

Executive Summary

This Environmental Impact Report (EIR) has been prepared in compliance with the California Environmental Quality Act (CEQA) Public Resources Code [PRC] Section 21000 et seq., the CEQA Guidelines (Section 15000 et seq.) as promulgated by the California Resources Agency and the Governor’s Office of Planning and Research (OPR). The purpose of this environmental document is to assess the potential environmental effects associated with Dogwood Geothermal Energy Project and to propose mitigation measures, where required, to reduce significant impacts.

Project Overview

The Dogwood Geothermal Energy Project is located on approximately 125 acres of privately-owned lands in southern Imperial County, California, approximately one mile south of the City of Heber jurisdictional limit and approximately 0.5 miles west from the City of Calexico jurisdictional limit. The project site is within portions of three parcels: Assessor Parcel Numbers (APN) 054-250-031, 059-020-001, and 054-250-017. APN 054-250-31 is within the existing Heber 2 Geothermal Energy Complex (HGEC) located at 855 Dogwood Road, Heber, CA, and APN 059-020-001 and APN 054-250-017 are immediately southeast and east, respectively, of the HGEC.

The project applicant, OrHeber 3, LLC, Heber Field Company, LLC, and the Second Imperial Geothermal Company (collectively, the “Applicants”, and all wholly owned subsidiaries of Ormat Technologies, Inc. [Ormat]) has filed three separate Conditional Use Permits (CUP) applications with the County of Imperial for the construction and operation of various facilities. The three CUP applications are described below. Collectively, these three CUP applications are herein referred to as the “project.”

1. Dogwood Geothermal Energy Project – CUP No. 23-0020

The Dogwood Geothermal Energy Project includes a geothermal plant and associated ancillary and auxiliary facilities, new substation, 7 megawatt (MW) solar facility, and medium voltage distribution cable from the proposed solar facility to the geothermal plant. These project components are summarized below.

- a. **ORMAT Energy Converter (Geothermal Energy Production Unit):** The proposed ORMAT Energy Converter (OEC) unit would be a two-turbine combined cycle binary unit, operating on a subcritical Rankine cycle, with isopentane as the motive fluid. The OEC system consists of a generator, turbines, a vaporizer, air cooled condensers, preheaters and recuperators, and an evacuation skid/vapor recovery maintenance unit (VRMU) for purging and maintenance events. The design capacity for the unit is 25 MW (net).
- b. **Isopentane Storage Tanks:** Two double-walled 20,000-gallon above-ground storage tanks would be installed for motive fluid (isopentane) storage. Numerous safety and fire prevention measures would be installed on/near the ABST, including the following:
 - Concrete foundations with blast walls separating the tank from the OEC.
 - An automated water suppression system.
 - Concrete containment areas.

- Two flame detectors, which will immediately detect any fire and immediately trigger the automatic fire suppression system.
 - A gas detector, which will immediately detect any isopentane leak and notify the control room (manned 24/7).
- c. **Cooling Tower:** A cooling tower array will perform air-cooling operations of the geothermal fluid. The cooling tower will include a series of heat-absorbing evaporators and condensers to capture and transfer heat stored in the geothermal fluid. No water is necessary.
- d. **Dogwood Substation:** The proposed Dogwood geothermal plant will require a new substation to step up the low voltage electrical energy generated at the Dogwood geothermal unit to the higher voltage required for commercial transmission. Pending Imperial Irrigation District (IID) review, no upgrades to off-site transmission facilities are necessary. If upgrades to off-site facilities are later deemed necessary through an IID transmission study, recommendations could include protection upgrades and metering replacements at existing IID substations and/or upgrades to telecommunications, distribution lines, and transmission lines. Such upgrades would use existing infrastructure, easements, right-of-way, and corridors to the extent practicable.

The new Dogwood substation will connect directly to the existing point of interconnection with the IID controlled grid. The substation will include a 13.8 kV circuit breaker to protect the electric generator, a minimum of 80 megavolt ampere 13.8 kV/115 kV transformer, and 115 kV potential and current transformers for metering and system protection. A main control building would contain instrumentation and telecommunications equipment located within the within the greater HGEC.

The substation footprint would measure up to 145 feet by 66 feet and would be surrounded by an eight-foot-tall chain link fence with vehicle and personnel access gates. The surface of the substation would be covered by gravel and the substation equipment would be placed onto concrete foundations.

- e. **Parasitic Solar Energy Facility:** A 7 MW solar facility would provide supplemental/auxiliary energy to the proposed Dogwood geothermal plant. The solar facility is classified as behind-the-meter and would provide supplemental energy directly to the Dogwood geothermal unit (OEC). This energy would not enter the transmission grid.
- f. **Medium Voltage Distribution Line:** The energy generated by the proposed Dogwood solar facility would be collected at an on-site XMD and switch on the western edge of the Heber 2 Project site, adjacent to South (S) Dogwood Road. A medium voltage distribution cable would cross S Dogwood Road and be attached via trays to the existing pipeline that runs west before turning north to cross the Beech Drain and Main Canal at the existing above-ground pipeline span. The cable would continue to follow the existing pipeline alignment and connect into the new Dogwood OEC. No new footings or foundations are required for the cable trays.

