

# **EXECUTIVE SUMMARY**

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**ES.1 PROJECT BACKGROUND**

For the last two decades, California has emerged as a leader in promoting policies designed to grow the State's portfolio of renewable energy generation and use. Most recently, California passed two bills further increasing the State's commitment to reductions in greenhouse gas emissions through reductions in fossil fuels and increases in renewable energy: Senate Bill (SB) 350 requiring retail sellers and publicly owned utilities to procure half of their electricity from renewable sources by 2030. This requirement is known as the Renewable Portfolio Standard or "RPS." In 2016, the Legislature passed SB 32, which codifies a 2030 greenhouse gas emissions reduction target of 40 percent below 1990 levels. According to Greentech Media, reaching such high amounts of variable renewable generation all but requires a wider build-out of storage capacity to give the grid more control over when that wind and solar power is consumed. The California legislature has passed several bills recently to help expand and expedite the amount of energy storage that is connected to California's electric grid. Newly signed AB 2861 authorizes the CPUC to create an independent dispute-resolution panel, staffed by electrical systems experts. Their job is to evaluate a disputed interconnection fee, gathering input from both sides and ruling on the case within 60 days. AB 2868 is aimed at increasing the overall size of the storage market by directing utilities to deploy up to 500 megawatts of additional storage capacity, of which no more than a quarter can be behind-the-meter. AB 33 declares the legislature's wish that the CPUC pay extra attention to long-duration storage for the grid. "The commission, in coordination with the Energy Commission, shall, as part of a new or existing proceeding, evaluate and analyze the potential for all types of long-duration bulk energy storage resources to help integrate renewable generation into the electrical grid," the law says. The CPUC's ruling comes after years of work jump-started by a 2010 state law, Assembly Bill 2514, which originally called for the statewide energy storage mandate of 1.3 GW to enable a "market transformation" for these new technologies. On June 10, 2013, CPUC Commissioner Peterman's Assigned Commissioner's Ruling stated "Energy storage has the potential to transform how the California electric system is conceived, designed, and operated. In so doing, energy storage has the potential to offer services needed as California seeks to maximize the value of its generation and transmission investments: optimizing the grid to avoid or defer investments in new fossil-power plants, integrating renewable power, and minimizing greenhouse emissions."

The Applicant is proposing to construct, operate and decommission a solar generation and energy storage facility on approximately 855 gross and 762.8 net farmable acres (inclusive of solar field, energy storage, project substation(s), roads, retention basins, etc.) located in southern Imperial County, California. A fundamental challenge posed by solar energy is that peak supply does not consistently coincide with peak demand times (e.g., 5:00 p.m. – 9:00 p.m.). Energy storage is a rapidly developing technology that can help balance supply and demand by capturing and storing renewable energy generated during daylight hours for peak evening demand. Energy storage, where available, reduces reliance on fossil fuels and furthers California's RPS policies by providing for better integration of locally-sourced solar and wind generation and RPS requirements.

The ICPDS Department received the following applications submitted by the Applicant dated December 28, 2017, January 8, 2018, July 5, 2018, July 31, 2018, August 28, 2018, January 22, 2019:

- Amendment (GPA#17-0006) to the Imperial County General Plan for amendment of the Renewable Energy & Transmission Element to create an Island Overlay for the Project Site;
- Zone Change (ZC#17-0007) to add the RE Overlay Zone to the Project Site;

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- Parcel Map (PM#02478) to fix the existing inconsistency with the legal and physical boundary of the SW ¼ Section of the Project Site (APNs: 052-170-039 & 052-170-067), including APN 052-170-030 to the north of the Project Site as part of the Parcel Map;
- Five CUPs (CUP#17-0031, CUP#17-0032, CUP#17-0033, CUP#17-0034 and CUP#17-0035) to develop solar energy generating systems including potential energy storage on lands zoned A-2, A-2-R, and A-3 per Title 9, Division 5: Zoning Areas Established, Chapter 8, Sections 90508.02 and 90509.02;
- One CUP (CUP#18-0001) to develop energy storage as a component of solar on lands zoned A-2 and A-3 per Title 9, Division 5: Zoning Areas Established, Chapter 8, Sections 90508.02 and 90509.02 (A-2 & A-3). Said energy storage would be removed at the time of removal of associated solar facility;
- Variance (V#17-0003) for power pole structures that are over 120 feet in height in the Project Area including the existing Drew Switchyard. With approval of the Variance, the proposed structures could be up to 180 feet in height; and
- Up to five Lot Tie Agreements to hold some or all of the parcels that are part of the Project together as a single parcel in order to reduce/eliminate the setbacks for interior property lines of parcels that are part of the Project and adjacent to one another.
- A Development Agreement between the County and the Applicant to enable and control a phased build-out of the Project that is capable of meeting changing market demands by authorizing initiation of the CUP or CUPs anytime within a 10-year period. Pursuant to the terms of the Development Agreement, thereafter, the CUPs would be valid for the remaining period of 40 years from the date of the CUP approval. The requested Development Agreement would provide flexibility to allow the start of construction to commence for up to 10 years after the CUPs are approved.

The Project will use PV technology to convert sunlight directly into direct current (DC) electricity. The process starts with photovoltaic cells that make up photovoltaic modules (environmentally sealed collections of photovoltaic cells). PV modules are generally non-reflective. Groups of photovoltaic modules are wired together to form a PV array. The DC produced by the array is collected at inverters (power conversion devices) where the DC is converted to AC. The voltage of the electricity is increased by a transformer at each power conversion station to a medium voltage level (typically 34.5 kilovolts [kV]). Medium voltage electric lines (underground and/or overhead) are used to collect the electricity from each medium voltage transformer and transmit it to the facility substation(s), where the voltage is further increased by a high voltage transformer to match the electric grid for export to the point of interconnection at the Drew Road Switchyard. Disconnect switches, fuses, circuit breakers, and other miscellaneous equipment will be installed throughout the system for electrical protection and operations and maintenance purposes.

This EIR is being prepared to analyze the potential environmental impacts of the Project and fulfill the requirements of the California Environmental Quality Act (CEQA).

### ES.2 PROJECT OVERVIEW

The Project is a proposal to build an approximately 100-mega-watt (MW) alternating current (AC) solar generation facility using photovoltaic (PV) technology. The entire Project is located on land owned by the Imperial Irrigation District (IID). The Project's two generation interconnection (Gen-Tie) transmission lines are proposed from the south end of the Project site extending south across Drew Road and State

Route (SR) 98 connecting to the existing Drew Switchyard located on APN 052-190-039.

The Proposed Project consists of a photovoltaic (PV) solar facility capable of producing approximately 100 MWAC on approximately 855 gross and 762.8 net farmable acres. The ultimate energy output is dependent on several variables, including off-take arrangements and the evolving efficiency of PV panels, so it is possible that the Project could generate more or less than 100 MW. The Project may be constructed at one time over approximately 18 months, or it may be built out over an approximately 10-year period. A conceptual phasing configuration is shown in Figure 2.0-3. A Site Plan is provided in Figure 2.0-4. The Applicant is requesting that a Conditional Use Permit (CUP) be issued for each of the five phases of the Project as well as an additional sixth CUP for Phase 5 for energy storage in the southwesterly portion of the Project Area. Project phasing allows utilities greater flexibility in obtaining renewable energy to meet ratepayer needs by allowing utilities to procure smaller energy quantities phased over time.

The Applicant has filed an application for a General Plan Amendment (GPA) for amendment of the Renewable Energy & Transmission Element to add the Project site to the RE Overlay Zone as an Island Overlay for the Project site; a Zone Change to add the RE Overlay to the Project site, a Variance and six CUPs and a Parcel Map. Each of the six CUPs may include an Operations and Maintenance (O&M) building or buildings. The Project may also include additional auxiliary facilities such as raw water/fire water storage, treated water storage, evaporation ponds, storm water retention basins, water filtration buildings and equipment, and equipment control buildings, septic system(s) and parking. The Project will also include electric and vehicular crossings of State facilities, IID facilities and County facilities. The Project crossings will not interfere with the purpose of these Agencies' facilities (e.g., where a drain flows, the Project crossing will still allow the drain to flow). Each phase of the Project may have its own energy storage component as well as energy storage being housed within the inverters.

### **ES.3 PURPOSE AND NEED**

Section 15124(b) of the CEQA Guidelines requires that an EIR include a statement of objectives sought by the proposed Project. These objectives identify the underlying purpose of the project and provide a basis for identification of alternatives evaluated in the EIR. A clearly written statement of objectives allows the lead agency to develop a reasonable range of alternatives to evaluate in the EIR and aids the decision-makers in preparing findings or a statement of overriding considerations, if necessary.

Demand for new forms of renewable electric energy continues to grow based on three factors. First, total electricity demand continues to grow as a result of population growth, economic growth and new applications offset only, in part, by energy efficiency programs. The 2010 United States Energy Information Administration (EIA) Annual Energy Outlook ("reference case") forecast is for a 30 percent increase in total demand (from 3,873 billion kilowatt hours to 5,021 billion kilowatt hours, annually), between the years 2008 and 2035. Second, new generation facilities are required to not only meet this demand, but to replace the output of aging generation facilities which are to be retired during this period. Third, driven by federal incentives, regional greenhouse gas reduction targets, state renewable energy portfolio standards (RPS) requirements, and potential legislation, an increasingly greater portion of new generation will need to be supplied in the form of renewable energy. The EIA forecast for the period from 2008 to 2035 is for 41 percent of growth in generation to come from non-hydro renewables.

