CHAPTER 6.0
OTHER CEQA CONSIDERATIONS

This section discusses the additional topics statutorily required by CEQA Guidelines Section 15126.2. The topics include whether the proposed Project would: cause significant irreversible environmental changes; result in growth inducing impacts; or create unavoidable significant environmental impacts. A discussion of Mandatory Findings of Significance is also included. This section begins with a discussion of socioeconomic impacts associated with implementation of the proposed Project as addressed in CEQA Guidelines Section 15131.

6.1 SOCIOECONOMIC IMPACTS

Development Management Group, Inc. (DMG 2019), prepared a report that examined the fiscal and economic impacts of the proposed Drew Solar Project. The report examined impacts of converting the solar field site parcels from an agricultural use to an industrial solar project. Three analyses were undertaken to determine how the Project would affect the region: 1) an Economic Impact Analysis; 2) an Employment/Jobs Impact Analysis; and 3) a Fiscal Impact Analysis. The findings of each analysis is briefly summarized below with the full report provided on the attached CD of Technical Appendices as **Appendix M** of this EIR.

6.1.1 ECONOMIC IMPACT ANALYSIS

The Economic Impact Analysis calculated the predicted impact of the Drew Solar Project to the Imperial County Region including all known direct (and indirect) expenditures resulting from construction and operation for the life of the Project. The economic impact of the Drew Solar Project to the Imperial County region was calculated to be approximately $109.14 million over the Project's 30-year life (inclusive of both project construction and operations). By comparison, the estimated economic impact of the current use of the solar field site parcels (field/grass crops and produce) over the same 30-year period was calculated to be $80.34 million. Thus, the proposed Project would result in $28.8 million more for the Imperial County region compared to the existing agricultural uses (DMG 2019).

6.1.2 EMPLOYMENT OR JOBS IMPACT ANALYSIS

The Employment/Jobs Impact Analysis calculates the total amount of construction and operational jobs created by the Project and compares these jobs to those already in existence on the Project site. The solar field site parcels have historically been used for hay/grass type crops. The proposed use of the solar field site parcels for solar energy production will generate about 4 or 5 more total (direct and indirect) permanent jobs compared to the current agricultural use. This is in addition to the 190 one-year full-time equivalent construction jobs that are projected during the first year (the construction period) (DMG 2019).

6.1.3 FISCAL IMPACT ANALYSIS

The Fiscal Impact Analysis calculates the amount of revenue a governmental agency is expected to receive and calculates the projected costs the agency will incur to provide appropriate services to both the project and the additional population/employment generated by the project. A comparative model is produced to determine if the project is of economic benefit or cost to the government agency (DMG 2019).

Development Management Group, Inc. calculated that the Drew Solar Project will generate approximately $3.36 million in net local (county) tax revenue over the 30-year life of the project. This is derived from an estimated $1.31 million in sales tax revenue and $2.05 in net property tax revenue (DMG 2019).

The estimated cost to the County to provide appropriate services and related employment to the Project is approximately $2.56 million thus generating a projected surplus to the County of Imperial of

approximately $802,000 over the 30-year life of the project (subject to acceptance of the recommendations provided within the report). Note that this amount is based solely on the tax laws currently in place and does not include any amounts that may be received by the County under a Public Benefit Agreement or similar arrangement (DMG 2019).

6.1.4 STATEMENT REGARDING URBAN DECAY AS A RESULT OF THE PROPOSED PROJECT

The CEQA Guidelines discuss and define the parameters for which the consideration of socioeconomic impacts should be included in an environmental evaluation. CEQA Guidelines Section 15131 states that "economic or social information may be included in an EIR or may be presented in whatever form the agency desires." Section 15131(a) of the Guidelines states that "economic or social effects of a project shall not be treated as significant effects on the environment." An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus on the analysis shall be on the physical changes." CEQA Guidelines Section 15131(b) also state that "economic or social effects of a project may be used to determine the significance of physical changes caused by the project (DMG 2019, p. 25)."

For example, the physical division of a community caused by rail lines that bisect a community. Impacts upon the community caused by the rail line could be measured (DMG 2019, p. 25).

In recent years, California Courts have generally defined the term "urban decay" to mean the physical changes that a projects potential socioeconomic impacts could bring to other parts in a community. The case that brought the concept of urban decay to light is *Bakersfield Citizens for Local Control v. City of Bakersfield (204) 124 Cal.App.4th 1184.* In this case, the court set aside two EIRs for proposed Wal-Mart projects that would have been located less than five miles from each other. The case appears to be the first time the courts used the words "urban decay" rather than "blight". In essence, the courts ruled that the two Wal-Mart projects could result in a chain reaction of store closures and vacancies as a result of new retail growth that may or may not be supported by other changes in market conditions (i.e., the downtowns would become ghost towns because the Wal-Mart(s) moved the retail business away from the urban center) (DMG 2019, p. 25).

