PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE **AGENDA DATE: September 23, 2021**

FROM: PLANNING & DEVELOPMENT SERVICES DEPT. **AGENDA TIME 1:30 PM/No. 1**

CUP21-0014/CUP21-0013/
ZC#21-0002/LLA#00321/IS21-0016

PROJECT TYPE: Laurel 2 North and Laurel 2 South Project SUPERVISOR DIST #2

051-300-032/-035 &-036

LOCATION: 1520 & 1400 Jessup Road, APN: -051-310-027 & -028-000

El Centro, CA PARCEL SIZE: Approx. 280 acres

GENERAL PLAN (existing) Agriculture GENERAL PLAN (proposed) N/A

A-2-R-RE (General Agriculture-Rural-Renewable Energy Overlay)
A-3-RE (Heavy Agriculture-Renewable Energy),

ZONE (existing) A-3 (Heavy Agriculture), A-2-R (General Agriculture-Rural) ZONE (proposed) A-3-RE

GENERAL PLAN FINDINGS ☒ CONSISTENT ☐ INCONSISTENT ☐ MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 09/23/2021

INITIAL STUDY: 21-0016

☐ NEGATIVE DECLARATION ☐ MITIGATED NEG. DECLARATION ☒ **ADDENDUM**

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	☐ NONE	☒ ATTACHED
AG / APCD	☐ NONE	☒ ATTACHED
E.H.S.	☐ NONE	☒ ATTACHED
FIRE / OES	☐ NONE	☒ ATTACHED
OTHER	CEO, IID and Quechan	

REQUESTED ACTION:

(See Attached)

Initial Study & Environmental Analysis
For:

Laurel 2 South Solar Farm CUP #21-0013
Laurel 2 North Solar Farm CUP #21-0014
Zone Change #21-0002
Lot Line Adjustment #00321

Prepared By:

HDR
591 Camino de la Reina, Suite 300
San Diego, CA 92108

Reviewed by:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
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August 2021

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SECTION 1
INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level, ☒ project level Initial Study for evaluation of potential environmental impacts resulting from proposed actions and approvals that will reorganize the previously-approved Laurel 2 Solar Farm to create the proposed Laurel 2 South and Laurel 2 North Solar Farm Projects.

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's "CEQA Regulations Guidelines for the Implementation of CEQA, as amended", an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

☐ According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

☐ According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.

☐ According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study has determined that the proposed applications will not result in any potentially significant environmental impacts that were not previously evaluated, or otherwise meet any of the conditions identified in CEQA Guidelines Section 15162 As such, pursuant to CEQA Guidelines Section 15164, an EIR Addendum to the previously certified Laurel Cluster Final EIR has been prepared.

This Initial Study is prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15063 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County

of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY

This Initial Study is an informational document which is intended to inform County of Imperial decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed applications.

SECTION 1

I. INTRODUCTION presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a potentially significant impact, potentially significant unless mitigation incorporated, less than significant impact or no impact.

PROJECT SUMMARY, LOCATION AND EVIRONMENTAL SETTINGS describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

SECTION 3

III. MANDATORY FINDINGS presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

IV. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in preparation of this Initial Study and Negative Declaration.

V. REFERENCES lists bibliographical materials used in preparation of this document.

VI. ENVIRONMENTAL DOCUMENT – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. **No Impact:** A "No Impact" response is adequately supported if the impact simply does not apply to the proposed applications.

2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.

3. **Potentially Significant Unless Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact".

4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study and Negative Declaration will be conducted under a ☐ policy-level, ☒ project level analysis. Regarding mitigation measures, it is not the intent of this document to "overlap" or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County's jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

1. Tiered Documents

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. Tiering is defined as follows:

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

"Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

Further, Section 15152(d) of the CEQA Guidelines states:

"Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation By Reference

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]). This document incorporates by reference appropriate information from the "Final Environmental Impact Report and Environmental Assessment for the "County of Imperial General Plan EIR" prepared by Brian F. Mooney Associates in 1993 and updates.

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR and updates are available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and

provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.

- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.

- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

II. Environmental Checklist

1. **Project Title**: Laurel 2 South Solar Farm and Laurel 2 North Solar Farm Projects
2. **Lead Agency**: Imperial County Planning & Development Services Department
3. **Contact person and phone number**: Diana Robinson, Planner III, (442) 265-1751
4. **Address**: 801 Main Street, El Centro CA, 92243
5. **E-mail**: DianaRobinson@co.imperial.ca.us
6. **Project location**: The proposed Laurel 2 South Solar Farm (L2S) and Laurel 2 North Solar Farm (L2N) Projects are located approximately eight miles southwest of the City of El Centro in an unincorporated area of the County of Imperial. The L2S project site encompasses approximately 160 acres and is located north of West Diehl Road, west of Derrick Road, and east of Jessup Road. The L2N project site encompasses approximately 120 acres and is located south of Interstate 8 (I-8), west of Jessup Road, north of West Vaughn Road and east of Fern Canal.
7. **Project sponsor's name and address**:

   L2S – 92JT 8me, LLC

   5455 Wilshire Boulevard, Suite 2010

   Los Angeles, CA 90036

   L2N – 38KM 8me, LLC

   5455 Wilshire Boulevard, Suite 2010

   Los Angeles, CA 90036
8. **General Plan designation**: Agriculture
9. **Zoning**:
   - L2S – A-2-R-RE (General Agriculture – Rural – Renewable Energy Overlay Zone)
   - L2N – A-2-R-RE (General Agriculture – Rural – Renewable Energy Overlay Zone) and A-3-RE (Heavy Agriculture– Renewable Energy Overlay Zone)
10. **Description of project**: See Project Summary for detailed project description.
11. **Surrounding land uses and setting**: The project sites are located on private lands south of Interstate-8. Properties surrounding the L2S and L2N Projects consist of agricultural lands and other solar farms, including the Campo Verde Solar Farm (operational) located immediately south of the proposed projects.
12. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.):
    - Public Works Department – Ministerial permits (building, grading, encroachment)
    - Imperial Irrigation District – Rights-of-Way Permit
    - Regional Water Quality Control Board

13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that

includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentially, etc.?

As part of the Laurel Cluster Solar Farms Project Final EIR, the County conducted the appropriate outreach to Native American Tribes pursuant to Assembly Bill (AB) 52 and Senate Bill 18. AB 52 requires that lead agencies, upon request of a California Native American tribe, begin consultation prior to the release of a negative declaration, mitigated negative declaration, or EIR for a project. Although AB 52 does not apply to an Addendum, the County conducted additional AB 52 outreach as part of the currently proposed project. On July 8, 2021, the County provided the project applications (CUPs, Zone Change, and Lot Line Adjustment) for review and comments to the following Native American tribes:

- Chemehuevi Reservation,
- Torres-Martinez Indian Tribe
- Fort Yuma Quechan Indian Tribe
- Campo Band of Mission Indians
- Augustine Band of Cahuilla Mission Indians
- La Posta Band of Mission Indians
- Manzanita Band of Kumeyaay Nation
- Cocopah Indian Tribe
- Colorado River Indian Tribe
- Inter-Tribal Cultural Resource Protections Council
- Ewiiaapaayp Tribe Office
- Kumeyaay Cultural Repatriation Committee

The Fort Yuma Quechan Indian Tribe responded via e-mail on July 16, 2021 indicating that they did not have any comments on the projects. Responses were not received from any other Native American tribes that were notified of the projects.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21080.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☒	Aesthetics	☒	Agriculture and Forestry Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☒	Geology /Soils	☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials
☒	Hydrology / Water Quality	☐	Land Use / Planning	☐	Mineral Resources
☐	Noise	☐	Population / Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

After Review of the Initial Study, the Environmental Evaluation Committee has:

☐ Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Found that although the proposed project could have a significant effect on the environment, all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE DE MINIMIS IMPACT FINDING: ☐ Yes ☐ No

EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	☐	☐	☐
ENVIRONMENTAL HEALTH SVCS	☐	☐	☐
OFFICE EMERGENCY SERVICES	☐	☐	☐
APCD	☐	☐	☐
AG	☐	☐	☐
SHERIFF DEPARTMENT	☐	☐	☐
ICPDS	☐	☐	☐

Jim Minnick, Director of Planning/EEC Chairman Date:

PROJECT SUMMARY

A. **Project Location**: The proposed Laurel 2 South Solar Farm (L2S) and Laurel 2 North Solar Farm (L2N) Projects are located approximately eight miles southwest of the City of El Centro in an unincorporated area of the County of Imperial. The L2S project site encompasses approximately 160 acres and is located north of West Diehl Road, west of Derrick Road, and east of Jessup Road. The L2N project site encompasses approximately 120 acres and is located south of Interstate 8 (I-8), west of Jessup Road, north of West Vaughn Road and east of Fern Canal.

B. **Project Summary**:

Background

On January 15, 2019, the Imperial County Board of Supervisors certified the Final Environmental Impact Report (EIR) and adopted four Conditional Use Permits (CUPs) for the Laurel Cluster Solar Farms Project. The Laurel Cluster Solar Farms Project consisted of four photovoltaic (PV) solar farm facilities and associated infrastructure, which would collectively generate up to 325 megawatts on approximately 1,380 acres. 92JT 8me LLC and 90FI 8me LLC applied for individual CUPs for each of the proposed locations: Laurel Cluster Solar Farm 1 (CUP 17-0028), Laurel Cluster Solar Farm 2 (CUP 17-0029), Laurel Cluster Solar Farm 3 (CUP 17-0030), and Laurel Cluster Solar Farm 4 (CUP 17-0027). Table 1 provides the acreage and proposed MW output of each of the projects.

Table 1. Laurel Cluster Solar Farms Acreage and Proposed Megawatt Output

Project	CUP	Acreage	Proposed MW
Laurel Cluster Solar Farm 1	17-0028	171	40
Laurel Cluster Solar Farm 2	17-0029	280	70
Laurel Cluster Solar Farm 3	17-0030	587	140
Laurel Cluster Solar Farm 4	17-0027	342	75
Total	--	**1,380**	**325**

The Board-certified Laurel Cluster Solar Farms Project Final EIR (State Clearinghouse No. 2017121078) determined that all significant impacts could be reduced to a level less than significant with the incorporation of mitigation measures. The potentially significant effects that were mitigated consisted of the following: Aesthetics (specifically related to light and glare), Agriculture Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, and Hydrology/Water Quality. Figure 1 illustrates the area approved for solar development in 2019 and differentiates between the four individual CUPs.

Project Description

The project applicant is requesting approval of two CUPs for the construction and operation of two individual utility-scale solar farms, Laurel 2 South Solar Farm (L2S) and Laurel 2 North Solar Farm (L2N), within the previously-approved Laurel Cluster Solar Farms project area (Figure 1). Specifically, the projects would be located within the Laurel Cluster Solar Farm 2 project area (Assessor Parcel Numbers 051-300-032, 051-300-036, 051-310-027, and 051-310-028) (Figures 2 and 3). The two CUPs will simply be the reorganization of the previously-approved Laurel Cluster Solar Farm 2 project area, as follows:

- L2S Project (CUP 21-0013) – 40 MW PV solar facility on 160 acres
- L2N Project (CUP 21-0014) – 30 MW PV solar facility on 120 acres

With approval of these two CUPS, the Laurel Cluster Solar Farms Projects would have a total of 5 CUPs covering 5 individual solar farm facilities.

The project applicant is also requesting a lot line adjustment to change the property lines on three existing APNs (APN 051-300-032, 051-300-035, and 051-300-036) (Figure 4). The lot line adjustment proposes the following:

- Reconfiguration of APN 051-300-032
- Combine a portion of APN 051-300-032 with APN 051-300-036
- Combine a portion of APN 051-300-032 with APN 051-300-035

Because APN 051-300-032 is proposed to be reconfigured, the project applicant is requesting to change the zoning designation of the entire parcel from A-2-R-RE/A-3-RE to A-3-RE (Figure 5). In doing so, all resulting parcels from the proposed lot line adjustment will have the same A-3-RE zoning designation (Figure 5).

No substantial changes to the previously-approved project are proposed. The proposed L2S and L2N Projects would involve the development of PV energy facilities, battery storage facilities (up to 40 megawatts and up to 30 megawatts, respectively) and associated infrastructure on 160 acres and 120 acres, respectively. Power generated by each Project would be delivered from the project sites via 230 kilovolt overhead and/or underground electrical transmission line(s) originating from an on-site substation(s)/switchyard(s) and terminating at the proposed Imperial Irrigation District (IID) Fern Substation, as stated in the CUP applications. Alternatively, power from the projects may be transmitted via the existing Campo Verde's 230 kV gen-tie line to SDG&E's Imperial Valley Substation located on Bureau of Land Management land. The Laurel Solar Farms Project Final EIR analyzed development of on-site operations and maintenance (O&M), substation, and/or transmission facilities as part of the previously approved Laurel Cluster Solar Farm (CUP 17-0029). As stated in the CUP applications, the proposed L2S and L2N Projects may involve the development of these facilities or may instead share such facilities with nearby solar projects and/or may be remotely operated.

C. **Environmental Setting**: The project sites are located on private lands south of Interstate-8. Properties surrounding the L2S and L2N Projects consist of agricultural lands and other solar farms, including the Campo Verde Solar Farm (operational) located immediately south of the proposed projects.

D. **Analysis**: CEQA Guidelines, Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously-approved Negative Declaration or a previously certified EIR for the project. CEQA Guidelines, Sections 15162(a) and 15163, state that when a Negative Declaration has been adopted or an EIR certified for a project, no Subsequent or Supplemental EIR or Subsequent Negative Declaration shall be prepared for that project unless the lead agency determines that none of the conditions described in Section 15162 requiring the preparation of a subsequent Negative Declaration or EIR have occurred. The CEQA Guidelines require that a brief explanation be provided to support the findings that no subsequent EIR or Negative Declaration is needed for further discretionary approval. These findings are described below. The analysis in support of these findings is provided in the Initial Study portion of this document.

1. *Required Finding: Substantial changes are not proposed for the project that will require major revisions of the previous EIR due to the involvement of new, significant environmental effects or a substantial increase in the severity of previously identified effects.*

Substantial changes are not proposed for the projects and will not require revisions to the Laurel Cluster Solar Farms Project Final EIR. The previously-certified Final EIR analyzed the direct and physical changes to the environment that would result from the construction and operation of a solar energy on the Laurel Cluster Solar Farm 2 development area. The proposed projects would not expand or increase the development footprint as previously evaluated, nor would the fundamental characteristics of the project change from that previously analyzed in the certified Final EIR. The project applicant is requesting approval of two CUPs for the construction and operation of two individual utility-scale solar farms, L2S and L2N, within the previously-

approved Laurel Cluster Solar Farm 2 project area (Figures 2 and 3). The two CUPs will simply be the reorganization of the previously-approved Laurel Cluster Solar Farm 2 project area, as follows:

- L2S Project (CUP 21-0013) – 40 MW PV solar facility on 160 acres
- L2N Project (CUP 21-0014) – 30 MW PV solar facility on 120 acres

The project applicant is also requesting a lot line adjustment to change the property lines on three existing APNs (APN 051-300-032, 051-300-035, and 051-300-036) (Figure 4). The lot line adjustment proposes the following:

- Reconfiguration of APN 051-300-032
- Combine a portion of APN 051-300-032 with APN 051-300-036
- Combine a portion of APN 051-300-032 with APN 051-300-035

The LS2 project site is currently zoned A-2-R-RE (General Agriculture – Rural – Renewable Energy Overlay Zone). Pursuant to Title 9, Division 5, Chapter 8, the following uses are permitted in the A-2 and A-2-R zone subject to approval of a CUP from Imperial County: solar energy electrical generator, electrical power generating plant, major facilities relating to the generation and transmission of electrical energy, and resource extraction and energy development. The L2N project site is currently zoned A-2-R-RE and A-3-RE (Heavy Agriculture – Renewable Energy Overlay Zone). Because APN 051-300-032 (associated with the L2N project site) is proposed to be reconfigured as part of the lot line adjustment, the project applicant is requesting to change the zoning designation of the entire parcel from A-2-R-RE and A-3-RE to A-3-RE (Figure 5). Pursuant to Title 9, Division 5, Chapter 9, "Solar Energy Plants" and "Transmission lines, including supporting towers, poles microwave towers, utility substations" are uses that are permitted in the A-3 Zone, subject to approval of a CUP. Therefore, with approval of the CUPs, the proposed projects would be consistent with the A-2, A-2-R, and A-3 zoning designations. There would be no other changes to the previously approved project.