The national trend in renewable energy is particularly evident in the West, the fastest growing region in the United States. Many Western states have adopted renewable energy standards and greenhouse gas (GHG) reduction goals. California is a national leader in requiring a significant proportion of electricity to come from renewable sources. The 2010 requirement that 20 percent of electricity sales come from

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renewable energy was increased to 33 percent by 2020. With California's 33 percent mandate, combined with other mandated RPS requirements and regional sales growth, the total renewable energy sales for the United States portion of the Western Electricity Coordinating Council region has been estimated at close to 150,000 Gigawatt hours (GWh) by 2020 (not including Idaho, Utah and Wyoming). The proposed Project will help California meet its statutory and regulatory goals for increasing renewable power generation and use.

The Gen-Tie lines component of the proposed Project would provide the needed transmission capacity to connect the CUPs of the Drew Solar Project with the Drew Switchyard. Both gen-tie lines may be underground or one may be underground and one above-ground.

The Drew Solar Project qualifies as an Eligible Renewable Energy Resource as defined by the California Public Utilities Code and would assist the state in meeting current and planned goals for renewable energy development and use. The California Energy Commission (CEC) pre-certified the Drew Solar Project as an eligible renewable energy resource under the RPS and assigned it CEC-RPS identification (ID) number 63896.

### ES.4 OBJECTIVES

Pursuant to CEQA Section 15124(d), objectives have been identified for the proposed Project. A primary objective is to develop a project that will produce public benefits for Imperial County, the Southern California Region, and the State of California. The following is a list of key public benefits that are fundamental to the Project's objectives:

- To create significant lease revenue for Imperial Irrigation District ("IID") as the property owner, a public agency, which will benefit the citizens of Imperial County.
- To support the Imperial County General Plan renewable energy policies and objectives.
- To locate the Project at a location along the existing transmission system which has available capacity to deliver electricity to major load centers in California.
- To meet the terms and requirements of any Power Purchase Agreement (PPA) and Large Generator Interconnection Agreement ("LGIA") that the Applicant has or may enter into and that require it to be interconnected directly to the CAISO grid at the existing Drew Switchyard.
- To deploy a technology that is safe, readily available, efficient, and environmentally responsible.
- To generate power, and store energy in an efficient manner and at a cost that is competitive in the renewable market on sites controlled by the applicant.
- To provide an additional source of renewable energy to assist the State of California in achieving and exceeding the RPS.
- To maximize local construction jobs for a variety of trades thereby helping maximize the reduction of unemployment in the construction sector.
- To locate the Project in an area that ranks among the highest in solar resource potential in the nation, as measured by the CEC.
- To minimize potential impacts to aesthetics, health and safety and other potential environmental impacts:
  - o Locating the Project on disturbed land.
  - o Grouping or collocating the Project's proposed electrical interconnection facilities with existing or proposed electrical interconnection facilities (consistent with County conditions on

similar solar generation projects), to the extent that such grouping/collocation can be accommodated.

o Utilizing existing infrastructure (switchyards, transmission lines, roads, and water sources) where feasible to locate the project proximate to existing electric interconnection and transmission systems in Imperial County with capacity to deliver electricity to major load centers in California.

- To diversify Imperial County's economic base.
- To provide tax revenue through sales, use and property taxes generated by development within Imperial County.

### **ES.5 ALTERNATIVES**

This EIR considered two alternatives in addition to the proposed project:

#### **ALTERNATIVE 1 – REDUCED PRIME FARMLAND ALTERNATIVE**

This alternative would exclude the portion of the proposed Project west of Drew Road within (CUP#17-0035 and CUP#18-0001) that is Prime Farmland and would reduce potential impacts to 39.5 acres of Prime Farmland.

#### **ALTERNATIVE 2 – NO PROJECT ALTERNATIVE**

CEQA Guidelines Section 15126.6(e)(1) requires that a No Project Alternative be analyzed in order to allow the decision-makers to compare the impacts of approving a proposed Project with the impacts of not approving the proposed Project. Under the No Project Alternative, the proposed Drew Solar Project would not be developed. No GPA, Zone Change, Variance or CUP applications would be approved. The Project site could remain in its existing condition as agricultural land owned by the IID.

### **ES.6 SUMMARY OF IMPACTS**

**Table ES-1** summarizes the environmental impacts resulting from the proposed project pursuant to CEQA Guidelines Section 15123(b)(1).

**TABLE ES-1  
SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<b>AESTHETICS</b>			
<p><b>Adverse Effect on Scenic Vista</b>  <b>Impact 4.1.1</b> The Project Area is not considered a scenic vista nor does it contain any outstanding aesthetic features. Therefore, this impact is considered <b>less than significant</b> under both the Full-Buildout and Phased CUP scenarios.</p>	LTS	None required.	LTS
<p><b>Degrade Existing Visual Character or Quality of the Site and its Surroundings</b>  <b>Impact 4.1.2</b> The proposed Project would convert agricultural fields to a solar energy generation and storage facility thereby replacing flat crops with man-made structures. The Project would not significantly alter the overall character of the Project Area which is currently characterized by agricultural fields and solar energy facilities. Very few residences are in the area and agricultural land is not considered a significant visual resource. Therefore, impacts associated with changes to the existing visual character or quality of the site are considered <b>less than significant</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS

= Less than Significant  
 = Less than Cumulatively Considerable

Potentially Significant  
 : Cumulatively Considerable

: Significant and Unavoidable

No Impact

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SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<p><b>New Source of Substantial Light or Glare</b>  <b>Impact 4.1.3</b> The proposed Project includes non-reflective PV panels which are not anticipated to create glare. Likewise, the proposed lighting system would be designed to provide minimum illumination. Therefore, impacts associated with creation of substantial light and glare are considered <b>less than significant</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	<p>LTS</p>	<p>None required.</p>	<p>LTS</p>

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<p><b>Cumulative Visual and Light and Glare Impacts</b>  <b>Impact 4.1.4</b> Implementation of the proposed Project in combination with proposed, approved and reasonably foreseeable projects in the vicinity of the Project Site would not significantly alter the overall character of the Project Area which is currently characterized by agricultural fields and solar generation facilities. Very few residential homes are in the area nor are there any scenic resources within the Project viewshed. Potential visual impacts by other cumulative projects would be subject to review and approval by the County on a project-by-project basis. Therefore, the Project's contribution to cumulative aesthetics, light and glare impacts is considered <b>less than cumulatively considerable</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS

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<b>LAND USE</b>			
<p><b>Cause a Significant Environmental Impact due to a Conflict with Any Land Use Plan, Policy, or Regulation</b></p> <p><b>Impact 4.2.1</b> Upon approval of the requested GPA, one ZC, one Parcel Map, six CUPs, one Variance and up to five Lot-Tie Agreements and a Development Agreement, the proposed Project would be consistent with the General Plan and Land Use Ordinance under both the Full-Buildout Scenario and Phased CUP Scenario. This is considered a <b>less than significant impact</b> under both the Full Build-out Scenario and Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Cumulative Conflicts with Applicable Land Use Plans, Policies, or Regulations</b>  <b>Impact 4.2.2</b> Development of the proposed Project in combination with proposed, approved and reasonably foreseeable projects in the region would not incrementally cause a significant environmental impact due to a conflict with applicable land use plans, policies and regulations. Each CUP Area would be required to be overall consistent with the applicable plans, policies and regulations. Thus, environmental impacts associated with conflicts with applicable land use plans, policies and regulations are considered <b>less than cumulatively considerable</b> under both the Full Build-out Scenario and Phased Build-out Scenario.</p>	LCC	None required.	LCC

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<b>TRANSPORTATION</b>			
<p><b>Conflict with Applicable Plan – Existing Year 2017 Plus Project Construction Conditions</b></p> <p><b>Impact 4.3.1</b> Implementation of the proposed Project would add traffic to existing traffic volumes on Project study area intersections, roadway segments and freeway segments during (Year 2017) Project construction. The additional traffic would not result in an exceedance of LOS C. Therefore, conflicts with the Imperial County General Plan Circulation and Scenic Highways Element are considered <b>less than significant</b> for (Year 2017) with Project construction conditions under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Conflict with Applicable Plan – Near-Term (Year 2019) With Project</b></p> <p><b>Impact 4.3.2</b> Implementation of the proposed Project would add traffic to existing traffic volumes on the Project study area intersections, roadway segments and freeway segments during Near-Term (Year 2019) Project construction. The additional traffic would not result in an exceedance of LOS C. Therefore, conflicts with the Imperial County General Plan Circulation and Scenic Highways Element are considered <b>less than significant</b> under Near-Term (Year 2019) with Project Conditions under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Conflict with Applicable Plan – Long-Term (Year 2027) Conditions</b></p> <p><b>Impact 4.3.3</b> Implementation of the proposed Project would add traffic to existing traffic volumes on Project study area intersections, roadway segments and freeway segments during Long-Term (Year 2019) Project construction. The additional traffic would not result in an exceedance of LOS C. Therefore, conflicts with the Imperial County General Plan Circulation and Scenic Highways Element are considered <b>less than significant</b> under Mid-Term (Year 2027) With Project conditions under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	<p>LTS</p>	<p>None required.</p>	<p>LTS</p>

