

## CHAPTER 6.0 – OTHER CEQA CONSIDERATIONS

This chapter presents the evaluation of other types of environmental impacts required by CEQA that are not covered within the other chapters of this Draft EIR. The other CEQA considerations include effects not found to be significant, irreversible environmental changes, growth-inducing impacts, and significant and unavoidable adverse impacts.

### 6.1 EFFECTS NOT FOUND TO BE SIGNIFICANT

This section includes information from the Initial Study that was prepared by Chambers Group on December 11, 2020, which can be found in Appendix A: Initial Study (County 2020). In addition to the environmental impact thresholds analyzed in detail in this EIR, the County has determined through the preparation of an Initial Study that the development and operation of the Project would not result in potentially significant impacts to the environmental impact topics discussed below. Section 15128 of the CEQA Guidelines requires a brief description of any possible significant effects that were determined not to be significant and were not analyzed in detail within the environmental analysis. Therefore, this section has been included in this Draft EIR as required by CEQA.

The discussion below presents the analysis of the effects related to aesthetics, agriculture and forestry resources, air quality, biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, and wildfire not found to be significant. Any thresholds or topics not addressed in this section are addressed in Section 4.0: Environmental Impact Analysis of this Draft EIR.

#### 6.1.1 Aesthetics

**Threshold a) Have a substantial adverse effect on a scenic vista or scenic highway?**

**Threshold b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?**

The Project is not located within the viewshed of any scenic vistas or officially designated State scenic highways (Caltrans 2019). The closest scenic viewpoint is an observation deck located within the Sonny Bono Salton Sea National Wildlife Refuge, approximately 3 miles southwest of the Project site (USFWS 2019). Although the area is relatively flat, an extensive shrub-covered marsh and the Alamo River separate the viewpoint from the Project site; thus, the Project site would not be within the viewshed of the observation deck. Additionally, Highway 111 is listed by Caltrans as eligible for State scenic highway designation and is located 3 miles east of the Project site. However, Highway 111 has not been officially designated, and the eligible section of highway is from Bombay Beach to the Imperial County-Riverside County line, approximately 13 miles northwest of the Project site at the closest point (Caltrans 2019). Further, the site is void of any trees, rock outcrops, or historic buildings; and, therefore, no scenic resources would be damaged as a result of the Project. No impacts would occur to scenic vistas or scenic resources along a State scenic highway, and no further analysis is required.

**Threshold c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized**

**area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

The Project is located on a vacant, nonurbanized area characterized by agricultural and industrial land uses, as well as vacant desert land. Public viewers of the Project site would be limited to workers at HR1 power plant and any passersby on nearby roads. No residences or recreation areas are in proximity of the Project site. In addition, construction of the Project would be temporary, occurring from approximately Quarter 3 of 2021 to Quarter 2 of 2023. Views of Project operations will be consistent with current views of the area, which include the neighboring HR1 power plant. The Project would not substantially degrade the existing visual character or public views of the site or surroundings, and no impacts would occur. Thus, no further analysis is required.

**Threshold d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

As part of the Project design, industrial-grade lighting sources would be required for Project operations and safety purposes. Lighting would be covered and directed downward (downshielded) or toward the proposed facility to avoid backscatter. Nighttime illumination features for the Project would be controlled with sensors or switches operated such that lighting would be activated only when needed. In addition, the Project is in a rural area of the County with the closest sensitive receptor being a residence over 1 mile north of the Project site on Pound Road. Industrial-level lighting that would be associated with the Proposed Project would not be significant when compared to the existing uses on the site. Impacts related to increased light and glare from operation of the proposed facility would be less than significant, and no further analysis is required.

**6.1.2 Agricultural and Forest Resources**

**Threshold a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the Project site is a combination of "Urban and Built-Up Land" and "Other Land" (DOC 2020a). No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is located within or in proximity to the Project site. The County General Plan designates the Project site as Agriculture land use; however, according to the General Plan Land Use Element, a nonagricultural land use may be permitted within General Plan-designated agricultural land if the use does not conflict with agricultural operations and will not result in the premature elimination of agricultural operations (County 2015a). No existing agricultural land is present on the Project site, thus the Project would not conflict with or eliminate agricultural operations. Historically agricultural operations occurred on the Project site, but the conversion of this agricultural land to another use was analyzed as part of the 2007 Hudson Ranch Power I Project and determined to be below the level of CEQA significance. No impacts would occur, and no further analysis is required.