Therefore, no proposed changes or revisions to the Laurel Cluster Solar Farms Project Final EIR are required. In addition, all previously adopted mitigation measures presented in the Laurel Cluster Solar Farms Project Final EIR are incorporated herein by reference.

2. *Required Finding: Substantial changes have not occurred with respect to the circumstances under which the project is undertaken, that would require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.*

Since certification of the Laurel Cluster Solar Farms Project Final EIR in August 2018, the Office of Planning and Research updated portions of Appendix G of the State CEQA Guidelines as follows:

- Addition of a new impact category – "Energy"
- Addition of a new impact category – "Tribal Cultural Resources"
- Addition of a new impact category – "Wildfire"
- Addition of a new threshold under the Transportation category to analyze vehicle miles traveled:
    - Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)?

Energy. Energy was not previously analyzed as a separate individual topic in the Laurel Cluster Solar Farms Final EIR. However, this does not mean that Energy was not analyzed in the Final EIR. Rather, impacts related to energy were addressed within the greenhouse gas emissions analysis (Section 4.7 of the Final EIR), utilities/service systems analysis (Section 4.14 of the Final EIR), and Chapter 5, Analysis of Long-Term Effects of the Final EIR. As described in this Initial Study, the proposed L2S and L2N projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy.

Tribal Cultural Resources. As part of the Laurel Cluster Solar Farms Project Final EIR, the County conducted the appropriate outreach to Native American Tribes pursuant to AB 52. AB 52 requires that lead agencies, upon request of a California Native American tribe, begin consultation prior to the release of a negative declaration, mitigated negative declaration, or EIR for a project. Although AB 52 does not apply to an Addendum, the County conducted additional AB 52 outreach as part of the currently proposed project. On July 8, 2021, the County provided the project applications (CUPs, Zone Change, and Lot Line Adjustment) for review and comments to the following Native American tribes:

- Chemehuevi Reservation,
- Torres-Martinez Indian Tribe
- Fort Yuma Quechan Indian Tribe
- Campo Band of Mission Indians
- Augustine Band of Cahuilla Mission Indians
- La Posta Band of Mission Indians
- Manzanita Band of Kumeyaay Nation
- Cocopah Indian Tribe
- Colorado River Indian Tribe
- Inter-Tribal Cultural Resource Protections Council
- Ewiiaapaayp Tribe Office
- Kumeyaay Cultural Repatriation Committee

The Fort Yuma Quechan Indian Tribe responded via e-mail on July 16, 2021 indicating that they did not have any comments on the projects. Responses were not received from any other Native American tribes that were notified of the projects.

As this CEQA document is an Addendum, the AB 52 requirements are not applicable. The proposed L2S and L2N projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to tribal cultural resources.

Wildfire. At the time of the prior environmental analysis, Wildfire, was not a specific topic analyzed because the CEQA criteria and thresholds related to analyzing Wildfire did not exist at the time the Final EIR was prepared. However, this does not mean that Wildfire was not analyzed. Rather, impacts related to Wildfire were addressed in Section 4.8, Hazards and Hazardous Materials, of the Final EIR. As described in this Initial Study, the proposed L2S and L2N projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to Wildfire.

Vehicle Miles Traveled. At the time of the prior environmental analysis, Vehicle Miles Traveled (VMT), was not a specific topic analyzed because the CEQA criteria and threshold related to analyzing VMT did not exist at the time the Final EIR was prepared. As described in this Initial Study, the proposed L2S and L2N projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to VMT.

3. *Required Finding: No new information has been provided that would indicate that the proposed project would result in one or more significant effects not discussed in the previous EIR.*

There is nothing in the proposed projects that would suggest that their adoption and implementation would result in any new significant environmental effects not previously discussed in the certified Laurel Cluster Solar Farms Project Final EIR. Therefore, no proposed changes or revisions to the EIR are required. In addition, all previously adopted mitigation measures presented in the Laurel Cluster Solar Farms Project Final EIR are incorporated herein by reference and part of the CUPs for the L2N and L2S Solar Farm Projects.

CONCLUSION

The Initial Study provided in a subsequent section of this document substantiates the conclusions that no additional CEQA documentation is required for the project. Based on the findings and information contained in the previously-certified Laurel Cluster Solar Farms Project Final EIR, the analysis above and contained within the Initial Study, the CEQA statute and State CEQA Guidelines, including Sections 15164 and 15162, the project will not result in any new, increased, or substantially different impacts, other than those previously considered and addressed in the Laurel Cluster Solar Farms Project Final EIR. No changes or additions to the Laurel Cluster Solar Farms Project Final EIR analyses are necessary, nor is there a need for any additional mitigation measures. Therefore, pursuant to State CEQA Guidelines, Section 15164, the Imperial County Board of Supervisors will adopt CEQA Guideline Sections 15162 and 15164 findings as its consideration of the CEQA compliance for the proposed project.

E. **General Plan Consistency**: The projects are located within the unincorporated area of Imperial County. The existing General Plan land use designation is "Agriculture." Pursuant to Title 9, Division 5, Chapter 8, the following uses are permitted in the A-2 and A-2-R zone subject to approval of a CUP from Imperial County: solar energy electrical generator, electrical power generating plant, major facilities relating to the generation and transmission of electrical energy, and resource extraction and energy development. The L2N project site is currently zoned A-2-R-RE and A-3-RE (Heavy Agriculture – Renewable Energy Overlay Zone). Because APN 051-300-032 (associated with the L2N project site) is proposed to be reconfigured as part of the lot line adjustment, the project applicant is requesting to change the zoning designation of the entire parcel from A-2-R-RE and A-3-RE to A-3-RE (Figure 5). Pursuant to Title 9, Division 5, Chapter 9, "Solar Energy Plants" and "Transmission lines, including supporting towers, poles microwave towers, utility substations" are uses that are permitted in the A-3 Zone, subject to approval of a CUP. Therefore, with approval of the CUPs, the proposed projects would be consistent with the A-2, A-2-R, and A-3 zoning designations.