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<p><b>Increase Hazards Due to a Geometric Design Feature – Driveways and Travel Speeds</b>  <b>Impact 4.3.4</b> Implementation of the proposed Project would not require provision of left-turn lanes at Project driveways to allow access to any of the CUPs. No geometric design features are proposed that would result in hazards. Likewise, area roadways are currently traveled by farm equipment similar in size and speed to construction equipment necessary for the proposed Project. Therefore, impacts resulting from an increase in hazards due to a geometric design feature or an incompatible use are considered <b>less than significant</b> under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Increase Hazards Due to a Geometric Design Feature – Damage to County-Maintained Roadways During Project Construction</b></p> <p><b>Impact 4.3.5</b> Construction of the proposed Project will require movement of heavy equipment and large vehicles on County roadways not designed to accommodate high volumes of overweight trucks and loads. The condition of the roadways may deteriorate rapidly based on the volume and weight of construction traffic. Therefore, impacts to County-maintained roadways are considered <b>potentially significant</b> under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	<p>PS</p>	<p><b>MM 4.3.5a All CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001)</b> The Project contractor shall utilize SR 98 for all equipment deliveries. Employee and vendor routes to each CUP shall be limited to SR 98, Drew Road, Pulliam Road and Kubler Road, unless improvements are made to other county roads leading to individual CUP sites in advance of development of each CUP.</p> <p><b>MM 4.3.5b All CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001)</b> The CUP owner(s) shall limit the Project’s construction traffic to paved County roadways. In the event the Applicant’s construction traffic requires the use of unpaved County roadways, the Applicant shall mitigate those County unpaved roadways in accordance with ICAPCD Rule 805.</p> <p>In addition to complying with Rule 805, if 50 vehicle trips per day (VPD) (cumulative from public and project use) are triggered by the project on any single County unpaved roadway, the Applicant shall provide for the future maintenance cost of the affected roadway for the full term of the CUP which triggered the increase beyond the 50 VPD threshold.</p>	<p>LTS</p>

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<p><b>Increase Hazards Due to a Geometric Design Feature – Damage to County-Maintained Roadways During Project Construction</b></p> <p><b>Impact 4.3.5</b> Construction of the proposed Project will require movement of heavy equipment and large vehicles on County roadways not designed to accommodate high volumes of overweight trucks and loads. The condition of the roadways may deteriorate rapidly based on the volume and weight of construction traffic. Therefore, impacts to County-maintained roadways are considered <b>potentially significant</b> under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	<p>PS</p>	<p><b>MM 4.3.5c All CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001)</b></p> <p>As each CUP may be constructed individually and independently, the CUP owner(s) shall improve the roads per the approved haul route study. If the CUP owner(s) has already improved the roads that will be utilized by the next CUP to start construction, then no new road improvements are required.</p> <p><b>MM 4.3.5d All CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001)</b></p> <p>Construction traffic shall prioritize ingress and egress from SR 98. In the event project construction traffic utilizes County roads, a fair share shall be paid per the approved haul route study, and the Developer will be required to repair any damages caused to County roads by construction traffic during construction and maintain them in safe conditions. The Imperial County Public Works Department/Road Commissioner shall have final authority as to the fair share percentage and the final payment amounts based on the final and approved access points in the project’s grading and improvement plans. Fair share shall be paid in full prior to Issuance of grading, building and encroachment permits.</p>	<p>LTS</p>

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<p><b>Increase Hazards Due to a Geometric Design Feature – Damage to County-Maintained Roadways During Project Construction</b></p> <p><b>Impact 4.3.5</b> Construction of the proposed Project will require movement of heavy equipment and large vehicles on County roadways not designed to accommodate high volumes of overweight trucks and loads. The condition of the roadways may deteriorate rapidly based on the volume and weight of construction traffic. Therefore, impacts to County-maintained roadways are considered <b>potentially significant</b> under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	<p>PS</p>	<p><b>MM 4.3.5e CUP#17-0031</b> Fair share payments shall be paid per the approved haul route study as approved by Imperial County Public Works Department prior to issuance of grading, building and encroachment permits.</p> <p><b>MM 4.3.5f CUP#17-0032, CUP#17-0033, CUP#17-0034, CUP#17-0035 and CUP#18-0001</b> Prior to issuance of final Certificate of Occupancy, CUP owner shall be responsible for repairing any damage caused to County roads and bridges it utilizes via improvements as determined by the County Road Commissioner based on the final and approved access points in the Project’s grading and improvement plans.</p>	<p>LTS</p>

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<p><b>Increase Hazards Due to a Geometric Design Feature – Damage to County-Maintained Roadways During Project Construction</b></p> <p><b>Impact 4.3.5</b> Construction of the proposed Project will require movement of heavy equipment and large vehicles on County roadways not designed to accommodate high volumes of overweight trucks and loads. The condition of the roadways may deteriorate rapidly based on the volume and weight of construction traffic. Therefore, impacts to County-maintained roadways are considered <b>potentially significant</b> under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	<p>PS</p>	<p><b>MM 4.3.5g CUP#17-0033</b> Fair share payments shall be paid for 2,800 feet of asphalt paving required on Pulliam Road north of SR 98 or as approved by ICDPW prior to issuance of Final Certificate of Occupancy based on the final and approved access points in the Project’s grading and improvement plans. Fair share payments shall be paid for 1,600 feet of asphalt patching required on Kubler Road west of Pulliam Road relating to construction haul route, or as approved by Imperial County Public Works Department prior to issuance of Final Certificate of Occupancy.</p> <p><b>MM 4.3.5h CUP#17-0034</b> Install up to 2,400 feet of asphalt paving required on Kubler Road west of Pulliam Road relating to the construction haul route and 2,400 feet of Drew Road, or as approved by Imperial County Public Works Department prior to issuance of Final Certificate of Occupancy based on the final and approved access points in the Project’s grading and improvement plans, unless already condition has already been satisfied as part of CUP#17-0033.</p>	<p>LTS</p>

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SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<p><b>Increase Hazards Due to a Geometric Design Feature – Damage to County-Maintained Roadways During Project Construction</b></p> <p><b>Impact 4.3.5</b> Construction of the proposed Project will require movement of heavy equipment and large vehicles on County roadways not designed to accommodate high volumes of overweight trucks and loads. The condition of the roadways may deteriorate rapidly based on the volume and weight of construction traffic. Therefore, impacts to County-maintained roadways are considered <b>potentially significant</b> under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	<p>PS</p>	<p><b>MM 4.3.5i CUP#17-0035 and CUP#18-0001</b></p> <p>Install up to 2,400 feet of asphalt paving required on Drew Road relating to construction haul route, or as approved by Imperial County Public Works Department prior to issuance of Final Certificate of Occupancy based on the final and approved access points in the Project’s grading and improvement plans.</p>	<p>LTS</p>

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<p><b>Emergency Access</b>  <b>Impact 4.3.6</b> The proposed Project includes emergency access points off of Kubler Road, Drew Road, Pulliam Road. Access of SR 98 is to a frontage road which connects with an emergency access. Final design will be review by the Imperial County Fire Department and Imperial County Sheriff’s Office prior to approval. Therefore, impacts associated with adequate emergency access are <b>less than significant</b> under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LTS	None required.	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<p><b>Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS - Existing (Year 2017) With Project Construction With Cumulative Conditions</b></p> <p><b>Impact 4.3.7</b> Implementation of the proposed Project would contribute construction traffic to Project study area intersections, roadway, State Route and freeway segments under (Year 2017) With Project Construction With Cumulative Conditions. However, none of the intersections or segments would exceed LOS C or V/C ratios under this scenario. Therefore, cumulative impacts to study area intersections, roadway, State Route and freeway segments under (Year 2017) With Project Construction With Cumulative Conditions are considered <b>less than cumulatively considerable</b> under both the Full Build-Out Scenario and Phased CUP Scenario under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LCC	None required.	LCC

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<p><b>Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS Near-Term (Year 2019) With Project Construction With Cumulative Conditions)</b></p> <p><b>Impact 4.3.8</b> Implementation of the proposed Project would contribute construction traffic to Project study area intersections, roadway, State Route and freeway segments under Near-Term (Year 2019) With Project Construction With Cumulative Conditions. However, none of the intersections or segments would exceed LOS C or V/C ratios under this scenario. Therefore, cumulative impacts to Project study area intersections, roadway, State Route and freeway segments under Near-Term (Year 2019) With Project Construction With Cumulative Conditions are considered <b>less than cumulatively considerable</b> under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LCC	None required.	LCC

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<p><b>Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS - Long-Term (Year 2027) With Project Construction With Cumulative Conditions</b></p> <p><b>Impact 4.3.9</b> Implementation of the proposed Project would contribute construction traffic to Project study area intersections, roadway, State Route and freeway segments under Long-Term (Year 2027) With Project Construction With Cumulative Conditions. However, none of the intersections or segments would exceed LOS C or V/C ratios under this scenario. Therefore, cumulative impacts to Project study area intersection, roadway, State Route and freeway segments under Long-Term (Year 2027) With Project Construction With Cumulative Conditions are considered <b>less than cumulatively considerable</b> under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LCC	None required.	LCC

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<p><b>Cumulative Increase Hazards Due to a Geometric Design Feature</b>  <b>Impact 4.3.10</b> Implementation of the proposed Project would not require improvements or modifications to any Project study area roadways. Therefore cumulative increases in hazards due to a geometric design feature are considered <b>less than cumulatively considerable</b> under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LCC	None required.	LCC
<p><b>Cumulative Increases in Hazards Due to a Geometric Design Feature – Damage to County-Maintained Roadways During Project Construction</b>  <b>Impact 4.3.11</b> Construction of the proposed Project, in combination with other cumulative projects using Project study area roadways, will require movement of heavy-duty equipment and large vehicles on County roadways not designed to accommodate high volumes of overweight trucks and loads. The high volume of trips in combination with the weight of construction vehicles would deteriorate the surface of Project study area roadways. This is considered a <b>cumulatively considerable impact</b> under both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LCC	Implement mitigation measures MM 4.3.5a thru MM 4.3.5i.	LCC

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<b>AIR QUALITY</b>			
<p><b>Conflict with or Obstruct Implementation of an Applicable Air Quality Plan</b></p> <p><b>Impact 4.4.1</b> Implementation of the proposed Project would increase air pollutant emissions during Project construction and operation. No criteria pollutant thresholds were calculated to be exceeded during either Project construction or operation. Therefore, the Project’s potential to conflict with or obstruct an applicable air quality plan is considered a <b>less than significant impact</b> during Project construction, operation and decommissioning/reclamation.</p>	LTS	None required.	LTS