**Threshold b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

The Project site is zoned M-2 and is located within the geothermal overlay zone (G) and pre-existing allowed/restricted overlay zone (PE). No land within the Project site is zoned for agricultural use, and the

Project was considered consistent with the site zoning with the approval of the CUP in June 2020. The Project site is not subject to the provisions of a Williamson Act contract (DOC 2018). No impacts would occur, and no further analysis is required.

**Threshold c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

**Threshold d) Result in the loss of forest land or conversion of forest land to non-forest use?**

As previously mentioned, the Project site is zoned M-2-G-PE. No land within the Project site is zoned forest land or timberland, and no forest land exists on the Project site or in the immediate vicinity. The Project would not result in the loss of forest land or the conversion of forest land to non-forest use; no impacts would occur, and no further analysis is required.

**Threshold e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

The Project site is zoned M-2-G-PE and does not contain agricultural land or forest land. The Project would not result in the conversion of agricultural land or forest land. No impacts would occur, and no further analysis is required.

### **6.1.3 Air Quality**

**Threshold c) Expose sensitive receptors to substantial pollutants concentrations?**

The Project is located in a rural area of the County and is not in close proximity to any sensitive receptors such as residences, hospitals, or schools. The closest residence is over a mile north of the Project site along Pound Road, the closest school is approximately 4 miles southeast of the Project site, and the closest hospital is approximately 16 miles south of the Project site (Google 2021). Approximately 62 full-time employees are expected to be working on site, but these employees will be provided the proper personal protective equipment (PPE) and training in accordance with OSHA regulations to protect them from substantial pollutant concentrations. A less than significant impact is expected to result, but these issues will be evaluated further in the EIR.

**Threshold d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?**

As mentioned above, the Project is located in a rural area of the County and is not in close proximity to any sensitive receptors, with the closest residence over a mile north of the Project site along Pound Road, the closest school approximately 4 miles southeast of the Project site, and the closest hospital approximately 16 miles south of the Project site (Google 2021). Approximately 62 full-time employees are expected to be working on site, but these employees will be provided the PPE and training in accordance with OSHA regulations. Any odors on site are expected to affect only employees and are not anticipated to affect a substantial amount of people. Less than significant impacts are expected, but odors will be evaluated further in the EIR.

#### **6.1.4 Biological Resources**

- Threshold b)** **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**
- Threshold c)** **Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

According to the U.S. Fish and Wildlife Service's National Wetland Inventory, the Project site does not contain any wetland or riparian habitat. The closest potential wetland and riparian habitats include freshwater emergent wetlands and the Alamo River, which is likely to have riparian habitat along its banks, located approximately 1 mile southwest of the Project site (USFWS 2021). The Project site is approximately 500 feet north of IID canals and agricultural drains that flow into these wetlands and the Alamo River; however, to prevent offsite impacts to nearby wetlands resulting from stormwater runoff during construction, the Project would be required to obtain coverage under a Construction General Permit to comply with NPDES requirements. Compliance with the Construction General Permit would require the development and implementation of a SWPPP and associated BMPs. These BMPs will include measures that would be implemented to prevent discharges into adjacent wetland and riparian habitat from the Project site during construction activities.

To prevent significant impacts to the nearby wetland and riparian habitat due to increased runoff at the Project site during operations, a stormwater retention basin will be developed on site. The Project will likely share the HR1 stormwater retention basin and will ensure the basin is engineered and constructed to contain the combined stormwater storage requirements of both the HR1 and Project plant sites. If a basin cannot be shared for technical, legal, or other reasons, then the Project will construct its own separate basin on the far south side of the parcel. Overall, impacts to wetland and riparian habitats resulting from the Project would be less than significant, and no further analysis is required.

- Threshold e)** **Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?**
- Threshold f)** **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

The County General Plan Conservation and Open Space Element policies require conservation of native habitat of sensitive plants and animals through the dedication of open space easements or other means that will ensure their long-term protection and survival. As mentioned above, the Project site is highly disturbed from previous uses and is not expected to contain high quality native habitat. However, the Project site is located within the boundaries of the Desert Renewable Energy Conservation Plan (DRECP), which aims to protect irreplaceable desert habitats, plants, animals, and ecological processes and allows for the development of a significant amount of centralized renewable energy (from solar, wind, and geothermal facilities, which will also require transmission lines) by focusing on areas with the least ecological impact. Because the DRECP's intent is to identify areas in the desert appropriate for the utility-scale development of wind, solar, and geothermal energy projects and the Project does not include the development of such energy projects, the Project would neither conflict with nor does it require

compliance with the DRECP. Impacts to native habitat of sensitive plants and animals resulting from the Project would be less than significant, and no further analysis is required.