Figure 1. Previously Approved Laurel Cluster Solar Farms Project

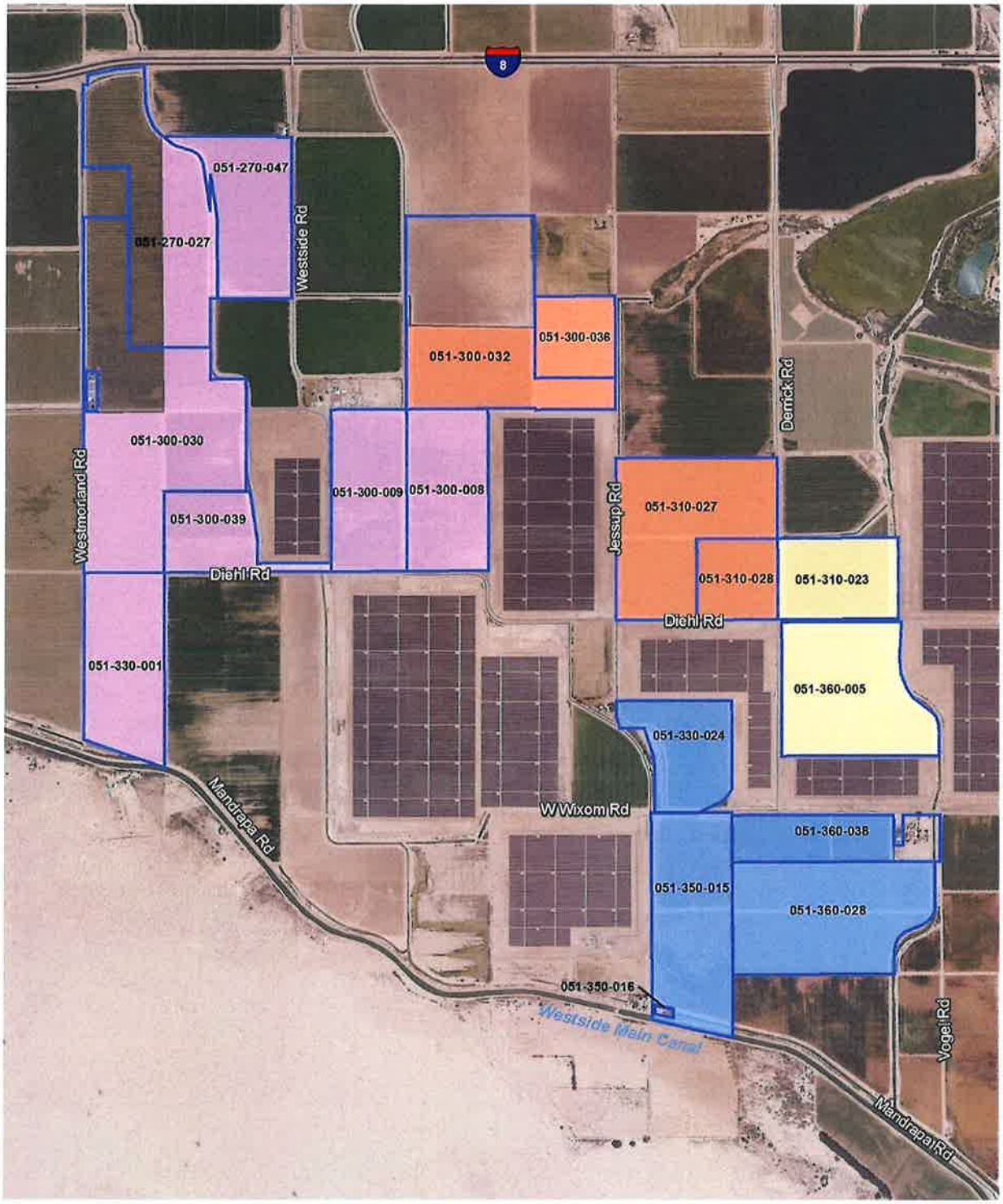


Figure 2. Proposed CUP Modification Area

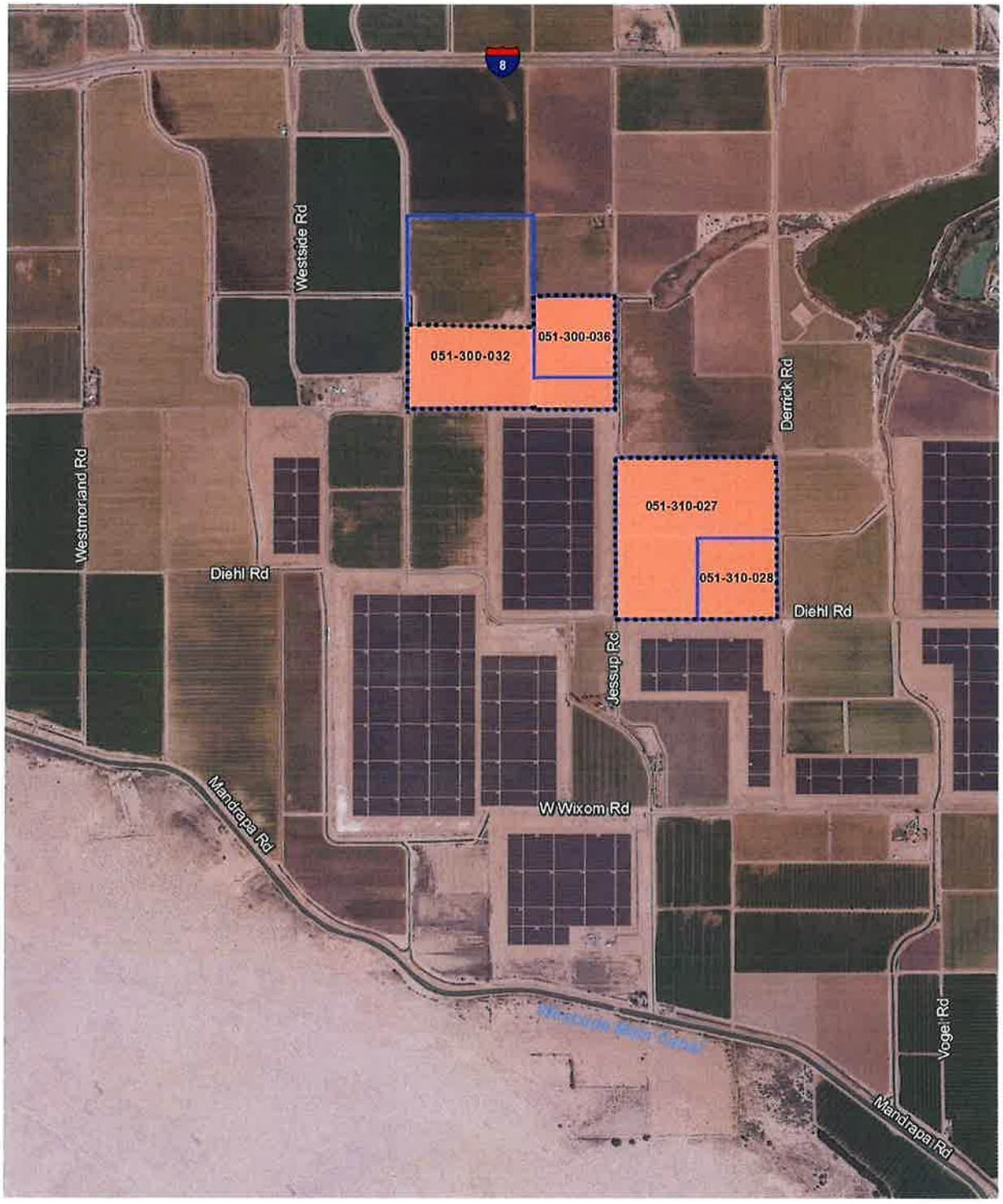


Figure 3. Proposed Laurel 2 North Solar Farm and Laurel 2 South Solar Farm

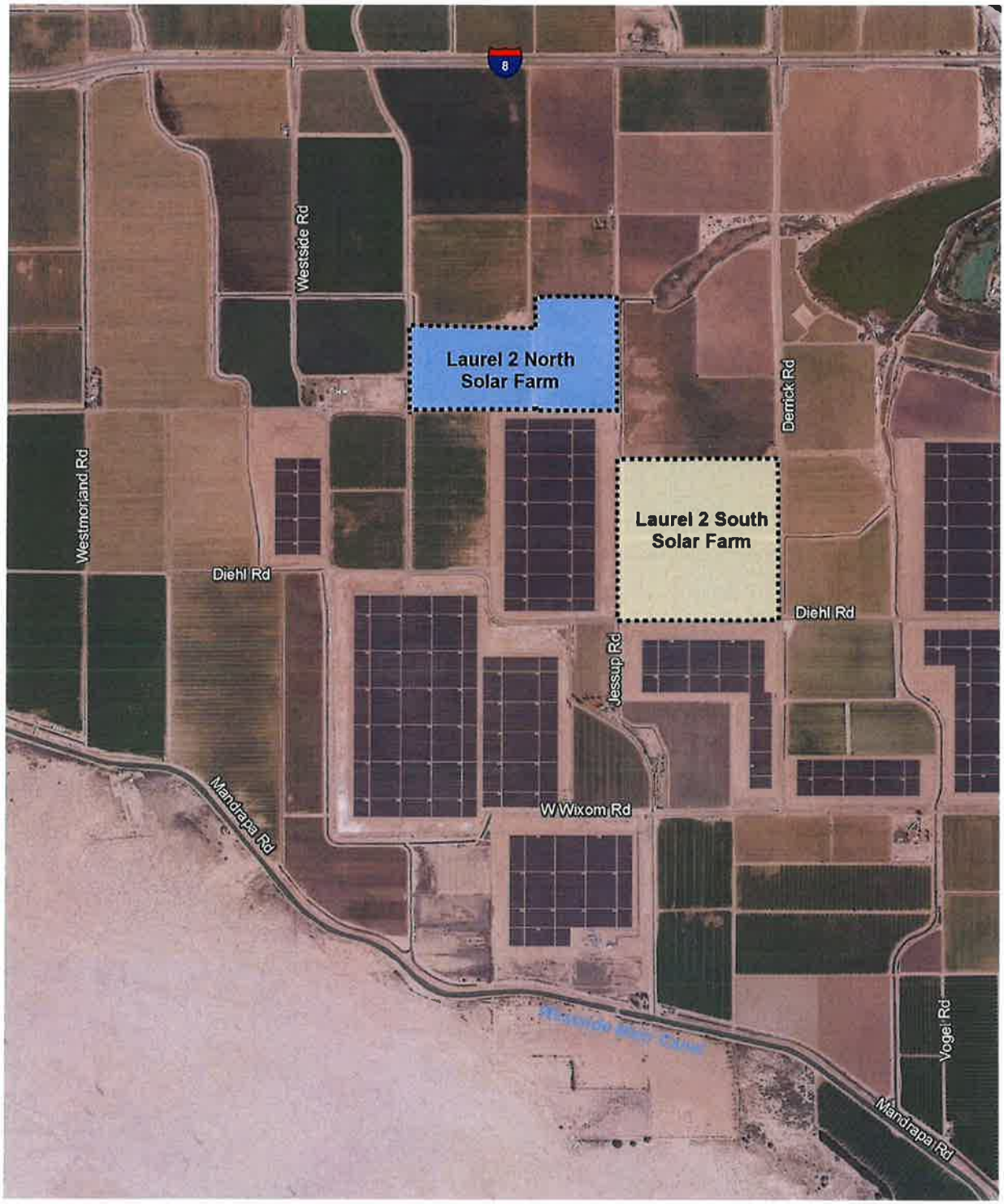


Figure 4. Proposed Lot Line Adjustment

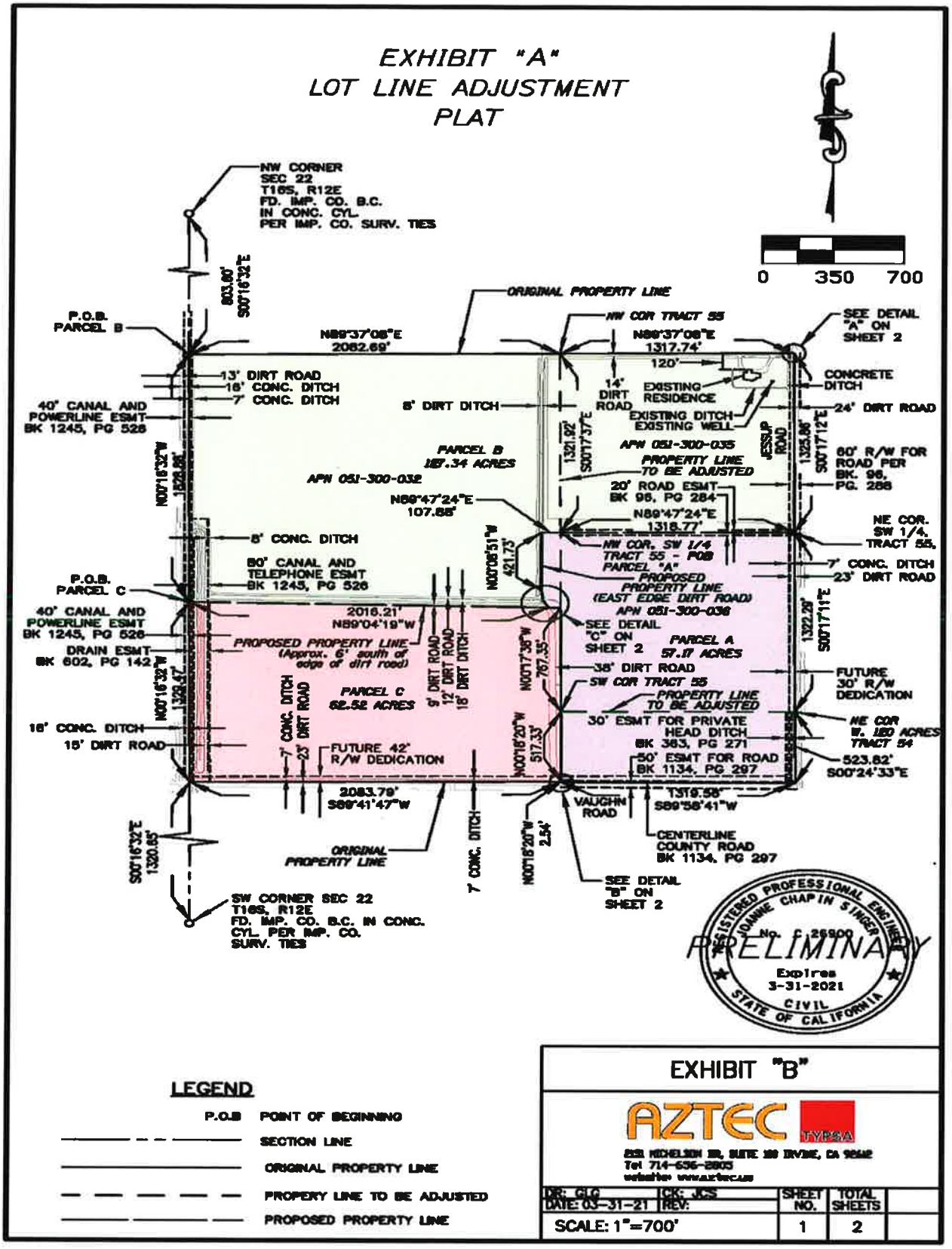
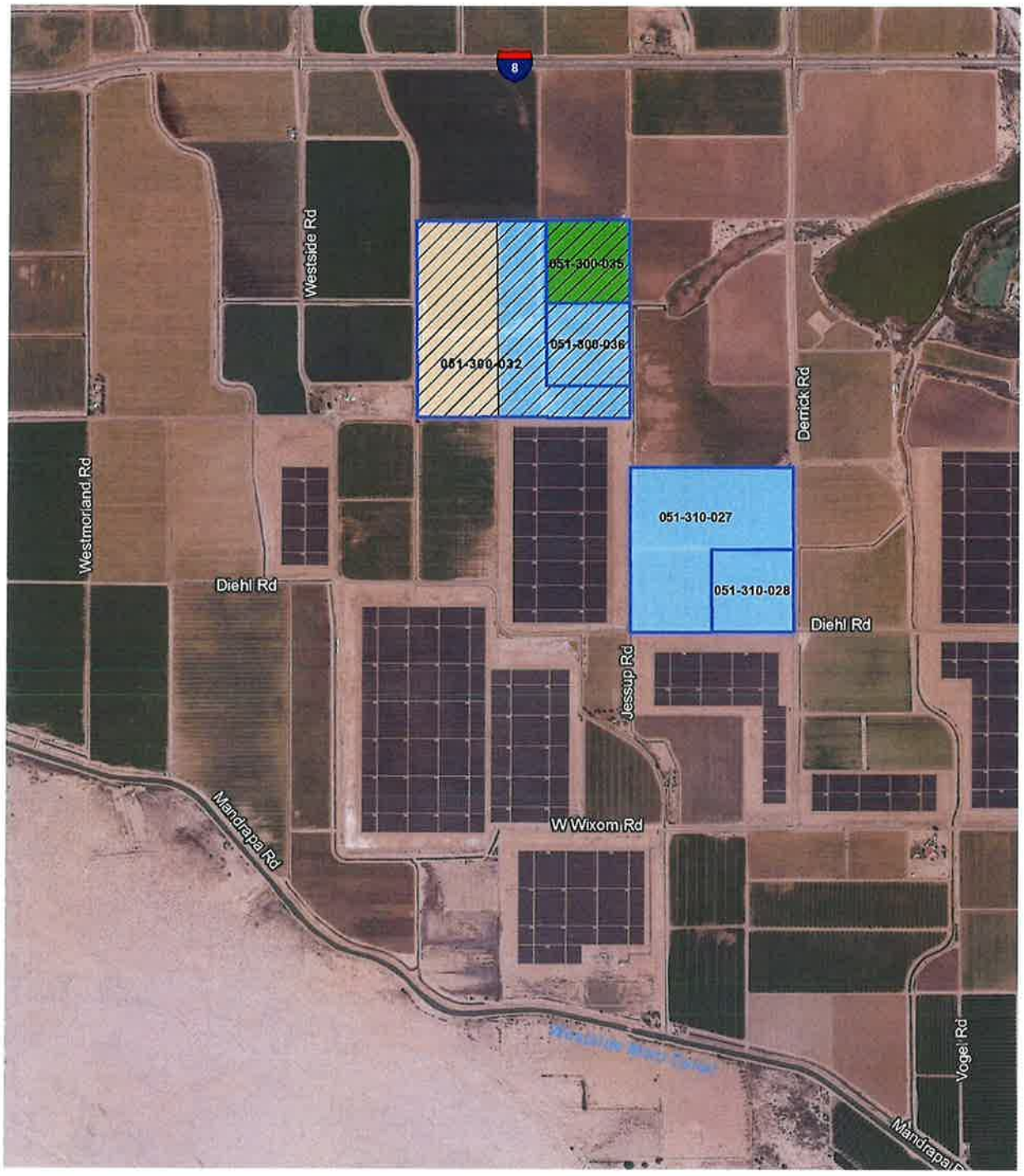


Figure 5. Proposed Zone Change



LEGEND

- Proposed A-3-RE Zone (Heavy Agriculture- Renewable Energy Overlay Zone)

Existing Zoning

- A-2-R-RE (General Agricultural - Rural- Renewable Energy Overlay Zone)
- A-3 (Heavy Agriculture)
- A-3-RE (Heavy Agriculture- Renewable Energy Overlay Zone)
- Assessor Parcels

0 Feet 2,500

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

I. *AESTHETICS*

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista or scenic highway? ☐ ☐ ☐ ☒

a) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. Therefore, the proposed projects would result in no new or significant changes to any scenic vista as discussed in the Final EIR.

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

b) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. There are no designated state scenic highways in the project areas. Therefore, the proposed projects would result in no new or significant changes to any state scenic highway as discussed in the Final EIR.

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? ☐ ☐ ☒ ☐

c) Less Than Significant Impact. Impacts associated with the visual quality of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. Therefore, the proposed projects would result in no new or significant changes to the degradation of the existing visual character or quality of the site and its surroundings as discussed in the Final EIR.

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

d) Potentially Significant Impact Unless Mitigation Incorporated. Impacts associated with the light and glare of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. In addition, the conclusions and mitigation measure (Mitigation Measure VQ-1), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects. Therefore, the proposed projects would result in no new or significant changes to substantial light or glare as discussed in the Final EIR.

II. *AGRICULTURE AND FOREST RESOURCES*

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. --Would the project:

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? ☐ ☒ ☐ ☐

a) Potentially Significant Unless Mitigation Incorporated. The potential agricultural impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. In addition, the conclusions and mitigation measures (Mitigation Measures AG-1a and AG-1b), as attached hereto,

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects. Therefore, the proposed projects would result in no new or significant changes to the impacts to Prime Farmland or Farmland of Statewide Importance as discussed in the Final EIR.

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

b) Less Than Significant Impact. The potential agricultural impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged.

The LS2 project site is currently zoned A-2-R-RE (General Agriculture – Rural – Renewable Energy Overlay Zone). Pursuant to Title 9, Division 5, Chapter 8, the following uses are permitted in the A-2 and A-2-R zone subject to approval of a CUP from Imperial County: solar energy electrical generator, electrical power generating plant, major facilities relating to the generation and transmission of electrical energy, and resource extraction and energy development. The L2N project site is currently zoned A-2-R-RE and A-3-RE (Heavy Agriculture – Renewable Energy Overlay Zone). Because APN 051-300-032 (associated with the L2N project site) is proposed to be reconfigured as part of the lot line adjustment, the project applicant is requesting to change the zoning designation of the entire parcel from A-2-R-RE and A-3-RE to A-3-RE (Figure 5). Pursuant to Title 9, Division 5, Chapter 9, "Solar Energy Plants" and "Transmission lines, including supporting towers, poles microwave towers, utility substations" are uses that are permitted in the A-3 Zone, subject to approval of a CUP. Therefore, with approval of the CUPs, the proposed projects would be consistent with the A-2, A-2-R, and A-3 zoning designations.

The proposed projects would result in no new or significant changes to agricultural use zoning or Williamson Act Contracts as discussed in the Final EIR.

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))? ☐ ☐ ☐ ☒

c) No Impact. The potential forest land and timberland impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The project sites do not contain forest, timberland, or timberland zoned Timberland Production areas.

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

d) No Impact. The potential forest land impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The project sites do not contain forest land.

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? ☐ ☒ ☐ ☐

e) Potentially Significant Unless Mitigation Incorporated. The potential agricultural impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The conclusions and mitigation measure (Mitigation Measures AG-1b and AG-2), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects. Therefore, the proposed projects would result in no new or significant changes to the impacts on conversion of Farmland as discussed in the Final EIR.