2. Heber 2 Solar Energy Project – CUP No. 23-0021

- a. **Parasitic Solar Energy Facility:** A 15 MW solar facility would provide supplemental/auxiliary energy to the existing Heber 2 geothermal plant. The solar facility is classified as behind-the-meter and would provide supplemental energy directly to the Heber 2 geothermal unit (OEC). This energy would not enter the transmission grid. The energy generated by the solar facility would be collected by an on-site XMD and switch and transmitted via a medium voltage distribution cable (as described above).



3. Heber Field Company (HFC) Geothermal Wells and Pipeline Project – CUP No. 23-0022

- a. **Geothermal Production and Injection Wells:** Production wells flow geothermal fluid to the surface, and injection wells are used to inject geothermal fluid from the energy plant back into the geothermal reservoir. Injection ensures the longevity and renewability of the geothermal resource. The Applicant proposes to develop three geothermal production wells, all within the Imperial County Geothermal Overlay Zone. The wells will be sited at three locations within APNs 059-020-001 and 054-250-017. The injection well would be installed within the HGEC, immediately next to the proposed Dogwood OEC.
- b. **Geothermal Fluid Pipeline:** Approximately 4,500 feet (0.85 miles) of geothermal fluid production pipeline are proposed for installation on APN 059-020-001. This new segment of pipeline will connect to an existing pipeline collection point that will deliver the geothermal brine to the proposed Dogwood OEC. The well on APN 054-250-017 would connect to the existing pipeline segment adjacent to the proposed well pad site. The pipeline would be used to transport geothermal fluid from the production wells to the power plants.

Purpose of an EIR

The purpose of an EIR is to analyze the potential environmental impacts associated with a project. CEQA (Section 15002) states that the purpose of CEQA is to: (1) inform the public and governmental decision makers of the potential significant environmental impacts of a project; (2) identify the ways that environmental damage can be avoided or significantly reduced; (3) prevent significant avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and (4) disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Eliminated from Further Review in Notice of Preparation

Based on the Initial Study and Notice of Preparation (IS/NOP) prepared for the proposed project (Appendix A of this EIR), Imperial County (County) has determined that the proposed project would not have the potential to cause significant impacts associated with the following topics: Forestry Resources, Mineral Resources, Population/Housing, Public Services (Schools, Parks and Other Public Facilities), Recreation, Utilities (Wastewater, Stormwater, and Solid Waste), and Wildfire. Therefore, these impacts are not addressed in this EIR; however, the rationale for eliminating these issues is discussed in Chapter 6.0, Effects Found Not Significant.

Summary of Significant Impacts and Mitigation Measures that Reduce or Avoid the Significant Impacts

Based on the analysis presented in the IS/NOP and the information provided in the comments to the IS/NOP, the following environmental topics are analyzed in this EIR:

- Aesthetics
- Agriculture Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Noise and Vibration
- Public Services
- Transportation
- Tribal Cultural Resources

Table ES-3 summarizes existing environmental impacts that were determined to be potentially significant, mitigation measures, and level of significance after mitigation associated with the project. Additional measures would be implemented to further minimize unintended impacts and events as a result of facility construction and operation and are referred to as Applicant Proposed Measures and Best Management Practices. These measures are contained in Section 2.7 of Chapter 2.0, Project Description.

Areas of Controversy and Issues to be Resolved

Areas of Concern

Section 15123(b)(2) of the CEQA Guidelines requires that an EIR identify areas of controversy known to the Lead Agency, including issues raised by other agencies and the public as well as issues to be resolved. A primary issue associated with this geothermal and solar farm project, and other geothermal and solar facility projects that are proposed in the County, is the corresponding land use compatibility and fiscal/economic impacts to the County. Through the environmental review process for this project, other areas of concern and issues to be resolved include impacts on IID drains, air quality, and health and safety hazards. Further, comments received during the scoping process include pipeline integrity and safety concerns (in particular, of existing pipelines in the area and integrity of any proposed pipelines, leaking and spillage); current and proposed pest management practices (Pest Management Plan), to mitigate negative impacts to surrounding farmland including insects, vertebrates, weeds, and plant pathogens; and, implementation and monitoring of non-structural water quality best management practices and reporting (pursuant to Operations Management Plan).

Detailed analyses of these topics are included within each corresponding section contained within this document.