#### **6.1.5      Geology and Soils**

**Threshold a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving:**

- i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?**

The Project site is not located within an Alquist-Priolo fault zone, and the closest fault zone is the San Andreas fault zone approximately 13 miles northwest (DOC 2020b). However, the County General Plan shows that the potentially active Calipatria Fault runs underneath the Project site (County 1997a). Despite a known earthquake fault within the Project site, all parcels encompassing the site have been previously graded and would not require excavation. Approximately 10,000 cubic yards of soil will be brought on site to raise the elevation, but no significant ground-disturbing activities that could directly cause rupture of the Calipatria Fault would occur during Project construction or operation. Further, no Project activities would indirectly cause rupture of any known earthquake faults in the area. Impacts would be less than significant.

- iv) **Landslides?**

The Project site is flat and is not located within an identified landslide zone (DOC 2020b). According to the County General Plan, the closest area of landslide activity is on the border of San Diego and Imperial Counties approximately 30 miles west of the Project site (County 1997a). The Project would not exacerbate the risk of loss, injury, or death involving landslides. No impacts would occur, and no further analysis is required.

**Threshold b) Result in substantial soil erosion or the loss of topsoil?**

Project construction and operations have the potential to result in soil erosion and loss of topsoil mainly through increasing impervious surfaces on site and increasing vehicle and foot traffic on site. All parcels encompassing the Project site have been previously graded and would not require excavation. Approximately 10,000 cubic yards of soil will be brought on site to raise the elevation, and approximately 55 acres of the Project site would be permanently disturbed by the Project. The Project would implement standard industry methods, such as BMPs, to prevent surface runoff and erosion where applicable. These BMPs would comply with the County Building & Grading Regulations and the SWPPP developed for the Project. Moreover, a Drainage and Grading Plan will be submitted to the County to ensure implementation of all required BMPs. Impacts related to soil erosion would be less than significant, and no further analysis is required.

- Threshold e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

During construction of the Project, portable toilets would be provided for construction workers, and waste would be transported off site to a sanitary water treatment plant. Sewage generated during Project operations would be processed by the existing HR1 sewer treatment plant adjacent to the Project site, which has available capacity. No new septic tanks or alternative wastewater disposal systems will be constructed as a result of the Project; thus, no impacts would occur, and no further analysis will be required.

#### **6.1.6 Hazards and Hazardous Materials**

- Threshold c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Although the Project has the potential to emit hazardous emissions and/or handle hazardous substances, the Project site is not within 0.25 mile of an existing or proposed school. The closest school to the Project site is Grace Smith Elementary School, approximately 4 miles northeast in Niland. Additionally, the Emergency Response Plan (ERP) that would be prepared and implemented for the Project will limit human risk associated with exposure to hazardous materials, with special consideration of the schools in the area. Impacts would be less than significant, and no further analysis is required.

- Threshold e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

The Project site is not located within 2 miles of a public airport or public use airport or within the boundaries of an airport land use plan. The closest airport is Calipatria Municipal Airport approximately 6 miles southeast of the Project site. Therefore, the Project would not expose people working in the Project area to safety hazards or excessive noise. No impact would occur, and no further analysis is required.

- Threshold f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Temporary or single-lane closure of some roadways may occur during the transport of oversized equipment or construction activities. Road closures would be coordinated with County Public Works, the County Sheriff, and the Imperial County Fire District (ICFD) prior to closure and would be scheduled to occur during off-peak commute hours. The Project's construction and operational activities would be in compliance with the Imperial County Emergency Operations Plan (EOP) and Multi-Jurisdiction Hazard Mitigation Plan (MJHMP) and would not physically interfere with the execution of the policies and procedures in these plans (County 2016, 2021b). Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant, and no further analysis is required.