Based on this case and work that DMG (and others have completed relative to "urban decay" analysis), it appears that the core question to ask (and answer) is: Would the construction of the Drew Project at the proposed site result in substantial and adverse physical changes to surrounding areas (i.e., will the project cause such a shift in the marketplace that other portions of the community become visually blighted "urban decay" (DMG 2019, p. 26)?

Industrial scale renewable energy projects are built to generate power at a specific location to export to another location for use by various consumers (residents and businesses). Each power generation facility is a stand-alone project that is built as a result of a contractual obligation (power purchase agreement) in which a power provider contracts with a power producer (DMG 2019, p. 26).

It can be argued that most (if not all) of the renewable power generation constructed in the Imperial Valley (Imperial County) over the last five years has been a direct result of action by the State of California Legislature commonly known as Renewable Portfolio Standard (RPS). The RPS has essentially created a new market or industry for renewable energy in the State of California (DMG 2019, p. 26).

Overall, it would appear as though power production is increasing faster than the general population which would create a situation whereby urban decay could be occurring elsewhere as a result of these

new projects. This urban decay would be as a result of the new power projects coming on-line replacing other power generation sources (DMG 2019, p. 26).

DMG concludes that traditional power generation facilities (namely coal and nuclear) are being replaced with a larger percentage of renewable power generation sources (solar, wind and geothermal) as a result of legislative action in California. This means that even if another non-renewable energy power generation facility in the Imperial Valley were being "put out of business" and the solar field site parcels were to become "visually blighted", urban decay would not occur because the legislature determined the greater good for California is reached by a greater percentage of energy coming from renewable sources (DMG 2019, p. 26). For example, the recent decision to close the San Onofre Nuclear Power Plant in North County San Diego means that a greater amount of overall power generation must be developed to replace the power that was being generated by that specific nuclear source.

DMG further determined that the development of the Drew Solar Project would not cause physical blight (urban decay) because the facility is a stand-alone and will have its own contracts based on power purchase demand. In other words, another industrial scale energy facility that will not cease to operate as a result of the proposed Project (DMG 2019, p. 27).

6.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. In addition, Section 15093(a) of the CEQA Guidelines requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits (including region-wide or statewide environmental benefits of a proposed Project) against its unavoidable environmental risks when determining whether to approve the project. The County of Imperial can approve a project with unavoidable adverse impacts if it adopts a "Statement of Overriding Considerations" setting forth the specific reasons for its decision. Based on the analysis provided in Sections 4.1 through 4.14, the proposed Drew Solar Project would not result in any significant and unavoidable adverse impacts.

6.3 LONG-TERM GROWTH-INDUCING IMPACTS

6.3.1 INTRODUCTION

CEQA Guidelines Section 15126.2[d] requires that an EIR evaluate the growth-inducing impacts of a proposed action. A "growth-inducing impact" is defined by the CEQA Guidelines as:

> *"…the ways in which the proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth… It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."*

Growth inducement potential can result from a project either directly or indirectly. Direct growth inducement results from a project which can accommodate population growth such as residential subdivision or apartment complex. Indirect growth inducement potential can result from a large number of new permanent employment opportunities associated with commercial or industrial development. Likewise, indirect growth can occur if a project removes an obstacle to additional growth and development, such as removing a constraint on a required public service. Growth inducing projects provide resources (such as water) or infrastructure capacity (such as wastewater conveyance and treatment) that has previously been missing or inadequate to allow growth.

Environmental effects of growth inducement are considered indirect impacts. These indirect impacts or secondary effects of growth have the potential to result in significant, adverse environmental impacts. Potential secondary effects of growth include: increased traffic and noise; increased demand on other community and public services and infrastructure; adverse environmental impacts such as degradation of air and water quality; degradation or loss of plant and animal habitat; and conversion of agricultural and open space land to developed uses.

The Imperial County General Plan provides for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by public utilities and services. A project that would induce unplanned growth or growth that conflicts with the local land use plans could indirectly cause additional adverse environmental and public services and utilities impacts. To determine if a growth-inducing project will result in adverse secondary effects, it is important to assess the degree to which the growth occurring as part of a project would or would not be consistent with applicable land use plans.