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
Agricultural Resources			
Impact 3.3-1: Conversion of Important Farmlands to non-agricultural use.	Potentially Significant	<p>The following mitigation measures are applicable to the Dogwood Geothermal Energy Project (CUP #23-0020) and Heber 2 Solar Energy Project (CUP #23-0021) only:</p> <p>AG-1a. Payment of Agricultural and Other Benefit Fees. Prior to the issuance of a grading permit or building permit (whichever is issued first), one of the following options included below shall be implemented:</p> <p>A. Mitigation for Non-Prime Farmland:</p> <p>Option 1: Provide Agricultural Conservation Easement(s). The Permittee shall procure Agricultural Conservation Easements on a “1 on 1” basis on land of equal size, of equal quality farmland, outside the path of development. The conservation easement shall meet DOC regulations and shall be recorded prior to issuance of any grading or building permits; or</p> <p>Option 2: Pay Agricultural In-Lieu Mitigation Fee. The Permittee shall pay an “Agricultural In-Lieu Mitigation Fee” in the amount of 20 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 acquisition, stewardship, preservation, and enhancement of agricultural lands within Imperial County; or,</p> <p>Option 3: Public Benefit Agreement. The Permittee and County voluntarily enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that: 1) is consistent with Board Resolution 2023-#17; and 2) must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation</p>	Less than Significant

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		<p>and enhancement of agricultural lands within Imperial County and to implement the goals and objectives of the Agricultural Benefit program (as amended by the Board of Supervisors on November 7, 2023: Resolution “Amending the Public Benefit Program for use with Solar Power Plants in Imperial County”), as specified in the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy.</p> <p>B. Mitigation for Prime Farmland:</p> <p>Option 1: <i>Provide Agricultural Conservation Easements.</i> Provide Agricultural Conservation Easement(s). The permittee shall procure Agricultural Conservation Easements on a “2 on 1” basis on land of equal size, of equal quality farmland, outside the path of development. The conservation easement shall meet DOC regulations and shall be recorded prior to issuance of any grading or building permits; or</p> <p>Option 2: <i>Agricultural In-Lieu Mitigation Fee.</i> 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 acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County; or</p> <p>Option 3: <i>Public Benefit Agreement.</i> The Permittee and County voluntarily enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that 1) is consistent with Board Resolution 2023-#17; and 2) 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</p>	



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		<p>implement the goals and objectives of the Agricultural Benefit program (as amended by the Board of Supervisors on November 7, 2023: Resolution “Amending the Public Benefit Program for use with Solar Power Plants in Imperial County”), as specified in 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 the local economy for the purpose of off-setting jobs displaced by this Project; or</p> <p>Option 4: Avoid Prime Farmland. The Permittee must revise their Conditional Use Permit Application/Site Plan to avoid Prime Farmland.</p> <p>AG-1b. Site Reclamation Plan. The DOC has clarified the goal of a reclamation and decommissioning plan: the land must be restored to land which can be farmed. In addition to Mitigation Measure AG-1a for Prime Farmland and Non-Prime Farmland, the Applicant shall submit to Imperial County, a Reclamation Plan prior to issuance of a grading permit. The Reclamation Plan shall document the procedures by which the project site will be returned to its current agricultural condition. Permittee shall also provide financial assurance/bonding in the 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>	
<p>Impact 3.3-3: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.</p>	<p>Potentially Significant</p>	<p>The following mitigation measures are applicable to the Dogwood Geothermal Energy Project (CUP #23-0020) Heber 2 Solar Energy Project (CUP #23-0021):</p> <p>AG-2 Pest Management Plan. Prior to the issuance of a grading permit or building permit (whichever occurs first), a Pest Management Plan shall be developed by the project applicant and approved by the County of Imperial Agricultural Commissioner. The project applicant</p>	<p>Less than Significant</p>

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Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>shall maintain a Pest Management Plan until reclamation is complete. The plan shall provide the following:</p> <ol style="list-style-type: none"> 1. Monitoring, preventative, and management strategies for weed and pest control during construction activities at any portion of the project (e.g., transmission line); 2. Control and management of weeds and pests in areas temporarily disturbed during construction where native seed will aid in site revegetation as follows: <ul style="list-style-type: none"> • Monitor for all pests including insects, vertebrates, weeds, and pathogens. Promptly control or eradicate pests when found, or when notified by the Agricultural Commissioner’s office that a pest problem is present on the project site. The assistance of a licensed pest control advisor is recommended. All treatments must be performed by a qualified applicator or a licensed pest control business; • All treatments must be performed by a qualified applicator or a licensed pest control operator; • “Control” means to reduce the population of common pests below economically damaging levels, and includes attempts to exclude pests before infestation, and effective control methods after infestation. Effective control methods may include physical/mechanical removal, bio control, cultural control, or chemical treatments; • Use of “permanent” soil sterilants to control weeds or other pests is prohibited because this would interfere with reclamation; • Notify the Agricultural Commissioner’s office immediately regarding any suspected exotic/invasive pest species as defined by the California Department of Food Agriculture 	



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		<p>and the U.S. Department of Agriculture. Request a sample be taken by the Agricultural Commissioner's Office of a suspected invasive species. Eradication of exotic pests shall be done under the direction of the Agricultural Commissioner's Office and/or California Department of Food and Agriculture;</p> <ul style="list-style-type: none"> • Obey all pesticide use laws, regulations, and permit conditions; • Allow access by Agricultural Commissioner staff for routine visual and trap pest surveys, compliance inspections, eradication of exotic pests, and other official duties; • Ensure all project employees that handle pest control issues are appropriately trained and certified, all required records are maintained and made available for inspection, and all required permits and other required legal documents are current; • Maintain records of pests found and treatments or pest management methods used. Records should include the date, location/block, project name (current and previous if changed), and methods used. For pesticides include the chemical(s) used, EPA Registration numbers, application rates, etc. A pesticide use report may be used for this; • Submit a report of monitoring, pest finds, and treatments, or other pest management methods to the Agricultural Commissioner quarterly within 15 days after the end of the previous quarter, and upon request. The report is required even if no pests were found or treatment occurred. It may consist of a copy of all records for the previous quarter, or may be a summary letter/report as 	

