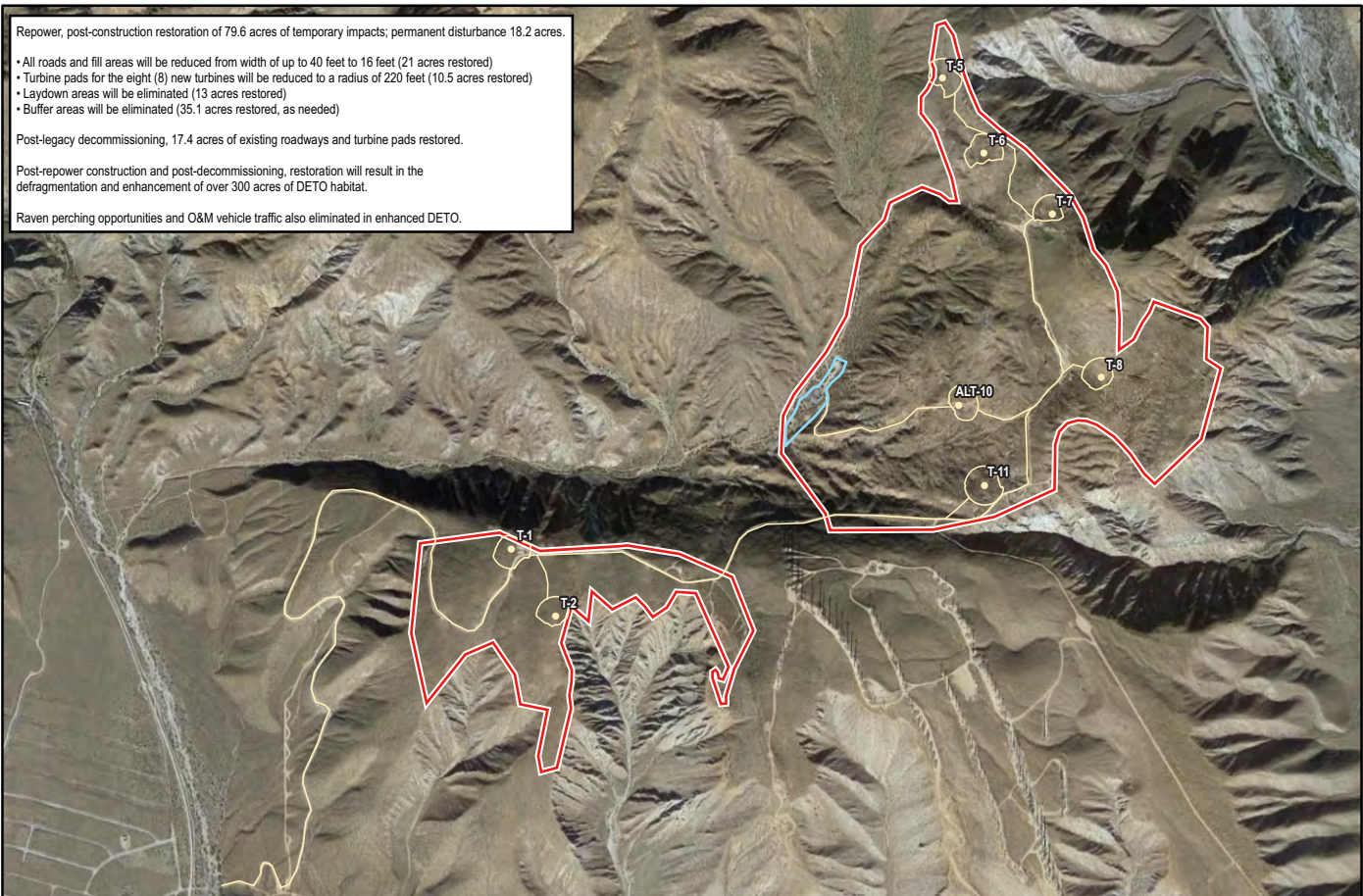


Sources: Aspen, 2021; Esri, 2021.



Mesa Wind Existing ROW (CACA-55718)

Existing Disturbance



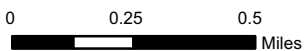
Repower, post-construction restoration of 79.6 acres of temporary impacts; permanent disturbance 18.2 acres.