6.3.2 COMPONENTS OF GROWTH

The timing, location and extent of development and population growth in a community or region are based on multiple factors. Key variables include regional economic trends, market demand for residential and nonresidential uses, land availability and cost, the availability and quality of transportation facilities and public services, proximity to employment centers, the supply and cost of housing, and regulatory policies or conditions. The general plan is the primary mechanism used to regulate development and growth in California as it is used to define location, type, and intensity of growth.

6.3.3 PROJECT-SPECIFIC GROWTH-INDUCING IMPACTS

A. GROWTH INDUCEMENT POTENTIAL

As described in Chapter 2.0, Project Description, the Drew Solar Project proposes to

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. The Applicant, Drew Solar, LLC, submitted the following applications to ICPDS Department:

- Amendment (GPA#17-0006) to Imperial County's General Plan for amendment of the Renewable Energy & Transmission Element to create an Island Overlay for the Project Site, and amendment of the requirements for said Island Overlay;
- Zone Change (ZC#17-0007) to add the RE Overlay Zone to the Project Site;
- 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 on all proposed project parcels, 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.

As described in Section 4.2, Land Use, the proposed solar field site parcels are located in unincorporated Imperial County and are subject to the Imperial County General Plan and Land Use Ordinance. The General Plan land use designation “Agriculture” applies to all five of the solar field site parcels. The solar field site parcels are also zoned as “Agriculture” (General Agriculture [A-2], General Agriculture Rural [A-2-R] and Heavy Agriculture [A-3]) by the Imperial County Land Use Ordinance. Per Title 9, Division 5, Sections 90508.02 and 90509.02 of the Land Use Ordinance, solar energy electrical generators, electrical power generating plants, substations, and facilities for the transmission of electrical energy are allowed as conditional uses in Agricultural zones. A maximum 120-foot height limit applies in A-2, A-2-R and A-3 zones.

The proposed Project will require approval of a General Plan Amendment (GPA#17-0006) for amendment of the Renewable Energy & Transmission Element to expand the Alternative Energy Overlay to include Project site. The Project shares a common boundary to an existing transmission source (i.e. the existing Drew Switchyard) and is adjacent to the existing Centinela Solar Farm. The Project also requires a Zone Change (ZC#17-0007) to add the RE Overlay Zone to the Project site. In keeping with zoning requirements, the Project requires six CUP applications (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001) for the proposed Drew Solar Project. Due to the height limit in the Agricultural Zone, the Project requires a Variance (V#17-0003) for the entire proposed Project Area, including the existing Drew Switchyard, for power pole structures that are over 120 feet in height. With approval of the Variance, the proposed structures could be up to 180 feet in height. The Project is also processing a 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. In doing so the net farmable acreage of the Project site will remain the same (762.8 net acres), and the gross acreage will increase from 844.2 gross acres to approximately 855 gross acres once the Parcel Map is recorded. The Project is also requesting Lot Tie Agreement(s) 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. Lastly, the Project is processing a Development Agreement with Imperial County 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. Thereafter, the CUPs are 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.

Approval of the GPA, Zone Change, Variance, CUPs, Parcel Map and Lot Tie Agreements requests as well as the Development Agreement by the Imperial County Board of Supervisors would allow the Project to attain consistency with the General Plan and Land Use Ordinance allowable land uses. By its nature as a solar energy generating facility, the Project would not directly induce growth because it does not create new housing and it does not create a substantial number of new permanent residents or employees. Upon completion, the Full Build-out Scenario will only require approximately 6 full-time employees to maintain and operate the facility. Thus, the Project would not induce substantial population growth in the area.

The Project's creation of approximately 250 temporary construction jobs will not induce growth because the majority of workers will come from the adequate local supply of labor available to fill the Project-generated construction jobs. The County of Imperial had an unemployment rate of 19.3% in July 2018 (EDD 2018). The construction industry represents a significant portion of the local unemployed population. As such, construction of the Project, whether constructed as the Full Build-out Scenario or the Phased CUP Scenario, would not have a growth inducing effect related to workers moving into the area and increasing the demand for housing and services.

Lastly, the Project does not induce growth because the Project would provide renewable energy to meet existing and future planned electricity demands of the region and provide a new source of renewable energy to assist the State of California in achieving the RPS. Moreover, energy generated by the Project will integrate directly into the grid to serve regional energy needs and will not be available to directly serve potential population growth in surrounding areas.

