

**ATTACHMENT 3**  
**BEST MANAGEMENT PRACTICES AND MITIGATION MEASURES**

### Attachment 3 Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Climate and Air Quality Resources	Construction	On-site wind speed monitors will be monitored during windy periods. Earthmoving activity will be minimized and vehicle speeds will be reduced if sustained winds exceed 22 miles per hour (mph), or if gusts exceed 30 mph.	4-11		Dust Plan, 4
Climate and Air Quality Resources, Visual Resources	Construction, Reclamation, Decommissioning	Minimizing surface area disturbance, controlling erosion, applying dust suppression practices, and, where feasible, return disturbed areas as close as possible to the original condition, including grade and vegetation.	4-11, 4-74	B-10, B-11	
Climate and Air Quality Resources	Construction	Using aggregate materials on access roads and internal Project roads and design the roads using natural contours and avoiding excessive grades.	4-11	B-11	POD 2-7, and Section 3.2 (similar text), Transportation and Traffic Control Plan
Climate and Air Quality Resources	Construction, Operations	Restricting travel within the Project Area to the roads developed for the Project and enforcing posted speed limits on those roads to minimize the generation of dust. The magnitude of the limits will be based on the localized soil stability conditions and will not exceed 25 mph.	4-11	B-11	POD Section 3.2 (similar text)
Climate and Air Quality Resources	Construction	Reducing the wind profile of stockpiled materials and covering or watering materials that could become a source of fugitive dust.	4-11	B-11	
Climate and Air Quality Resources	Construction	Employing blasting techniques that minimize the ejection of material into the air.	4-12	B-11	Blasting Plan (to be developed before NTP)
Climate and Air Quality Resources	Construction	Utilizing dust abatement techniques, such as the application of water or appropriate palliatives (as pre-approved by BLM and/or Reclamation), prior to and during blasting activities, excavation, and surface clearing.	4-12	B-11	Blasting Plan (to be developed before NTP)
Climate and Air Quality Resources	Construction	Placing cobble beds at egress points to minimize “trackout” onto paved roads.	4-12		SWPPP (to be developed before NTP)
Climate and Air Quality Resources	Construction, Operations	Complying with the parameters of the Transportation and Traffic Plan with regard to projected road use, traffic volume minimization, and road maintenance.	4-12		

### Attachment 3 Best Management Practices and Mitigation Measures

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Climate and Air Quality Resources	Construction	Requiring construction contractors to maintain equipment to meet federal and state requirements and conducting scheduled and unscheduled inspections to check for unnecessary idling and to confirm that equipment is in proper operation per the Health, Safety, Security and Environment (HSSE) plan and in adherence with manufacturer's recommendations.	4-12		
Climate and Air Quality Resources	Construction	Employing trained environmental monitors, who will be on site daily to observe dust-prone areas to ensure implementation of emission control and other mitigation measures.	4-12		Dust Plan, 2; ECCMP
Climate and Air Quality Resources	Construction, Operations, Decommissioning	Trucks transporting mineral materials for road construction or to the two batch plants will be covered with tarps.			POD 2-6; Dust Plan, 2
Climate and Air Quality Resources	Construction	BP Wind Energy will take preventative measures to limit dust from disturbed soils. Disturbed surface areas will be controlled via construction sequencing and clearing will be kept to a minimum width within the rights of way.			Dust Plan, 3
Geology, Soils and Minerals	Design, Construction	If new roads are necessary, they shall be designed and constructed to the appropriate standard and be no higher than necessary to accommodate their intended functions (e.g., traffic volume and weight of vehicles). Road design should avoid changes to surface water runoff so erosion is not initiated. Excessive grades on roads, road embankments, ditches, wetlands, and drainages shall be avoided, especially in area with erodible soils. Slopes will be cut back to a stable grade. Special construction techniques shall be used, where applicable.	4-17	B-4, B-11	
Geology, Soils and Minerals	Design	To the extent practicable, the locations of roads, turbines, and other structures will be chosen in an attempt to avoid placing them near unstable areas.	4-17		
Geology, Soils and Minerals	Construction, Operations, Decommissioning	Erosion controls that comply with county, state, and federal standards shall be applied. Practices such as jute netting, silt fences, and check dams shall be applied near disturbed areas.		B-10	
Geology, Soils and Minerals	Construction	Access roads shall be located to follow natural contours and minimize side hill cuts.		B-11	

### Attachment 3 Best Management Practices and Mitigation Measures

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Geology, Soils and Minerals	Construction, Operations	Implementing BMPs and a Dust and Emissions Control Plan, including applying water to the ground surface and instituting a 25 mph speed limit to minimize erosion and prevent soil loss.	4-17		Dust and Emissions Control Plan, 4
Geology, Soils and Minerals	Design, Construction, Monitoring	The Project shall be planned to use existing roads and utility corridors to the maximum extent feasible, and to minimize the number and length/size of new roads, lay-down areas, and borrow areas.		B-4, B-10, B-11	
Geology, Soils and Minerals	Reclamation, Operations, Decommissioning	All areas of disturbed soil shall be reclaimed using weed-free native shrubs, grasses, and forbs. Reclamation activities shall be undertaken as early as possible on disturbed areas.		B-10, B-14	Integrated Reclamation Plan, 6 (Sections 2.4.2, 2.6)
Geology, Soils and Minerals	Reclamation, Decommissioning	Abandoned roads and roads that are no longer needed shall be recontoured and revegetated.		B-11	
Geology, Soils and Minerals	Reclamation	To prevent localized landslides resulting from slope instability, disturbed areas will be recontoured with salvaged topsoil and soil removed during construction and later revegetated.	4-17	B-10, B-14	
Geology, Soils and Minerals	Pre-construction, Construction	Identify unstable slopes and local factors that can induce slope instability (such as groundwater conditions, precipitation, earthquake activities, slope angles, and the dip angles of geologic strata). Avoid creating excessive slopes during excavation and blasting operations. Special construction techniques shall be used where applicable in areas of steep slopes, erodible soil, and stream channel crossings.		B-10	
Geology, Soils and Minerals	Construction	Borrow material shall be obtained only from authorized and permitted sites. Existing sites shall be used in preference to new sites.		B-12	
Geology, Soils and Minerals	Construction	Foundations and trenches shall be backfilled with originally excavated material as much as possible. Excess excavation materials shall be disposed of only in approved areas or, if suitable, stockpiled for use in reclamation activities.		B-12	
Geology, Soils and Minerals	Decommissioning	A decommissioning plan shall be developed and approved by the BLM. The decommissioning plan shall include removal of all turbines and ancillary structures, a reclamation plan, and a monitoring program.		B-14	POD, 3-4; Integrated Reclamation Plan