- All roads and fill areas will be reduced from width of up to 40 feet to 16 feet (21 acres restored)
- Turbine pads for the eight (8) new turbines will be reduced to a radius of 220 feet (10.5 acres restored)
- Laydown areas will be eliminated (13 acres restored)
- Buffer areas will be eliminated (35.1 acres restored, as needed)

Post-legacy decommissioning, 17.4 acres of existing roadways and turbine pads restored.

Post-repower construction and post-decommissioning, restoration will result in the defragmentation and enhancement of over 300 acres of DETO habitat.

Raven perching opportunities and O&M vehicle traffic also eliminated in enhanced DETO.



Mesa Wind Existing ROW (CACA-55718)

Project O&M Disturbance Area

Substation/O&M Building

Figure 2A

Post Legacy Turbine Removal and Repower Construction



Michael Clayton & Associates

Existing View. The numerous existing WTGs impart considerable industrial character to an otherwise generally, natural-appearing landscape.

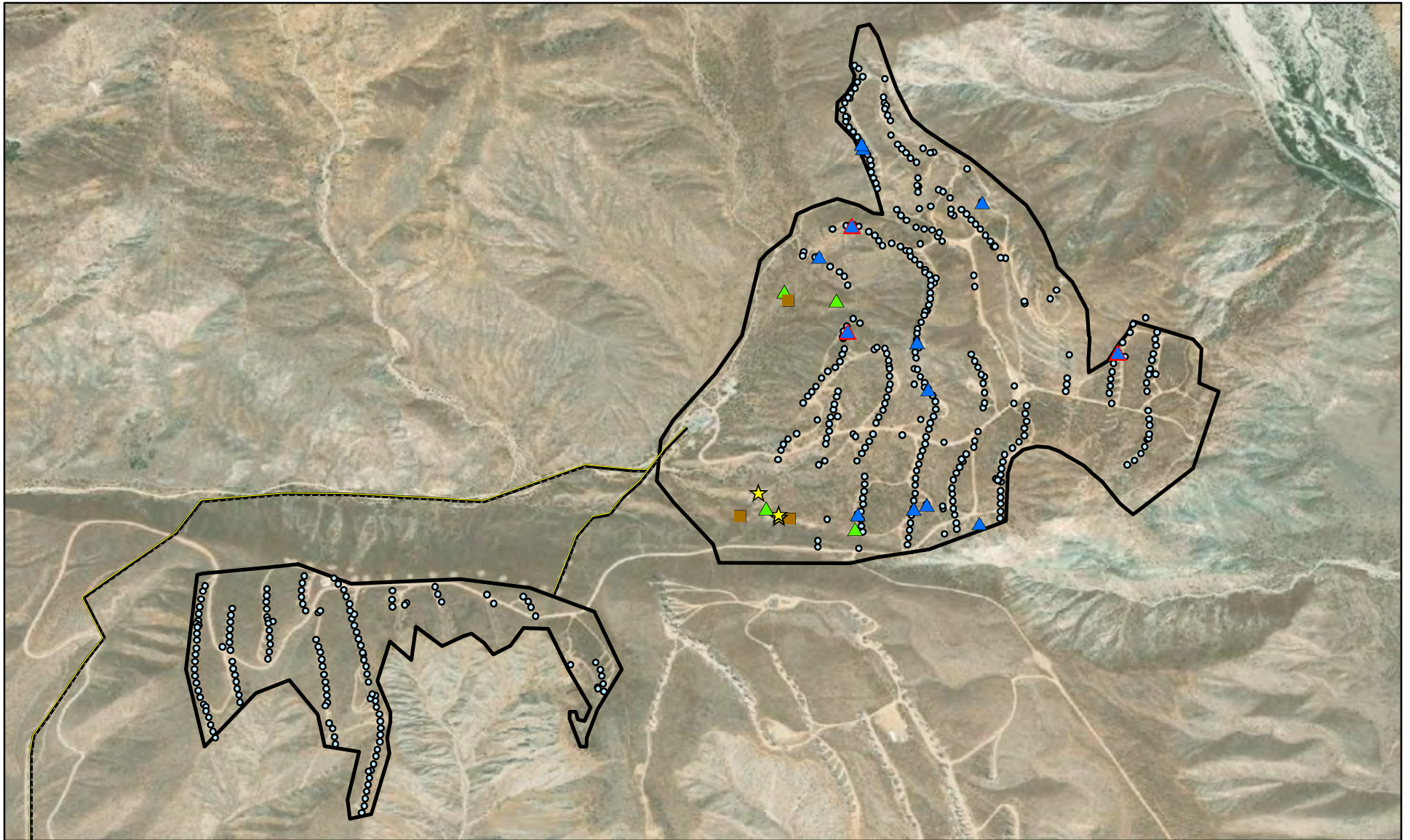


Michael Clayton & Associates

Visual Simulation. As shown in the visual simulation, the existing, lower-capacity (and smaller) WTGs on the site would be removed, and all areas not required for the future WTGs would be revegetated.