**Threshold g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

The Seismic and Public Safety Element of the County General Plan states that the potential for a major fire in the unincorporated areas of the County is generally low (County 1997a). According to the California Department of Forestry and Fire Protection's (CAL FIRE) Fire Hazard Severity Zone Viewer, no very high, high, or moderate fire hazard severity zones are in the local or State responsibility areas within 30 miles of the Project site (CAL FIRE 2020). Additionally, the Project will include fire suppression systems designed in accordance with federal, State, and local fire codes; occupational health and safety regulations; and other jurisdictional codes, requirements, and standard practices. Included in the fire suppression system is a 500,000-gallon aboveground water tank to be installed on site, serving as the primary water supply for the joint fire suppression system. In addition, during construction the Project site and access road will be cleared of all vegetation and cleared areas will be maintained throughout construction. Fire extinguishers will be available around the construction site as well. During operations, a brush control program will be prepared and implemented on those portions of the Project site that will not be developed. The ICFD will be consulted to review and approve any and all proposed fire equipment, apparatus, and related fire prevention plans. Impacts would be less than significant, and no further analysis is required.

**6.1.7 Hydrology and Water Quality**

**Threshold a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

The Project site is located within the California RWQCB's Colorado River Basin Region. The Project is therefore subject to standards set forth in the Colorado River Basin's (CRB) Water Quality Control Plan. As previously mentioned, Project construction and operations would have the potential to result in soil erosion and runoff on and off site mainly due to grading and increased impervious surfaces. Through implementation of a SWPPP and a Drainage and Grading Plan, the Project would implement standard industry BMPs and relevant CRB BMPs to control offsite discharges. Additionally, the Project would develop a stormwater retention basin, either shared with HR1 or independent, which would be engineered and constructed to contain any stormwater runoff. If a retention basin cannot be shared for technical, legal, or other reasons, then the Project will construct its own basin on the far south side of the parcel. Stormwater flows will be directed to the retention basin via ditches, culverts, and/or swales.

Spill containment areas and sumps subject to spills of immiscible chemicals would be drained to a dilution water tank. Any oil contamination spills would be collected with absorbent pads and disposed as required by law. The Project site would be graded and constructed so that all process spills would drain into area drains that would be reprocessed into the system. Excess process spills would drain into the brine pond.

The Project will not allow any offsite discharges that could violate water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. Impacts would therefore be less than significant, and no further analysis is required.

**Threshold c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

- (i) result in substantial erosion or siltation on- or off-site;
- (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
- (iii) 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; or;
- (iv) impede or redirect flood flows?

No rivers or streams travel through the Project site or are directly adjacent to the Project site. The Alamo River is approximately 0.7 mile southwest of the Project site, and drainage channels are approximately 500 feet south of the Project site (along Schrimpf Road) lead toward the Alamo River and surrounding wetlands. Although Project construction and operations would have the potential to result in soil erosion and runoff on and off site due to grading and increased impervious surfaces, through implementation of a SWPPP and a Drainage and Grading Plan, the Project would implement standard industry BMPs and relevant CRB BMPs to control offsite discharges. Additionally, a stormwater retention basin would be developed on the site. In order to prevent substantial erosion resulting from high winds in the area, a Fugitive Dust Suppression Plan will be prepared, and the Project site will be watered as necessary.

The western portion of the Project site, currently APN 020-100-025, is located within the FEMA 100-year floodplain (FEMA 2020). However, during construction of the HR1 plant an administrative Flood Plan permit was approved for the HR1 site and an earthen flood protection berm was constructed. This berm, constructed on the west and south sides of APN 020-100-025, would prevent flooding of the Project site.

With implementation of BMPs and construction of a new retention basin, substantial erosion and runoff on and off site is not expected. Less than significant impacts would occur, and no further analysis is required.

**Threshold d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

As mentioned above, the western portion of the Project site (APN 020-100-025) is located within the FEMA 100-year floodplain; however, an earthen flood protection berm surrounds the western and southern sides of the parcel (FEMA 2020). The flood protection berm would prevent flooding onto the Project site. Additionally, the Project site is 2 miles east of the Salton Sea, which is a potential source of seiche. According to the County General Plan's Seismic and Public Safety Element, a seiche at the Salton Sea could occur under the appropriate seismic conditions, but a number of seismic events have occurred with no significant seiches resulting to date (County 1997a). Further, all dams within the County are approximately 65 miles east of the Project site, and the Project site is approximately 100 miles from the coast of the Pacific Ocean. Thus, no risk of dam inundation or tsunami within the Project site exists. Impacts would be less than significant, and no further analysis is required.

#### **6.1.8      Land Use and Planning**

**Threshold a) Physically divide an established community?**

The Project is located in a rural area approximately 3 miles south of Niland, which is the closest nearby community. No residences are in close proximity to the Project site; thus, the Project would not physically divide an established community, and no impacts would occur and no further analysis is required.