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<p><b>Result in a Cumulatively Considerable Net Increase of any Criteria Pollutant</b>  <b>Impact 4.4.2</b> The proposed Project is consistent with ICAPCD plans and would not exceed pollutant thresholds during construction, operation and reclamation. Therefore, the Project’s potential to result in a cumulatively considerable net increase of any criteria pollutant is considered <b>less than significant</b> under the worst-case Full Build-out Scenario.</p>	LTS	None required.	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<p><b>Exposure of Sensitive Receptors to Substantial Pollutant Concentrations</b>  <b>Impact 4.4.3</b> The proposed Project would result in short-term diesel exhaust emissions during construction and decommissioning/reclamation. However, diesel exhaust operational emissions would be very low. Based on the worst-case Full Buildout Scenario, exposure of sensitive receptors in the vicinity of the Project Site would be for a limited duration and would not exceed the diesel particulate matter exposure threshold. Therefore, sensitive receptor exposure to substantial pollutant concentrations is considered a <b>less than significant impact</b> under the worst-case Full Build-out Scenario.</p>	LTS	None required.	LTS
<p><b>Result in Emissions Affecting a Substantial Number of People</b>  <b>Impact 4.4.4</b> Use of diesel equipment during Project construction, operation and decommissioning/reclamation activities could result in temporary emissions of adverse odors. This is considered a <b>less than significant impact</b> under the Full Build-out Scenario.</p>	LTS	None required.	LTS

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<p><b>Cumulative Air Quality Impacts – Violate Air Quality Standard/Cause Air Quality Violation</b></p> <p><b>Impact 4.4.5</b> The proposed Project would generate criteria pollutant emissions during construction. However, the short-term construction emissions exceedances of ICAPCD thresholds would be mitigated through compliance with ICAPCD Regulation VIII. Operational emissions would not exceed ICAPCD thresholds. Therefore, the proposed Project would result in a <b>less than cumulatively considerable impact</b> with regard to violating an air quality standard under both the Full Buildout Scenario and Phased CUP Scenario.</p>	LCC	None required.	LCC

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<b>GREENHOUSE GASES</b>			
<p><b>Generation of Greenhouse Gas Emissions</b>  <b>Impact 4.5.1</b> The proposed Project would generate GHG emissions during construction and reclamation activities, primarily related to emissions from construction equipment. Operational emissions would occur to a lesser degree in relation to the use of maintenance equipment. Impacts resulting from Project-generated GHGs are considered <b>less than significant</b>.</p>	LTS	None required.	LTS
<p><b>Conflict with an Applicable Plan, Policy, or Regulation Adopted to Reduce Greenhouse Gas Emissions</b>  <b>Impact 4.5.2</b> The Project would help promote California’s GHG policies by creating renewable energy resources and would not exceed applicable GHG screening levels. Therefore, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions. Moreover, Project conflicts with an applicable plan, policy, or regulation adopted to reduce GHG emissions are considered <b>less than significant</b> during construction, operation and reclamation.</p>	LTS	None required.	LTS

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<b>GEOLOGY AND SOILS</b>			
<p><b>Alquist-Priolo Earthquake Fault Rupture</b>  <b>Impact 4.6.1</b> An unnamed fault mapped as an Alquist-Priolo Earthquake Fault Zone extends into CUP #17-0035. Surface rupture is considered low to moderate. This is considered a <b>potentially significant impact</b>.</p>	<p>PS</p>	<p><b>MM 4.6.1</b> A Fault Hazard Study including fault trenching shall be prepared for CUP#17-0035 and CUP#18-0001 to address any issues associated with the presence of an Alquist-Priolo Earthquake Fault Zone.</p>	<p>LTS</p>

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<p><b>Strong Seismic Ground Shaking</b>  <b>Impact 4.6.2</b> The Project site is located in a seismically active region and would be subject to strong seismic ground shaking in the event of an earthquake. This is considered a <b>potentially significant impact</b>.</p>	<p>PS</p>	<p><b>MM 4.6.2</b> Prior to approval of final building plans, a registered civil engineer or certified engineering geologist, having at least five years of experience in the field of seismic hazard evaluation and mitigation, shall prepare a Final Geotechnical and GeoHazards Report containing site-specific evaluations of the ground shaking hazards affecting the Project, identify the portions of the Project site containing ground shaking hazards, and identify appropriate Project design measures pursuant to the established and proven methodologies (e.g. Special Publication 117A). The Report shall also include site-specific evaluations of potential for liquefaction, expansive soils and corrosive soils for all solar field site parcels, energy storage components and Gen-Tie foundations. The Report shall identify appropriate Project design measures pursuant to the established and proven methodologies set forth in the 2016 CBC. All recommended Project design measures as set forth in the Final Geotechnical and GeoHazards Report</p>	<p>LTS</p>

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<p><b>Strong Seismic Ground Shaking</b>  <b>Impact 4.6.2</b> The Project site is located in a seismically active region and would be subject to strong seismic ground shaking in the event of an earthquake. This is considered a <b>potentially significant impact</b>.</p>	PS	<p>shall be incorporated into and reflected on the final design and building plans for each CUP. All recommended Project design measures as set forth in the Final Geotechnical and GeoHazards Report shall be incorporated into and reflected on the final design and building plans. The Final Geotechnical and GeoHazards Report and Project plans shall be submitted for review and approval by the Imperial County Planning and Development Services Department, Division of Building &amp; Safety prior to approval of the final building plans.</p>	LTS
<p><b>Liquefaction</b>  <b>Impact 4.6.3</b> Soils throughout the solar field site parcels have characteristics prone to liquefaction. Evidence of liquefaction was also noted in the area of the Project site. Therefore, a <b>potentially significant impact</b> could occur with regard to liquefaction.</p>	PS	Implement mitigation measure MM 4.6.2.	LTS

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<p><b>Soil Erosion Impact 4.6.4</b> Construction, maintenance, and decommissioning activities would result in earth moving and potential for erosion and loss of top soil. The Project is subject to mandatory compliance with several regulatory requirements established to address erosion. Therefore, soil erosion impacts are considered <b>less than significant</b>.</p>	LTS	None required beyond compliance with state and local construction requirements as well as Phased CUP Scenario-Proposed Measures related to dust and erosion control.	LTS
<p><b>Expansive Soils Impact 4.6.5</b> Near surface soils within the Project site consist of silty clay and clay having a moderate to high expansion potential. Therefore, expansive soils impacts are considered <b>less than significant</b>.</p>	LTS	Implement mitigation measure MM 4.6.2.	LTS

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<p><b>Soil Capability to Support On-site Wastewater Treatment System</b>  <b>Impact 4.6.6</b> The Project would generate wastewater from sanitary facilities such as sinks and toilets in the O&amp;M building(s). The Project proposes to construct an on-site sanitary waste septic system. Project site soils are capable of supporting an on-site wastewater treatment system. Therefore, impacts with regard to supporting an on-site wastewater treatment system are considered <b>less than significant</b>.</p>	LTS	None required.	LTS
<p><b>Soil Corrosivity</b>  <b>Impact 4.6.7</b> Soils within the Project Area are known to be corrosive. Steel and concrete structures could be damaged through contact with corrosive soils. This is considered a <b>potentially significant impact</b>.</p>	PS	<p><b>MM 4.6.7a</b> Concrete mixed with higher cement contents (6 sacks Type V Portland Cement) and low water-cement ratios (0.45 w/c ratio) shall be used for all concrete structures proposed as part of the Project subject to approval by the County Engineer and Planning Director.</p> <p><b>MM 4.6.7b</b> Zinc coatings (galvanizing) or increased structural sections shall be used to protect all steel posts and to compensate for metal loss due to corrosion subject to approval by the County Engineer and Planning Director.</p>	LTS

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<p><b>Impacts to Paleontological Resources</b>  <b>Impact 4.6.8</b> The Project Site and surrounding areas are underlain by geologic units comprised of quaternary lake deposits of the ancient Lake Cahuilla. As such, the potential exists for fossils to be impacted during construction. Thus, impacts to paleontological resources are considered <b>potentially significant</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	<p>PS</p>	<p><b>MM 4.6.8</b> Qualified Paleontological monitor(s) shall be hired to oversee excavations or drilling activities greater than 10 feet in depth. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Fossil specimens shall be curated by accessioning into an established, accredited museum repository with permanent retrievable paleontological storage. A report of findings with an appended itemized inventory of specimens shall be prepared. Submittal of the report and inventory to the Imperial County Planning and Development Services Department, along with confirmation of the curation of recovered specimens into an established, accredited museum repository, shall signify completion of the program to mitigate impacts to paleontological resources.</p>	<p>LTS</p>

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<p><b>Cumulative Exposure to Geologic and Seismic Impacts</b>  <b>Impact 4.6.9</b> Implementation of the proposed Project, in combination with proposed, approved and reasonably foreseeable projects in the region, may result in cumulative exposure to geologic and seismic hazards. However, geologic and seismic hazards are analyzed and mitigated on a project-by-project basis. Therefore, cumulative exposure to geologic and seismic impacts is considered <b>less than cumulatively considerable</b>.</p>	LCC	Implement mitigation measures MM 4.6.1, MM 4.6.2, MM 4.6.7a, and MM 4.6.7b	LCC
<p><b>Cumulative Impacts to Paleontological Resources</b>  <b>Impact 4.6.10</b> Implementation of the proposed Project in combination with proposed, approved and reasonably foreseeable projects in the region identified in the cumulative setting, has the potential to result in impacts to paleontological resources including fossil remains and fossil bearing geological formations. However, such impacts are addressed on a project-by-project basis through the CEQA process. Therefore, impacts to paleontological resources are considered <b>less than cumulatively considerable</b> or both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LCC	Implement mitigation measure MM 4.6.8.	LCC