### Attachment 3

## Best Management Practices and Mitigation Measures

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Geology, Soils and Minerals	Decommissioning	Topsoil from all decommissioning activities shall be salvaged and reapplied during final reclamation.		B-14	
Geology, Soils and Minerals	Reclamation	Re-grade site to pre-construction contours where feasible. After foundations are poured and concrete cures to engineered strength (approximately 30 days), soils moved from foundation areas will be replaced. Excess fill (excluding removed topsoil) will be packed around foundation bases or elsewhere in the Project, such as fill material for interior roads, and compacted to 80 percent or greater as required for soil stability.	2-38		POD Section 2.8 (similar)
Geology, Soils and Minerals	Construction, Reclamation, Operations, Decommissioning	Mulching (supplemented with vegetation removed during construction) will be implemented during all phases of development in reclaimed areas with certified weed-free mulch to protect the soil surface from wind and water erosion.	2-38		Integrated Reclamation Plan Sections 2.5, 2.6, 2.8.2 (similar)
Geology, Soils and Minerals	Construction, Reclamation	Removed topsoil will be stored either in windrows along the edge of disturbance or in stockpiles designed to minimize the surface area occupied and constructed to maintain slope stability until they are used for reclamation. Soil stockpiles will be located near the edges of disturbance, but within the surveyed limits of disturbance and will be segregated from other stockpiles. While soil is stored in windrows and stockpiles, water will be added to the surface to control dust or tackifier will be added to form a crust. Flagging and staking should be used to prevent the soil stockpiles from being run over by equipment and to help maintain soil quality until it is used and distributed. Salvaged topsoil and subsoil will be identified, delineated, and segregated based on a site-specific soil evaluation, including depth, chemical, and physical properties.			Integrated Reclamation Plan 9-10; POD (Section 2.6)
Geology, Soils and Minerals	Construction, Reclamation	Topsoil stored for more than 6 months should be seeded using the approved seed mix (see Table 2 in the Integrated Reclamation Plan) and watered deep enough to stimulate germination (but not exhaust the nutrients in the soil), and maintained or watered for at least 8 weeks (depending on the season).			Integrated Reclamation Plan 9, 11; POD (Section 2.6)

### Attachment 3

## Best Management Practices and Mitigation Measures

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Geology, Soils and Minerals	Construction, Reclamation	Pit slopes will be constructed at an inclination no steeper than 3:1 (about an 18 degree angle of repose) with maximum height of about 20 feet. At completion of mining, the pit will have slopes which are constructed at 3:1, including all points of use, and will be leveled after all equipment, structures, and the concrete batch plant have been removed from the site.			Mining Plan of Operations 5, 9; POD (Section 2.8)
Water Resources	Design, Construction	Avoid locating Project features in jurisdictional waters, ephemeral washes, and aquatic features, as feasible, and/or minimize impacts through techniques such as bridging, using at-grade crossing for roads, providing adequate buffers for flood control, and minimizing the number of road crossings over waters.	4-28		
Water Resources	Design	Existing drainage systems shall not be altered, especially in sensitive areas such as erodible soils or steep slopes. Potential soil erosion shall be controlled at culvert outlets with appropriate structures. Catch basins, roadway ditches, and culverts shall be cleaned and maintained regularly. Avoid creating hydrologic conduits between two aquifers during foundation excavation and other activities.		B-11, B-12	
Water Resources	Construction	Explosives shall be used only within specified times and at specified distances from sensitive wildlife or streams and lakes, as established by the BLM or other federal and state agencies.		B-12	POD Section 2.6
Water Resources	Pre-Construction, Construction, Operations, Decommissioning	Develop and implement a Spill Prevention, Control, and Countermeasures Plan identifying where hazardous materials and wastes are stored on site, spill prevention measures to be implemented, training requirements, appropriate spill response actions for each material or waste, the locations of spill response kits on site, a procedure for ensuring that the spill response kits are adequately stocked at all times, and procedures for making timely notifications to authorities.	4-27	B-8	SPCC Plan (to be finalized before NTP)
Water Resources	Pre-Construction, Construction, Operations, Decommissioning	Prepare and implement a site-specific Stormwater Pollution Prevention Plan to control sediment (expected to be the primary nonpoint source contaminant); manage the collection, conveyance, and/or storage of storm water runoff at the Project Area; ensure compliance with applicable regulations; and prevent off-site migration of contaminated storm water or increased soil erosion.	4-27	B-8	SWPPP (to be developed before NTP)

### Attachment 3 Best Management Practices and Mitigation Measures

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Water Resources	Pre-Construction	Obtain and comply with necessary permits in accordance with the Clean Water Act Section 404 and Section 401.	4-28		
Water Resources	Construction, Reclamation, Operations, Decommissioning	Control erosion per the Integrated Reclamation Plan.	4-28		Integrated Reclamation Plan
Water Resources	Construction	Avoid, to the extent possible, the occupancy and modification of floodplains.	4-28		
Water Resources	Construction, Operations, Decommissioning	Comply with all federal and state laws related to control and abatement of water pollution. All waste material and sewage from construction activities or Project-related features will be disposed of according to federal and state pollution-control regulations including the Clean Water Act, Arizona Surface Water Quality Standards (AAC Section R18-11-107) and Aquifer Water Quality Standards.	4-28		
Water Resources	Construction, Operations	Inspect site access roads monthly and after heavy rainfall events to identify and repair eroded areas or blocked culverts.	4-28		
Water Resources	Design, Construction	Access roads shall be located to minimize stream crossings. All structures crossing streams shall be located and constructed so that they do not decrease channel stability or increase water velocity. All applicable federal and state permits shall be obtained.		B-11	
Water Resources	Design, Construction	Identify areas of groundwater discharge and recharge and their potential relationships with surface water bodies to gain a clear understanding of the local hydrogeology and avoid creating hydrologic conduits between two aquifers during foundation excavation, blasting, and other activities.		B-12	
Water Resources	Construction, Operations	All efforts shall be made to prevent oil from reaching water.			SPCC Plan 7 (to be finalized before NTP)
Water Resources	Construction, Operations	For a “minor” discharge (poses no significant harm (or threat) to human health and safety or to the environment), shut down the source of discharge; use sorbents, berms, fences, trenches, sandbags, or other material to contain the discharge; prevent the discharge from reaching off-site or surface water; and contact the Facility Manager.			SPCC Plan 9 (to be finalized before NTP)

### Attachment 3

## Best Management Practices and Mitigation Measures

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Water Resources	Construction	Precipitation falling in the materials pit (processing area) will be contained where the water will either percolate, evaporate, or be mechanically removed without creating additional runoff.			Mining Plan of Operations 8; (Section 3.2)
Biological Resources	Design, Construction	Meteorological towers shall not be located in sensitive habitats or in areas where ecological resources known to be sensitive to human activities (e.g., prairie grouse) are present. Installation of towers shall be scheduled to avoid disruption of wildlife reproductive activities or other important behaviors.		B-4	
Biological Resources	Design	Facilities shall be designed to discourage their use as perching or nesting substrates by birds including: 1) avoid the use of guy wires on met towers and other structures; 2) design of above ground transmission and collector lines will follow established Avian Power Line Interaction Committee (APLIC) guidelines to minimize attracting nocturnal migrant birds, avoid collisions with birds, and avoid electrocution of raptors; and 3) use bird flight diverter devices where appropriate.	2-24, 4-73, 4-74	B-6, B-10	ECP/BCS Sections 3.2, 4 (similar)
Biological Resources	Design	Permanent met towers, transmission towers, and other facilities should be designed to discourage use by birds or other wildlife.	4-74		ECP/BCS Section 4 (similar)
Biological Resources	Design, Operations	Avoid night-lighting for facilities other than mandatory lighting on turbines to minimize attracting nocturnal migrant birds.	4-74	B-6	ECP/BCS Section 4
Biological Resources	Design, Construction	Minimize the disturbance footprints and co-locate roads, collector lines, and other linear facilities to the extent possible to minimize disturbance to biological resources. Overhead lines may be used in cases where burial of lines will result in further habitat disturbance.	4-74	B-10	POD Section 1.1
Biological Resources	Pre-Construction, Construction, Operations	If pesticides are used on the site, an integrated pest management plan shall be developed and implemented to ensure that applications will be conducted within the framework of BLM and DOI policies and entail only the use of EPA-registered pesticides. Pesticide use shall be limited to nonpersistent, immobile pesticides and shall only be applied in accordance with label and application permit directions and stipulations for terrestrial and aquatic applications.		B-7	Integrated Reclamation Plan (similar)