III. *AIR QUALITY*

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to the following determinations. Would the Project:

a) Conflict with or obstruct implementation of the applicable air ☐ ☐ ☐ ☒

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

quality plan?

a) No Impact. The potential air quality impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in similar emissions as described in the Final EIR. Therefore, the proposed projects would result in no new or significant changes to applicable air quality plans as discussed in the Final EIR.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? ☐ ☒ ☐ ☐

b) Potentially Significant Unless Mitigation Incorporated. The potential air quality impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in comparable emissions during construction as identified in the original EIR. Similar to the previously-approved project, the L2N and L2S projects would be required to equip construction equipment with an engine designation of EPA Tier 2 or better (Tier 2+), as described in Mitigation Measure AQ-1 of the Final EIR, and to comply with the requirements of ICAPCD Regulation VIII for the control of fugitive dust, as described in Mitigation Measure AQ-2 of the Final EIR. The conclusions and mitigation measures (Mitigation Measure AQ-1 and AQ-2), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

c) Expose sensitive receptors to substantial pollutants concentrations? ☐ ☐ ☒ ☐

c) Less Than Significant Impact. The potential air quality impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to the exposure of sensitive receptors to substantial pollutant concentrations as discussed in the Final EIR.

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

d) Less Than Significant Impact. The potential air quality impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant odor impacts that could otherwise affect a substantial number of people as discussed in the Final EIR.

IV. *BIOLOGICAL RESOURCES Would the project:*

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ☐ ☒ ☐ ☐

a) Potentially Significant Unless Mitigation Incorporated. The potential biological resources impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to impacts identified for special-status species as discussed in the Final EIR. Further, conclusions and mitigation measures (Mitigation Measures BIO-1 through BIO-7), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

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? ☐ ☐ ☐ ☒

b) No Impact. The potential biological resources impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. There are no riparian habitat or other sensitive natural communities within the project sites.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

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? ☐ ☐ ☐ ☒

c) No Impact. The potential biological resources impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to project-related impacts to state or federally protected wetlands as discussed in the Final EIR.

d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? ☐ ☒ ☐ ☐

d) Potentially Significant Unless Mitigation Incorporated. The potential biological resources impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to the movement of any native resident or migratory wildlife corridors as discussed in the Final EIR. Further, the conclusions and mitigation measure (Mitigation Measure BIO-6), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance? ☐ ☐ ☒ ☐

e) Less Than Significant Impact. The potential biological resources impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would comply with local policies or ordinances protecting biological resources as discussed in the Final EIR.

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? ☐ ☐ ☐ ☒

f) No Impact. The potential biological resources impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects are not be located within an HCP, NCCP, or other approved local, regional, or state HCP.

V. *CULTURAL RESOURCES* *Would the project:*

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? ☐ ☒ ☐ ☐

a) Potentially Significant Unless Mitigation Incorporated. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions and mitigation measures (Mitigation Measures CR-1 through CR-4), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? ☐ ☒ ☐ ☐

b) Potentially Significant Unless Mitigation Incorporated. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

and mitigation measures (Mitigation Measures CR-5 through CR-6), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

c) Disturb any human remains, including those interred outside of dedicated cemeteries? ☐ ☒ ☐ ☐

c) Potentially Significant Unless Mitigation Incorporated. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions and mitigation measures (Mitigation Measure CR-8), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

VI. *ENERGY Would the project:*

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? ☐ ☐ ☒ ☐

a) Less Than Significant Impact. Energy was not previously analyzed as a separate individual topic in the Laurel Cluster Solar Farms Final EIR. However, this does not mean that Energy was not analyzed. Rather, impacts related to energy were addressed within the greenhouse gas emissions analysis (Section 4.7 of the Final EIR), utilities/service systems analysis (Section 4.14 of the Final EIR), and Chapter 5, Analysis of Long-Term Effects of the Final EIR. Since the State CEQA Guidelines has been revised by the Office of Planning and Research to include separate criteria and thresholds, this Addendum includes Energy as a separate topic.

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Therefore, energy use would be similar as analyzed in the Final EIR for the Laurel Cluster Solar Farm 2 project. In addition, the projects would be a renewable source of energy that could displace electricity generated by fossil fuel combustion and provide low-GHG electricity to customers.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ☐ ☐ ☒ ☐

b) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. The projects would provide a renewable source of energy that would assist the state meet its statutory and regulatory goal of increasing renewable power generation. Ultimately, the projects would provide renewable energy that would replace other sources of energy, including those that consume fossil fuels.

VII. *GEOLOGY AND SOILS Would the project:*

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

1) 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? ☐ ☐ ☐ ☒

1) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The project sites are not located on an active fault or within a designated AP Zone.

2) Strong Seismic ground shaking? ☐ ☒ ☐ ☐

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

2) Potentially Significant Unless Mitigation Incorporated. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions and mitigation measures (Mitigation Measure GEO-1), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

3) Seismic-related ground failure, including liquefaction and seiche/tsunami? ☐ ☒ ☐ ☐

3) Potentially Significant Unless Mitigation Incorporated. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions and mitigation measures (Mitigation Measures GEO-1), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

4) Landslides? ☐ ☐ ☐ ☒

4) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The potential for earthquake induced landslides to occur at the project sites is unlikely due to the flat topography of the project sites.

b) Result in substantial soil erosion or the loss of topsoil? ☐ ☒ ☐ ☐

b) Potentially Significant Unless Mitigation Incorporated. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions and mitigation measures (Mitigation Measure HYD-1), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse? ☐ ☒ ☐ ☐

c) Potentially Significant Unless Mitigation Incorporated. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions and mitigation measures (Mitigation Measure GEO-1), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property? ☐ ☒ ☐ ☐

d) Potentially Significant Unless Mitigation Incorporated. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions and mitigation measures (Mitigation Measure GEO-2), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

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? ☐ ☒ ☐ ☐

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

e) Potentially Significant Unless Mitigation Incorporated Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions and mitigation measures (Mitigation Measure GEO-3), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ☐ ☒ ☐ ☐

f) Potentially Significant Unless Mitigation Incorporated. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions and mitigation measures (Mitigation Measure CR-7), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

VIII. *GREENHOUSE GAS EMISSION Would the project:*

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ☐ ☐ ☒ ☐

a) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to impacts related to GHG emissions as discussed in the Final EIR.

b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ☐ ☐ ☒ ☐

b) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions as discussed in the Final EIR.

IX. *HAZARDS AND HAZARDOUS MATERIALS Would the project:*

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ☐ ☐ ☒ ☐

a) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farm Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to the impacts to the public or the environment through the routine transport, use, or disposal of hazardous materials as discussed in the Final EIR.

b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ☐ ☐ ☒ ☐

b) Less than Significant. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to the impacts related to a significant hazard to the public or the environment involving the release of hazardous materials into the environment.

		Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒

c) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. No schools are located within 0.25 mile of the project sites.

d)	Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

d) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The project sites are not located on a site included on a list of hazardous materials sites.

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?	☐	☐	☐	☒

e) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The project sites are not located within two miles of an airport.

f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

f) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to the implementation of an adopted emergency response plan or emergency evacuation as discussed in the Final EIR.

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

g) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to the exposure of people or structures to significant risk of loss, injury or death involving wildland fires as discussed in the Final EIR.

X. *HYDROLOGY AND WATER QUALITY Would the project:*

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

a) Potentially Significant Unless Mitigation Incorporated. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions and mitigation measures (Mitigation Measures HYD-1 through HYD-3), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the	☐	☐	☒	☐

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

basin?

b) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to groundwater supplies as discussed in the Final EIR.

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; ☐ ☐ ☒ ☐

Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to existing drainage patterns of the site or on- or off-site erosion or siltation as discussed in the Final EIR.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; ☐ ☐ ☒ ☐

Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to a substantial increase in the rate or amount of surface runoff in a manner which would result in flooding on- or off-site as discussed in the Final EIR.

(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; ☐ ☐ ☒ ☐

Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to sources of polluted runoff water contribution as discussed in the Final EIR.

(iv) impede or redirect flood flows? ☐ ☐ ☐ ☒

No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The project sites are not located within a 100-year flood hazard area and therefore would not impede or redirect flood flows.

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

d) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to the risk of release of pollutants due to project inundation.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ☐ ☐ ☒ ☐

e) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR. Further, conclusions and mitigation measures (Mitigation Measures HYD-1 through HYD-3), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

XI. *LAND USE AND PLANNING Would the project:*

		Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a)	Physically divide an established community?	☐	☐	☐	☒

a) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to established communities as discussed in the Final EIR.

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?	☐	☐	☒	☐

b) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The project applicant is requesting approval of two CUPs for the construction and operation of two individual utility-scale solar farms, L2S and L2N, within the previously-approved Laurel Cluster Solar Farm 2 project area. The two CUPs will simply be the reorganization of the previously-approved Laurel Cluster Solar Farm 2 project area.

The LS2 project site is currently zoned A-2-R-RE (General Agriculture – Rural – Renewable Energy Overlay Zone). Pursuant to Title 9, Division 5, Chapter 8, the following uses are permitted in the A-2 and A-2-R zone subject to approval of a CUP from Imperial County: solar energy electrical generator, electrical power generating plant, major facilities relating to the generation and transmission of electrical energy, and resource extraction and energy development. The L2N project site is currently zoned A-2-R-RE and A-3-RE (Heavy Agriculture – Renewable Energy Overlay Zone). Because APN 051-300-032 (associated with the L2N project site) is proposed to be reconfigured as part of the lot line adjustment, the project applicant is requesting to change the zoning designation of the entire parcel from A-2-R-RE and A-3-RE to A-3-RE (Figure 5). Pursuant to Title 9, Division 5, Chapter 9, "Solar Energy Plants" and "Transmission lines, including supporting towers, poles microwave towers, utility substations" are uses that are permitted in the A-3 Zone, subject to approval of a CUP. Therefore, with approval of the CUPs, the proposed projects would be consistent with the A-2, A-2-R, and A-3 zoning designations.

The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project as discussed in the Final EIR.

XII. *MINERAL RESOURCES Would the project:*

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?	☐	☐	☐	☒

a) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to mineral resources of value to the region and the residents of the state as discussed in the Final EIR.

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?	☐	☐	☐	☒

b) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to locally-important mineral resource recovery sites as discussed in the Final EIR.

XIII. *NOISE Would the project result in:*

a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

a) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to generation of noise levels in excess of standards established in the local general

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

plan or noise ordinance as discussed in the Final EIR.

b) Generation of excessive groundborne vibration or groundborne noise levels? ☐ ☐ ☒ ☐

b) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant groundborne vibration or groundborne noise levels as discussed in the Final EIR.

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? ☐ ☐ ☐ ☒

c) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes in airport-related noise levels as discussed in the Final EIR.

XIV. *POPULATION AND HOUSING* *Would the project:*

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)? ☐ ☐ ☐ ☒

a) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to population growth in the area as discussed in the Final EIR.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☐ ☒

b) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to displacement of substantial numbers of existing people or housing as discussed in the Final EIR. The project applicant is requesting a lot line adjustment to change the property lines on three existing APNs (APN 051-300-032, 051-300-035, and 051-300-036). There is one existing residence located on APN 051-300-035. The proposed line adjustment would not result in the displacement of the existing residence on APN 051-300-035. Therefore, no impact would occur.

XV. *PUBLIC SERVICES*

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: ☐ ☐ ☒ ☐

1) Fire Protection? ☐ ☐ ☒ ☐

1) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to fire protection services as discussed in the Final EIR. Imperial County requires payment of impact fees for new development projects. Fire Impact Fees are imposed pursuant to Ordinance 1418 §2 (2006), which was drafted in accordance with the County's TischlerBise Impact Fee Study. The ordinance has provisions for non-residential industrial projects based on square footage. The project applicant will be required to pay the fire protection services' impact fees. These fees,

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

as well as other applicable fire department requirements, would be included in the Conditions of Approval for the CUPs.

2) Police Protection? ☐ ☐ ☒ ☐

2) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to police protection services as discussed in the Final EIR. Imperial County requires payment of impact fees for new development projects. Police services Impact Fees are imposed pursuant to Ordinance 1418 §2 (2006), which was drafted in accordance with the County's TischlerBise Impact Fee Study. The ordinance has provisions for non-residential industrial projects based on square footage. The project applicant will be required to pay the police protection services' impact fees. These fees, as well as any other applicable law enforcement requirements, would be included in the Conditions of Approval for the CUPs.

3) Schools? ☐ ☐ ☐ ☒

3) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to school services as discussed in the Final EIR.

4) Parks? ☐ ☐ ☐ ☒

4) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to park services as discussed in the Final EIR.

5) Other Public Facilities? ☐ ☐ ☐ ☒

5) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to other public services as discussed in the Final EIR.

XVI. *RECREATION*

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? ☐ ☐ ☐ ☒

a) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to neighborhood and regional parks or other recreational facilities as discussed in the Final EIR.

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? ☐ ☐ ☐ ☒

b) No Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. The proposed projects do not propose the construction of recreational facilities.

XVII. *TRANSPORTATION* ***Would the project:***

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ☐ ☐ ☒ ☐

a) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to impacts related to a conflict with a program plan, ordinance or policy addressing the circulation system..

b) Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)? ☐ ☐ ☒ ☐

b) Less Than Significant Impact. At the time of the prior environmental analysis, Vehicle Miles Traveled (VMT), was not a specific topic analyzed because the CEQA criteria and threshold related to analyzing VMT did not exist at the time the Final EIR was prepared.

Although the proposed projects would increase VMT during the construction phase as a result of trips made by construction workers and transportation of construction material and equipment, these increases are temporary in nature. Further, operation of the proposed projects would only require 5 full-time employees, which would be a nominal amount of vehicle trips generated. Therefore, the proposed project would not conflict or be inconsistent with Section 15064.3(b) of the CEQA Guidelines and no new, significant environmental impact would occur.

c) Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ☐ ☐ ☒ ☐

c) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to local roadway hazards as discussed in the Final EIR.

d) Result in inadequate emergency access? ☐ ☐ ☒ ☐

d) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to emergency access as discussed in the Final EIR.

XVIII. *TRIBAL CULTURAL RESOURCES*

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is: ☐ ☐ ☐ ☒

(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or ☐ ☐ ☐ ☒

(i) No Impact. As part of the Laurel Cluster Solar Farms Project Final EIR, the County conducted the appropriate outreach to Native American Tribes pursuant to AB 52. AB 52 requires that lead agencies, upon request of a California Native American tribe, begin consultation prior to the release of a negative declaration, mitigated negative declaration, or EIR for a project. Although AB 52 does not apply to an Addendum, the County conducted additional AB 52 outreach as part of the currently proposed project. On July 8, 2021, the County provided the project applications (CUPs, Zone Change, and Lot Line Adjustment) for review and comments to the following Native American tribes:

- Chemehuevi Reservation,
- Torres-Martinez Indian Tribe
- Fort Yuma Quechan Indian Tribe
- Campo Band of Mission Indians
- Augustine Band of Cahuilla Mission Indians
- La Posta Band of Mission Indians
- Manzanita Band of Kumeyaay Nation
- Cocopah Indian Tribe
- Colorado River Indian Tribe
- Inter-Tribal Cultural Resource Protections Council
- Ewiiaapaayp Tribe Office
- Kumeyaay Cultural Repatriation Committee

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

The Fort Yuma Quechan Indian Tribe responded via e-mail on July 16, 2021 indicating that they did not have any comments on the projects. Responses were not received from any other Native American tribes that were notified of the projects.

As this CEQA document is an Addendum, the AB 52 requirements are not applicable. The proposed L2S and L2N projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to tribal cultural resources. Cup applicant

(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth is subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. ☐ ☐ ☐ ☒

(ii) No Impact. See Response for Impact XVIII i) above.