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		<p>long as the original detailed records are available upon request.</p> <ol style="list-style-type: none"> 3. A long-term strategy for weed and pest control and management during the operation of the proposed project. Such strategies may include, but are not limited to: <ul style="list-style-type: none"> • Use of specific types of herbicides and pesticides on a scheduled basis. 4. Maintenance and management of project site conditions to reduce the potential for a significant increase in pest-related nuisance conditions on surrounding agricultural lands. 5. The project shall reimburse the Agricultural Commissioner's office for the actual cost of investigations, inspections, or other required non-routine responses to the site that are not funded by other sources. 	
Air Quality			
Impact 3.4-1: Conflict with or obstruct implementation of the applicable air quality plan.	Less than Significant	<p>AQ-1 Fugitive Dust Control. Pursuant to ICAPCD, all construction sites, regardless of size, must comply with the requirements contained within Regulation VIII – Fugitive Dust Control Measures. ICAPCD will verify implementation and compliance with these measures as part of the grading permit review/approval process.</p> <p>ICAPCD Standard Measures for Fugitive Dust (PM₁₀) Control</p> <ul style="list-style-type: none"> • All disturbed areas, including bulk material storage, which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material, such as vegetative ground cover. • All on-site and offsite unpaved roads will be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by 	Less than Significant



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Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>paving, chemical stabilizers, dust suppressants, and/or watering.</p> <ul style="list-style-type: none"> • All unpaved traffic areas 1 acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering. • The transport of bulk materials shall be completely covered unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks is to be cleaned and/or washed at delivery site after removal of bulk material. • All track-out or carry-out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area. • Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line. • The construction of any new unpaved road is prohibited within any area with a population of 500 or more unless the road meets the definition of a temporary unpaved road. Any temporary unpaved road shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emission by paving, chemical stabilizers, dust suppressants, and/or watering. <p>Standard Mitigation Measures for Construction Combustion Equipment</p>	

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		<ul style="list-style-type: none"> • Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel-powered equipment. • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum. • Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use. • When commercially available, replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). <p>AQ-2 Construction Equipment. All off-road construction diesel engines not registered under CARB’s Statewide Portable Equipment Registration Program, which have a rating of 50 horsepower or more, shall meet, at a minimum, the Tier 4 Final California Emission Standards for Off-road Compression-Ignition Engines as specified in CCR, Title 13, section 2423(b)(1) unless such engine is not available for a particular item of equipment. In the event a Tier 4 Final engine is not available for any off-road engine larger than 100 horsepower, that engine shall be equipped with retrofit controls that would provide NOX and particulate matter emissions that are equivalent to Tier 4 engine. Drill rig engines shall meet a minimum of Tier 4 Interim California Emission Standards. A list of the construction equipment, including all off-road equipment utilized at the project site by make, model, year, horsepower and expected/actual hours of use, and the associated EPA Tier shall be submitted to the County Planning and Development Services Department and ICAPCD prior to the issuance of a grading permit. The equipment list shall be submitted periodically to ICAPCD to perform a NOx analysis. ICAPCD shall utilize this list to calculate air emissions to verify that equipment use does not exceed the significance thresholds. The Planning and</p>	



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		<p>Development Services Department and ICAPCD shall verify implementation of this measure.</p> <p>AQ-3 Dust Suppression. The project applicant shall employ a method of dust suppression (such as water or chemical stabilization) approved by ICAPCD. All unpaved roads associated with construction shall be effectively stabilized of dust emissions using stabilizers/suppressant before the commencement of all construction phases. This will be conducted monthly at a rate of 0.1 gallon/ square yard of chemical dust suppressant. The project applicant shall apply chemical stabilization as directed by the product manufacturer to control dust between the panels as approved by ICAPCD, and other non-used areas (exceptions will be the paved entrance and parking area, and Fire Department access/emergency entry/exit points as approved by Fire/Office of Emergency Services [OES] Department).</p> <p>AQ-4 Dust Suppression Management Plan. Prior to any earthmoving activity, the applicant shall submit a construction dust control plan and obtain ICAPCD and Imperial County Planning and Development Services Department (ICPDS) approval.</p> <p>AQ-5 Operational Dust Control Plan. Prior to issuance of a Certificate of Occupancy, the applicant shall submit an operations dust control plan and obtain ICAPCD and ICPDS approval. ICAPCD Rule 301 Operational Fees apply to any project applying for a building permit. At the time that building permits are submitted for the proposed project, ICAPCD shall review the project to determine if Rule 310 fees are applicable to the project.</p> <p>AQ-6 Speed Limit. During construction and operation of the proposed project, the applicant shall limit the speed of all vehicles operating onsite on unpaved roads to 15 miles per hour or less.</p>	