6.4 GROWTH EFFECTS OF THE PROJECT

6.4.1 EXISTING AND PROPOSED LAND USES

Criterion "e" in Section 4.9, Agricultural Resources section of this Draft EIR inquires whether the project would "Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use." The Project would conditionally allow a solar energy generation facility on lands designated for agriculture on the Imperial County General Plan Land Use Map. Although implementation of the proposed Project would result in the temporary conversion of agricultural land, it is not anticipated to result in growth-related land use impacts as it does not propose residential development or other use that would attract a large population base. As noted above, local construction workers are expected to supply Project construction labor. During the operation, the Project will require between two to six employees. This small increase in employment is not sufficient to have a growth inducing impact. Further, at the end of the useful life of the Drew Solar Project, each of the six CUPs (17-0031 thru 17-0035 and 18-0001) would be reclaimed for use as active agricultural land, similar to the existing conditions at the solar field site parcels.

A. INFRASTRUCTURE

The Full Build-out Scenario and all CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001) proposed as part of the Phased CUP Scenario would include electric line and vehicular crossings of Imperial Irrigation District (IID) facilities, Caltrans facilities (SR 98) and County facilities as shown on the Project Phasing Map (refer to Figures 2.0-3 in Chapter 2.0-Project Description). It is anticipated that electric lines would require either overhead or underground crossings. If the crossings are constructed underground, either trenching or horizontal directional drilling may be required to place the electric or water lines under existing IID and County facilities.

The Project's two generation interconnection (Gen-Tie) transmission lines ("Gen-Ties") which are proposed to extend from the south end of the Project site approximately 400 feet south across Drew Road and State Route (SR) 98 connecting into the existing Drew Switchyard located on APN 052-190-039-000. One gen-tie is for solar generation and one is for energy storage. Both gen-tie lines may be underground or one may be underground and one above-ground. If the Project is able to collocate with other facilities in the area, the Project may construct a new pole to the east of the existing pole that is on the northerly side of the existing Drew Switchyard in order to reduce Gen-tie crossings. The Project is not expected to have an impact on infrastructure availability to adjacent parcels. The Project will be interconnected to the regional transmission system from the onsite substation(s)/switchyard(s) via the two Gen-Tie line facilities.

As a general rule, extension of utilities or increased capacity of infrastructure has the potential to result in growth inducement. Any such improvements not only accommodate a project for which they are built, but also for any other projects in the surrounding area that would be proposed or become feasible as a result of the availability of new infrastructure. However, the proposed Project is located in a rural and remote area of southwestern Imperial County with limited infrastructure. The Project would generate electricity to serve existing and projected growth that is ultimately transferred to the existing electrical grid. The Project does not extend infrastructure into an undeveloped area in a way that attracts new residential or urban growth to the Project site or surrounding area. The extension of IID electrical lines would be limited to connecting to the Full Build-out Scenario and all CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001) proposed as part of the Phased CUP Scenario and is not considered growth inducing. Thus, implementation of the proposed Project would not contribute to growth in this area of the County.

B. HOUSING

The most recent Regional Housing Needs Assessment has determined that the unincorporated area of the County will need 13,427 housing units for the period 2006–2014 (Imperial County 2013). No housing is proposed as part of the Drew Solar Project nor is the Project anticipated to induce growth in other regions, as discussed above.

C. ROADWAYS AND OTHER SYSTEMS

Multiple County maintained roads provide access throughout the Project site and to each CUP (refer to Figures 2.0-3 in Chapter 2.0-Project Description). Access to the each CUP would primarily be via the following existing paved roads: Drew Road, Kubler Road, Pulliam Road, and SR 98. The Project does not proposed to use any unpaved County roads to access the site. Implementation of the proposed Project, whether implemented as the Full Build-out Scenario or as six CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001) proposed as part of the Phased CUP Scenario, would not result in new or improved roadways that would induce growth in other regions. Additionally, the Project would not involve the

development of any new water systems, or sewer that could serve areas beyond the Project site. For these reasons, the Project would not further facilitate additional development into other areas.

6.4.2 SECONDARY EFFECTS OF GROWTH

Secondary effects of the proposed Drew Solar Project would include the creation of increased traffic, noise, and air emissions during construction. However, during operation and maintenance of the Project, traffic, noise and air emissions would not increase substantially over existing levels currently experienced in the Project Area. Because the Project will generate very few permanent jobs (two to six full-time workers), no long-term substantial increase in traffic, noise or air emissions would occur as a result of the Full Build-out Scenario and all CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001) proposed as part of the Phased CUP Scenario. The Drew Solar Project would also not result in the introduction of people and activities to an area that was formerly used for agriculture. The use of agricultural land for renewable solar energy generation facilities is a temporary condition. Once operational, the Project would require limited trips to each CUP for operation and maintenance activities during the operational lifespan of each CUP which is expected to be operate for 30 to 40 years. At the end of the Project's operational lifespan, each of the six CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001) would be decommissioned and reclaimed for agricultural use, similar to the existing condition.