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<b>CULTURAL RESOURCES &amp; TRIBAL CULTURAL RESOURCES</b>			
<p><b>Impacts to Historical Resources</b></p> <p><b>Impact 4.7.1</b> All historic age irrigation canals and drainage resources within the Project APE are recommended not eligible for the NRHP and CRHR based on a lack of historical significance, and in some cases, a lack of integrity. Therefore, impacts to historical resources are considered <b>less than significant</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Impacts to Unanticipated Archaeological Resources</b></p> <p><b>Impact 4.7.2</b> The proposed Solar Field Site Parcels have been farmed since the late 1930's and most are currently in agricultural production. No known archaeological resources were identified during the Records Search or pedestrian survey. However, the potential exists for unanticipated archaeological resources to be discovered during construction. This is considered a <b>potentially significant impact</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	<p>PS</p>	<p><b>MM 4.7.2a</b> A monitor from the Campo Band of Mission Indians shall be present as a Native American monitor for initial ground disturbing activities within the boundaries of the Project site. Following initial disturbance, a determination shall be made by the County in accordance with State regulations if continued monitoring is necessary based on the outcome of any discoveries or lack thereof.</p> <p><b>MM 4.7.2b</b> In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find and determine whether or not additional study is warranted. If the discovery is clearly not significant (e.g., an isolate) the archaeologist may simply record the find and allow work to continue. If the discovery proves potentially significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.</p>	<p>LTS</p>

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<p><b>Impacts to Previously Unknown Subsurface Human Remains</b>  <b>Impact 4.7.3</b> Though unlikely, previously unknown human remains may be present within the Project Site which could be unearthed during construction. This is considered a <b>potentially significant impact</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	<p>PS</p>	<p><b>MM 4.7.3</b> In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be notified of the discovery immediately. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify those persons it believes to be the MLD from the deceased Native American. The MLD shall complete inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.</p>	<p>LTS</p>

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<p><b>Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource</b>  <b>Impact 4.7.4</b> Implementation of the proposed Project under both the Full Build-out Scenario and Phased CUP Scenario would not result in a substantial adverse change in the significance of a tribal cultural resource. No tribal cultural resources were identified as part of the AB 52 process. Therefore, impacts to tribal cultural resources would be <b>less than significant</b> under both the Full Build-out Scenario and Phased CUP Scenario.</p>	<p>PS</p>	<p>Implement mitigation measure MM 4.7.2a.</p>	<p>LTS</p>

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**TABLE ES-1  
SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<p><b>Cumulative Impacts to Historic and Archaeological Resources, Human Remains and Tribal Cultural Resources</b>  <b>Impact 4.7.5</b> Implementation of the proposed Project, in combination with proposed, approved, and reasonably foreseeable projects in the region identified in the cumulative setting, has the potential to result in impacts to historic and archaeological resources, human remains and tribal cultural resources. However, impacts to historic and archaeological resources, human remains and tribal cultural resources are addressed on a project-by-project basis through the CEQA process. Therefore, this is considered a <b>less than cumulatively considerable impact</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	<p>LCC</p>	<p>Implement mitigation measures MM 4.7.2a, MM 4.7.2b and MM 4.7.3.</p>	<p>LCC</p>

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<b>NOISE</b>			
<p><b>Substantial Temporary or Permanent Noise Increase in Excess of Standards</b>  <b>Impact 4.8.1</b> Construction and decommissioning activities would cause short-term increases in noise on and in the vicinity of the Project. Likewise, operation of the Full Build-out Scenario or the Phased CUP Scenario could cause permanent noise levels to rise. However, the Project includes noise- and vibration-reducing design features which would reduce noise levels during construction, operation and decommissioning to be within County standards. Therefore, impacts with regard to noise levels in excess of standards and substantial temporary and permanent noise increases are considered <b>less than significant</b> for both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Groundborne Vibration or Groundborne Noise Level Impacts</b>  <b>Impact 4.8.2</b> The proposed Project would generate groundborne vibration or noise levels associated with construction and operation of on-site equipment. However, the levels are anticipated to be below the level of human annoyance and the significance threshold. Therefore, groundborne vibration and noise impacts are considered <b>less than significant</b> for both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LTS	None required.	LTS
<p><b>Cumulative Noise Increases/Groundborne Vibration</b>  <b>Impact 4.8.3</b> Long-term operation of the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects in the region, would not result in a substantial contribution to cumulative noise levels or groundborne vibration. Therefore, cumulative noise impacts and groundborne vibration would be considered <b>less than cumulatively considerable</b> for both the Full Build-Out Scenario and Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Cumulative Noise Increases</b>  <b>Impact 4.8.4</b> Long-term operation of the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects in the region, would not result in a substantial contribution to cumulative noise levels. Therefore, cumulative noise impacts would be considered <b>less than cumulatively considerable</b>.</p>	LCC	None required.	LCC
<b>AGRICULTURAL RESOURCES</b>			
<p><b>Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance</b>  <b>Impact 4.9.1</b> The proposed Project, whether implemented as the Full Build-out Scenario or six individual CUPs proposed as part of the Phased CUP Scenario, would temporarily convert Prime Farmland and Farmland of Statewide Importance to non-agricultural uses. This is considered a <b>potentially significant impact</b>.</p>	PS	<p><b>MM 4.9.1a Payment of Agricultural and Other Benefit Fees</b>            One of the following options included below shall be implemented prior to the issuance of a grading permit or building permit (whichever is issued first) for the proposed Project:  <u>For Non-Prime Farmland:</u>  <b>Option 1:</b> The Permittee shall procure Agricultural Conservation Easements on a 1 to 1 basis on land of equal size, of equal quality of farmland, outside the path of development. The Conservation Easement</p>	LTS

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<p><b>Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance</b>  <b>Impact 4.9.1</b> The proposed Project, whether implemented as the Full Build-out Scenario or six individual CUPs proposed as part of the Phased CUP Scenario, would temporarily convert Prime Farmland and Farmland of Statewide Importance to non-agricultural uses. This is considered a <b>potentially significant impact</b>.</p>	<p>PS</p>	<p>shall meet the State Department of Conservation’s regulations and shall be recorded prior to issuance of any grading or building permits;  <b>Option 2:</b> The Permittee shall pay an “Agricultural In-Lieu Mitigation Fee” in the amount of 20% of the fair market value per acre for the total acres of proposed site based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee, will be placed in a trust account administered by the Imperial County Agricultural Commissioner’s office and will be used for such purposes as the acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County; or  <b>Option 3:</b> The Permittee and County voluntarily enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that is (1) consistent with Board Resolution 2012-005; (2) the Agricultural Benefit Fee must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation and enhancement of agricultural lands</p>	<p>LTS</p>

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<p><b>Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance</b>  <b>Impact 4.9.1</b> The proposed Project, whether implemented as the Full Build-out Scenario or six individual CUPs proposed as part of the Phased CUP Scenario, would temporarily convert Prime Farmland and Farmland of Statewide Importance to non-agricultural uses. This is considered a <b>potentially significant impact</b>.</p>	<p>PS</p>	<p>within Imperial County and to implement the goals and objectives of the Agricultural Benefit program, as specified the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy.  <u>For Prime Farmland:</u>  <b>Option 1:</b> The Permittee shall procure Agricultural Conservation Easements on a "2 to 1" basis on land of equal size, of equal quality farmland, outside of the path of development. The Conservation Easements shall meet the State Department of Conservation's regulations and shall be recorded prior to issuance of any grading or building permits; or  <b>Option 2:</b> The Permittee shall pay an "Agricultural In-Lieu Mitigation Fee" in the amount of 30 percent of the fair market value per acre for the total acres of the proposed site based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee, will be placed in a trust account administered by the Imperial County Agricultural Commissioner's office and will be used for such purposes as the</p>	<p>LTS</p>

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<p><b>Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance</b></p> <p><b>Impact 4.9.1</b> The proposed Project, whether implemented as the Full Build-out Scenario or six individual CUPs proposed as part of the Phased CUP Scenario, would temporarily convert Prime Farmland and Farmland of Statewide Importance to non-agricultural uses. This is considered a <b>potentially significant impact</b>.</p>	<p>PS</p>	<p>acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County.</p> <p><b>Option 3:</b> The Permittee and County shall enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that is (1) consistent with Board Resolution 2012-005; (2) the Agricultural Benefit Fee must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation and enhancement of agricultural lands within Imperial County and to implement the goals and objectives of the Agricultural Benefit program, as specified the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy; the Project and other recipients of the Project’s Agricultural Benefit Fee funds; or emphasis on creation of jobs in the agricultural sector of local economy for the purpose of off-setting jobs displaced by this Project.</p> <p><b>Option 4:</b> The Permittee shall revise their CUP Application/Site Plan to avoid Prime Farmland.</p>	<p>LTS</p>