XIX. ***UTILITIES AND SERVICE SYSTEMS*** ***Would the project:***

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects? ☐ ☐ ☒ ☐

a) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the projects would be the same as evaluated in the prior Final EIR.

b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years? ☐ ☐ ☒ ☐

b) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to water supplies as discussed in the Final EIR.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ☐ ☐ ☒ ☐

c) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to wastewater provider capacity as discussed in the Final EIR.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? ☐ ☐ ☒ ☐

d) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to landfill capacity to meet solid waste disposal needs as discussed in the Final EIR.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

e) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to federal, state, and local statutes and regulations related to solid waste as discussed in the Final EIR.

XX. *WILDFIRE*

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

a) Less Than Significant Impact. At the time of the prior environmental analysis, Wildfire, was not a specific topic analyzed because the CEQA criteria and thresholds related to analyzing wildfire did not exist at the time the Final EIR was prepared. However, this does not mean that Wildfire was not analyzed. Rather, impacts related to Wildfire were addressed in Section 4.8, Hazards and Hazardous Materials, of the Final EIR. Since the State CEQA Guidelines has been revised by the Office of Planning and Research to include separate thresholds, this Addendum includes Wildfire as a separate topic.

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. According to the Fire Hazard Severity Zones in State Responsibility Areas map for Imperial County prepared by the California Department of Forestry and Fire Protection, the project sites are not located in or near a state responsibility area. Major evacuation plans identified include SR 11, SR 98, and I-8. As discussed in Section 4.13 Transportation/Traffic, the projects would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. In addition, as part of the project's conditions of approval, a street improvement plan will be required to include emergency access points and safe vehicular travel. Therefore, the proposed projects would not impair an adopted emergency response plan or emergency evacuation plan.

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?	☐	☐	☒	☐

b) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S project sites would be located within the previously-approved Laurel Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. According to the Fire Hazard Severity Zones in State Responsibility Areas map for Imperial County prepared by the California Department of Forestry and Fire Protection, the project sites are not located in or near a state responsibility area. The project sites and the surrounding area is mostly flat and does not include slopes. Therefore, the proposed projects would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope or prevailing winds.

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?	☐	☐	☒	☐

c) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S project sites would be located within the previously-approved Laurel Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. According to the Fire Hazard Severity Zones in State Responsibility Areas map for Imperial County prepared by the California Department of Forestry and Fire Protection, the project sites are not located in or near a state responsibility area. The proposed projects would not expand or increase the development footprint as previously evaluated and the construction and operation of the project would be the same as evaluated in the prior Final EIR. As a part of the proposed projects, fire protection measures are incorporated as part of project design features, including portable CO_2 fire extinguishers mounted outside inverter/electrical distribution containers on pads throughout the solar arrays. On-site water storage is also required for fire protection. Therefore, the proposed project would not require the installation or maintenance of associated infrastructure exacerbate fire risk or result in temporary or ongoing impacts to the environment.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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?	☐	☐	☒	☐

d) Less Than Significant Impact. Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged. According to the Fire Hazard Severity Zones in State Responsibility Areas map for Imperial County prepared by the California Department of Forestry and Fire Protection, the project sites are not located in or near a state responsibility area. The project sites and surrounding areas are mostly flat and drainage patterns will remain largely unchanged. In addition, the project sites are not contained to 100-year flood hazard areas. Therefore, the proposed projects would not 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.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Revised 2009- CEQA
Revised 2011- ICPDS
Revised 2016 – ICPDS
Revised 2017 – ICPDS
Revised 2019 – ICPDS

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

SECTION 3
III. MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

a)	**Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, eliminate tribal cultural resources or eliminate important examples of the major periods of California history or prehistory?**	☐	☐	☐	☐
b)	**Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**	☐	☐	☐	☐
c)	**Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**	☐	☐	☐	☐

IV. PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Diana Robinson, Planner III

B. OTHER AGENCIES/ORGANIZATIONS

- **Public Works Department – Ministerial permits (building, grading, encroachment)**
- **Imperial Irrigation District – Rights-of-Way Permit**
- **Regional Water Quality Control Board**

(Written or oral comments received on the checklist prior to circulation)

V. REFERENCES

1. "County of Imperial General Plan EIR", prepared by Brian F. Mooney & Associates in 1993; and as Amended by County in 1996, 1998, 2001, 2003, 2006 & 2008, 2015, 2016.
2. Laurel Cluster Solar Farms Project Final EIR (2018)

VI. Environmental Document – County of Imperial

Project Name:

Laurel 2 South Solar Farm Project (L2S) (CUP # 21-0013)
Laurel 2 North Solar Farm Project (L2N) (CUP # 21-0014)

Project Applicant:

L2S – 92JT 8me LLC
L2N – 38KM 8me LLC

Project Location:
The proposed Laurel 2 South Solar Farm (L2S) and Laurel 2 North Solar Farm (L2N) Projects are located approximately eight miles southwest of the City of El Centro in an unincorporated area of the County of Imperial. The L2S project site encompasses approximately 160 acres and is located north of West Diehl Road, west of Derrick Road, and east of Jessup Road. The L2N project site encompasses approximately 120 acres and is located south of Interstate 8 (I-8), west of Jessup Road, north of West Vaughn Road and east of Fern Canal.

Description of Project:
The project applicant is requesting approval of two CUPs for the construction and operation of two individual utility-scale solar farms, L2S and L2N, within the previously-approved Laurel Cluster Solar Farms project area. Specifically, the projects would be located within the Laurel Cluster Solar Farm 2 project area (Assessor Parcel Numbers 051-300-032, 051-300-036, 051-310-027, and 051-310-028). The two CUPs will simply be the reorganization of the previously-approved Laurel Cluster Solar Farm 2 project area, as follows:

- L2S Project (CUP 21-0013) – 40 MW PV solar facility on 160 acres
- L2N Project (CUP 21-0014) – 30 MW PV solar facility on 120 acres

With approval of these two CUPS, the Laurel Cluster Solar Farms Projects would have a total of 5 CUPs covering 5 individual solar farm facilities.

The project applicant is also requesting a lot line adjustment to change the property lines on three existing APNs (APN 051-300-032, 051-300-035, and 051-300-036). The lot line adjustment proposes the following:

- Reconfiguration of APN 051-300-032
- Combine a portion of APN 051-300-032 with APN 051-300-036
- Combine a portion of APN 051-300-032 with APN 051-300-035

Because APN 051-300-032 is proposed to be reconfigured, the project applicant is requesting to change the zoning designation of the entire parcel from A-2-R-RE/A-3-RE to A-3-RE. In doing so, all resulting parcels from the proposed lot line adjustment will have the same A-3-RE zoning designation.

No substantial changes to the previously-approved project are proposed. The proposed L2S and L2N Projects would involve the development of PV energy facilities, battery storage facilities (up to 40 megawatts and up to 30 megawatts, respectively) and associated infrastructure on 160 acres and 120 acres, respectively. Power generated by each project would be delivered from the project sites via 230 kilovolt overhead and/or underground electrical transmission line(s) originating from an on-site substation(s)/switchyard(s) and terminating at the proposed Imperial Irrigation District (IID) Fern Substation, as stated in the CUP applications. Alternatively, power from the projects may be transmitted via the existing Campo Verde's 230 kV gen-tie line to SDG&E's Imperial Valley Substation located on Bureau of Land

Management land. The Laurel Cluster Solar Farms Project Final EIR analyzed development of on-site operations and maintenance (O&M), substation, and/or transmission facilities as part of the previously approved Laurel Cluster Solar Farm 2 project (CUP 17-0029). As stated in the CUP applications, the proposed L2S and L2N Projects may involve the development of these facilities or may instead share such facilities with nearby solar projects and/or may be remotely operated.

VII. FINDINGS

This is to advise that the County of Imperial, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environment and is proposing the following:

☐ The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☐ The Initial Study identifies potentially significant effects but:

(1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.

(2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.

(3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

☒ Based on the environmental analysis, an ADDENDUM to the Laurel Cluster Solar Farm Project Final EIR has been prepared for the proposed project.

Reasons to support this finding are included in the attached Initial Study. The project file and all related documents are available for review at the County of Imperial, Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 (442) 265-1736.

NOTICE

The public is invited to comment on the proposed Addendum and Initial Study during the 10-day notice period associated with the proposed project.

Date of Determination Jim Minnick, Director of Planning & Development Services

The Applicant hereby acknowledges and accepts the results of the Environmental Evaluation Committee (EEC) and hereby agrees to implement all Mitigation Measures, if applicable, as outlined in the MMRP.

Applicant Signature Date

SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

Attached is the adopted MMRP for the Laurel Cluster Solar Farms Project Final EIR. Applicable mitigation measures would be required of the L2S and L2N Solar Farm Projects.

Addendum to the Environmental Impact Report for the Laurel Cluster Solar Farms Project Imperial County, California SCH No. 2017121078

Laurel 2 South Solar Farm CUP #21-0013
Laurel 2 North Solar Farm CUP #21-0014
Zone Change #21-0002
Lot Line Adjustment #00321

Prepared By:

HDR
591 Camino de la Reina, Suite 300
San Diego, CA 92108

Reviewed by:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
(442) 265-1750
www.icpds.com

August 2021

BACKGROUND

On January 15, 2019, the Imperial County Board of Supervisors certified the Final Environmental Impact Report (EIR) and adopted four Conditional Use Permits (CUPs) for the Laurel Cluster Solar Farms Project. The Laurel Cluster Solar Farms Project consisted of four photovoltaic (PV) solar farm facilities and associated infrastructure, which would collectively generate up to 325 megawatts on approximately 1,380 acres. 92JT 8me LLC and 90FI 8me LLC applied for individual CUPs for each of the proposed locations: Laurel Cluster Solar Farm 1 (CUP 17-0028), Laurel Cluster Solar Farm 2 (CUP 17-0029), Laurel Cluster Solar Farm 3 (CUP 17-0030), and Laurel Cluster Solar Farm 4 (CUP 17-0027). Table 1 provides the acreage and proposed MW output of each of the projects.

Table 1. Laurel Cluster Solar Farms Acreage and Proposed Megawatt Output

Project	CUP	Acreage	Proposed MW
Laurel Cluster Solar Farm 1	17-0028	171	40
Laurel Cluster Solar Farm 2	17-0029	280	70
Laurel Cluster Solar Farm 3	17-0030	587	140
Laurel Cluster Solar Farm 4	17-0027	342	75
Total	--	**1,380**	**325**

The Board-certified Laurel Cluster Solar Farms Project Final EIR (State Clearinghouse No. 2017121078) determined that all significant impacts could be reduced to a level less than significant with the incorporation of mitigation measures. The potentially significant effects that were mitigated consisted of the following: Aesthetics (specifically related to light and glare), Agriculture Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials (impact and mitigation is specific to Laurel Cluster Solar Farm 1 Project only and not to the Laurel Cluster Solar Farm 2 Project which is the subject of this Addendum), and Hydrology/Water Quality. Figure 1 of Attachment A illustrates the area approved for solar development in 2019 and differentiates between the four individual CUPs.

PROJECT DESCRIPTION

The project applicant is requesting approval of two CUPs for the construction and operation of two individual utility-scale solar farms, Laurel 2 South Solar Farm (L2S) and Laurel 2 North Solar Farm (L2N), within the previously-approved Laurel Cluster Solar Farms project area (Figure 1). Specifically, the projects would be located within the Laurel Cluster Solar Farm 2 project area (Assessor Parcel Numbers 051-300-032, 051-300-036, 051-310-027, and 051-310-028) (Figures 2 and 3). The two CUPs will simply be the reorganization of the previously-approved Laurel Cluster Solar Farm 2 project area, as follows:

- L2S Project (CUP 21-0013) – 40 MW PV solar facility on 160 acres
- L2N Project (CUP 21-0014) – 30 MW PV solar facility on 120 acres

With approval of these two CUPS, the Laurel Cluster Solar Farms Projects would have a total of 5 CUPs covering 5 individual solar farm facilities.

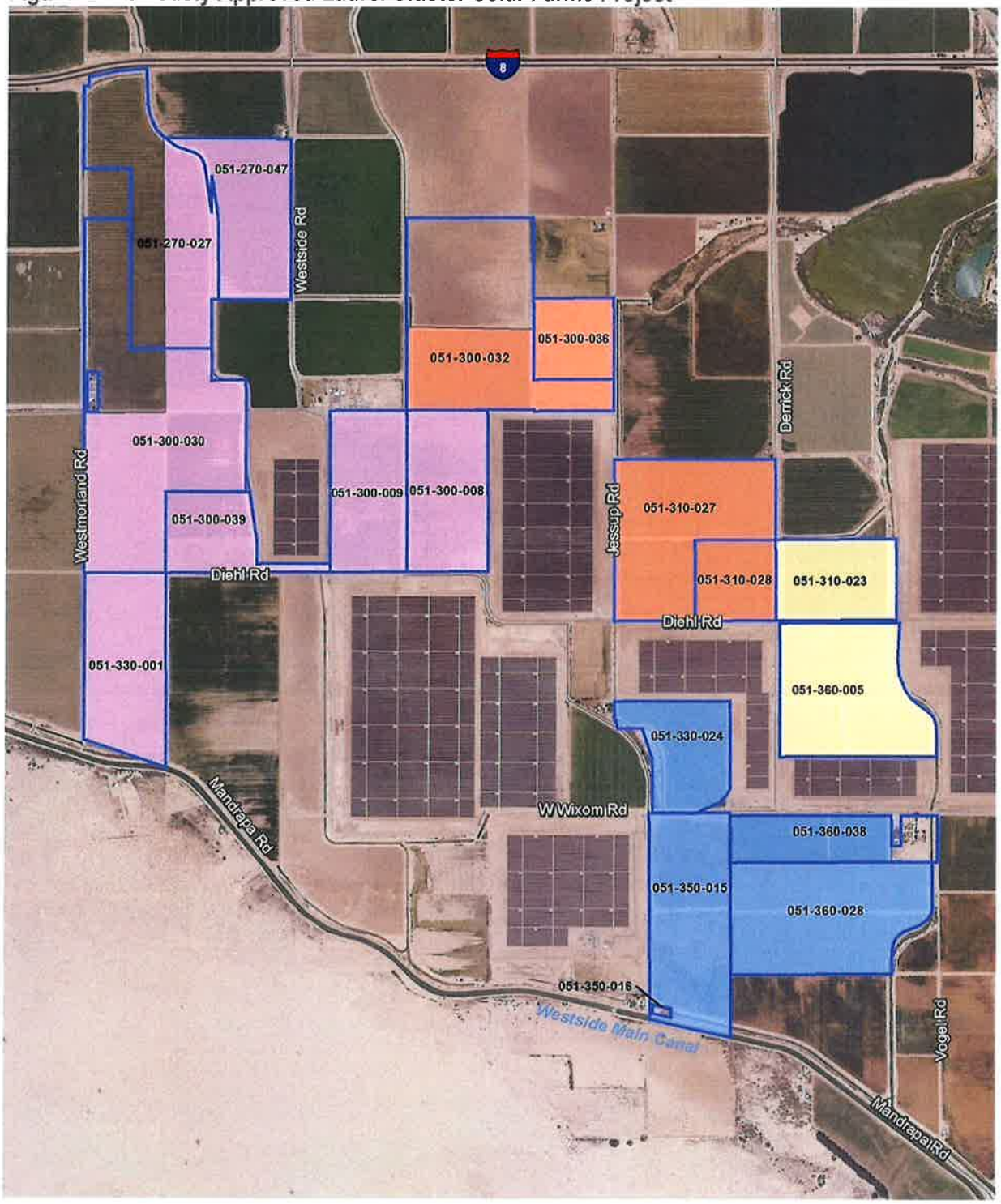
The project applicant is also requesting a lot line adjustment to change the property lines on three existing APNs (APN 051-300-032, 051-300-035, and 051-300-036) (Figure 4). The lot line adjustment proposes the following:

- Reconfiguration of APN 051-300-032
- Combine a portion of APN 051-300-032 with APN 051-300-036
- Combine a portion of APN 051-300-032 with APN 051-300-035

Because APN 051-300-032 is proposed to be reconfigured, the project applicant is requesting to change the zoning designation of the entire parcel from A-2-R-RE (General Agriculture – Rural – Renewable Energy Overlay Zone) and

A-3-RE (Heavy Agriculture – Renewable Energy Overlay Zone) to A-3-RE (Figure 5). In doing so, all resulting parcels from the proposed lot line adjustment will have the same A-3-RE zoning designation (Figure 5).