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Biological Resources			
Impact 3.5-1: Potential impacts on special-status species	Potentially Significant	<p>BIO-1 Worker Environmental Awareness Program. Prior to project construction, a Worker Environmental Awareness Program shall be developed and implemented by a qualified biologist and shall be available in both English and Spanish. Handouts summarizing potential impacts on special-status biological resources and the potential penalties for impacts on these resources shall be provided to all construction personnel. At a minimum, the education program shall include the following:</p> <ul style="list-style-type: none"> • the purpose for resource protection; • a description of special-status species including representative photographs and general ecology; • occurrences of USACE, RWQCB, and CDFW regulated features in the project area; • regulatory framework for biological resource protection and consequences if violated • sensitivity of the species to human activities; • avoidance and minimization measures designed to reduce the impacts on special-status biological resources • environmentally responsible construction practices; • reporting requirements; • the protocol to resolve conflicts that may arise at any time during the construction process; and • workers sign acknowledgement form indicating that the Environmental Awareness Training and Education Program that has been completed, which shall be kept on record. <p>BIO-2 Preconstruction Nesting Bird Survey: If construction or other project activities are scheduled to occur during the bird breeding season (typically February 1 through August 31 for raptors and</p>	Less than Significant



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		<p>March 15 through August 31 for the majority of migratory bird species), a preconstruction nesting-bird survey shall be conducted by a qualified avian biologist to ensure that active bird nests, including those for the northern harrier, long-billed curlew, and burrowing owl, will not be disturbed or destroyed. In addition, any clearing of vegetation that may occur is required to take place outside of the breeding season. The survey shall be completed no more than 3 days prior to initial ground disturbance. The nesting bird survey shall include the project area and adjacent areas where project activities have the potential to affect active nests, either directly or indirectly, due to construction activity or noise. If an active nest is identified, the biologist shall establish an appropriately sized disturbance limit buffer around the nest using flagging or staking. Construction activities shall not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist.</p> <p>BIO-3 Biological Monitoring: If preconstruction surveys determine either the presence of special-status species or sensitive biological resources on the project site, a construction monitor may be needed during construction. If determined necessary, construction monitoring shall be conducted by a qualified biologist. The biologist shall be given authority to execute the following functions:</p> <ul style="list-style-type: none"> • Establish construction exclusion zones and make recommendations for implementing erosion control measures in temporary impact areas. • Ensure all construction activities stay within the staked construction zone and do not go beyond the limits of disturbance. • Minimize trimming/removal of vegetation to within the project impact area. 	

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		<ul style="list-style-type: none"> • Restrict non-essential equipment to the existing roadways and/or disturbed areas to avoid disturbance to existing adjacent native vegetation. <p>During construction, biological monitors shall inspect and verify field conditions, as needed, to ensure that wildlife and vegetation adjacent to the BSA are not harmed. The biological monitor shall coordinate with the construction supervisor and construction crew and shall have the authority to stop any activity that has the potential to affect special-status species or remove vegetation.</p> <p>BIO-4 Burrowing Owl Avoidance and Minimization. Take avoidance (pre-construction) surveys for burrowing owl shall be completed prior to project construction. Surveys shall be conducted as detailed within Appendix D of the Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game [CDFG] 2012). If burrowing owl is not detected, construction may proceed.</p> <ul style="list-style-type: none"> • If burrowing owl is identified during the non-breeding season (September 1 through January 31), a minimum 50-meter buffer shall be established by the biological monitor for low level disturbance, However, the minimum buffer shall be increased depending on the level of construction disturbance (e.g., medium or high). Construction within the buffer will be avoided until a qualified biologist determines that burrowing owl is no longer present or until a CDFW-approved exclusion plan has been implemented. The buffer distance may be reduced if noise attenuation buffers such as hay bales are placed between the occupied burrow and construction activities. • If burrowing owl is identified during the breeding season (February 1 through August 31), then an appropriate buffer will be established by the biological monitor in accordance with the Staff Report on Burrowing Owl Mitigation (CDFG 2012). Construction within the buffer will be avoided until a qualified biologist determines that burrowing owl is no longer present or 	



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		until young have fledged. The buffer distance may be reduced in consultation with CDFW if noise attenuation buffers such as hay bales are placed between the occupied burrow and construction activities.	
Cultural Resources			
Impact 3.6-2: Impact on archaeological resources	Potentially Significant	<p>CUL-1 Evaluate Significance of Find (Unknown Archaeological Resources). In the event of the discovery of previously unidentified archaeological materials, the contractor shall immediately cease all work activities within approximately 100 feet of the discovery. After cessation of excavation, the contractor shall immediately contact the Imperial County Department of Planning and Development Services. Except in the case of cultural items that fall within the scope of the Native American Grave Protection and Repatriation Act, the discovery of any cultural resource within the project area shall not be grounds for a “stop work” notice or otherwise interfere with the project’s continuation except as set forth in this paragraph.</p> <p>In the event of an unanticipated discovery of archaeological materials during construction, the applicant shall retain the services of a qualified professional archaeologist, meeting the Secretary of the Interior’s Standards for a Qualified Archaeologist, to evaluate the significance of the materials prior to resuming any construction-related activities in the vicinity of the find. If the qualified archaeologist determines that the discovery constitutes a significant resource under CEQA and it cannot be avoided, the applicant shall implement an archaeological data recovery program.</p>	Less than Significant
Impact 3.6-3: Impact on human remains	Potentially Significant	<p>CUL-2 Human Remains. If subsurface deposits believed to be human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist who meets the Secretary of the Interior’s Standards for prehistoric and historic archaeology and is familiar with the resources of the region, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no work radius</p>	Less than Significant