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<p><b>Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance</b></p> <p><b>Impact 4.9.1</b> The proposed Project, whether implemented as the Full Build-out Scenario or six individual CUPs proposed as part of the Phased CUP Scenario, would temporarily convert Prime Farmland and Farmland of Statewide Importance to non-agricultural uses. This is considered a <b>potentially significant impact</b>.</p>	PS	<p><b>MM 4.9.1b Reclamation/Decommissioning Plan and Security</b> Prior to the issuance of a grading permit or building permit (whichever is issued first) for the proposed Project, the Permittee shall submit to Imperial County a Reclamation and Decommissioning Plan. The plan shall document the procedures by which each CUP area will be returned to its current agricultural condition/LESA score of 57.9. The Permittee shall also provide financial assurance/bonding in an amount equal to a cost estimate prepared by a California-licensed general contractor or civil engineer for implementation of the Reclamation Plan in the event Permittee fails to perform the Reclamation Plan.</p>	LTS
<p><b>Indirect Environmental Effects of Conversion of Farmland</b></p> <p><b>Impact 4.9.2</b> The proposed Project would not involve other changes to the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use. Nuisance issues such as dust, pests and weeds are already addressed through ICAPCD Rules and County requirements to prepare Weed and Pest Management Plans. Thus, indirect effects of the temporary conversion of farmland are considered <b>less than significant</b>.</p>	LTS	None required.	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<p><b>Cumulative Agricultural Resources Impacts</b></p> <p><b>Impact 4.9.3</b> Implementation of the Project under both the Full Build-out Scenario and the Phased CUP Scenario would incrementally add to the temporary conversion of agricultural land in Imperial County. Temporary impacts to agricultural resources are mitigated on a project-by-project basis through payment of in-lieu fees, conservation easements and/or execution of Public Benefit Agreements. Therefore, temporary impacts to agricultural resources are considered <b>less than cumulatively considerable</b>.</p>	<p>LCC</p>	<p>Implement MM 4.9.1a and MM 4.9.1b.</p>	<p>LTS</p>

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<b>HAZARDS AND HAZARDOUS MATERIALS</b>			
<p><b>Hazardous Materials Transport, Use, Disposal and Accidental Release</b></p> <p><b>Impact 4.10.1</b> Implementation of both the Full Build-out Scenario and Phased Build-out Scenario would use some hazardous materials for the construction, operations, and decommissioning phases and could create a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials. All materials would be transported, used and disposed of in accordance with all applicable local, state and federal requirements. Therefore, impacts associated with accidental release during hazardous materials transport, use and disposal are considered <b>less than significant</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Hazard Through Upset/Release of Hazardous Materials</b>  <b>Impact 4.10.2</b> No hazardous materials that could be a significant hazard to the public or the environment were identified on the proposed solar field site parcels. Therefore, impacts associated with hazard through upset/release of hazardous materials are considered <b>less than significant</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS
<p><b>Cumulative Hazards and Hazardous Materials Impact</b>  <b>Impact 4.10.3</b> The proposed Project, in combination with other reasonably foreseeable projects in the vicinity of the solar field site parcels, would increase the density of development in the area, thereby potentially increasing the potential for the presence of hazards and use of hazardous materials. However, hazards are addressed on a case-by-case basis through federal and state hazardous materials laws, regulations, and policies. Therefore, cumulative hazards and hazardous materials impacts are considered <b>less than cumulatively considerable</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LCC	None required.	LCC

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<b>HYDROLOGY AND WATER QUALITY</b>			
<p><b>Violate Water Quality Standards or Waste Discharge Requirements</b>  <b>Impact 4.11.1</b> Implementation of the proposed Project, whether under the Full Build-out Scenario or phased by CUP Area under the Phased CUP Scenario, would generate small amounts of runoff during construction, operation and decommissioning. The Project would comply with all applicable water quality regulations and implement Applicant-proposed BMPs in order to meet water quality standards and waste discharge requirements. Therefore, this impact is considered <b>less than significant</b> under both the Full Build-out Scenario and Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Result in Decreased Groundwater Supplies or Interfere Substantially with Groundwater Recharge</b>  <b>Impact 4.11.2</b> Project implementation under both the Full Build-out Scenario and the Phased CUP Scenario would not impact groundwater supply as the Project does not propose use of groundwater. During construction and decommissioning, there is a small potential for encountering groundwater while excavating for structure foundations or Gen-Tie footings. If groundwater is encountered, it would be contained locally in the vicinity of Gen-Tie pole locations and substation foundations. The CUP Areas would largely remain pervious during Project operation. Therefore, impacts associated with decreasing groundwater supplies or interfering with groundwater recharge are considered <b>less than significant</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	<p>LTS</p>	<p>None required.</p>	<p>LTS</p>

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<p><b>Result in Substantial Erosion or Siltation On- or Off-site</b>  <b>Impact 4.11.3</b> During construction, operation and maintenance and decommissioning activities, the Project shall comply with a Project-specific SWPPP, file for coverage under the construction and operational NPDES permits and comply with all other applicable State and local regulations. Therefore, under both the Full Build-out Scenario and Phased CUP Scenario, Project implementation would result in a <b>less than significant</b> impact regarding earth disturbance and potential for erosion and loss of top soil.</p>	LTS	None required.	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<p><b>Alteration of Drainage Pattern Substantially Increasing Surface Runoff/Construction of Stormwater Drainage</b>  <b>Impact 4.11.4</b> Upon Project implementation under both the Full Build-out Scenario and Phased CUP Scenario, Project site drainage patterns and the general drainage system will remain similar to the existing condition. Runoff will follow existing drainage patterns to proposed basins/ponding areas for detention and infiltration with storm flows conveyed toward existing IID Drains. Project implementation will also result in less run-off from the Project site as compared to the existing agricultural uses. Therefore, Project implementation would result in a <b>less than significant impact</b> with regard to substantially altering the existing drainage pattern in a manner which would result in flooding on- or off-site under both the Full Build-out Scenario and Phased CUP Scenario.</p>	<p>LTS</p>	<p>None required.</p>	<p>LTS</p>

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<p><b>Create or Contribute Runoff Exceeding Capacity/Provide Substantial Sources of Polluted Runoff</b></p> <p><b>Impact 4.11.5</b> Implementation of the proposed Project would generate on-site runoff throughout the Project site as a whole under the Full Build-out Scenario and at each of the six CUP Areas if constructed under the Phased CUP Scenario. Alteration of the existing drainage pattern would not alter the course of a stream or river nor would the Project create additional sources of polluted runoff. Existing drainage patterns would be maintained and the surface of each CUP Area would remain mostly pervious. Sufficient capacity to collect on-site runoff is available in receiving IID drains and proposed on-site ponding areas/detention basins. Therefore, impacts associated with exceedance of existing or planned stormwater drainage systems capacity or providing additional sources of polluted runoff are considered <b>less than significant</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Cumulative Water Quality and Runoff Impacts</b></p> <p><b>Impact 4.11.6</b> With the implementation of legally required SWRCB, RWQCB, and County policies, plans and ordinances governing land use activities that may degrade or contribute to the violation of water quality standards, the proposed Project, in combination with approved, proposed and other reasonably foreseeable projects in the Salton Sea watershed would not contribute to the cumulative effects of degradation of water quality, or result in changes in water runoff patterns. This impact is considered <b>less than cumulatively considerable</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LCC	None required.	LCC

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<b>BIOLOGICAL RESOURCES</b>			
<p><b>Impacts to Special Status Species (Burrowing Owl)</b>  <b>Impact 4.12.1</b> The Project Area contains suitable habitat for burrowing owl. Several owls were discovered during field surveys of the Project site. Therefore, potential for impacts to special status species is considered <b>potentially significant</b> under both the Full Build-out and Phased CUP Scenarios.</p>	<p>PS</p>	<p><b>MM 4.12.1a General Avoidance and Minimization Measures</b>  <u>Debris/Non-native Vegetation/Pollution</u></p> <ul style="list-style-type: none"> <li>• Fully covered trash receptacles that are animal-proof will be installed and used onsite to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash.</li> <li>• No litter or debris will be discharged into state-jurisdictional waters.</li> <li>• Work areas shall be kept clean of debris, such as trash, and construction materials.</li> <li>• Vehicle and Equipment Restrictions and Maintenance</li> <li>• Night-time construction should be minimized to the extent possible. However, if night-time activity (e.g., equipment maintenance) is necessary, then the speed limit shall be 10 mph.</li> <li>• Vehicle operation within jurisdictional resources when surface water is present will be prohibited except as necessary to perform work in IID facilities pursuant to USACE, RWQCB, and/or CDFW permits and/or authorizations. Any equipment or vehicles driven and/or operated within or adjacent to a state-jurisdictional</li> </ul>	<p>LTS</p>

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<p><b>Impacts to Special Status Species (Burrowing Owl)</b></p> <p><b>Impact 4.12.1</b> The Project Area contains suitable habitat for burrowing owl. Several owls were discovered during field surveys of the Project site. Therefore, potential for impacts to special status species is considered <b>potentially significant</b> under both the Full Build-out and Phased CUP Scenarios.</p>	<p>PS</p>	<p>channel will be checked and maintained by the operator daily to prevent leaks of oil or other petroleum products that could be deleterious to aquatic life if introduced to the watercourse.</p> <ul style="list-style-type: none"> <li>• Vehicles and equipment access will be limited to the identified impact areas and speed limit of 15 mph will be enforced. The work areas and sensitive areas will be flagged prior to construction in order to ensure construction activities remain within the approved work limits. During operations and maintenance, vehicles and equipment will be restricted from entering sensitive habitat, and limited to maintenance access roads, where feasible, and the minimal area necessary to perform the work.</li> <li>• Staging and storage areas for spoils, equipment, materials, fuels, lubricants, and solvents will be located outside the state-jurisdictional channels and within the designated impact area. Stationary equipment, such as motors, pumps, generators, compressors, and welders, located adjacent to state-jurisdictional waters shall be positioned over drip-pans or other containment. Prior to refueling and lubrication, vehicles and other equipment shall be moved away from the jurisdictional waters.</li> </ul>	<p>LTS</p>