### Attachment 3

## Best Management Practices and Mitigation Measures

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Biological Resources	Pre-Construction, Construction	Develop and implement a plan for control of noxious weeds and invasive species, which could occur as a result of new surface disturbance activities at the site. The plan shall address monitoring, education of personnel on weed identification, the manner in which weeds spread, and methods for treating infestations. The use of certified weed-free mulching shall be required. If trucks and construction equipment are arriving from locations with known invasive vegetation problems, a controlled inspection and cleaning area shall be established to visually inspect construction equipment arriving at the project area and to remove and collect seeds that may be adhering to tires and other equipment surfaces.		B-7	Integrated Reclamation Plan
Biological Resources	Pre-Construction, Construction, Operations, Decommissioning	Develop an Eagle Conservation Plan/Bird Conservation Strategy (ECP/BCS). Implement the site-specific mitigation measures identified in the ECP/BCS that were developed in coordination with USFWS, BLM, Reclamation, Western, and Arizona Game and Fish Department (AGFD).	4-75		ECP/BCS
Biological Resources	Pre-Construction, Construction, Reclamation, Operations, Decommissioning	Develop and implement an Integrated Reclamation Plan, including a Habitat Restoration Plan component, vegetation identification, soil stabilization, erosion reduction measures, and weed and invasive plant control. The plan shall require that restoration occur as soon as possible after completion of activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.	4-72, 4-73, 4-75	B-5, B-6, B-10	Integrated Reclamation Plan
Biological Resources	Pre-Construction, Design	Identify important, sensitive, or unique habitats in the vicinity of the Project and design the Project to avoid (if possible) or minimize impacts on these habitats (e.g., locate the turbines, roads, and ancillary facilities in the least environmentally sensitive areas; i.e., away from riparian habitats, streams, wetlands, drainages, or critical wildlife habitats).	4-72, 4-73,	B-5, B-11	ECP/BCS Section 4
Biological Resources	Pre-Construction	Review existing information on species and habitats in the vicinity of the Project Area to identify potential concerns.	4-72	B-5	ECP/BCS Section 4

### Attachment 3

## Best Management Practices and Mitigation Measures

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Biological Resources	Pre-Construction	Conduct surveys for federal and/or state-protected species and other species of concern (including special status plant and animal species) within the Project Area once the final disturbance areas are determined.	4-72	B-5	Integrated Reclamation Plan 5; ECP/BCS Section 4
Biological Resources	Pre-Construction	Evaluate avian and bat use of the Project Area and design the Project to minimize the potential for bird and bat strikes (e.g., development shall not occur in riparian habitats and wetlands). Scientifically rigorous avian and bat use surveys shall be conducted; the amount and extent of ecological baseline data required shall be determined on a project basis.	4-73	B-5	ECP/BCS Section 4; Bat Conservation Strategy Section 4
Biological Resources	Pre-Construction	Turbines shall be configured to avoid landscape features known to attract raptors, if site studies show that placing turbines there would pose a significant risk to raptors.	4-73	B-5	ECP/BCS Section 4
Biological Resources	Pre-Construction	Determine the presence of bat colonies and avoid placing turbines near known bat hibernation, breeding, and maternity/nursery colonies; in known migration corridors; or in known flight paths between colonies and feeding areas.	4-73	B-5	Bat Conservation Strategy Section 4
Biological Resources	Pre-Construction	Determine the presence of active raptor nests (i.e., raptor nests used during the breeding season). Measures to reduce raptor use at the Project Area (e.g., minimize road cuts, maintain either no vegetation or non-attractive plant species around the turbines) shall be considered.	4-73	B-5	ECP/BCS Section 4
Biological Resources	Pre-Construction	Procedures shall be developed to avoid or lessen potential impacts on special status species. Such measures could include avoidance, relocation of project facilities or lay-down areas, and/or relocation of biota.	4-72, 4-73	B-5	ECP/BCS Section 4; Bat Conservation Strategy Section 4
Biological Resources	Pre-Construction, Construction	Where practicable, avoid and minimize potential impacts to important, sensitive, or unique habitat and biota in the Project Area.	4-73		
Biological Resources	Pre-Construction	Avoid or minimize impacts on sensitive wildlife and their habitat during Project planning and design.	4-73	B-5	
Biological Resources	Pre-Construction	Develop and present an ecological awareness training program that discusses biological conservation measures, impacts minimization, and acceptable BMPs.	4-74		POD 2-4; ECCMP

### Attachment 3

## Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
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Biological Resources	Pre-Construction	Configure access roads and utility corridors to avoid high quality habitats and minimize habitat degradation and fragmentation.	4-74		
Biological Resources	Pre-Construction	Minimize the number and extent of drainage crossings to limit impacts on high quality xeroriparian habitats.	4-74		
Biological Resources	Pre-Construction, Construction	Employ BLM's Strategy for Desert Tortoise Habitat Management on Public Lands in Arizona: New Guidance on Compensation for the Desert Tortoise (Instruction Memorandum No. AZ-92-46), as appropriate.	4-75		
Biological Resources	Pre-Construction, Construction	Avoid or minimize impacts on burrowing owls by following AGFD Burrowing Owl Project Clearance Guidance for Landowners (AGFD 2009b), to survey for burrowing owls and to institute the appropriate conservation measures for burrowing owls that occupy burrows in or near the construction footprint.	4-75		ECP/BCS Section 5
Biological Resources	Pre-Construction, Construction	Develop and implement guidelines to clean and inspect vehicles in an established wash site to prevent propagating reproductive materials of invasive plants and noxious weeds from entering the Project Area.	4-76	B-7	POD 2-1; Integrated Reclamation Plan 8
Biological Resources	Construction, Operations	All construction employees, contractors, and site visitors shall be instructed to avoid harassment and disturbance of wildlife, especially during reproductive (e.g., courtship and nesting) seasons. In addition, pets shall not be permitted on site during construction.		B-10, B-13	
Biological Resources	Construction, Operations	Observations of potential wildlife problems, including wildlife mortality, shall be reported to the BLM authorized officer immediately.		B-13	
Biological Resources	Construction	Conserve and redistribute native topsoil and associated seed bank of rare plant species.	4-74		
Biological Resources	Construction	Where only temporary disturbances are necessary (e.g., for pull sites or temporary construction areas), mow or crush vegetation in favor of land clearing methods where root systems are damaged.	4-74		Integrated Reclamation Plan Section 2.5 (similar)
Biological Resources	Construction	Limit vehicle and foot traffic to areas within long-term and short-term disturbance sites.	4-74		