Figure 2B

**Mesa Wind - Existing View
and Visual Simulation**



- Legacy structures
- Existing transmission line
- ▭ Mesa Wind existing ROW

Desert Tortoise

- ★ Individual
- Scat
- ▲ Burrow
- ▲ Potential burrow (unoccupied) at electrical locations or empty pad
- ▲ Potential burrow (unoccupied) at turbine foundation

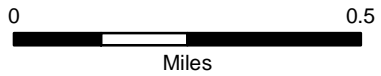


Figure 3

DETO Survey Results

Attachment B

Impacts from Decommissioning
Compared to Impacts Identified
in the Final IS/MND

Table 1: Impacts from Decommissioning Compared to Impacts Identified in the Final IS/MND	
Impact	Rationale
IMPACTS REDUCED FROM “LESS THAN SIGNIFICANT WITH MITIGATION” TO “NO IMPACT”	
Biological Resources, Impact 3.4f CVMSHCP Conflicts	- Decommissioning would not affect the existing roadway through CVCC lands.
Land Use, Impact 3.1b Land use plan, policy, or regulation conflict	- Decommissioning would not affect the existing roadway through CVCC lands.
IMPACTS REDUCED FROM “LESS THAN SIGNIFICANT” TO “NO IMPACT”	
Aesthetics, Impact 3.1a Scenic Vistas	- Decommissioning would improve aesthetics from all viewpoints by removing 400+ legacy turbines and revegetating disturbed lands to remove land scars and restore natural conditions.
Aesthetics, Impact 3.1b Scenic Resources	- Decommissioning will remove 400+ legacy turbines, remove land scars through revegetation, and return much of the site to its natural condition.
Aesthetics, Impact 3.1c Visual character/quality of public views	- See above. Decommissioning will have a net positive effect on the quality and character of public views.
Aesthetics, Impact 3.1d Source of substantial light or glare	- See above. Decommissioning will remove potential sources of light and glare through removal of 400+ legacy turbines
Biological Resources, Impact 3.4a Coastal California gnatcatcher	- Decommissioning activities would not occur in CAGN habitat. - Decommissioning activities would occur in the non-breeding season. - Removal of legacy towers would eliminate collision risks. - Onsite habitat would be improved with revegetation.
Biological Resources, Impact 3.4a Swainson’s hawk	- Do not nest or overwinter in the project region. - Removal of legacy towers would eliminate collision risks.
Biological Resources, Impact 3.4a Riparian Birds	- Do not nest or overwinter in the project region. - Removal of legacy towers would eliminate collision risks.
Biological Resources, Impact 3.4a Other Protected Birds	- Decommissioning to occur in the non-nesting season. - Decommissioning activities would not affect foraging opportunities. - Removal of legacy towers would eliminate collision risks. - Removal of legacy towers would eliminate raven perching opportunities. - Onsite habitat would be improved with revegetation.
Biological Resources, Impact 3.4d Create wildlife movement barriers	- Wildlife barriers would be removed. - Revegetation would enhance wildlife movement.
Biological Resources, Impact 3.4e/f CVMSHCP Conflicts	- Decommissioning would not affect the existing roadway through CVCC lands.
Cultural Resources, Impact 3.5a/b/c Historic and archaeological resources, and human remains.	- No known cultural resources identified. - Decommissioning activities would be limited to previously disturbed areas; no disturbance to native soils.
Geology and Soils, Impact 3.7a Geologic hazards	- Decommissioning involves the removal of structures; no new ground disturbance or development of occupied structures.
Geology and Soils, Impact 3.7b Soil Erosion/Loss of Topsoil	- Decommissioning activities would be limited to previously disturbed areas; no disturbance to native soils. - Revegetation would reduce erosion potential.
Geology and Soils, Impact 3.7c Creation of unstable soil conditions.	- Decommissioning involves the removal of structures; no new ground disturbance
Geology and Soils, Impact 3.7f Paleontological resources	- No known paleontological resources identified. - Decommissioning activities would be limited to previously disturbed areas; no disturbance to native soils.
Hazards & Hazardous Materials, Impact 3.9f Create barrier with respect to emergency response.	- No temporary public road lane closures are required.