Figure 1. Previously Approved Laurel Cluster Solar Farms Project



LEGEND

- Laurel Solar Farm 1
- Laurel Solar Farm 2
- Laurel Solar Farm 3
- Laurel Solar Farm 4
- Assessor Parcels

0 Feet 2,500

Figure 1. Proposed CUP Modification Area

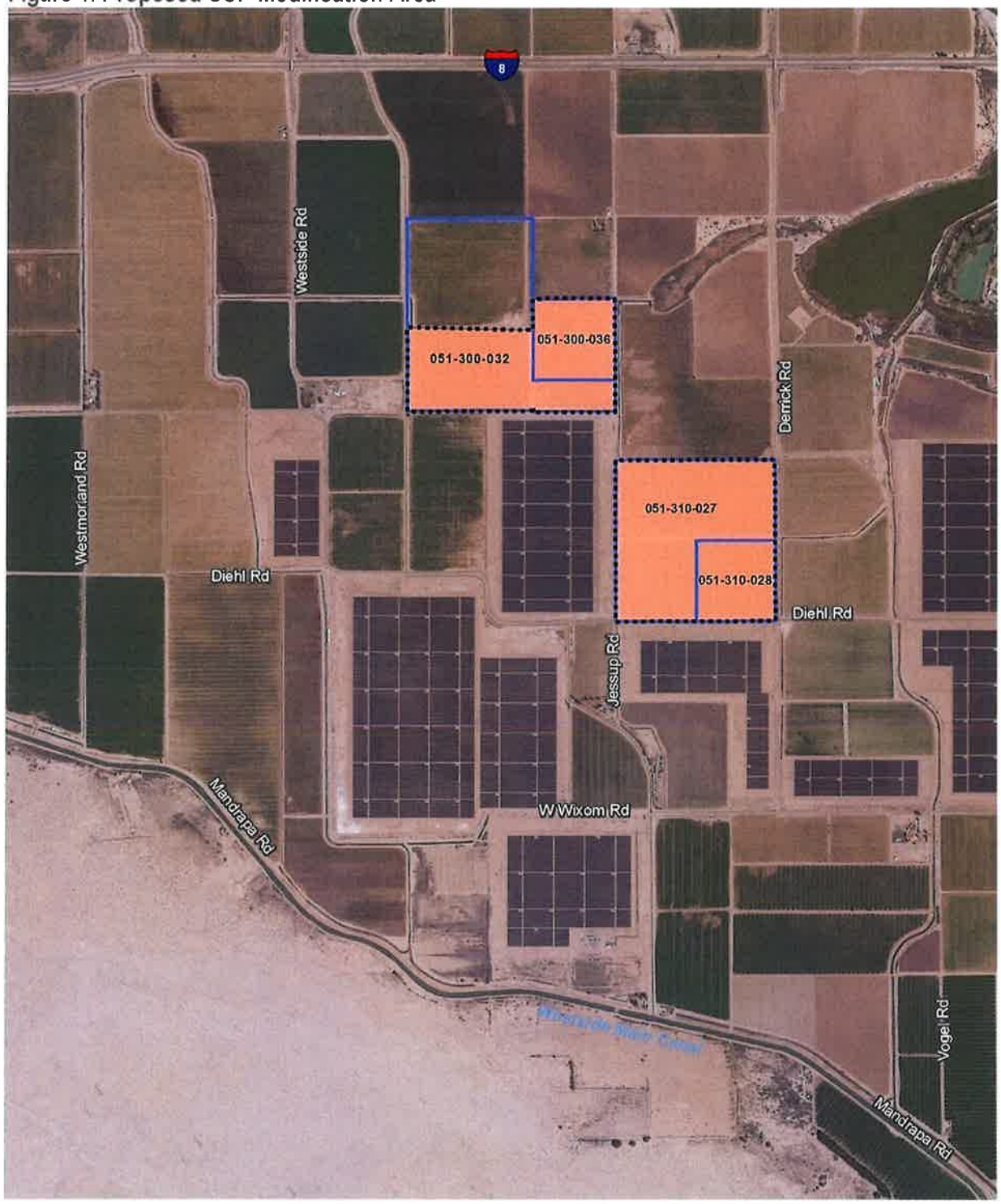


Figure 3. Proposed Laurel 2 North Solar Farm and Laurel 2 South Solar Farm

Figure 4. Proposed Lot Line Adjustment

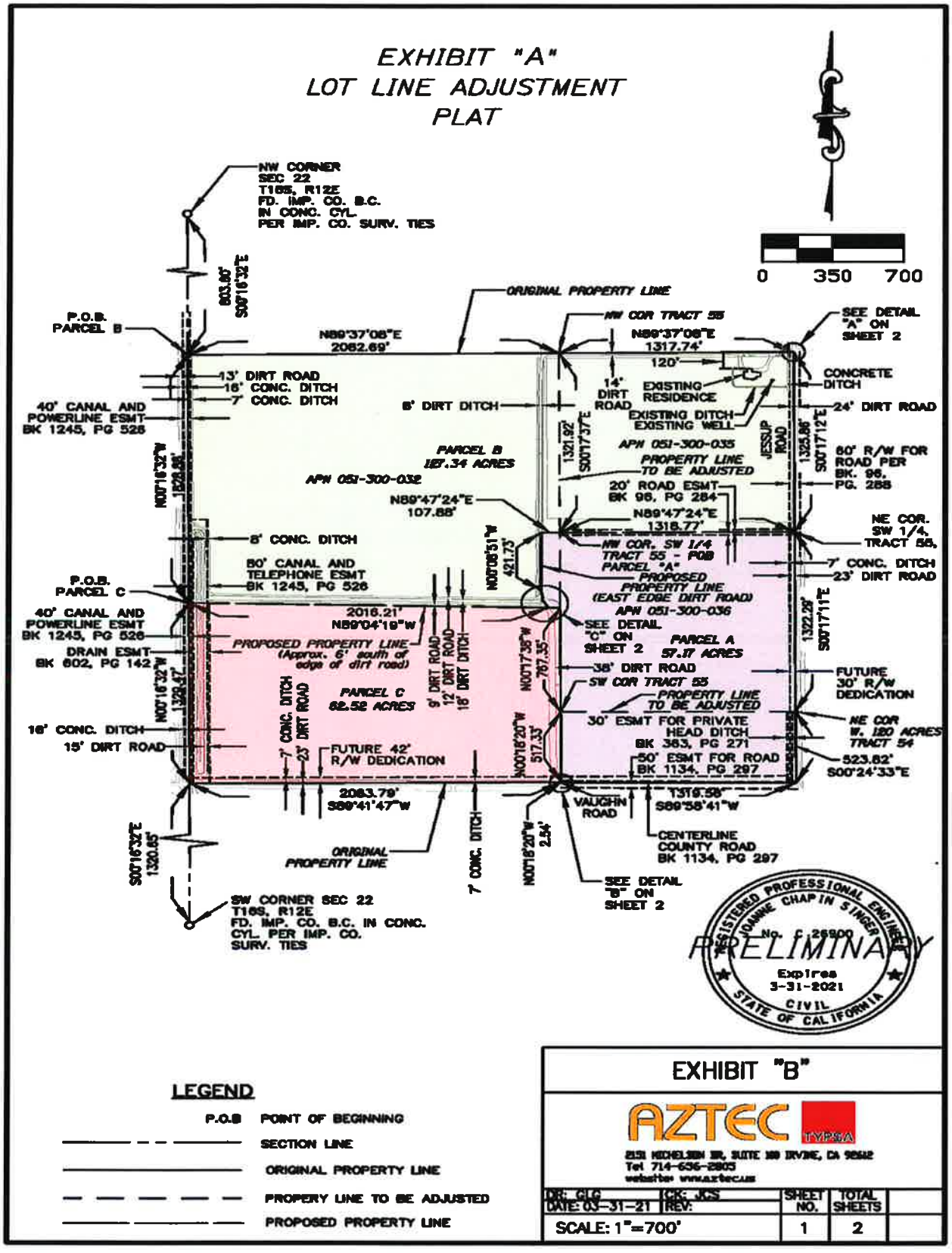
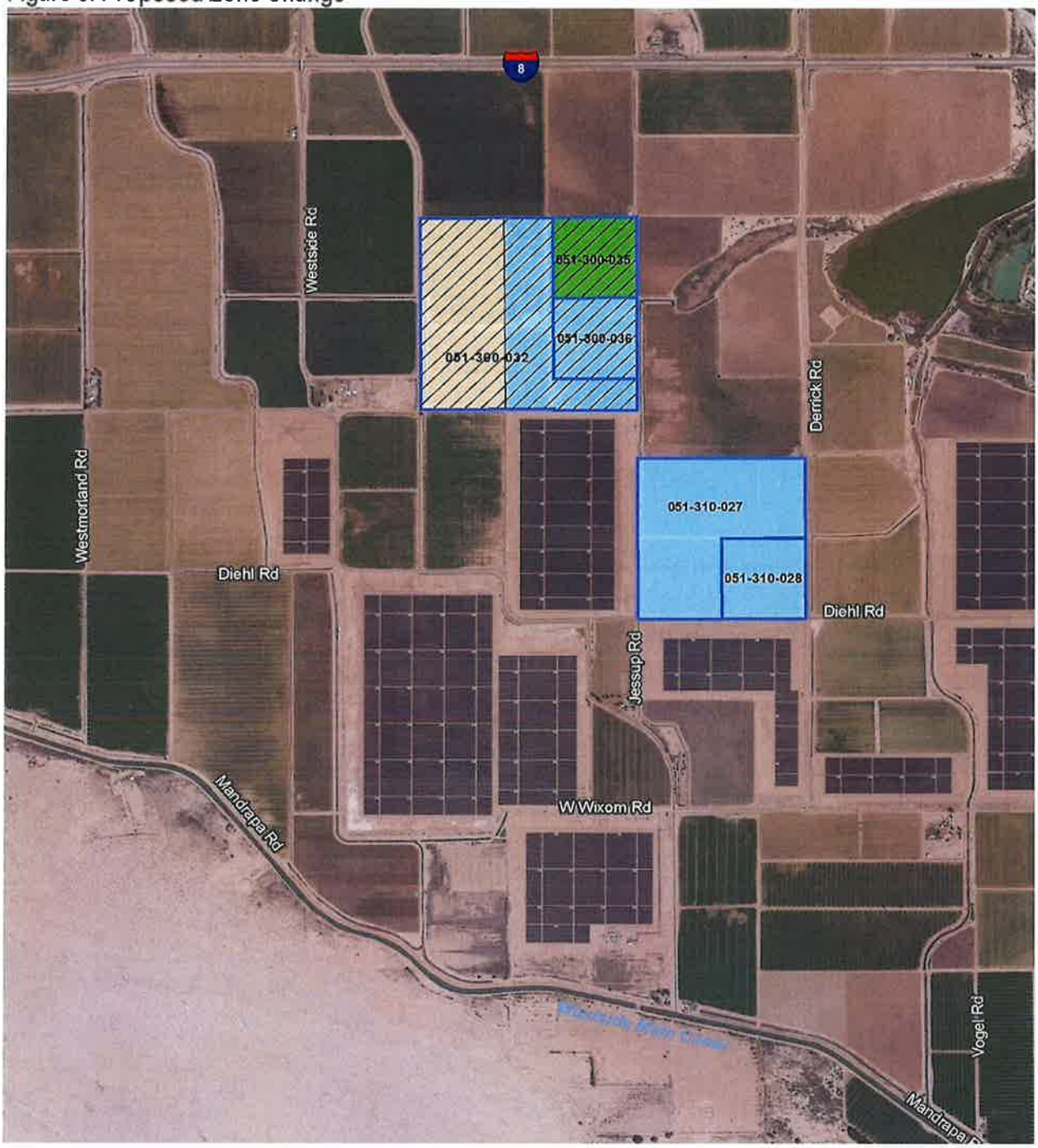


Figure 5. Proposed Zone Change



LEGEND

- Proposed A-3-RE Zone (Heavy Agriculture- Renewable Energy Overlay Zone)

Existing Zoning

- A-2-R-RE (General Agricultural - Rural- Renewable Energy Overlay Zone)
- A-3 (Heavy Agriculture)
- A-3-RE (Heavy Agriculture- Renewable Energy Overlay Zone)
- Assessor Parcels

0 Feet 2,500

ANALYSIS

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously-approved Negative Declaration or a previously certified EIR for the project. CEQA Guidelines, Sections 15162(a) and 15163, state that when a Negative Declaration has been adopted or an EIR certified for a project, no Subsequent or Supplemental EIR or Subsequent Negative Declaration shall be prepared for that project unless the lead agency determines that none of the conditions described in Section 15162 requiring the preparation of a subsequent Negative Declaration or EIR have occurred. The CEQA Guidelines require that a brief explanation be provided to support the findings that no subsequent EIR or Negative Declaration is needed for further discretionary approval. These findings are described below. The analysis in support of these findings is provided on the following pages.