### Attachment 3

## Best Management Practices and Mitigation Measures

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Biological Resources	Construction	Present the ecological awareness training program to Project personnel, construction contractors, and guest to the Project Area.	4-74		POD Section 2.5 (briefly not entirely addressed); ECCMP Section 3.0
Biological Resources	Construction, Operations	Employ wildland fire prevention measures including limiting vehicle travel to and within construction areas to only essential vehicles, establishing parking guidelines in remote areas, banning smoking and non-construction flame sources outside of vehicles, and establishing safety guidelines for construction flame and spark sources.	4-74		
Biological Resources	Construction	Conduct vegetation clearing during the non-breeding bird season. If the bird breeding season cannot be avoided, conduct bird nest surveys in areas to be cleared and flag a non-disturbance area to avoid destroying active nests.	4-75	B-6	ECP/BCS Section 5
Biological Resources	Construction, Decommissioning	Follow AGFD guidelines for monitoring and handling of desert tortoises on construction projects. Employ qualified/certified desert tortoise monitors during construction and demolition.	4-75		
Biological Resources	Construction	Monitor or provide internal support (e.g., wadded paper) for tortoise burrows that collapse in blast areas. Inspect, remove, and relocate on-site eggs and tortoises from burrows that will be destroyed by land clearing activities. Collapse burrows after removal of contents.	4-75		
Biological Resources	Construction, Decommissioning	Fill any trenches/holes immediately, or cover them at night and provide escape ramps every 147 feet (45 meters) when not in use. Escape ramps can be short lateral trenches or wooden planks sloping to the surface at an angle of 45 degrees or less to prevent entrapment of wildlife. Trenches that have been left open overnight, or after rain events will be inspected, and animals removed prior to backfilling. Trenches that have been left open overnight, or after rain events should be inspected, and animals removed prior to back filling.	4-75		POD Section 2.9 (briefly not entirely addressed)

### Attachment 3

## Best Management Practices and Mitigation Measures

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Biological Resources	Construction	Limit access to Project Area to only construction and Project-related vehicles to limit establishing and spreading noxious weeds or invasive plants.	4-76		
Biological Resources	Construction, Reclamation	Utilize fill materials from on-site sources to the extent possible to limit incursion of noxious weeds or invasive plants. Outside sources of fill material shall be from weed-free sources.	4-76		
Biological Resources	Reclamation	Mulch material and seeds for reclamation shall be certified weed free.	4-76		Integrated Reclamation Plan Section 2.5
Biological Resources	Construction, Reclamation	Pre-treat reclamation sites to limit germination of noxious weeds or invasive plants in disturbance areas.	4-76		
Biological Resources	Construction, Operations	Limit herbicides to non-persistent, immobile types, and apply these in accordance with their application and permit directions and use in terrestrial or aquatic applications.	4-76		Integrated Reclamation Plan Section 4.3 (similar)
Biological Resources	Construction	Implement guidelines to clean and inspect vehicles in an established wash site to prevent propagating reproductive materials of invasive plants and noxious weeds from entering the Project Area.	4-76	B-7	Integrated Reclamation Plan Sections 2.5, 4.3 (similar)
Biological Resources	Reclamation, Operations	Use an integrated approach to manage infestations that includes scheduled surveys and reporting of any infestations along Project roads, disturbance zones, and Project facilities. Utilize chemical, mechanical, or biological methods of weed control to limit the spread of noxious weeds and invasive plants and tailor treatments to specific weeds on site.	4-76	B-7	Integrated Reclamation Plan Section 4.3
Biological Resources	Operations	Complete two years of post-construction mortality monitoring for all birds and bats, complete and provide agencies with an annual report, and revisit at the end of the first two years of data collection to determine if any additional measures are needed. Avoid potential bat roost sites to the extent possible.	4-74		Bat Conservation Strategy Sections 6, 7, 8.2, 8.2, 9

### Attachment 3 Best Management Practices and Mitigation Measures

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Biological Resources	Construction, Operations, Decommissioning	If BLM sensitive plants are identified within the limits of disturbance at any point during the life of the Project, BLM will be contacted prior to initiating the activity. If impacts to sensitive plants cannot be avoided, adaptive management strategies will be developed to minimize impacts, such as collect all seeds from the plant or transplant.	4-74		
Biological Resources	Reclamation	Native plants that have been identified for transplanting as a result of ground disturbance activities will be transplanted during reclamation in a manner similar to natural vegetative spacing in the Project Area to the extent possible.	4-73		Integrated Reclamation Plan Sections 2.7.1.1, 3.0
Biological Resources	Construction, Reclamation, Operations, Decommissioning	Consistent with the Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement, only BLM-approved herbicides will be used.	4-75		POD Section 3.1; Integrated Reclamation Plan Section 4.3
Biological Resources	Construction	If required, blasting with explosive material would be used within times and at specified distances from sensitive wildlife or surface waters as established by BLM or other federal and state agencies.	2-7		Blasting Plan (to be developed before NTP)
Biological Resources	Construction	Strip and segregate vegetation and topsoil where grading will occur to conserve the existing seed bank. Natural vegetation will be cleared or trimmed only when necessary to provide suitable access for construction, and O&M of the proposed wind farm facility. Where vegetation needs to be trimmed and/or removed for construction, but not for actual operations, it may be clipped or sheared at ground level to help facilitate resprouting.	2-38		
Biological Resources	Reclamation	Imprint disturbed soils with equipment that will create indentations to catch seeds and water, aiding in the natural revegetation of the construction work area.	2-38		

### Attachment 3 Best Management Practices and Mitigation Measures

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Biological Resources	Pre-Construction	Prior to ground disturbance, a 100 percent pedestrian visual survey of the limits of disturbance will be completed using transects to assess plant community characterizations, list of key plant species, soil surface indicators and general soil types, areas where noxious and invasive weed species are present, and approximate number of individual plants for the salvage restricted species (see Integrated Reclamation Plan Table 3).	4-75		Integrated Reclamation Plan 5, 15; POD Section 2.3
Biological Resources	Construction	The area disturbed by installation of meteorological towers (i.e., footprint) shall be kept to a minimum.		B-4	
Biological Resources	Construction, Operations, Decommissioning	No disturbance will be allowed that may affect a federally listed plant species.		B-5	
Biological Resources	Reclamation	The required reclaimed native vegetation cover will be 70 percent of the native background (pre-disturbance) vegetation cover for the area. Reclaimed areas must be capable of persisting without continued intervention, excluding noxious weed or invasive species management.		B-14	Integrated Reclamation Plan 6 (Sections 2.4, 2.4.1, 2.8.1)
Biological Resources	Construction, Reclamation	Special status species and salvage restricted plants identified for transplanting will be free from insect infestations or apparent diseases and representative of its species. These plants will be replanted in disturbed areas during reclamation or moved to a nursery for holding for later use.			Integrated Reclamation Plan 10 (Section 2.7.1.1)
Biological Resources	Construction, Operations	Employees will be prohibited from smoking outside of company vehicles during dry summer months.			POD 1-13 (Section 1.3.13)
Biological Resources	Construction, Operations	Each onsite company vehicle will contain a fire extinguisher, water spray can, shovel, Emergency Response procedures book, and a two-way radio for immediate communications with the O&M facility.			POD 1-13 (Section 1.3.13)
Biological Resources	Operations	Water buffaloes (water-carrying trailers) will be at hand during operations and brought to any job site where there is a substantial risk of fire.			POD 1-13 (Section 1.3.13)