- Threshold b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

The Project site is zoned M-2-G-PE (Medium Industrial /Geothermal Overlay), and the County General Plan designates the Project site as Agriculture land use. According to the General Plan Land Use Element, a nonagricultural land use may be permitted within General Plan-designated agricultural land if the use does not conflict with agricultural operations and will not result in the premature elimination of agricultural operations (County 2015a). No agricultural land exists on the Project site, and the land is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the Department of Conservation (DOC 2020a). A CUP was issued for the Project in June 2020, making the Project consistent with the site zoning in accordance with the County's Zoning Ordinance. No impacts would occur, and no further analysis is required.

#### **6.1.9      Mineral Resources**

- Threshold a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- Threshold b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

Other than the geothermal resources being developed in the Project vicinity, no mineral resources or mineral resource recovery sites are known to exist within the vicinity of the Project site (DOC 2021a; County 1993). A number of mines are found along the Chocolate Mountain Range to the east, but the closest is approximately 6 miles from the Project site (DOC 2020c). Additionally, the Project is a geothermal brine-processing plant that would produce commercial-grade lithium, zinc, and manganese products, increasing the availability of these mineral resources. The Project would therefore be in alignment with the County General Plan's Renewable Energy and Transmission Element, Objective 3.2, which states that the County should "encourage the continued development of the mineral extraction/production industry for job development using geothermal brines from the existing and future geothermal flash power plants" (County 2015b). No known mineral resources or mineral resource recovery sites would be lost as a result of the Project; thus, no impacts would occur and no further analysis is required.

#### **6.1.10    Noise**

- Threshold b) Generation of excessive groundborne vibration or groundborne noise levels?**

Groundborne vibration and groundborne noise could originate from earth movement during the construction phase of the Project. However, significant vibration is typically associated with activities such as blasting or the use of pile drivers, neither of which would be required during Project construction. Additionally, the closest sensitive receptor is a residence over 1 mile north of the Project site which would not experience damage or nuisance. The Project would be expected to comply with all applicable requirements for long-term operation, as well as with measures to reduce excessive groundborne vibration and noise to ensure that the Project would not expose persons or structures to excessive groundborne vibration. Impacts would be less than significant, and no further analysis is warranted.

- Threshold c) For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

The Project site is not located within 2 miles of a public airport or public use airport. The closest airport is Calipatria Municipal Airport approximately 6 miles southeast of the Project site. Therefore, the Project would not expose people working in the Project area to excessive noise levels. No impact would occur, and no further analysis is required.

#### **6.1.11 Population and Housing**

- Threshold a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?**

The Project involves construction and operation of a geothermal brine processing plant and does not propose the development of any housing on site. The Project would require approximately 62 full-time employees. The Applicant expects to utilize available workers from the local and regional area who are already residents of and would commute from the surrounding communities. Therefore, the Project is not anticipated to induce population growth directly or indirectly; impacts would be less than significant and no further analysis is required.

- Threshold b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

The Project site is partially on the existing HR1 site, which was previously permitted for the geothermal plant. In addition to the actual power plant, the rest of the land has been used for laydown areas, storage areas, and stormwater management. The additional land that will be included is an approximately 15-acre parcel, APN 020-100-025, and an approximate 40-acre portion of APN 020-100-046, both of which have been vacant for several decades and were previously used for geothermal testing and associated activities. No residences are within the Project site or within close proximity; thus no existing people or housing would be displaced as a result of the Project. No impacts would occur, and no further analysis is required.

#### **6.1.12 Public Services**

- Threshold a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services?**

**i) Fire Protection?**

Fire protection and emergency medical services in the Project area are provided by the ICFD. The closest station to the Project site is the Niland Station, approximately 4 miles northeast, or an approximately 9-minute drive (Google 2021). During construction, the Project site and access road will be cleared of all vegetation, and

cleared areas will be maintained throughout construction. Fire extinguishers will also be available around the construction site. In case of emergency response during operations, both the Project access roads (off McDonald Road and Davis Road) would have turnaround areas to allow clearance for fire trucks per fire department standards: 70 feet by 70 feet, and 20 feet wide. In addition, a 500,000-gallon firewater storage tank will be constructed adjacent to the HR1 water storage pond (on the east side of the site) to serve as the primary water supply for the new joint fire suppression system to be constructed near the storage tank. The joint fire protection system will be equipped with quick-connect hose bibs; an underground fire main and surface distribution equipment such as yard hydrants and hose houses; monitors around the perimeter of the cooling tower; automatic sprinklers for the buildings, if needed; and a complete detection and alarm system. The fire-fighting water supply and pumping system will provide an adequate quantity of fire-fighting water and a 62-horsepower diesel-fueled firewater pump will be available on site. A brush control program will also be prepared and implemented on those portions of the Project site not being developed to mitigate the potential of an offsite brush fire.