1. *Required Finding: Substantial changes are not proposed for the project that will require major revisions of the previous EIR due to the involvement of new, significant environmental effects or a substantial increase in the severity of previously identified effects.*

   Substantial changes are not proposed for the projects and will not require revisions to the Laurel Cluster Solar Farms Project Final EIR. The previously-certified Final EIR analyzed the direct and physical changes to the environment that would result from the construction and operation of a solar energy on the Laurel Cluster Solar Farm 2 development area. The proposed projects would not expand or increase the development footprint as previously evaluated, nor would the fundamental characteristics of the project change from that previously analyzed in the certified Final EIR. The project applicant is requesting approval of two CUPs for the construction and operation of two individual utility-scale solar farms, L2S and L2N, within the previously-approved Laurel Cluster Solar Farm 2 project area (Figures 2 and 3). The two CUPs will simply be the reorganization of the previously-approved Laurel Cluster Solar Farm 2 project area, as follows:

   - L2S Project (CUP 21-0013) – 40 MW PV solar facility on 160 acres
   - L2N Project (CUP 21-0014) – 30 MW PV solar facility on 120 acres

   The project applicant is also requesting a lot line adjustment to change the property lines on three existing APNs (APN 051-300-032, 051-300-035, and 051-300-036) (Figure 4). The lot line adjustment proposes the following:

   - Reconfiguration of APN 051-300-032
   - Combine a portion of APN 051-300-032 with APN 051-300-036
   - Combine a portion of APN 051-300-032 with APN 051-300-035

   The LS2 project site is currently zoned A-2-R-RE (General Agriculture – Rural – Renewable Energy Overlay Zone). Pursuant to Title 9, Division 5, Chapter 8, the following uses are permitted in the A-2 and A-2-R zone subject to approval of a CUP from Imperial County: solar energy electrical generator, electrical power generating plant, major facilities relating to the generation and transmission of electrical energy, and resource extraction and energy development. The L2N project site is currently zoned A-2-R-RE and A-3-RE (Heavy Agriculture – Renewable Energy Overlay Zone). Because APN 051-300-032 (associated with the L2N project site) is proposed to be reconfigured as part of the lot line adjustment, the project applicant is requesting to change the zoning designation of the entire parcel from A-2-R-RE and A-3-RE to A-3-RE (Figure 5). Pursuant to Title 9, Division 5, Chapter 9, "Solar Energy Plants" and "Transmission lines, including supporting towers, poles microwave towers, utility substations" are uses that are permitted in the A-3 Zone, subject to approval of a CUP. Therefore, with approval of the CUPs, the proposed projects would be consistent with the A-2, A-2-R, and A-3 zoning designations.

Therefore, no proposed changes or revisions to the Laurel Cluster Solar Farms Project Final EIR are required. In addition, all previously adopted mitigation measures presented in the Laurel Cluster Solar Farms Project Final EIR are incorporated herein by reference.

2. *Required Finding: Substantial changes have not occurred with respect to the circumstances under which the project is undertaken, that would require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.*

Updates to the State CEQA Guidelines

Since certification of the Laurel Cluster Solar Farms Project Final EIR in August 2018, the Office of Planning and Research updated portions of Appendix G of the State CEQA Guidelines as follows:

- Addition of a new impact category – "Energy"
- Addition of a new impact category – "Tribal Cultural Resources"
- Addition of a new impact category – "Wildfire"
- Addition of a new threshold under the Transportation category to analyze vehicle miles traveled:
    - Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)?

Energy. Energy was not previously analyzed as a separate individual topic in the Laurel Cluster Solar Farms Final EIR. However, this does not mean that Energy was not analyzed in the Final EIR. Rather, impacts related to energy were addressed within the greenhouse gas emissions analysis (Section 4.7 of the Final EIR), utilities/service systems analysis (Section 4.14 of the Final EIR), and Chapter 5, Analysis of Long-Term Effects of the Final EIR. As described in this Initial Study, the proposed L2S and L2N projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy.

Tribal Cultural Resources. As part of the Laurel Cluster Solar Farms Project Final EIR, the County conducted the appropriate outreach to Native American Tribes pursuant to AB 52. AB 52 requires that lead agencies, upon request of a California Native American tribe, begin consultation prior to the release of a negative declaration, mitigated negative declaration, or EIR for a project. Although AB 52 does not apply to an Addendum, the County conducted additional AB 52 outreach as part of the currently proposed project. On July 8, 2021, the County provided the project applications (CUPs, Zone Change, and Lot Line Adjustment) for review and comments to the following Native American tribes:

- Chemehuevi Reservation,
- Torres-Martinez Indian Tribe
- Fort Yuma Quechan Indian Tribe
- Campo Band of Mission Indians
- Augustine Band of Cahuilla Mission Indians
- La Posta Band of Mission Indians
- Manzanita Band of Kumeyaay Nation
- Cocopah Indian Tribe
- Colorado River Indian Tribe
- Inter-Tribal Cultural Resource Protections Council
- Ewiiaapaayp Tribe Office
- Kumeyaay Cultural Repatriation Committee

The Fort Yuma Quechan Indian Tribe responded via e-mail on July 16, 2021 indicating that they did not have any comments on the projects. Responses were not received from any other Native American tribes that were notified of the projects.

As this CEQA document is an Addendum, the AB 52 requirements are not applicable. The proposed L2S and L2N projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to tribal cultural resources.

Wildfire. At the time of the prior environmental analysis, Wildfire, was not a specific topic analyzed because the CEQA criteria and thresholds related to analyzing Wildfire did not exist at the time the Final EIR was prepared. However, this does not mean that Wildfire was not analyzed. Rather, impacts related to Wildfire were addressed in Section 4.8, Hazards and Hazardous Materials, of the Final EIR. As described in this Initial Study, the proposed L2S and L2N projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to Wildfire.

Vehicle Miles Traveled. At the time of the prior environmental analysis, Vehicle Miles Traveled (VMT), was not a specific topic analyzed because the CEQA criteria and threshold related to analyzing VMT did not exist at the time the Final EIR was prepared. As described in this Initial Study, the proposed L2S and L2N projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to VMT.

Summary of Impacts from Initial Study
An Initial Study was prepared to analyze the potential impacts of the L2S and L2N Solar Farm Projects. The following is a summary of the potential impacts.

Aesthetics

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any aesthetics impacts as discussed in the Final EIR. Further, the conclusions and mitigation measure (Mitigation Measure VQ-1), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

Agriculture Resources

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any agricultural resources impacts as discussed in the Final EIR. Further, the conclusions and mitigation measures (Mitigation Measures AG-1a, AG-1b, and AG-2), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

Air Quality

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any air quality impacts as discussed in the Final EIR. Further, the conclusions and mitigation measures (Mitigation Measures AQ-1 and AQ-2), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

Biological Resources

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any biological resources impacts as discussed in the Final EIR. Further, the conclusions and mitigation measures (Mitigation Measures BIO-1 through BIO-7), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

Cultural Resources

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any cultural resources impacts as discussed in the Final EIR. In addition, the conclusions and mitigation measures (Mitigation Measures CR-1 through CR-6 and CR-8), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

Energy

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged resulting in no significant changes to any energy impacts as discussed in the Final EIR.

Geology and Soils

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any geology and soils and paleontological resources impacts as discussed in the Final EIR. Further, the conclusions and mitigation measures (Mitigation Measures GEO-1 through GEO-3, HYD-1, and CR-7), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

Greenhouse Gas Emissions

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any greenhouse gas emissions impacts as discussed in the Final EIR.

Hazards and Hazardous Materials

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be

located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any hazards and hazardous materials impacts as discussed in the Final EIR.

Hydrology and Water Quality

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any hydrology and water quality impacts as discussed in the Final EIR. Further, the conclusions and mitigation measures (Mitigation Measures HYD-1 through HYD-3), as attached hereto, identified in the previously-certified Final EIR remain accurate and applicable to the proposed projects.

Land Use and Planning

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S project sites would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any land use and planning impacts as discussed in the Final EIR.

Mineral Resources

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any mineral resources impacts as discussed in the Final EIR.

Noise

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any noise impacts as discussed in the Final EIR.

Population and Housing

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any population and housing impacts as discussed in the Final EIR.

Public Services

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint

and all project components would remain unchanged, resulting in no significant changes to any public services impacts as discussed in the Final EIR.

Recreation

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any recreation impacts as discussed in the Final EIR.

Transportation/Traffic

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any transportation/traffic impacts as discussed in the Final EIR.

Tribal Cultural Resources

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any tribal cultural resources impacts as discussed in the Final EIR.

Although AB 52 does not apply to an Addendum, the County conducted additional AB 52 outreach as part of the currently proposed project. On July 8, 2021, the County provided the project applications (CUPs, Zone Change, and Lot Line Adjustment) for review and comments to the following Native American tribes:

- Chemehuevi Reservation,
- Torres-Martinez Indian Tribe
- Fort Yuma Quechan Indian Tribe
- Campo Band of Mission Indians
- Augustine Band of Cahuilla Mission Indians
- La Posta Band of Mission Indians
- Manzanita Band of Kumeyaay Nation
- Cocopah Indian Tribe
- Colorado River Indian Tribe
- Inter-Tribal Cultural Resource Protections Council
- Ewiiaapaayp Tribe Office
- Kumeyaay Cultural Repatriation Committee

The Fort Yuma Quechan Indian Tribe responded via e-mail on July 16, 2021 indicating that they did not have any comments on the projects. Responses were not received from any other Native American tribes that were notified of the projects.

As this CEQA document is an Addendum, the AB 52 requirements are not applicable. The proposed L2S and L2N projects would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to tribal cultural resources.

Utilities and Service Systems

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S projects would be located within the previously-approved Laurel Cluster Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any utilities and service systems impacts as discussed in the Final EIR.

Wildfire

Impacts associated with the construction and operation of a utility-scale PV project at the project sites were evaluated in the Laurel Cluster Solar Farms Project Final EIR. The proposed L2N and L2S project sites would be located within the previously-approved Laurel Solar Farm 2 (CUP #17-0029) development footprint and all project components would remain unchanged, resulting in no significant changes to any wildfire impacts as discussed in the Final EIR.

Conclusion

Based on the considerations above, no new significant environmental effects or a substantial increase in the severity of previously identified significant effects would occur with implementation of the proposed projects. Therefore, no proposed changes or revisions to the Final EIR are required. In addition, all previously adopted mitigation measures are a condition of project approval and are incorporated herein by reference.

3. *Required Finding: No new information has been provided that would indicate that the proposed project would result in one or more significant effects not discussed in the previous EIR.*

   There is nothing in the proposed project that would suggest that its adoption and implementation would result in any new significant environmental effects not previously discussed in the certified Laurel Cluster Solar Farms Project Final EIR. Therefore, no proposed changes or revisions to the EIR are required. In addition, all previously adopted mitigation measures presented in the Laurel Cluster Solar Farms Project Final EIR are incorporated herein by reference and part of the CUPs for the L2S and L2N Projects.

CONCLUSION

Based on the findings and information contained in the previously-certified Laurel Cluster Solar Farms Project Final EIR, the analysis above and contained within the Initial Study, the CEQA statute and State CEQA Guidelines, including Sections 15164 and 15162, the project will not result in any new, increased, or substantially different impacts, other than those previously considered and addressed in the Laurel Cluster Solar Farms Project Final EIR. No changes or additions to the Laurel Cluster Solar Farms Project Final EIR analyses are necessary, nor is there a need for any additional mitigation measures. Therefore, pursuant to State CEQA Guidelines, Section 15164, the Imperial County Board of Supervisors will adopt CEQA Guideline Sections 15162 and 15164 findings as its consideration of the CEQA compliance for the proposed project.

0.3 Mitigation Monitoring and Reporting Program

The County of Imperial will adopt this Mitigation Monitoring and Reporting Program (MMRP) in accordance with Public Resources Code (PRC) Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines. The purpose of the MMRP is to ensure that the Laurel Cluster Solar Farm Project, which is the subject of the Environmental Impact Report (EIR), comply with all applicable environmental mitigation requirements. The mitigation measures for the project will be adopted by the County of Imperial, in conjunction with the adoption of the EIR. The mitigation measures have been integrated into this MMRP.

The mitigation measures are provided in Table 0.3-1. The specific mitigation measures are identified, as well as the monitoring method, responsible monitoring party, monitoring phase, verification/approval party, date mitigation measure verified or implemented, location of documents (monitoring record), and completion requirement for each mitigation measure.

The mitigation measures applicable to the project include avoiding certain impacts altogether, minimizing impacts by limiting the degree or magnitude of the action and its implementation, and/or reducing or eliminating impacts over time by maintenance operations during the life of the action.

Public Resources Code Section 21081.6 requires the Lead Agency, for each project that is subject to CEQA, to monitor performance of the mitigation measures included in any environmental document to ensure that implementation does, in fact, take place. The County of Imperial is the designated CEQA lead agency for the Mitigation Monitoring and Reporting Program. The County of Imperial is responsible for review of all monitoring reports, enforcement actions, and document disposition as it relates to impacts within the County's jurisdiction. The County of Imperial will rely on information provided by the monitor as accurate and up to date and will field check mitigation measure status as required.

A record of the MMRP will be maintained at County of Imperial, Department of Planning and Development Services, 801 Main Street, El Centro, CA 92243. All mitigation measures contained in the EIR shall be made conditions of the project as may be further described below.

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Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
Aesthetics and Visual Resources								
VQ-1	For areas where Fixed Tilt PV panels are proposed, as a component of submittal of final engineering and design for the site plan layouts, PV array position and configuration, PV panel type, the potential glint and glare shall be studied based on the more defined final engineering plans to determine whether fencing slats are required in specific locations of the perimeter fencing adjacent to project roadways. This measure is required for any proposed fixed-tilt trackers proposed to be installed in locations that face the following roadways: Westside Road, West Vaughn Road, West Diehl Road, Derrick Road, West Wixom Road, and Drew Road. This measure is not required for single-axis and double-axis tracker systems.	Prior to issuance of a building permit for each CUP site, if Fixed Tilt PV panels are proposed, the Department of Planning and Development Services shall verify that, if Fixed Tilt PV panels are proposed, neutral colored fence slats are incorporated into the final engineering and design layouts at those specific locations determined to be necessary based on the glint and glare studied prepared specifically as part of final engineering.	Department of Planning and Development Services	Prior to issuance of a building permit for each CUP site	Department of Planning and Development Services			
AG-1a	**Payment of Agricultural and Other Benefit Fees.** One of the following options included below is to be implemented prior to the issuance of a grading permit or building permit (whichever is issued first) for the projects: **A. Mitigation for Non-Prime Farmland.** **Option 1: Provide Agricultural Conservation Easement(s).** The Permittee shall procure Agricultural Conservation Easements on a "1 to 1" basis on land of equal size, of equal quality farmland, outside the path of development. The conservation easement shall meet Department of Conservation (DOC) regulations and shall be recorded prior to issuance of any grading or building permits. **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 programs costs on a cost recovery/time and material basis. The Agricultural In-Lieu	Prior to the issuance of a grading permit, Planning and Development Services shall verify that the Applicant has implemented one of the following mitigation options for Non Prime Farmland: procured a conservation easement, paid an agricultural in-lieu mitigation fee, or entered into an enforceable Public Benefit Agreement or Development Agreement with the County. Prior to the issuance of a grading permit, Planning and Development Services shall verify that the Applicant has implemented one of the following mitigation options for Prime Farmland: procured a conservation easement, paid an agricultural in-lieu mitigation fee, entered into an enforceable Public Benefit Agreement or	Department of Planning and Development Services	Prior to issuance of a grading permit for each CUP site	Department of Planning and Development Services			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	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,	Development Agreement with the County, or submitted revised applicable CUP applications and associated site plans.						
	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 is (1) consistent with Board Resolution 2012-005; 2) the Agricultural Benefit Fee must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation and enhancement of agricultural lands within Imperial County and to implement the goals and objectives of the Agricultural Benefit program, as specified in the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy.							
	B. Mitigation for Prime Farmland.							
	Option 1: **Provide Agricultural Conservation Easement(s).** Agricultural Conservation Easements on a "2 to 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							
	Option 2: **Pay Agricultural In-Lieu Mitigation Fee.** 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							