### Attachment 3 Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Cultural Resources	Pre-Construction	When any rights-of-way application includes remnants of a National Historic Trail, is located within the viewshed of a National Historic Trail's designated centerline, or includes or is within the viewshed of a trail eligible for listing on the NRHP, the operator shall evaluate the potential visual impacts to the trail associated with the proposed project and identify appropriate mitigation measures for inclusion as stipulations in the POD.		B-7	
Cultural Resources	Pre-Construction	Determine if each of the National Register-listed or eligible historic properties could be avoided by construction (as preferred).	4-77		MOA Stip. III B and Table 2
Cultural Resources	Pre-Construction	Studies will be conducted to recover and preserve information and artifacts from sites that cannot be avoided.	4-78		MOA Stip. III A and B
Cultural Resources	Pre-Construction	Data recovery and monitoring procedures will be defined by a Historic Properties Treatment Plan (HPTP).	4-78	B-7	MOA Stip. III
Cultural Resources	Pre-Construction	In accordance with the HPTP, develop educational programs, curriculum materials, or public outreach designed to preserve information about the traditional cultural importance of the area for the Hualapai Tribe and to reinforce the Tribe's continuing cultural connections to the area.	4-84, 4-85		MOA Stip. III E
Cultural Resources	Pre-Construction	Conduct supplemental surveys if final designs include Project facilities outside the areas that were surveyed for cultural resources during preparation of this EIS.	4-84		MOA Stip. II C; POD Section 1.1
Cultural Resources	Pre-Construction, Operations, Decommissioning	In accordance with the procedures defined in the HPTP, train workers to protect cultural resources during construction, operation, and decommissioning of the Project and to report any discoveries that might be made.	4-84		MOA Stip. III C D; POD Section 2.5
Cultural Resources	Pre-Construction	Prepare and implement a Cultural Resource Management Plan (CRMP) in accordance with guidance of the BLM Programmatic Environmental Impact Statement on Wind Energy, including a Plan of Action to address any unanticipated discoveries of human remains, funerary objects, sacred objects, and objects of cultural patrimony in compliance with the Native American Graves Protection and Repatriation Act; measures to ensure continued access for traditional religious purposes or resource collection by tribes; and other potential measures for mitigating impacts on elements of the cultural environment that are not historic properties.	4-85	B-7	CRMP (to be developed before NTP)

**Attachment 3**  
**Best Management Practices and Mitigation Measures**

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
		The CRMP also shall (1) establish a monitoring program, (2) identify measures to prevent potential looting/vandalism or erosion impacts, and (3) address the education of workers and the public to make them aware of the consequences of unauthorized collection of artifacts and destruction of property on public land.			
Cultural Resources	Construction, Operations	BLM will continue to consult with Indian Tribal governments to identify issues related to the presence of cultural properties, access rights, disruption to traditional cultural practices, and impacts to visual resources important to the Tribe(s) regarding discovery activities during construction, access to the area, or other concerns.		B-7	HPTP (to be finalized before NTP)
Cultural Resources, Paleontological Resources	Construction	Unexpected discovery of cultural or paleontological resources during construction shall be brought to the attention of the responsible BLM authorized officer immediately. Work shall be halted in the vicinity of the find to avoid further disturbance of the resources while they are being evaluated and appropriate mitigation measures are being developed.		B-12	MOA Stip. III C; HPTP to be finalized before NTP and to include Monitoring and Discovery Plan
Cultural Resources	Construction, Operations, Decommissioning	Monitor to ensure that avoided cultural resource sites are not damaged and check for vandalism or erosional damage to sites in the Project Area to ensure cultural resource sites are protected throughout the life of the wind farm.	4-78, 4-84		MOA Stip. III C; HPTP to be finalized before NTP and to include Monitoring and Discovery Plan
Cultural Resources	Construction, Operations, Decommissioning	Protect any unrecorded cultural resources that might be discovered during construction, operation, or decommissioning of the Project, and evaluating and treating such discoveries.	4-84		MOA Stip. III C; HPTP to be finalized before NTP and to include Monitoring and Discovery Plan
Paleontological Resources	Pre-Construction	Before any construction takes place, qualified paleontologists will undertake a pedestrian survey for paleontological resources of the Tertiary and Quaternary sediments within the Project.	4-87	B-8	Paleontology Monitoring Plan (to be developed before NTP)

### Attachment 3 Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Paleontological Resources	Pre-Construction, Construction	Construction monitoring by a qualified paleontologist will take place in areas determined to be sensitive (if such areas are present) based on a pre-construction survey. In addition, develop a plan to address next steps in the event that sites are discovered during construction survey. The paleontological resources management plan also shall (1) establish a monitoring program, (2) identify measures to prevent potential looting/vandalism or erosion impacts, and (3) address the education of workers and the public to make them aware of the consequences of unauthorized collection of fossils on public land.	4-87	B-8	ECCMP; Paleontology Monitoring Plan (to be developed before NTP)
Paleontological Resources	Pre-Construction	A paleontological monitoring plan will be formulated by a qualified paleontologist after the preconstruction survey. The plan will conform to the standards of the Society of Vertebrate Paleontology.	4-87	B-8	Paleontology Monitoring Plan (to be developed before NTP)
Paleontological Resources	Pre-Construction	A worker environmental appreciation program for construction personnel will be developed and presented to construction personnel regarding the appearance of possible paleontological resources in the area and procedures to be followed if suspected paleontological resources are encountered.	4-87	B-8	ECCMP; Paleontology Monitoring Plan (to be developed before NTP)
Paleontological Resources	Construction	Paleontological resources collected during monitoring activities must be stabilized, prepared to the point of identification, and curated in a museum with a permanent paleontological collection.	4-87	B-8	Paleontology Monitoring Plan (to be developed before NTP)
Paleontological Resources	Construction	A final report will be generated for all monitoring activities to summarize the results of the monitoring efforts, including a list and description of any resources found, and outlining the context and condition of these resources. This report will be submitted to the BLM and/or Reclamation depending on the locations of findings. The final report, maps of the localities and field notes must accompany any collected specimens.	4-87	B-8	ECCMP Section 5.2.4
Land Use	Design	Utilize existing roads and utility corridors to the maximum extent feasible.	4-97	B-4	