All fire suppression systems will be designed in accordance with federal, State, and local fire codes; occupational health and safety regulations; and other jurisdictional codes, requirements, and standard practices. The ICFD will be consulted to review and approve any and all proposed fire equipment, apparatus, and related fire prevention plans. Acceptable service ratios and response times for fire protection will be maintained following Project implementation through consultation with the ICFD and the County. Impacts would be less than significant, and no further analysis is required.

**ii) Police Protection?**

Police protection services in the area are provided by the Imperial County Sheriff's Department. The closest police station to the Project site is the Imperial County Sheriff's office in Niland, approximately 4 miles northeast or an approximately 10-minute drive (Google 2021). The increase in construction-related traffic is not anticipated to significantly increase demand on law enforcement services due to the rural nature of the Project vicinity. Additionally, the Project site would be fenced with 6-foot-high chain-link security fence, which may be topped with three-strand barbed wire; and points of ingress/egress would be accessed via locked gates with a guard house. As part of the Project design, industrial grade lighting sources would also be required for Project operations and safety purposes. This lighting will include sensors or switches operated such that lighting would be activated when needed during nighttime hours. In addition, approximately 62 full-time employees will be on site 24 hours a day, 7 days a week during operation of the Project, thereby minimizing the need for police surveillance. Impacts would be less than significant, and no further analysis is required.

- iii) Schools?**
- iv) Parks?**
- v) Other Public Facilities?**

An estimated up to 200 to 250 workers would be traveling to the Project site during construction and approximately 62 full-time employees during operations. It is expected that most of these workers/employers will commute to the Project site from surrounding communities. Therefore, substantial temporary increases in population that will adversely affect local schools, parks, or other public facilities are not anticipated. No impacts would occur, and no further analysis is required.

#### **6.1.13     Recreation**

- Threshold a)** **Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- Threshold b)** **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?**

No parks or other developed federal, State, or county recreational facilities are in the Project area or immediate vicinity. Further, the Project involves the construction of a geothermal brine processing plant and would not construct any recreational facilities. During construction 200 to 250 workers are anticipated to be on the Project site, and operation would include 62 full-time workers employed on site; but these workers and employees are expected to come from existing populations that live in and commute from the surrounding local communities. Therefore, no increase in population would result, and no physical deterioration of existing recreational facilities would occur. No impacts would occur, and no further analysis is required.

#### **6.1.14     Transportation**

- Threshold d)** **Result in inadequate emergency access?**

The Project would not impact emergency access. For emergency response, both the Project access roads (off McDonald Road and Davis Road) would have turnaround areas to allow clearance for fire trucks per fire department standards: 70 feet by 70 feet, and 20 feet wide. The County Department of Public Works, the County Sheriff, and ICFD will be consulted as necessary to ensure that any potential impacts to the public or emergency services traveling on McDonald Road or Davis Road during Project construction or operations would be minimized. Impacts would be less than significant, and no further analysis will be required.

#### **6.1.15     Wildfire**

- Threshold a)** **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

CAL FIRE's Fire Hazard Severity Zone Viewer identifies no very high, high, or moderate fire hazard severity zones in the local or State responsibility areas within 30 miles of the Project site (CAL FIRE 2020). Additionally, all fire suppression systems will be designed in accordance with federal, State, and local fire codes; occupational health and safety regulations; and other jurisdictional codes, requirements, and standard practices. The ICFD will also be consulted to review and approve any and all proposed fire equipment, apparatus, and related fire prevention plans. Compliance with local emergency response and

evacuation plans, including the EOP and MJHMP, will be maintained through consultation with the ICFD and the County. Impacts would be less than significant, and no further analysis is required.