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:</p> <ul style="list-style-type: none"> • If the find includes human remains, or remains that are potentially human, the professional archaeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Imperial County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. • If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC may mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinterment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the Imperial County Planning and Development Services Department, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction. 	
Energy			



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
<p>Impact 3.7-1: Wasteful, inefficient, or unnecessary consumption of energy resources, during project construction of operation.</p>	<p>Less than Significant</p>	<p>ENG-1 Energy Conservation Control Measures. The project applicant shall implement all the following applicable energy conservation control measures during construction of the project:</p> <ul style="list-style-type: none"> • Idling times on all diesel-fueled commercial vehicles over 10,000 pounds shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure 13 CCR §2485). Clear signage to this effect shall be provided for construction workers at all access points. • Idling times on all diesel-fueled off-road vehicles over 25 horsepower shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes and fleet operators must develop a written policy as required by 13 CCR §2449 (“CARB Off-Road Diesel Regulations”). • All construction equipment shall be maintained and properly tuned in accordance with the manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • Portable equipment shall be powered by electricity if available. If electricity is not available, propane or natural gas shall be used if feasible. Diesel engines shall only be used if electricity is not available, and it is not feasible to use propane or natural gas. 	<p>Less than Significant</p>
<p>Geology and Soils</p>			
<p>Impact 3.8-2: Possible risks to people and structures caused by strong seismic ground shaking.</p>	<p>Potentially Significant</p>	<p>GEO-1 Prepare Geotechnical Report(s) as Part of Final Engineering for the Project and Implement Required Measures. Facility design for all project components shall comply with the site-specific design recommendations as provided by a licensed geotechnical or civil engineer to be retained by the project applicant. The final</p>	<p>Less than Significant</p>

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>geotechnical and/or civil engineering report shall address and make recommendations on the following:</p> <ul style="list-style-type: none"> • Site preparation • Soil bearing capacity • Appropriate sources and types of fill • Potential need for soil amendments • Structural foundations • Grading practices • Soil corrosion of concrete and steel • Erosion/winterization • Seismic ground shaking • Liquefaction • Expansive/unstable soils <p>In addition to the recommendations for the conditions listed above, the geotechnical investigation shall include subsurface testing of soil and groundwater conditions and shall determine appropriate foundation designs that are consistent with the version of the CBC that is applicable at the time building and grading permits are applied for. All recommendations contained in the final geotechnical engineering report shall be implemented by the project applicants. The final geotechnical and/or civil engineering report shall be submitted to Imperial County Public Works Department, Engineering Division for review and approval prior to issuance of building permits.</p>	
Impact 3.8-5: Substantial soil erosion or the loss of topsoil.	Potentially Significant	Implement Mitigation Measure GEO-1 and Mitigation Measure HYD-1.	Less than Significant
Impact 3.8-6: Be located on a geologic unit or soil that is	Potentially Significant	Implement Mitigation Measure GEO-1.	Less than Significant



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
unstable or that would become unstable as a result of the project.			
Impact 3.8-7: Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property	Potentially Significant	Implement Mitigation Measure GEO-1.	Less than Significant
Impact 3.8-9: Impact on paleontological resources	Potentially Significant	GEO-2 Paleontological Resources. In the event that unanticipated paleontological resources or unique geologic resources are encountered during ground-disturbing activities, work must cease within 50 feet of the discovery and a paleontologist shall be hired to assess the scientific significance of the find. The consulting paleontologist shall have knowledge of local paleontology and the minimum levels of experience and expertise as defined by the Society of Vertebrate Paleontology’s Standard Procedures (2010) for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. If any paleontological resources or unique geologic features are found within the project site, the consulting paleontologist shall prepare a paleontological Treatment and Monitoring Plan to include the methods that will be used to protect paleontological resources that may exist within the project site, as well as procedures for monitoring, fossil preparation and identification, curation of specimens into an accredited repository, and preparation of a report at the conclusion of the monitoring program.	Less than Significant
Hazards and Hazardous Materials			
Impact 3.10-1: Create a significant hazard to the public or the environment through the routine transport,	Potentially Significant	HAZ-1 Isopentane Management Measures. A certified fire protection engineer survey and analysis of current and proposed fire suppression and detection equipment will be performed to evaluate the current systems performance and coverage of protection prior to	Less than Significant