### Attachment 3 Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Land Use	Pre-Construction, Construction, Operations	Continue to contact appropriate agencies, property owners, and other stakeholders during the permitting process to identify potentially sensitive land uses, and local and regional land use concerns.	4-97	B-4	
Land Use	Pre-Construction, Construction, Operations, Decommissioning	Plan for efficient use of the land and areas disturbed by construction, operation, and decommissioning of the Project through the use of the BMPs.	4-97		POD Section 3.4; Decommissioning Plan Section 2.2
Land Use, Noise	Construction	Implement a noise complaint process and hotline number for usage by members of the surrounding community (e.g., White Hills, Arizona). Upon establishment of the hotline, BP Wind Energy or its compliance inspectors will have the responsibility to receive, evaluate, and coordinate with the BLM or Reclamation representatives, respectively, and when appropriate make reasonable efforts to resolve noise complaints. The resolution and evaluation of noise complaints will be subject to appropriate criteria as described in the Final EIS, and as identified as the Mohave County Noise Standards – Maximum Noise Levels for Various Land Uses (see Figure 3-7 in the Final EIS).	4-97, 4-185 4-98		
Land Use	Construction	Gates or cattle guards will be installed where openings are needed within fences.	2-36		POD Section 1.3.14
Land Use	Pre-Construction, Operations	Meteorological towers installed for site monitoring and testing shall be inspected periodically for structural integrity.		B-4	
Transportation and Access	Pre-Construction	A traffic management plan shall be prepared for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan shall incorporate measures such as informational signs, flaggers when equipment may result in blocked throughways, and traffic cones to identify any necessary changes in temporary lane configuration.		B-6	Transportation and Traffic Control Plan Sections 4 and 8

### Attachment 3

## Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Transportation and Access	Pre-Construction	An access road siting and management plan shall be prepared incorporating existing BLM standards regarding road design, construction, and maintenance such as those described in the BLM 9113 Manual (BLM 1985) and the Surface Operating Standards for Oil and Gas Exploration and Development (RMRCC 1989) (i.e., the Gold Book).		B-6	
Transportation and Access	Pre-Construction	Develop and implement a Transportation Plan that identifies sensitive areas to be avoided. The plan also shall consider specific object sizes, weights, origin, destination, and unique handling requirements and shall evaluate alternative transportation approaches. In addition, the process to be used to comply with unique state requirements and to obtain all necessary permits shall be clearly identified.	4-104	B-6	Transportation and Traffic Control Plan
Transportation and Access	Pre-Construction	In accordance with the Traffic Management Plan, survey and flag sensitive areas where disturbance needs to be avoided.	4-104	B-6	Flagging Plan
Transportation and Access	Construction, Operations, Decommissioning	Project personnel and contractors shall be instructed and required to adhere to speed limits commensurate with road types, traffic volumes, vehicle types, and site-specific conditions, to ensure safe and efficient traffic flow and to reduce wildlife collisions and disturbance and airborne dust.		B-11	
Transportation and Access	Construction, Operations, Decommissioning	Traffic shall be restricted to the roads developed for the project. Use of other unimproved roads shall be restricted to emergency situations.		B-11	
Transportation and Access	Construction	Signs shall be placed along construction roads to identify speed limits, travel restrictions, and other standard traffic control information. To minimize impacts on local commuters, consideration shall be given to limiting construction vehicles traveling on public roadways during the morning and late afternoon commute time.		B-11	POD 1-13
Transportation and Access	Construction	Ongoing ground transportation planning shall be conducted to evaluate road use, minimize traffic volume, and ensure that roads are maintained adequately to minimize associated impacts.		B-13	

### Attachment 3 Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Transportation and Access	Construction	If required by ADOT regulation, add turning lanes to US 93 to provide access to the Project Area in an effort to accommodate the anticipated volume of slow-moving, oversized loads and mitigate the potential for traffic back-ups on a federal highway.	4-104		Transportation and Traffic Control Plan Sections 6 and 7
Transportation and Access	Pre-Construction, Construction	Obtain the applicable permits needed to transport equipment and materials and coordinate closely with ADOT and other state transportation departments, as appropriate.	4-104		Transportation and Traffic Control Plan Sections 6 and 9; Table 1-6
Transportation and Access	Construction	Personal vehicles of construction personnel will be parked at the main staging area for the site. BP Wind Energy will encourage ride sharing (at orientation for new workers and also from time to time at the morning meetings) to reduce the number of vehicles entering and exiting the site.	2-8, 2-36		POD Section 2.4
Transportation and Access	Construction	Widening improvements will be made to US 93 near Milepost 22 to accommodate the turning movement requirements of the oversized transport vehicles, with as little disruption as reasonably possible to high speed background through traffic traveling along this segment of US 93. The widened section of the median will be striped as a non-travel area to prohibit use by non-oversized vehicles and reflectorized pavement markers will be installed to further delineate traffic lanes for non-oversized vehicles. An Encroachment Permit and Traffic Control Permit will be obtained to construct the intersection improvements within the US 93 Right-of-Way.			Transportation and Traffic Control Plan Section 7, page 13 and Section 9, page 14
Transportation and Access	Construction	During construction of the wind facility it is anticipated that construction signage and LED advanced warning signs will be utilized ahead of the intersection, and flaggers will likely be used when oversized transport vehicles are entering and exiting the Project.			Transportation and Traffic Control Plan Section 8, page 14
Visual Resources	Design	Turbine arrays and turbine design shall be integrated with the surrounding landscape. Design elements to be addressed include visual uniformity, use of tubular towers, proportion and color of turbines, non-reflective paints, and prohibition of commercial messages on turbines. Efforts shall be made to minimize the need for and amount of lighting on ancillary structures.		B-6	

### Attachment 3 Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Visual Resources	Design, Construction, Operations	Turbines will be a shade of light gray (no darker than RAL 7035 or equivalent) throughout the Project, to reduce visual contrast while meeting the Federal Aviation Administration's (FAA) requirements for marking and lighting.	2-67		
Visual Resources	Design, Construction	Access roads shall be located to follow natural contours and minimize side cuts where feasible to capitalize on opportunities for natural screening by locating roads behind small ridges when doing so would not compromise road engineering constraints, or other resource concerns, and would promote a reduction in impacts on visual resources from frequently seen viewpoints.	4-151		
Visual Resources	Design, Construction	Structures for the majority of the transmission line will be steel or concrete monopoles that are nonspecular or a color suitable for the environment. The conductors will be nonspecular.	2-27, 4-136		POD Section 2.9.2
Visual Resources	Design, Construction	Components of the substations will typically have a maximum height of 35 feet (lightning masts will have heights closer to 75 feet) and the conductive components will have nonspecular metal surfaces. The small control buildings will be painted a neutral color with muted tones to blend with the environment.	2-25, 2-26, 4-137		POD Section 2.9.1
Visual Resources	Design, Construction	The O&M building will be approximately 60 feet by 100 feet and 16 feet high, with the roof and side panels painted a color to blend with the environment. Fences at the facility will be treated to minimize metal reflections.	2-30, 2-37, 4-137		POD Sections 1.3.14 and 3.3
Visual Resources	Construction, Reclamation	Side slopes at the Materials Source will be contoured to a 3:1 or flatter slope.	2-12, 4-137		Mining Plan of Operations Section 2.1
Visual Resources	Construction	Construction-related waste will be removed from the site. "Good housekeeping" procedures shall be developed and implemented to ensure that during operation the site will be kept clean of debris, garbage, carrion, fugitive trash or waste, and graffiti; to prohibit scrap heaps and dumps; and to minimize storage yards.	4-137	B-5	HSSE Plan 53; Waste Handling Plan (to be developed before NTP)
Visual Resources	Construction	Remove temporary facilities as soon as practical.	2-38, 4-135		