Table 1: Impacts from Decommissioning Compared to Impacts Identified in the Final IS/MND	
Impact	Rationale
Hydrology & Water Quality, Impact 3.10b Groundwater supply/recharge.	<ul style="list-style-type: none"> - 6.15 acre-feet total for decommissioning; 0.004% of the annual CVGB deficit (137,000 acre-feet/year). - Existing offsite water source within the CVGB to be used; no improvements required.
Hydrology & Water Quality, Impact 3.10c Alter existing drainage pattern of the site or area	<ul style="list-style-type: none"> - Decommissioning activities would be limited to previously disturbed areas; no disturbance to native soils. - Decommissioning would reduce impervious surfaces, improving onsite recharge.
Hydrology & Water Quality, Impact 3.10e Obstruct implementation of water quality/groundwater management plans	<ul style="list-style-type: none"> - 6.15 acre-feet total for decommissioning; 0.004% of the annual CVGB deficit (137,000 acre-feet/year). - Decommissioning would reduce impervious surfaces, improving onsite recharge.
Noise, Impact 3.13a Noise	<ul style="list-style-type: none"> - Exempt per Riverside County Ordinance No. 847.
Noise, Impact 3.13b Vibration	<ul style="list-style-type: none"> - Vibration within 50 feet, but closest residence to decommissioning is 2,250 ft. - Limited truck travel (4-8/day) on public roads.
Public Services, Impact 3.15c Police Services	<ul style="list-style-type: none"> - Security cameras are in place as well, and security guards would be used overnight if needed. - Decommissioning would not induce an increase in population levels requiring additional police protection.
Transportation, Impact 3.17a Impact to transportation systems	<ul style="list-style-type: none"> - Nominal crew (20 average/day) and offsite daily trucks (4 to 8/day); no effect on capacity of public transportation systems. - No oversized trucks or roadway closures required.
Transportation, Impact 3.17c Create hazards (sharp curves or dangerous intersections)	<ul style="list-style-type: none"> - No onsite roadway improvements required other than repair within existing roadway boundaries. - No offsite roadway improvements required. - No oversized trucks or roadway closures required.
Transportation, Impact 3.17d Emergency access	<ul style="list-style-type: none"> - No change to emergency vehicle access to project site. - No public roadway closures required.
Tribal Resources, Impact 3.18a Tribal resources	<ul style="list-style-type: none"> - No known tribal cultural resources identified. - Decommissioning activities would be limited to previously disturbed areas; no disturbance to native soils.
Utilities & Service Systems, Impact 3.19a Construction or relocation of utilities	<ul style="list-style-type: none"> - Portable toilet facilities to be used, wastewater to be disposed of by the local treatment provider. - Water for dust suppression would be obtained from nearby well. - No new or expanded stormwater, wastewater, electrical, natural gas, or telecommunication facilities.
Utilities & Service Systems, Impact 3.19b Water needs affect future water supply	<ul style="list-style-type: none"> - 6.15 acre-feet total for decommissioning; 0.004% of the annual CVGB deficit (137,000 acre-feet/year).
Utilities & Service Systems, Impact 3.19c Constrain wastewater treatment provider	<ul style="list-style-type: none"> - Decommissioning crews limited to 20 avg/day for up to 5 months. - Portable toilet facilities to be used
Wildfire, Impact 3.20a Impairment of emergency response or evacuation	<ul style="list-style-type: none"> - Standard sized trucks to be used; no blockages of local roadways. - All local roadways have redundant parallel roads to access the local neighborhood. - Local roadways are not known to be part of an adopted or designated emergency evacuation route or plan.
Wildfire, Impact 3.20c Installation of infrastructure that may exacerbate fire risk	<ul style="list-style-type: none"> - Decommissioning involves removal of 460 structures. - No new infrastructure required (roads, fuel breaks, etc.).
Wildfire, Impact 3.20d	<ul style="list-style-type: none"> - Decommissioning would alter soil stability or alter drainage patterns. - Nearest residence to decommissioning is 2,250 feet away.