**Threshold b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

As mentioned above, CAL FIRE does not have any designated very high, high, or moderate fire hazard severity zones in the local or State responsibility areas within 30 miles of the Project site (CAL FIRE 2020). The Seismic and Public Safety Element of the County General Plan also states that the potential for a major fire in the unincorporated areas of the County is generally low (County 2015b). Moreover, the Project site is flat and is not within an area of risk due to slope. Although the County has experienced damage from heavy winds in the past, hazards in the County are managed by the MJHMP, which is reviewed and updated every five years (County 2021b). Further, during construction the Project site and access road will be cleared of all vegetation, and cleared areas will be maintained throughout construction. Fire extinguishers will be available around the construction site as well. During operations, a brush control program will be prepared and implemented on those portions of the Project site that will not be developed. Hazardous materials on site during operations may be flammable, but fire suppression systems will be installed; and the ICFD will be consulted to review and approve any and all proposed fire equipment, apparatus, and related fire prevention plans. Thus, employees on site would not be exposed to pollutant concentrations from a wildfire. Impacts would be less than significant, and no further analysis is required.

**Threshold c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

CAL FIRE maps note that no very high, high, or moderate fire hazard severity zones in the local or State responsibility areas are within 30 miles of the Project site (CAL FIRE 2020). To prevent fire-related impacts on the Project site, Project access roads (off McDonald Road and Davis Road) would be constructed with turnaround areas; a 500,000-gallon fire-fighting water storage tank will be constructed; and a joint fire protection system will be installed. These features would help fire suppression and would not exacerbate fire risk. Further, these features will be constructed/installed and maintained within previously disturbed areas of the Project site in accordance with federal, State, and local fire codes; occupational health and safety regulations; and other jurisdictional codes, requirements, and standard practices. No significant environmental impacts would result. Impacts would be less than significant, and no further analysis is required.

**Threshold d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

CAL FIRE does not have any designated very high, high, or moderate fire hazard severity zones in the local or State responsibility areas within 30 miles of the Project site (CAL FIRE 2020). The Project site is also flat and is not located within an identified landslide zone (DOC 2020b). According to the County General Plan, the closest area of landslide activity is on the border of San Diego and Imperial Counties approximately 30 miles west of the Project site (County 1997a). Flooding on site would be prevented by the flood protection berm on the southern and western sides of the Project site. The Project would not expose

people or structures to significant risks as a result of runoff, post-fire instability, or drainage changes. Impacts would be less than significant, and no further analysis is required.

## **6.2 IRREVERSIBLE ENVIRONMENTAL CHANGES**

According to CEQA Guidelines, “[u]ses 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.” Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of Project implementation that cannot be avoided.

Energy resources needed for the construction and operation of the Project would contribute to the incremental depletion of renewable and nonrenewable resources. Resources, such as timber used in building construction are generally considered renewable and would ultimately be replenished. Nonrenewable resources, such as petrochemical construction materials, steel, copper, lead and other metals, gravel, concrete, and other materials, are typically considered finite and would not be replenished over the lifetime of the Project.

Although the Project is a mineral extraction project, the Project would use geothermal brine to produce quantities of lithium, manganese, zinc, and other minerals for commercial sale. Geothermal energy generation, which involves the extraction of geothermal brine, is considered a renewable process because its source is the almost unlimited amount of heat generated by the Earth’s core. Even in geothermal areas dependent on a reservoir of hot water, the volume taken out can be reinjected, making it a sustainable energy source. This is the case for the Project site, as spent process fluid will be reinjected into the geothermal resource; thus, the geothermal brine used for mineral extraction is considered a renewable resource, and no mineral resources would be depleted as a result of the Project. However, during Project operations approximately 81,290 MWh of electricity is required from the IID. IID has met or exceeded all Renewable Portfolio Standard requirements to date, procuring renewable energy from diverse sources, including biomass, biowaste, geothermal, hydroelectric, solar, and wind. Nevertheless, according to IID’s 2018 Integrated Resource Plan, only 35 percent of IID’s overall generation delivered to customers was from renewable energy sources; and that number is anticipated to reach only 50 percent by 2030 (IID 2018c). The Project would irretrievably commit resources over the anticipated 30-year life of the Project; however, these electric resources would represent a nominal amount of usage, which would be approximately 6 percent of the County’s total electricity usage in 2019 and approximately 2 percent of IID’s total electricity usage in 2019 (CEC 2021a; 2021c).