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
<p>use, or disposal of hazardous materials.</p>		<p>construction. This analysis will evaluate proposed fire suppression and detection equipment in conjunction with existing equipment and be reviewed and approved by the Imperial County Fire Department and OES prior to building permits approval. The following measures will be required for the project:</p> <ol style="list-style-type: none"> 1. All isopentane storage tanks will be protected by approved automatic fire suppression equipment. All automatic fire suppression will be installed and maintained to the current adapted fire code and regulation. 2. An approved automatic fire detection system will be installed as per the California Fire Code. All fire detection systems will be installed and maintained to the current adapted fire code and regulations. 3. Fire department access roads and gates will be in accordance with the current adapted fire code and the facility will maintain a Knox Box for access on site. 4. Applicants will provide product containment areas(s) for both product and water run-off in case of fire applications and retained for removal. 5. Each tank will be equipped with an automated water suppression system. 6. Each tank will be equipped with two flame detectors and one gas detector (for a total of 4 flame detectors and 2 gas detectors for the two tanks). <ol style="list-style-type: none"> a. In the case of an isopentane leak, the gas detector(s) will detect it immediately and send a notification to the operator at the control room (manned 24/7) to mobilize fixing the leak. b. In case of a fire, the flame detector(s) will detect it and immediately start the automatic fire suppression system. 	



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>c. In case of a fire, there will also be a horn and strobe system that will turn on automatically to alert the plant employees.</p> <p>7. Concrete containment areas will be constructed for the isopentane tanks.</p> <p>8. Isopentane vessels will rarely be filled to 90 percent capacity.</p> <p>9. Isopentane safety-control measures will be established.</p> <p>10. A blast wall will be built between the two proposed isopentane vessels.</p> <p>11. Diking and impoundment of the proposed isopentane tanks shall be installed to minimize the magnitude and extent of a tank failure.</p>	
Hydrology/Water Quality			
Impact 3.11-1: Violation of water quality standards.	Potentially Significant	<p>HYD-1 Prepare SWPPP and Implement BMPs Prior to Construction and Site Restoration. The project applicant or its contractor shall prepare a SWPPP specific to the project and be responsible for securing coverage under SWRCB's NPDES stormwater permit for general construction activity (Order 2009-0009-DWQ). The SWPPP shall identify specific actions and BMPs relating to the prevention of stormwater pollution from project-related construction sources by identifying a practical sequence for site restoration, BMP implementation, contingency measures, responsible parties, and agency contacts. The SWPPP shall reflect localized surface hydrological conditions and shall be reviewed and approved by the appropriate agency prior to commencement of work and shall be made conditions of the contract with the contractor selected to build and decommission the project. The SWPPP shall incorporate control measures in the following categories:</p> <ul style="list-style-type: none"> • Soil stabilization and erosion control practices (e.g., hydroseeding, erosion control blankets, mulching) 	Less than Significant

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> • Sediment control practices (e.g., temporary sediment basins, fiber rolls) • Temporary and post-construction on- and off-site runoff controls • Special considerations and BMPs for water crossings and drainages • Monitoring protocols for discharge(s) and receiving waters, with emphasis place on the following water quality objectives: dissolved oxygen, floating material, oil and grease, potential of hydrogen (pH), and turbidity • Waste management, handling, and disposal control practices • Corrective action and spill contingency measures • Agency and responsible party contact information • Training procedures that shall be used to ensure that workers are aware of permit requirements and proper installation methods for BMPs specified in the SWPPP <p>The SWPPP shall be prepared by a Qualified SWPPP Practitioner and/or Qualified SWPPP Developer with BMPs selected to achieve maximum pollutant removal and that represent the best available technology that is economically achievable. Emphasis for BMPs shall be placed on controlling discharges of oxygen-depleting substances, floating material, oil and grease, acidic or caustic substances or compounds, and turbidity. BMPs for soil stabilization and erosion control practices and sediment control practices will also be required. Performance and effectiveness of these BMPs shall be determined either by visual means where applicable (i.e., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination, (inadvertent petroleum release) is required to determine adequacy of the measure.</p>	



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>HYD-2 Incorporate Post-Construction Runoff BMPs into Project Drainage Plan. The project Drainage Plan shall adhere to the County’s Engineering Guidelines Manual, IID “Draft” Hydrology Manual, or other recognized source with approval by the County Engineer to control and manage the on- and off-site discharge of stormwater to existing drainage systems. Infiltration basins will be integrated into the Drainage Plan to the maximum extent practical. The Drainage Plan shall provide both short- and long-term drainage solutions to ensure the proper sequencing of drainage facilities and management of runoff generated from project impervious surfaces as necessary.</p> <p>HAZ-1 Isopentane Management Measures.</p>	
Impact 3.11-3: Result in substantial erosion or siltation on- or off-site.	Potentially Significant	Implement Mitigation Measure HYD-1.	Less than Significant
Impact 3.11-4: Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.	Potentially Significant	Implement Mitigation Measure HYD-2.	Less than Significant
Impact 3.11-5: Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	Potentially Significant	Implement Mitigation Measure HYD-1.	Less than Significant

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
Impact 3.11-6: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Potentially Significant	Implement Mitigation Measures HYD-1 and HYD-2.	Less than Significant
<i>Tribal Cultural Resources</i>			
Impact 3.16-1: Cause a substantial adverse change in the significance of a tribal cultural resource.	Potentially Significant	TCR-1 If previously unidentified tribal cultural resources are identified during construction activities, construction work within 100 feet of the find shall be halted and directed away from the discovery until a Secretary of the Interior qualified archaeologist and tribal representative assesses the significance of the resource. The archaeologist, in consultation with Imperial County and any interested Tribes, shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts if the finds are determined to be a tribal cultural resource as defined in PRC Section 21074.	Less than Significant

Statement of Overriding Considerations

CEQA Guidelines Section 15093 requires the Lead Agency to balance, as applicable, the economic, legal, social, and technological, or other benefits of the project against its unavoidable environmental risks when determining whether to approve the project. No significant and unmitigated impacts have been identified for the proposed project; therefore, the County would not be required to adopt a Statement of Overriding Considerations pursuant to Section 15093 for this project.