**Attachment 3**  
**Best Management Practices and Mitigation Measures**

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Visual Resources	Construction	Construction of underground collection cables will occur concurrently with road construction. Collector line cables will be buried parallel to the interior roads connecting the turbine corridors; the construction area disturbance will range from 56 feet to 136 feet in width.	2-32, 4-136	B-10	POD Sections 2.9 and 4.2 – does not state concurrently – grant states width
Visual Resources	Construction	For the installation of the overhead transmission line, no alteration to landform will be required beyond clearing or grading.	2-28, 4-136		
Visual Resources	Operations	Mitigation to reduce visual contrast resulting from lighting could include an Audio Visual Warning System, if approved by the FAA. Such a system will allow night lighting to remain off, unless an aircraft is detected in close proximity. BP Wind Energy will track FAA circulars and make annual requests to FAA for updates on any approved systems and inform BLM and Reclamation when there is an approved system. BLM, Reclamation, and BP Wind Energy will discuss the potential application of an Advanced Warning System within one year of FAA approval and the availability of test application results being available for at least one commercial wind farm project. If the initial evaluation results in a decision to dismiss the application of the Advanced Warning System for the Project, a second review and evaluation will occur within five years of the initial decision to account for changes in technology, costs, or resource impacts that may occur over time.	4-133		
Visual Resources	Reclamation, Operations	After construction of the Project is completed, BP Wind Energy will be responsible for monitoring reclaimed areas until reclamation of the area meets BLM and Bureau of Reclamation success criteria for restoration of plant communities, as defined in the Integrated Reclamation Plan.	4-135		Integrated Reclamation Plan 13; ECCMP
Visual Resources	Reclamation	Post-construction width for all interior roads, including shoulders, will be narrowed to 20 feet and the former width will be reclaimed and revegetated. Restoration will follow the Integrated Reclamation Plan.	2-33, 4-136		POD Section 3.1; Integrated Reclamation Plan

### Attachment 3 Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Visual Resources	Construction	Reduce visual impacts during construction by minimizing areas of surface disturbance, controlling erosion, using dust suppression techniques, and restoring exposed soils as closely as possible to their original contour and vegetation.		B-10	
Public Safety, Hazardous Materials, and Solid Waste	Pre-Construction	Develop and implement a hazardous materials management plan and waste management plan identifying the waste streams that are expected to be generated at the site and addressing hazardous waste determination procedures, waste storage locations, waste-specific management and disposal requirements, inspection procedures, and waste minimization procedures. This plan shall address all solid and liquid wastes that may be generated at the site, and identify requirements for notices to federal and local emergency response authorities and include emergency response plans.		B-8	Waste Handling Plan (to be developed before NTP)
Public Safety, Hazardous Materials, and Solid Waste	Pre-Construction	Supplemental plans will be prepared and implemented to contribute to maintaining a safe environment and/or minimizing the potential for adverse health effects associated with dust or pollutants in water. The additional plans include a site-specific SWPPP, Blasting Plan, Transportation and Traffic Management Plan, HSSE Plan, SPCC Plan, Dust and Emissions Control Plan, and Integrated Reclamation Plan.	4-165		Transportation and Traffic Control Plan, HSSE Plan, Dust Plan, Integrated Reclamation Plan; SWPPP, Blasting Plan, and SPCC Plan to be developed or finalized before NTP
Public Safety, Hazardous Materials, and Solid Waste	Pre-Construction, Operations	Develop and implement a fire management and response strategy to minimize the potential for a fire and to promptly extinguish fires.	4-165	B-9	POD Section 1.3.13; HSSE Plan Attachment: Fire Prevention/Protection Plan

### Attachment 3

## Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Public Safety, Hazardous Materials, and Solid Waste	Pre-Construction	A safety assessment will be conducted to describe potential safety issues and the means that will be taken to mitigate them, including issues such as site access, construction, safe work practices, security, heavy equipment transportation, traffic management, emergency procedures, and fire control. This also will include preparation of an HSSE Plan that addresses safety issues related to workers and the public. Identify all applicable federal and state occupational safety standards; establish safe work practices for each task (e.g., requirements for personal protective equipment and safety harnesses; Occupational Safety and Health Administration [OSHA] standard practices for safe use of explosives and blasting agents; and measures for reducing occupational electric and magnetic fields [EMF] exposures); establish fire safety evacuation procedures; and define safety performance standards (e.g., electrical system standards and lightning protection standards). The program shall include a training program to identify hazard training requirements for workers for each task and establish procedures for providing required training to all workers. Documentation of training and a mechanism for reporting serious accidents to appropriate agencies shall be established.	4-165	B-8, B-9	POD Section 1.3.14; HSSE Plan
Public Safety, Hazardous Materials, and Solid Waste	Pre-construction	Develop and implement a health and safety program that establishes a safety zone or setback for wind turbine generators from residences and occupied buildings, roads, rights-of-ways, and other public access areas that is sufficient to prevent accidents resulting from the operation of wind turbine generators. It shall identify requirements for temporary fencing around staging areas, storage yards, and excavations during construction or decommissioning activities. It shall also identify measures to be taken during the operation phase to limit public access to hazardous facilities.		B-9	

### Attachment 3

## Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Public Safety, Hazardous Materials, and Solid Waste	Pre-construction	The project shall be planned to minimize electromagnetic interference (EMI) (e.g., impacts to radar, microwave, television, and radio transmissions) and comply with Federal Communications Commission [FCC] regulations). Signal strength studies shall be conducted when proposed locations have the potential to impact transmissions. Potential interference with public safety communication systems (e.g., radio traffic related to emergency activities) shall be avoided.		B-9	
Public Safety, Hazardous Materials, and Solid Waste	Construction, Operations	Secondary containment shall be provided for all on-site hazardous materials and waste storage, including fuel. In particular, fuel storage (for construction vehicles and equipment) shall be a temporary activity occurring only for as long as is needed to support construction activities.		B-12	SPCC Plan (to be finalized before NTP)
Public Safety, Hazardous Materials, and Solid Waste	Construction, Operations	Wastes shall be properly containerized and removed periodically for disposal at appropriate off-site permitted disposal facilities.		B-12	POD Section 1.3.12; Waste Handling Plan (to be developed before NTP)
Public Safety, Hazardous Materials, and Solid Waste	Construction, Operations	In the event of an accidental release to the environment, the operator shall document the event, including a root cause analysis, appropriate corrective actions taken, and a characterization of the resulting environmental or health and safety impacts.		B-12, B-13	POD Section 3.3 (similar)
Public Safety, Hazardous Materials, and Solid Waste	Construction	Temporary fencing shall be installed around staging areas, storage yards, and excavations during construction to limit public access.		B-13	POD Section 1.3.14 (similar) (Excavation) Section 2.1 Laydown
Public Safety, Hazardous Materials, and Solid Waste	Construction	Any wastewater generated in association with temporary, portable sanitary facilities shall be periodically removed by a licensed hauler and introduced into an existing municipal sewage treatment facility. Temporary, portable sanitary facilities provided for construction crews shall be adequate to support expected on-site personnel and shall be removed at completion of construction activities.		B-13	