At the end of the Project’s operation term, the Applicant may determine that the Project should be decommissioned and deconstructed. Should the Project be decommissioned, the Project Applicant is required to restore land to its pre-project state. Consequently, some of the resources on the site could potentially be retrieved after the site has been decommissioned. Concrete footings, foundations, and pads would be removed and recycled at an offsite location. All remaining components would be removed, and all disturbed areas would be reclaimed and recontoured. The Applicant anticipates using the best available recycling measures at the time of decommissioning.

## **6.3 GROWTH-INDUCING IMPACTS**

Pursuant to Section 15126.2 of the CEQA Guidelines: an EIR must address whether a project will directly or indirectly foster growth as follows:

*[An EIR shall] discuss 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 (a major expansion of wastewater treatment plant, might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also, discuss the characteristic of some projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

As discussed below, this analysis evaluates whether the Project would directly or indirectly induce economic, population, or housing growth in the surrounding environment.

### **6.3.1 Direct Growth-Inducing Impacts**

Direct growth-inducing impacts occur when the development of a project induces population growth or the construction of additional developments in the same area of a proposed project and produces related growth-associated impacts. Growth-inducing projects remove physical obstacles to population growth, such as the construction of a new road into an undeveloped area, a wastewater treatment plant expansion, and projects that allow new development in the service area.

If the growth is not consistent with or accommodated by local land use plans and growth management plans and policies for the area affected, then the growth inducement may constitute an adverse impact. Local land use plans provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by adequate urban public services. A project that would conflict with the local land use plans (i.e., “disorderly” growth) could indirectly cause additional adverse environmental impacts and other public services impacts. To assess whether a growth-inducing project would result in adverse secondary effects, the growth accommodated by a project must be assessed to determine if it would or would not be consistent with applicable land use plans.

The Project involves construction and operation of a plant to extract lithium, manganese, zinc, and other commercially viable substances from geothermal brine produced at HR1. The Project also includes paving McDonald Road from Highway 111 to English Road (approximately 2 miles); however, the Project would not include the construction of any housing. McDonald Road is already currently utilized by the community; and a new commercial source of minerals would not have direct growth-inducing impacts in the area. The Project would not involve the development of any new roadways, new water systems, or sewer. Therefore, the Project would not further facilitate additional development into outlying areas.

The County General Plan designates the Project site as Agriculture land use; however, according to the General Plan Land Use Element, a nonagricultural land use may be permitted within General Plan-designated agricultural land if the use does not conflict with agricultural operations and will not result in the premature elimination of agricultural operations (County 2015a). No agricultural land exists on the

Project site; thus, the Project would not conflict with or eliminate agricultural operations. Historically, agricultural operations did occur on the Project site, but the conversion of this agricultural land to another use was analyzed as part of the 2007 Hudson Ranch Power I Project. The Project site is zoned Medium Industrial (M-2) and is located within the geothermal overlay zone (G) and pre-existing allowed/restricted overlay zone (PE). A CUP was issued for the Project in June 2020, making the Project consistent with the site zoning in accordance with the County's Zoning Ordinance.

### **6.3.2      Indirect Growth-Inducing Impacts**

CEQA Guidelines also specify that the environmental effects of induced growth are considered indirect impacts of the Proposed Project. The additional demand for housing, commodities, and services that new development causes or attracts by increasing population in the area are examples of indirect growth-inducing impacts or secondary effects of growth.

Indirect growth-inducing impacts typically include substantial new, permanent employment opportunities that can result from a project. The Project is located within the unincorporated area of Imperial County, and it does not involve the development of permanent residences that would directly result in population growth in the area. Approximately 200 to 250 workers are anticipated to be required at peak periods of Project construction. Beginning with startup operations, the Project is expected to be operated by a total staff of approximately 62 full-time, onsite employees. The unemployment rate in Imperial County as of December 2020 was 17.7 percent with 11,900 people unemployed (EDD 2021). The Applicant expects to utilize available workers from the local and regional area. The Applicant is currently in the process of establishing a Project Labor Agreement (PLA) with local labor organizations to support employment in the County. Based on the unemployment rate, the Project's PLA, and the availability of the local workforce, the Project would not have a growth-inducing effect related to workers moving into the area and increasing the demand for housing and services.

## **6.4            SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACT**

The potentially adverse effects of the Project are discussed in Chapter 3.0 of this Draft EIR. Mitigation measures have been recommended that would reduce impacts to biological resources, geology and soils, hazards and hazardous materials, utilities and service systems, and transportation impacts to less than significant based on each set of significance criteria. No significant and unavoidable impacts to any environmental resources would occur.