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<p><b>Impacts to Special Status Species (Burrowing Owl)</b></p> <p><b>Impact 4.12.1</b> The Project Area contains suitable habitat for burrowing owl. Several owls were discovered during field surveys of the Project site. Therefore, potential for impacts to special status species is considered <b>potentially significant</b> under both the Full Build-out and Phased CUP Scenarios.</p>	<p>PS</p>	<p><u>Other Restrictions on Activities and Personnel</u></p> <ul style="list-style-type: none"> <li>• No pets, such as cats or dogs, permitted on the Project site during construction or operations and maintenance.</li> <li>• Any contractor, employee, or agency personnel who kills, injures, or traps a wildlife species shall immediately report the incident to the Project biologist during construction and the operations manager during operations and maintenance.</li> <li>• All pipes, culverts, or similar structures with a diameter of 4 inches or more that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for special-status wildlife and nesting birds before the pipe is subsequently buried, capped, or otherwise used or moved in any way, and subsequently covered to prevent entry to nesting birds and other wildlife. If an animal is discovered inside a pipe, that section of pipe shall not be moved until the Project biologist has been consulted and the animal has either moved from the structure on its own accord or until the animal has been captured and relocated by a qualified biologist.</li> </ul>	<p>LTS</p>

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<p><b>Impacts to Special Status Species (Burrowing Owl)</b></p> <p><b>Impact 4.12.1</b> The Project Area contains suitable habitat for burrowing owl. Several owls were discovered during field surveys of the Project site. Therefore, potential for impacts to special status species is considered <b>potentially significant</b> under both the Full Build-out and Phased CUP Scenarios.</p>	<p>PS</p>	<p><b>MM 4.12.1b Environmental Awareness Training, Biological Monitoring, and Compliance</b>  <u>Worker Environmental Awareness Program and Ongoing Training</u>                      Prior to the initiation of any on-site grading, all construction/contractor personnel working on site must complete training through a Worker Environmental Awareness Program (WEAP). New construction workers engaged in construction activities (e.g., grading, utility installation, etc.) shall complete WEAP training within the first week of deployment on the site. Additionally, operational staff shall complete WEAP training prior to deployment on the site.</p> <p><u>Biological Monitoring and Compliance Documentation</u></p> <ul style="list-style-type: none"> <li>• The Project biologist shall perform the biological monitoring and compliance documentation for the Project during construction, including the following:</li> <li>• Prior to the initiation of any on-site grading, the Project biologist will document that required pre-construction surveys and/or relocation efforts have been implemented.</li> <li>• The Project biologist will periodically monitor activities during initial grading.</li> </ul>	<p>LTS</p>

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<p><b>Impacts to Special Status Species (Burrowing Owl)</b></p> <p><b>Impact 4.12.1</b> The Project Area contains suitable habitat for burrowing owl. Several owls were discovered during field surveys of the Project site. Therefore, potential for impacts to special status species is considered <b>potentially significant</b> under both the Full Build-out and Phased CUP Scenarios.</p>	<p>PS</p>	<ul style="list-style-type: none"> <li>• The Project biologist will note any evidence of trash and, if present, communicate the presence and requirement to remove the trash to the construction manager.</li> <li>• The Project Biologist shall have the following minimum qualifications: (1) Have a bachelor’s degree in biological sciences, zoology, botany, ecology or a closely related field; (2) Have at least 2 years of experience in biological compliance for construction projects; and (3) Have at least 1 year of field experience with biological resources found in the geographic region of the Project.</li> </ul> <p><b>MM 4.12.1c Burrowing Owl Surveys and Avoidance/Relocation.</b></p> <ul style="list-style-type: none"> <li>• No more than 14 days prior to ground-disturbing activities (vegetation clearance, grading), a qualified wildlife biologist (i.e., a wildlife biologist with previous burrowing owl survey experience) shall conduct pre-construction take avoidance surveys on and within 656 feet of the construction zone (where safe and legally accessible) to identify occupied breeding or wintering burrowing owl burrows. The two-pass take avoidance burrowing owl surveys shall be conducted in accordance with the Staff Report on</li> </ul>	<p>LTS</p>

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<p><b>Impacts to Special Status Species (Burrowing Owl)</b></p> <p><b>Impact 4.12.1</b> The Project Area contains suitable habitat for burrowing owl. Several owls were discovered during field surveys of the Project site. Therefore, potential for impacts to special status species is considered <b>potentially significant</b> under both the Full Build-out and Phased CUP Scenarios.</p>	<p>PS</p>	<p>burrow is confirmed empty by site surveillance and/or scoping, a qualified biologist shall implement a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 Staff Report. Passive relocation consists of excluding burrowing owls from occupied burrows by closing or collapsing the burrows and providing suitable artificial burrows nearby for the excluded burrowing owls.</p> <ul style="list-style-type: none"> <li>• Where required buffering will not be feasible, passive relocation is an option in consultation with CDFW, but it is preferred to install appropriate artificial burrows (in accordance with the negotiated Plan) and then let the owls decide whether they would like to abandon the existing burrow. Only burrows that are in danger by construction should be collapsed if at all possible.</li> <li>• A Burrowing Owl Relocation Plan will be prepared and approved by CDFW prior to commencement of burrowing owl exclusion activities if this method of mitigation is required. The plan will detail the procedures of the passive relocation effort, the location of constructed replacement</li> </ul>	<p>LTS</p>

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<p><b>Impacts to Special Status Species (California Black Rail and Yuma Ridgeway's Rail)</b>  <b>Impact 4.12.2</b> Suitable habitat for California Black Rail and Yuma Ridgeway's Rail is present within irrigation ditches located within the boundaries of the Project site. Therefore, potential for impacts to special status species is considered <b>potentially significant</b> during Project construction under both the Full Buildout and Phased CUP Scenarios.</p>	<p>PS</p>	<p>Implement mitigation measure MM 4.12.1a, MM 4.12.1b and MM 4.12.1d.</p>	<p>LTS</p>

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<p><b>Impacts on Riparian Habitat, Wetland Community or other Sensitive Natural Community (Arrow Weed Thicket and Cattail Marsh Alliance)</b></p> <p><b>Impact 4.12.3</b> The Project site contains Arrow Weed Thickets and Cattail Marshes Alliance. Arrow Weed Thicket is a sensitive biological resource under CEQA and Cattail Marshes Alliance is a wetland community, which is typically afforded protection under CEQA and the Clean Water Act. Implementation of the proposed Project would require permanent removal of both vegetation communities within the boundaries of CUP#17-0033. This is considered a <b>potentially significant impact</b> during Project construction under both the Full Buildout and Phased CUP Scenarios.</p>		<p><b>MM 4.12.3 CUP#17-0033 - Federal and State Agency Permits</b></p> <p>To comply with the state and federal regulations for impacts to jurisdictional resources regulated by the United States and State of California, the following permits and agreement shall be obtained, or evidence shall be provided from the respective resource agency satisfactory to the County that such an agreement or permit is not required if development activities are proposed within jurisdictional waters:</p> <ul style="list-style-type: none"> <li>• A Clean Water Act Section 404 permit issued by the USACE for all Project-related disturbances of jurisdictional non-wetland waters and/or wetlands.</li> <li>• A Clean Water Act Section 401 permit issued by the RWQCB for all Project-related disturbances of jurisdictional non-wetland waters and/or wetlands.</li> </ul> <p>A Section 1602 Streambed Alteration Agreement issued by the CDFW for all Project-related disturbances of any streambed and associated riparian habitat.</p>	

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<p><b>Impacts on Wetlands/Jurisdictional Resources</b></p> <p><b>Impact 4.12.4</b> Implementation of the proposed Project would result in the loss of both wetland waters under the jurisdiction of the USACE as well as riparian habitat during construction within the boundaries of CUP#17-0033. This is considered a <b>potentially significant impact</b> under both the Full Buildout and Phased CUP Scenarios.</p>	PS	Implement mitigation measure MM 4.12.3, CUP#17-0033 - Federal and State Agency Permits.	LTS
<p><b>Impacts to Wildlife Corridors/Habitat Linkage</b></p> <p><b>Impact 4.12.5</b> The Project site is primarily surrounded by, and includes, extensive historical and present day agricultural practices. The Project site is also bordered on the east and south by operating solar facilities. Therefore, impacts to wildlife corridors or habitat linkage are considered <b>less than significant</b> under both the Full Buildout and Phased CUP Scenarios.</p>	LTS	None required.	LTS

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<p><b>Cumulative Impacts to Biological Resources</b></p> <p><b>Impact 4.12.6</b> Implementation of the proposed Project in combination with other proposed, approved and reasonably foreseeable projects in the region could have cumulative impacts on special status species, sensitive vegetation communities, and jurisdictional waters. However, impacts to biological resources are addressed and mitigated on a project-by-project basis. Therefore, cumulative impacts to biological resources are considered <b>less than cumulatively considerable</b> under both the Full Buildout and Phased CUP Scenarios.</p>	LCC	Implement mitigation measures MM 4.12.1a, MM 4.12.1b, MM 4.12.1c, MM 4.12.1d, MM 4.12.1e and MM 4.12.2	LCC