Table 1: Impacts from Decommissioning Compared to Impacts Identified in the Final IS/MND	
Impact	Rationale
Expose people or structures to ancillary fire risk (landslides and flooding)	
IMPACTS REMAINING “LESS THAN SIGNIFICANT WITH MITIGATION”	
Biological Resources, Impact 3.3a Desert Tortoise	<ul style="list-style-type: none"> - Decommissioning activities may result in direct or indirect (habitat modification) of desert tortoise due to ground disturbing activities. - Implementation of APMs and mitigation identified in the Final IS/MND would minimize potential impacts to desert tortoise.
IMPACTS REMAINING “LESS THAN SIGNIFICANT”	
Air Quality, Impact 3.3a Conflicts with air quality plans	<ul style="list-style-type: none"> - Decommissioning would comply with SCAQMD Rules 402 and 403 to control nuisance emissions and fugitive dust.
Air Quality, Impact 3.3b Increases in criteria pollutants	<ul style="list-style-type: none"> - Emissions from decommissioning activities would not exceed SCAQMD thresholds. - Emissions would be further minimized through compliance with dust control measures and SCAQMD rules.
Air Quality, Impact 3.3a Impacts to sensitive receptors	<ul style="list-style-type: none"> - Nearby sensitive receptors are over 2,000 feet away. - Use of equipment will be temporary (5 months)
Biological Resources, Impact 3.3b Riparian habitat or sensitive natural communities	<ul style="list-style-type: none"> - No riparian habitat or sensitive natural communities are present in the proposed decommissioning areas. - Revegetation would be conducted pursuant to the approved Revegetation Plan.
Greenhouse Gas Emissions, Impact 3.8a GHG emissions	<ul style="list-style-type: none"> - GHG emissions would be temporary, involve limited heavy equipment, and would be well below SCAQMD thresholds of significance.
Greenhouse Gas Emissions, Impact 3.8b Conflicts with plans regulating GHGs	<ul style="list-style-type: none"> - Majority of emissions attributable to mobile sources and transportation fuels not subject to state plans. - GHG emissions would not exceed any thresholds established in local, regional, or state GHG management plans, policies, or regulations.
Hazards & Hazardous Materials, Impact 3.9a/b Hazardous materials transport, use, disposal, and releases	<ul style="list-style-type: none"> - Mesa Wind facility implements a Hazardous Materials Business Plan to minimize risks from hazardous materials. - Transport, use, and handling of hazardous materials will comply with applicable laws and regulations. - Decommissioning will remove existing sources of hazardous materials (turbines and nacelles) and avoid future releases from old turbines. - Disassembly of turbines will be performed on areas with secondary containment to minimize potential spills or releases.
Hazards and Hazardous Materials, Impact 3.9g Wildland fires	<ul style="list-style-type: none"> - Decommissioning will not involve any welding or other sources of intense heat and nearest residences are over 2,200 feet away. - Decommissioning activities will be implemented pursuant to the Construction Fire Prevention Plan (APM FIRE-1) to avoid and minimize fire risks.
Hydrology & Water Quality, Impact 3.10a Violations of water quality standards or waste discharge requirements	<ul style="list-style-type: none"> - Contaminant spills would be minimized through secondary containment and immediate cleanup. - Local drainageways are usually dry and typically lack connectivity to downstream waters.
Public Services, Impact 3.15a Fire Protection, Schools, Parks, Other Public Facilities	<ul style="list-style-type: none"> - Decommissioning activities would be temporary and risks of fires would be reduced through compliance with the Construction Fire Prevention Plan (APM FIRE-1). - Removal of turbines may reduce risks of wildlife associated from accidents or malfunctions.