6.5 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

6.5.1 INTRODUCTION

CEQA Guidelines Section 15126.2(c) describes irreversible environmental changes as follows:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

Build-out of the proposed solar field site parcels would result in the temporary conversion of parcels previously used for agricultural purposes to solar energy production, energy storage and associated supporting infrastructure such as transmission facilities.

Development of the Project site would irretrievably commit building materials and energy to the construction and maintenance of the Project, including the two Gen-Tie lines and associated buildings and infrastructure. Renewable, nonrenewable, and limited resources that would likely be consumed as part of the development of the proposed Project would include, but are not limited to, oil, gasoline, lumber, sand and gravel, asphalt, water, steel, and similar materials. Energy would also be irreversibly consumed, both as part of the construction and during operation of the proposed Project. However, the Project would provide a clean, renewable energy resource while implementing many Federal, State, and local goals and policies directed at moving away from reliance upon fossil fuels, and development of reliable sources of renewable energy. Moreover, the Applicant is required to restore the solar field site parcels to pre-Project conditions at the end of each CUP which could operate for up to 40 years from CUP approval date.

6.6 MANDATORY FINDINGS OF SIGNIFICANCE

CEQA Guidelines Section 15065 identifies four mandatory findings of significance that must be considered as part of the environmental review process of a project. These findings are identified below with an analysis of the Project's relationship to these findings.

1) The project has the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory.

The Project's impacts on biological resources and cultural resources are evaluated in Section 4.12, Biological Resources, and Section 4.7, Cultural Resources & Tribal Cultural Resources, of this Draft EIR, respectively. Both sections identify mitigation measures to reduce impacts to these resources to a level of insignificance. Upon implementation these of these measures, impacts to biological and cultural resources will be **less than significant**.

2) The project has potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.

The Project would result in short-term construction-related impacts with regard to traffic, unanticipated archaeological resources, previously unknown subsurface human remains, and paleontological resources; special status species (Burrowing Owl, California Black Rail and Yuma's Ridgeway's Rail) riparian habitat/sensitive natural community, wetlands/jurisdictional waters. During operation, long-term impacts could occur with regard to: exposure to Alquist-Priolo Earthquake Fault Rupture; strong seismic ground shaking; liquefaction; and soil corrosivity; and temporary conversion of agricultural land. However, the Drew Solar Project would expand the renewable energy sector in Imperial County and reduce the emission of GHGs from the generation of electricity. In doing so, the Project would assist the State of California in achieving the RPS. Development of the Full Build-out Scenario and all CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001) proposed as part of the Phased CUP Scenario may result in temporary disadvantages to long-term preservation goals for agricultural resources, and earthquake rupture and seismic ground shaking. However, at the end of the Project's useful life, all CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001) would be reclaimed for agricultural uses similar to existing conditions on the solar field site parcels. Therefore, the proposed Project would result in **less than significant** impacts to long-term environmental goals.

3) The project has possible environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The Project's potential cumulative impacts are summarized in Chapter 5.0 of this Draft EIR. Sections 4.1 through 4.14 evaluate cumulative impacts related to each resource and technical discussion area and identify mitigation measures addressing each cumulatively considerable impact. Upon implementation of these measures, cumulative impacts will be less than cumulatively considerable.

4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

6.0 OTHER CEQA CONSIDERATIONS

Potential adverse impacts on humans are discussed and evaluated in Section 4.4, Air Quality, Section 4.10, Hazards and Hazardous Materials, Section 4.8, Noise, and Section 4.5, Climate Change and Greenhouse Gases. As appropriate, each section identifies mitigation measures to reduce significant impacts associated with these resource areas. In addition, the Full Build-out Scenario and all CUPs (CUP#17-0031 thru CUP#17-0035 and CUP#18-0001) proposed as part of the Phased CUP Scenario would remain subject to applicable local, state, and federal regulations intended to avoid adverse effects on humans. The proposed Project would comply with all required regulatory/legal requirements, and Project-specific conditions of approval, whether developed as the Full Build-out Scenario or the Phased CUP Scenario and would therefore result in **less than significant** impacts on humans.

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