### Attachment 3 Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Public Safety, Hazardous Materials, and Solid Waste	Construction, Operations	Permanent fencing shall be installed and maintained around electrical substations, and turbine tower access doors shall be locked to limit public access.		B-14	POD Section 1.3.14 (similar except does not address doors)
Public Safety, Hazardous Materials, and Solid Waste	Construction, Decommissioning	Consult with local planning authorities regarding increased traffic issues during construction and decommissioning, including an assessment of the number of vehicles per day, their size, and type. Specific issues of concern (e.g., location of school bus routes and stops) shall be identified and addressed in the traffic management plan.	4-165	B-9	
Public Safety, Hazardous Materials, and Solid Waste	Construction, Operations	Comply with FAA regulations, including use of lighting requirements to warn aviators of obstructions, and plan project to avoid potential safety issues associated with proximity to airports, military bases or training areas, or landing strips.	4-165	B-9	POD Section 2.10 (similar)
Public Safety, Hazardous Materials, and Solid Waste	Construction, Operations	All stored chemicals, fuel, and oil will be secured in areas that provide for containment of spilled fluids in accordance with the SPCC Plan. Spill response kits will be located on equipment and in the on-site temporary storage facilities. Construction personnel will be trained in spill response, the use of the spill response kits, and notification requirements.	2-12		SPCC Plan (to be finalized before NTP)
Public Safety, Hazardous Materials, and Solid Waste	Construction, Operations	If oil or grease is spilled or leaked from equipment, the contaminated soil will be removed and hauled to an approved hazardous material dump. Used oil will be pumped into a truck and hauled to a recycling facility in Las Vegas, Nevada on an as-needed basis.	2-12		SPCC Plan (to be finalized before NTP)
Public Safety, Hazardous Materials, and Solid Waste	Construction	BP Wind Energy will post safety and warning signs informing the public of construction activities where the road(s) enters the Project Area from a public road. During construction, access to the site will be monitored and controlled, so as to prevent public access during such times when it would not be safe for public on-road or off-road use within the Project Area. During non-construction hours a security guard will patrol the Project Area.	2-36		POD Section 1.3.14

### Attachment 3

## Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Public Safety, Hazardous Materials, and Solid Waste	Construction	Good housekeeping rules will be followed to keep chemicals and waste materials from entering Detrital Wash. These rules include: providing a sediment pond for wash water from aggregate washing and other operations; proper disposal of oil and greasy substances to preclude them from mixing with the any surface water; and lined storage pits for chemical storage.			Mining Plan of Operations 6 (Section 2.9)
Microwave, Radar, and Other Communications	Design	Wind turbines will be relocated or eliminated from the Project as necessary to avoid the 13 microwave beams that are near the Project Area.	4-167		
Microwave, Radar, and Other Communications	Design, Pre-Construction	Relocated wind turbines, if any, will be submitted to the FAA for review and require the issuance of new Determinations of No Hazard. For Determinations set to expire in 2012, an extension request will be filed or, if necessary, the entire Project will be resubmitted to the FAA. The analysis area is all known radar and microwave communication facilities within 50 miles of the Project Area. The FAA-required notice of proposed construction will be made as early as possible to identify any air safety measures.	4-166, 4-167	B-4	
Microwave, Radar, and Other Communications	Construction	Wind turbines will be marked with synchronized obstruction warning lights as required by the FAA Determination of No Hazard and FAA Advisory Circular 70/7460-1K.	4-168		POD Section 2.10
Microwave, Radar, and Other Communications	Operations	In the event an installed wind energy development project results in EMI, the operator shall work with the owner of the impacted communications system to resolve the problem. Additional warning information may also need to be conveyed to aircraft with onboard radar systems so that echoes from wind turbines can be quickly recognized.		B-14	
Noise	Pre-Construction, Operations	Proponents of a wind energy development project shall take measurements to assess the existing background noise levels at a given sit and compare them with the anticipated noise levels associated with the proposed project.		B-6	
Noise	Construction	All stationary construction equipment (i.e., compressors and generator) shall be located as far as practicable from nearby residences.		B-12	

### Attachment 3 Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Noise	Construction	If blasting or other noisy activities are required during the construction period, nearby residents shall be notified in advance.		B-12	Blasting Plan (to be developed before NTP)
Noise	Construction	Noisy construction activities (including blasting) shall be limited to the least noise-sensitive times of day (i.e., daytime only between 7 a.m. and 10 p.m.) and weekdays.		B-12	
Noise	Construction	All noise-producing equipment and vehicles using internal combustion engines will be equipped with exhaust mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Mobile or fixed “package” equipment (e.g., arc-welders, air compressors) will be equipped with shrouds and noise control features that are readily available for that type of equipment. The diesel generator, a potential power source for the batch plant, will similarly be equipped to keep its resulting sound emission to levels below 81 dBA at a distance of 50 feet.	4-184, 4-185	B-12	
Noise	Operations	The proposed Project design and implementation will include appropriate noise attenuation measures adequate to help ensure that the noise levels from turbine transformers, substations, and other ancillary systems or components will not cause aggregate noise levels produced by operation of the Project to exceed identified thresholds. For instance, HVAC systems on an occupied control or maintenance building might feature, if needed, sound abating cabinet linings or intake/exhaust shrouds that are typically offered by manufacturers as optional equipment upgrades.	4-185		
Noise	Operations	Maintenance and security patrol vehicles, such as pick-up trucks and/or all-terrain vehicles, using internal combustion engines will be equipped with exhaust mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Operation of these vehicles will typically be expected to occur on access roads that interconnect turbine positions.	4-185		

### Attachment 3

## Best Management Practices and Mitigation Measures

Resource Area/Topic	Project Development Stage	Commitment	Final EIS and POD Location and Page Number		
			Chapter 2 or 4	Appendix B	POD
Monitoring	Monitoring, Construction, Operations	A monitoring program shall be developed to ensure that environmental conditions are monitored during the construction, operation, and decommissioning phases. The monitoring program shall identify the monitoring requirements for each environmental resource present at the site, establish metrics against which monitoring observations can be measured, identify potential mitigation measures, and establish protocols for incorporating monitoring observations and additional mitigation measures into standard operating procedures and BMPs. Site monitoring protocols defined in the POD shall be implemented. These will incorporate monitoring program observations and additional mitigation measures into standard operating procedures and BMPs to minimize future environmental impacts.		B-4, B-13	
Monitoring	Monitoring, Construction, Operations	Results of monitoring program efforts shall be provided to the BLM authorized officer.		B-13	ECCMP
Project Infrastructure	Operations	Inoperative turbines shall be repaired, replaced, or removed in a timely manner. Operators will be required to demonstrate due diligence in the repair, replacement, or removal of turbines; failure to do so could result in termination of the rights-of-way authorization.		B-13	POD 2-11
All Resources	Construction, Operations, Decommissioning	All control and mitigation measures established for the project in the POD and the resource-specific management plans that are part of the POD shall be maintained and implemented throughout the operational and decommissioning phase, as appropriate. These control and mitigation measures shall be reviewed and revised, as needed, to address changing conditions or requirements at the site, throughout the operational phase. This adaptive management approach would help ensure that impacts from operations are kept to a minimum.		B-13	