Table 1: Impacts from Decommissioning Compared to Impacts Identified in the Final IS/MND	
Impact	Rationale
	- The project will not impact existing schools, parks, or other public facilities, and will not induce population growth requiring construction of new schools, parks, or other public facilities.
Transportation, Impact 3.17b Conflicts or inconsistency with CEQA Guidelines section 15064.3(b)	- Vehicle travel will be of a short duration (5 months) and will not exceed any established thresholds for vehicle miles traveled (VMT). - Workers will commute from local communities, and disposal and recycling of turbines and debris will be at local or regional recycling and landfill facilities.
Utilities & Service Systems, Impact 3.19d Impacts from generation of solid waste	- Waste will be primarily recyclable steel consisting of 4 to 8 truckloads a day. A much smaller quantity of remaining waste would be disposed at nearby landfills. - Daily and total deliveries are not expected to exceed daily or overall throughput or capacity constraints.
Utilities & Service Systems, Impact 3.19e Compliance with waste management and reduction statutes and regulations	- Project would comply with Riverside County Source Reduction and Recycling Element. All materials would be recycled to the extent feasible, and any remaining waste would be disposed of at appropriate landfill or waste facilities. Solid waste would be disposed of in accordance with all applicable laws and regulations.
Wildfire, Impact 3.20b Exacerbate wildfire risks	- Compliance with the Construction Fire Prevention Plan (APM FIRE-1) would reduce or avoid potential impacts from wildfires. - Decommissioning would remove over 400+ turbines which are potential sources of contaminants and emissions during wildfire events.
IMPACTS REMAINING “NO IMPACT”	
Agriculture & Forestry Resources, Impact 3.2a Impacts to farmlands	- The Mesa Wind site does not contain any designated farmlands; thus, decommissioning will not have any impacts in this area.
Agriculture & Forestry Resources, Impact 3.2b Agricultural Zoning & Williams Act contracts	- See above. The site does not contain any areas zoned for agricultural uses; thus, decommissioning will not have any impacts in this area.
Agriculture & Forestry Resources, Impact 3.2c Impacts to forest lands or timberland	- The Mesa Wind site does not contain any forestlands and is not zoned for any forestry or timber harvesting purposes.
Agriculture & Forestry Resources, Impact 3.2d Loss or conversion of forest lands	- See above. The Mesa Wind site does not contain any forest lands.
Agriculture & Forestry Resources, Impact 3.2e Conversion of farmland or forest land	- See above. The Mesa Wind site does not contain any farmlands or forest lands, and is not zoned for agricultural or forestry-related activities.
Air Quality, Impact 3.3d Impacts to a substantial number of people	- Nearby sensitive receptors are over 2,000 feet away. - Use of equipment will be temporary (5 months)
Biological Resources, Impact 3.6a/b Wetlands	- No wetlands are present on the Mesa Wind site.
Energy, Impact 3.6a/b Desert Tortoise	- Decommissioning activities will be temporary and energy use would be minimized through best management practices.
Geology and Soils, Impact 3.7d/e Expansive soils & wastewater disposal	- Soils on Mesa Wind site have low potential for expansion, are predominantly located upslope, and do not hold water. - Decommissioning will use portable toilets and will not discharge wastewater at the site.
Hazards & Hazardous Materials, Impact 3.9c/d/e Hazardous materials near schools and public airports, and hazardous materials sites	- The Mesa Wind site is not located within one-quarter mile of an existing or proposed school. - The Mesa Wind site is not located on or near a known hazardous material site.

Table 1: Impacts from Decommissioning Compared to Impacts Identified in the Final IS/MND	
Impact	Rationale
	- The Mesa Wind site is not located within an airport land use plan or within 2 miles of a public airport or public use airport.
Hydrology & Water Quality, Impact 3.10d Flood hazard, tsunami, or seiche zones	- The project is not located in any flood hazard, tsunami, or seiche zones.
Land Use/Planning, Impact 3.9a Physically divide an established community	- The Mesa Wind site currently contains an existing wind energy project and the surrounding areas consist of vacant desert land or other wind farms. - The project would not create any new infrastructure that would create a barrier across an existing community.
Mineral Resources, Impact 3.12a/b Loss of mineral resources or mineral resource recovery site	- The Mesa Wind site does not contain any active mining operations, is not located on an important mining site, does not contain economically significant mineral deposits, and decommissioning will not otherwise affect mineral resources of mineral resource recovery sites.
Noise, Impact 3.13c Projects in vicinity of airports or private airstrips	- The project is located more than 10 miles from the closest airport and is not located in the vicinity of a private airstrip, airport land use plan, or public airport.
Population & Housing, Impact 3.14a/b Induce unplanned population growth or displace existing people or housing	- Decommissioning will be temporary, does not involve any new housing or infrastructure, and most workers are expected to commute from surrounding communities. - Decommissioning would not displace any people or existing housing.
Recreation, Impact 3.16a/b Induce deterioration of recreational facilities, or require new or expanded facilities	- Decommissioning will not result in increased use of any recreational facilities. - Decommissioning may improve views through the Pacific Crest Trail, but will not directly lead to increased use of such recreational facilities.