Project Alternatives

Alternatives Considered but Rejected

Alternative Site

Section 15126.6(f)(2) of the CEQA Guidelines addresses alternative locations for a project. The key question and first step in the analysis is whether any of the significant effects of the proposed project would be avoided or substantially lessened by constructing the proposed project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Further, CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account when addressing the feasibility of alternative locations are whether the project proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

The proponent does not have control of an alternate site; if control were viable, the proponent would have to re-initiate the application process as a new project. Similar to the proposed project site, an alternate site would require environmental review once the proponent has prepared sufficient project description information. At present, the proponent does not have control of an alternate site. This alternative would be the most complex, costly, and time-consuming alternative to implement. It is unknown if the environmental impacts associated with this Alternative would be less than the proposed project because it would be speculative to evaluate an unsecured alternate site. This is primarily due to the fact that the proponent does not have control of an alternate site. Therefore, an alternative site was eliminated from further consideration in this EIR.

Alternatives Evaluated

The environmental analysis for the proposed project evaluated the potential environmental impacts resulting from implementation of the proposed project, as well as alternatives to the project. The alternatives include: Alternative 1: No Project/No Development and Alternative 2: Reduced Project Site. A detailed discussion of the alternatives considered is included in Chapter 7. Table ES-2 summarizes the impacts resulting from the proposed project and the identified alternatives.

Alternative 1: No Project/No Development Alternative

The CEQA Guidelines require analysis of the No Project Alternative (PRC Section 15126). According to Section 15126.6(e)(1), “the specific alternative of ‘no project’ shall also be evaluated along with its impact.” Also, pursuant to Section 15126.6(e)(2); “The ‘no project’ analysis shall discuss the existing conditions at the time the notice of preparation is published, ... at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

The No Project/No Development Alternative assumes that the project, as proposed, would not be implemented and the project site would not be further developed with geothermal and solar energy facilities. The No Project/No Development Alternative would not meet the project objectives.

Alternative 2: Reduced Project Site

The purpose of Alternative 2 is to avoid the Prime Farmland located within the project site. As discussed in Section 3.3, Agricultural Resources, implementation of the project would result in the temporary conversion of approximately 106.88 acres of land currently under or available for agricultural production to non-agricultural uses, as described below:

- Dogwood Geothermal Energy Project (CUP #23-0020): Approximately 5.31 acres of the Dogwood parasitic solar facility footprint are classified as Prime Farmland and 34.67 acres are classified as Farmland of Statewide Importance.
- Heber 2 Solar Energy Project (CUP #23-0021): Approximately 17.63 acres of the Heber 2 parasitic solar facility footprint are classified as Prime Farmland and 49.27 acres are classified as Farmland of Statewide Importance.

This alternative would avoid approximately 22.94 acres of Prime Farmland on the project site (5.31 acres on Dogwood parasitic solar facility footprint and 17.63 acres on the Heber 2 parasitic solar facility footprint). The size and MW output of the solar facilities would be slightly reduced under this alternative.

Environmentally Superior Alternative

Table ES-2 provides a qualitative comparison of the impacts for each alternative compared to the proposed project. As noted on Table ES-2, the No Project/No Development Alternative would be considered the environmentally superior alternative, since it would eliminate all of the significant impacts identified for the project. However, CEQA Guidelines Section 15126.6(e)(2) states that “if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” As shown on Table ES-2, Alternative 2 would be the environmental superior alternative because it would reduce impacts for the following environmental issue areas as compared to the proposed project: agricultural resources, air quality, biological resources, cultural resources, hydrology/water quality, tribal cultural resources, and utilities/service systems.



Table ES-2. Comparison of Alternative Impacts to Proposed Project

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
Aesthetics	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Agricultural Resources	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact
Air Quality	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Less Impact
Biological Resources	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact (Avoid)	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact
Cultural Resources	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact (Avoid)	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact

Table ES-2. Comparison of Alternative Impacts to Proposed Project

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
Energy	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Geology and Soils	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact (Avoid)	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Similar Impact
GHG Emissions	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Hazards and Hazardous Materials	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Similar Impact
Hydrology/ Water Quality	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact (Avoid)	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact



Table ES-2. Comparison of Alternative Impacts to Proposed Project

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
Land Use/Planning	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Noise	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Public Services	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Transportation	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Tribal Cultural Resources	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact

Table ES-2. Comparison of Alternative Impacts to Proposed Project

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
Utilities/Service Systems	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Less Impact