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<b>PUBLIC SERVICES &amp; UTILITIES</b>			
<b>Impacts to ICFD Services</b>			
<p><b>Impact 4.13.1</b> The Proposed Project would develop a solar energy generation and storage facility on agricultural land in Imperial County. The location of the Project and the potential for development of individual CUP Areas over time could result in increased demand on the ICFD services. However, the Project would not cause a need to expand ICFD's public facilities. Therefore, impacts to ICFD services are <b>less than significant</b> for both the Full Build-out Scenario and the Phased CUP Scenario. Additionally, the proposed Project has been designed to incorporate fire safety features and would contribute to the agency to offset any costs associated with the Project.</p>	LTS	None required.	LTS
<b>Impacts to ICFD Accessibility</b>			
<p><b>Impact 4.13.2</b> The proposed Project will be designed to comply with ICFD access requirements. As such, impacts to ICFD accessibility are considered <b>less than significant</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Cumulative Impacts to ICFD Fire Protection and Emergency Response</b>  <b>Impact 4.13.3</b> Development of the proposed Project, in combination with proposed, approved and reasonably foreseeable projects in the ICFD service area, would increase demand for fire protection and emergency medical response. However, each individual project would be required to incorporate fire safety features, adequate access, and worker safety protocols in compliance with all applicable fire and occupational safety standards and codes. However, implementation of these projects would not cause ICFD to expand its public facilities. Therefore, environmental impacts related to fire protection and emergency response are considered less <b>than cumulatively considerable</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LCC	None required.	LCC

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<p><b>Impacts to ICSO Services</b>  <b>Impact 4.13.4</b> Implementation of the Project could negatively affect the ICSO’s response times and ability to carry out patrol duties. However, implementation of the proposed Project would result in the need to expand ICSO’s public facilities. Therefore, potential environmental impacts to law enforcement services are considered <b>less than significant</b> for both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS
<p><b>Cumulative Impacts to ICSO Services</b>  <b>Impact 4.13.5</b> Development of the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects in Imperial County would result in an increased cumulative demand for law enforcement. However, cumulative projects would not cause the ICSO to expand its public facilities. Therefore, impacts to law enforcement services are <b>less than cumulatively considerable</b> under both the Full Build-out Scenario and as proposed under the Phased CUP Scenario.</p>	LCC	None required.	LCC

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<p><b>Construction of New Water Facilities</b>  <b>Impact 4.13.6</b> The Project may install on-site water treatment facilities within each CUP that has an O&amp;M Building Complex. The facilities would be constructed within the footprint of the CUP and would not disturb off-site lands. Therefore, impacts associated with provision of water treatment facilities are considered <b>less than significant</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS
<p><b>Water Supply Sufficiency</b>  <b>Impact 4.13.7</b> The Project proposes to obtain water from the IID canal network for construction, operation and maintenance, and decommissioning/reclamation activities. Project demands for water would be lower than current agricultural water supply requirements. The IID Canal system and water entitlements are adequate to meet the proposed water demands and the Project would not cause a need to expand water entitlements. Therefore, impacts to water supply are considered <b>less than significant</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Cumulative Water Supply Impacts</b>  <b>Impact 4.13.8</b> Development of the proposed Project would require use of surface water from the IID canal system. Requests for water supply are approved by the IID on a project-by-project basis. The proposed Project would require less water than current agricultural uses on the solar field site parcels. Therefore, the Project’s contribution to cumulative water supply impacts is considered <b>less than cumulatively considerable</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	<p>LTS</p>	<p>None required.</p>	<p>LTS</p>

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<p><b>Construction of New Wastewater Treatment and Wastewater Treatment Infrastructure</b>  <b>Impact 4.13.9</b> The Project area is not currently served by a wastewater system. On-site septic system(s) and leach field(s) are proposed for each CUP where an O&amp;M Building will be constructed. Near-surface soils are considered good in supporting an on-site septic systems and leach fields for wastewater disposal. Therefore, impacts to wastewater treatment and wastewater conveyance infrastructure are considered <b>less than significant</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LCC	None required.	LCC
<p><b>Cumulative Wastewater Impacts</b>  <b>Impact 4.13.10</b> Development of the proposed Project would generate demand for on-site wastewater treatment. Septic systems and leach fields are proposed at individual CUP Areas where an O&amp;M building will be constructed to provide wastewater service. Therefore, cumulative wastewater impacts are considered <b>less than cumulatively considerable</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Generate Solid Waste in Excess of Standards or in Excess of Capacity of Local Infrastructure/Comply with Statutes and Regulations Related to Solid Waste</b></p> <p><b>Impact 4.13.11</b> Solid waste would be generated during construction, operation and maintenance, and decommissioning of the proposed Project. Solid waste materials would be disposed of using a locally-licensed waste hauling service and disposed of at a local landfill with sufficient capacity to accept this waste. Thus, a <b>less than significant impact</b> is identified for this issue under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LCC	None required.	LCC

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<p><b>Cumulative Impacts to Solid Waste in Excess of Standards or in Excess of Capacity of Local Infrastructure/Comply with Statutes and Regulations Related to Solid Waste</b></p> <p><b>Impact 4.13.12</b> Implementation of the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects in the County of Imperial, would result in cumulative demand for solid waste service and landfill capacity. However, the proposed Project would not generate a substantial quantity of waste, and disposal service is available to serve the Project. Therefore, cumulative solid waste impacts are considered <b>less than cumulatively considerable impact</b> under both the Full Build-out Scenario and Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Relocation or Construction of New or Expanded Electric Power Facilities</b>  <b>Impact 4.13.13</b> The proposed Project would increase the demand for electrical services from IID to operate the O&amp;M building(s) and keeping inverters warm during the evening hours. Within its on-site disturbance area, the Project includes a substation feedback and transmission interconnection coordinated with IID through an Affected Systems Agreement and Back-feed and Station Power Service Agreement. No permanent expansion of IID electrical infrastructure is necessary for the proposed Project. Thus, the proposed Project’s impacts to electricity and electrical infrastructure are <b>less than significant</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LCC	None required.	LCC

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<p><b>Cumulative Impacts to Electric Service</b>  <b>Impact 4.13.14</b> Implementation of the proposed Project, in combination with proposed, approved and reasonably foreseeable projects in the County of Imperial, would result in a minimal increase in the current use of IID electricity and a substantial increase in solar energy generation. The Project does not require the relocation or construction of new or expanded IID facilities. Therefore, cumulative impacts to electrical service are considered <b>less than cumulatively considerable</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS

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<p><b>Impacts to Telecommunications Facilities</b>  <b>Impact 4.13.15</b> The proposed Project and surrounding area is not currently served by telecommunications facilities. The proposed Project would increase the demand for telephone and internet services. AT&amp;T is anticipated to provide service to the Project as needed in accordance with all applicable fees. Therefore, impacts to telecommunication facilities are considered <b>less than significant</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LCC	None required.	LCC

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<p><b>Cumulative Impacts to Telecommunications Facilities</b>  <b>Impact 4.13.16</b> Implementation of the Proposed Project, in combination with other existing, proposed, approved and reasonably foreseeable projects in the region, would result in cumulative demands to telephone and internet service. Telecommunication service providers procure service to individual development projects on an as-needed basis. Therefore, cumulative impacts to telecommunication facilities are considered <b>less than cumulatively considerable</b> under both the Full Build-out Scenario and the Phased CUP Scenario.</p>	LTS	None required.	LTS

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SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<b>ENERGY</b>			
<p><b>Use of Energy Resources During Project Construction and Operation</b>  <b>Impact 4.14.1</b> Energy requirements for construction, operation, and decommissioning of the Project under the Full Build-out Scenario and all CUP Areas (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001) as proposed under the Phased CUP Scenario would not result in inefficient energy use by amount or fuel type. Therefore, the Project would therefore have a <b>less than significant impact</b> on energy use by amount or fuel type.</p>	LTS	None required.	LTS
<p><b>Consumption of Energy - Effects on Local and Regional Energy Supplies</b>  <b>Impact 4.14.2</b> The proposed Project, whether implemented under the Full Build-out Scenario or the Phased CUP Scenario, would not use substantial amounts of local and regional energy supplies or create requirements for additional capacity. Therefore, the Project's impact on local and regional energy supplies would be <b>less than significant</b>.</p>	LTS	None required.	LTS

LTS = Less than Significant  
LCC = Less than Cumulatively Considerable

PS = Potentially Significant  
CC = Cumulatively Considerable

SU = Significant and Unavoidable

NI = No Impact

**EXECUTIVE SUMMARY**

**TABLE ES-1  
SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<p><b>Consumption of Energy - Effects on Peak and Base Period Demands</b>  <b>Impact 4.14.3</b> The proposed Project would not impose additional demands on peak and base period demands for electricity and other forms of energy. To the contrary, under both the Full Buildout Scenario and the Phased CUP Scenario, the Project would contribute electricity during peak and base period demands. Therefore, the Project’s impact on peak and base period demands for electricity and other forms of energy would be <b>less than significant</b>.</p>	LTS	None required.	LTS
<p><b>Conflict with or Obstruct State or Local Plan - Compliance with Existing Energy Standards</b>  <b>Impact 4.14.4</b> Implementation of the Full Build-out Scenario or the Phased CUP Scenario would comply with existing energy standards. The Project would result in production of renewable solar energy that would help the State of California meet its goals for use and production of alternative renewable energy sources. Therefore, the Project’s impact on compliance with existing energy standards would be <b>less than significant</b>.</p>	LTS	None required.	LTS

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**TABLE ES-1  
SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<p><b>Energy Consumption - Effects on Energy Sources</b>  <b>Impact 4.14.5</b> Project implementation under the Full Build-out Scenario or the Phased CUP Scenario would not have an adverse effect on energy resources. The Project would create a new source of renewable energy resources. Therefore, the Project’s effect on energy resources would be <b>less than significant</b>.</p>	LTS	None required.	LTS
<p><b>Energy Consumption - Transportation Energy Use</b>  <b>Impact 4.14.6</b> Implementation of the Full Build-out Scenario or Phased CUP Scenario will generate minimal traffic during the operational phase. The Applicant will implement strategies to minimize transportation energy use and ensure overall use of efficient transportation alternatives, as appropriate. Therefore, the Project’s impact on transportation energy would be <b>less than significant</b>.</p>	LTS	None required.	LTS

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# EXECUTIVE SUMMARY

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