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	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. **Option 3:** **Public Benefit Agreement.** The Permittee and County enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that is (1) consistent with Board Resolution 2012-005; (2) the Agricultural Benefit Fee must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation and enhancement of agricultural lands within Imperial County and to implement the goals and objectives of the Agricultural Benefit program, as specified in the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy; the projects 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. **Option 4:** **Avoid Prime Farmland.** The Permittee must revise their CUP Application/Site Plan to avoid Prime Farmland.							
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 each CUP will be returned to its current	Prior to issuance of a grading permit for each CUP site, Planning and Development Services shall review and approve the Reclamation Plan. Planning and Development Services shall also verify that the	Department of Planning and Development Services	Prior to the issuance of a grading permit	Department of Planning and Development Services			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	agricultural condition/land evaluation site assessment (LESA) score of 58.48 for LSF1, 63.17 for LSF2, 65.37 for LSF3, and 66.15 for LSF4. Permittee also shall 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.	Permittee has provided financial assurance/bonding.						
AG-2	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 shall maintain a Pest Management Plan until reclamation is complete. The plan shall provide the following: 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; • 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;	Prior to the issuance of a grading permit for each CUP site, Planning and Development services shall review and approve the Weed and Pest Control Plan.	Department of Planning and Development Services and Agricultural Commissioner	Prior to the issuance of a grading permit	Department of Planning and Development Services Agricultural Commissioner			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	• 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 and Agriculture and the United States 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; • 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 that all project employees that handle pest control issues are appropriately trained and certified, that all required records are maintained and made available for inspection, and that 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, U.S. Environmental Protection Agency (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							

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	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 long as the original detailed records are available upon request. 3. A long-term strategy for weed and pest control and management during the operation of the proposed projects. Such strategies may include, but are not limited to: • 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. 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								
AQ-1	**Construction Equipment.** Construction equipment shall be equipped with an engine designation of EPA Tier 2 or better (Tier 2+). A list of the construction equipment, including all off-road equipment utilized at each of the projects by make, model, year, horsepower and expected/actual hours of use, and the associated EPA Tier shall be submitted to the Imperial County Planning and Development Services Department (ICPDS) and Imperial County Air Pollution Control District (ICAPCD) prior to the issuance of a grading permit. ICAPCD shall utilize this list to calculate air emissions to verify that equipment use does not exceed significance thresholds. ICPDS and ICAPCD shall verify implementation of this measure.	Prior to the issuance of a grading permit for each CUP site, ICAPCD shall verify that construction equipment are equipped with an engine designation of EPA Tier 2 or better.	Department of Planning and Development Services and ICAPCD	Prior to the issuance of a grading permit	Department of Planning and Development Services and ICAPCD			
AQ-2	**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. Whereas these Regulation VIII measures are mandatory and are not considered project environmental mitigation measures, the ICAPCD CEQA Handbook's required additional standard and enhanced mitigation measures listed below shall be implemented prior to and during construction. The County Department of	Prior to and during construction, the ICAPCD will verify that the project is in compliance with Regulation VIII-Fugitive Dust Control Measures.	Department of Planning and Development Services and ICAPCD	Prior to and during construction	Department of Public Works			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	Public Works will verify implementation and compliance with these measures as part of the grading permit review/approval process. ***ICAPCD Standard Measures for Fugitive Dust (PM_{10}) Control*** • 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 paving, chemical stabilizers, dust suppressants, and/or watering. • 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.							

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	ICAPCD "Discretionary" Measures for Fugitive Dust (PM_{10}) Control • Water exposed soil with adequate frequency for continued moist soil. • Replace ground cover in disturbed areas as quickly as possible. • Automatic sprinkler system installed on all soil piles. • Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site. • Develop a trip reduction plan to achieve a 1.5 average vehicle ridership for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. ***Standard Mitigation Measures for Construction Combustion Equipment*** • 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. • Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). ***Enhanced Mitigation Measures for Construction Equipment*** To help provide a greater degree of reduction of PM emissions from construction combustion equipment, ICAPCD recommends the following enhanced measures. • Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways. • Implement activity management (e.g., rescheduling activities to reduce short-term impacts).							

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
AQ-3	**Dust Suppression.** The project applicant shall employ a method of dust suppression (such as water or chemical stabilization) approved by ICAPCD. 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).	During construction, the Department of Planning and Development Services shall verify that the project applicant is employing a method of dust suppression approved by ICAPCD.	Department of Planning and Development Services	During construction	Department of Planning and Development Services			
AQ-4	**Dust Suppression Management Plan.** Prior to any earthmoving activity, the applicant shall submit and obtain approval from ICAPCD and ICPDS a construction Dust Control Plan.	Prior to any earthmoving activity, the ICAPCD and ICPDSD shall review and approve a construction Dust Control Plan.	ICAPCD and ICPDSD	Prior to construction, prior to issuance of a Certificate of Occupancy	Department of Planning and Development Services and ICAPCD			
AQ-5	**Operational Dust Control Plan.** Prior to issuance of a Certificate of Occupancy, the applicant shall submit and obtain approval from ICAPCD and ICPDS an Operations Dust Control Plan. 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, the ICAPCD shall review the project to determine if Rule 310 fees are applicable to the project.	Prior to the issuance of a Certificate of Occupancy, the applicant shall submit and obtain approval from the ICAPCD and ICPDSD an Operations Dust Control Plan.	Department of Planning and Development Services	Prior to construction, prior to issuance of a Certificate of Occupancy	Department of Planning and Development Services and ICAPCD			
Biological Resources								
BIO-1	**Burrowing Owl Mitigation.** Burrowing owls have been observed in the active agricultural fields within the project sites. The following measures will avoid, minimize, or mitigate potential impacts on burrowing owl during construction activities: 1. A distance of 160 feet, during non-nesting season (September through January), or 250 feet, during nesting season (February through August), shall be maintained between active burrows and construction activities. A qualified biologist may also employ the technique of sheltering in place (using hay bales to shelter the burrow from construction activities). If this technique is employed, the sheltered area shall be monitored weekly by a qualified biologist.	Prior to construction, the Planning and Development Services shall verify that pre-construction surveys were conducted for each CUP site. If active burrows are present, the measures as providing in Mitigation Measures 4.4-1a and 4.4-1b shall be implemented.	Department of Planning and Development Services	Prior to and during construction	Department of Planning and Development Services and CDFW			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	2. If construction is to begin during the breeding season, the following measures (Measure 4 below) shall be implemented prior to February 1 to discourage the nesting of the burrowing owls within the project footprint. As construction continues, any area where owls are sighted shall be subject to frequent surveys by the qualified biologist for burrows before the breeding season begins, so that owls can be properly relocated before nesting occurs.							
	3. Pre-construction clearance surveys for this species shall be conducted no less than 14 days prior to the start of ground disturbance and 24 hours of construction and report submitted by qualified and agency-approved biologists to determine the presence or absence of this species within the project footprint. This is necessary, as burrowing owls may not use the same burrow every year; therefore, numbers and locations of burrowing owl burrows at the time of construction may differ from the data collected during previous focused surveys. The proposed project footprint shall be clearly demarcated in the field by the project engineers and biologist prior to the commencement of the pre-construction clearance survey. The surveys shall follow the protocols provided in the Burrowing Owl Survey Protocol and Mitigation Guidelines.							
	4. If active burrows are present within the project footprint, the following mitigation measures shall be implemented. Passive relocation methods are to be used by the biological monitors to move the owls out of the impact zone. Passive relocation shall only be done in the non-breeding season in accordance with the guidelines found in the							

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	Imperial Irrigation District (IID) Artificial Burrow Installation Manual. This includes covering or excavating all burrows and installing one-way doors into occupied burrows. This will allow any animals inside to leave the burrow, but will exclude any animals from re-entering the burrow. A period of at least 1 week is required after the relocation effort to allow the birds to leave the impacted area before construction of the area can begin. The burrows shall then be excavated and filled in to prevent their reuse. The destruction of the active burrows on-site requires construction of new burrows at a mitigation ratio of 2:1 at least 50 meters from the impacted area and must be constructed as part of the above-described relocation efforts. The construction of new burrows will take place within open areas in the solar fields, such as detention basins.							
	5. As the project construction schedule and details are finalized, an agency-approved biologist shall prepare a Burrowing Owl Mitigation and Monitoring Plan that will detail the approved, site-specific methodology proposed to minimize and mitigate impacts on this species. Passive relocation, destruction of burrows, construction of artificial burrows, and a Forage Habitat Plan shall only be completed upon prior approval by and in cooperation with the California Department of Fish and Wildlife (CDFW). The Mitigation and Monitoring Plan shall include success criteria, remedial measures, and an annual report to CDFW and shall be funded by the project applicant to ensure long-term management and monitoring of the protected lands.							
BIO-2	**Burrowing Owl Compensation.** The project applicant shall compensate for impacts on burrowing owl habitat through the following measures:	Prior to and during construction for each CUP site, the Department of Planning and	Department of Planning and Development Services	Prior to and during construction	Department of Planning and Development Services and CDFW			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	• CDFW's mitigation guidelines for burrowing owl (CDFW 2012) require the acquisition and protection of replacement foraging habitat per pair or unpaired resident bird to offset the loss of foraging and burrow habitat on the project sites. The project applicant shall landscape small pockets of land along the perimeter of the solar fields, and/or within the solar fields themselves, with native vegetation that will provide suitable foraging habitat for burrowing owls, pursuant to a Mitigation and Monitoring Plan that is reviewed and approved by CDFW prior to the commencement of construction. Although the site plans show almost 100 percent coverage of solar panels, it is anticipated that because of the nature of solar panel configuration, there will be spaces at various locations, such as between the edges of the agricultural fields (i.e., outside of IID easements) and the solar project footprints. Sufficient open areas shall be set aside for burrowing owl habitat and burrow relocation for the lifespan of the solar projects. Because of County of Imperial requirements that the solar fields be returned to active agriculture after the life of the solar projects, it is assumed that when the land is returned to active agricultural crops, it will continue to provide habitat for burrowing owl. If the vegetation that is planted does not succeed, sufficient areas cannot be provided on-site, or planting is not feasible, alternative mitigation shall be provided, which CDFW determines provides equivalently effective mitigation. Such alternative mitigation may include off-site preservation of the required amount of foraging habitat through a CDFW-approved conservation easement, or an in-lieu fee in an amount approved by CDFW that is sufficient to acquire such conservation easements, or some combination of the two.	Development Services shall verify the measures as provided in Mitigation Measures 4.4-1a and 4.4-1b are implemented if active burrows are present.						
BIO-3	**Worker Awareness Program.** Prior to project initiation, a WEAP shall be developed and implemented by a qualified biologist, and shall be available in both English and Spanish. Wallet-sized cards summarizing this information shall be provided to all construction, operation, and maintenance personnel. The education program shall include the following aspects: • Biology and status of the burrowing owl • CDFW/USFWS regulations • Protection measures designed to reduce potential impacts on the species, function of flagging designated authorized work areas	Prior to construction for each CUP site, Planning and Development Services shall verify that a WEAP has been developed by the project biologist. The qualified biologist implementing the WEAP shall provide an attendance log to the Planning and Development Services verifying that all construction, operation,	Department of Planning and Development Services	Prior to and during construction	Department of Planning and Development Services			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	• Reporting procedures to be used if a burrowing owl (dead, alive, injured) is encountered in the field	and maintenance personnel have attended the worker awareness class.						
BIO-4	**Speed Limit.** The Designated Biologist or Biological Monitor(s) shall evaluate and implement best measures to reduce burrowing owl mortality along access roads. • A speed limit of 15 miles per hour when driving access roads. All vehicles required for O&M must remain on designated access/maintenance roads.	During construction	Designated Biologist or Biological Monitor	During construction	Designated Biologist or Biological Monitor and Department of Planning and Development Services			
BIO-5	**Temporary Construction Suspension.** If a Designated Biological Monitor observes Mountain Plover, Long Billed Curlew, Short Billed Dowitcher and/or Loggerhead Shrike foraging within the project sites, or in adjacent agricultural fields, the Designated Biological Monitor shall have the discretion to cease construction in the area of the observed species (i.e., maintain an appropriate buffer between the species and construction activity) until they disperse. Additionally, in order to reduce impacts on the Mountain Plover, Long Billed Curlew, Short Billed Dowitcher, and Loggerhead Shrike, an avian and bat protection plan (ABPP) shall be prepared following USFWS guidelines and subsequently implemented by the project applicant. The requirements of the ABPP are described in Mitigation Measure BIO-6.	During construction Mitigation Measure 4.4-1e shall be implemented.	Department of Planning and Development Services	During construction and O&M	Department of Planning and Development Services			
BIO-6	**Migratory Birds and Other Sensitive Non-Migratory Bird Species** **Construction and O&M Mitigation Measures.** In order to reduce the potential indirect impact on migratory birds, bats and raptors, an ABPP shall be prepared following the USFWS's guidelines and implemented by the project applicant. This ABPP shall outline conservation measures for construction and O&M activities that might reduce potential impacts on bird populations and shall be developed by the project applicant in conjunction with the County. Construction conservation measures to be incorporated into the ABPP include: 1. Minimizing disturbance to vegetation to the maximum extent practicable. 2. Clearing vegetation outside of the breeding season. If construction occurs between February 1 and September 15, an approved	During construction and O&M, the applicant shall implement Mitigation Measure 4.4-1f which would include adherence to the stipulations of the ABPP	Department of Planning and Development Services	During construction and O&M	Department of Planning and Development Services			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	biologist shall conduct a preconstruction clearance survey for nesting birds in suitable nesting habitat that occurs within the project footprint. Pre-construction nesting surveys will identify any active migratory birds (and other sensitive non-migratory birds) nests. Direct impact on any active migratory bird nest should be avoided. 3. Minimize wildfire potential. 4. Minimize activities that attract prey and predators. 5. Control of non-native plants. O&M conservation measures to be incorporated into the ABPP include: 1. Incorporate the Avian Powerline Interaction Committee's guidelines for overhead utilities as appropriate to minimize avian collisions with transmission facilities (Avian Powerline Interaction Committee 2012). 2. Minimize noise. 3. Minimize use of outdoor lighting. 4. Implement 1 year of post-construction avian monitoring incorporating the Wildlife Mortality Reporting Program. Additional years of post-construction avian monitoring should only be required at the discretion of the Designated Biological Monitor should the Monitor determine that avian mortality is occurring and measures are necessary to be implemented in order to reduce observed avian mortality.							
BIO-7	**Raptor and Active Raptor Nest Avoidance.** Raptors and active raptor nests are protected under California Fish and Game Code (FGC) 3503.5, 3503, 3513. In order to prevent direct and indirect noise impact on nesting raptors, such as red-tailed hawk, the following measures shall be implemented: 1. Initial grading and construction within the project sites should take place outside the raptors' breeding season of February 1 to July 15. If construction occurs between February 1 and July 15, a qualified biologist shall conduct a pre-construction clearance survey for nesting raptors in suitable nesting habitat (e.g., tall trees or	Prior to construction for each CUP site, Department of Planning and Development Services shall verify that pre-construction surveys were conducted. If active raptor nests are present, the measures as listed in Mitigation Measure 4.4-1g shall be implemented.	Department of Planning and Development Services	Prior to construction	Department of Planning and Development Services			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	transmission towers) that occurs within 500 feet of the survey area. If any active raptor nest is located, the nest area will be flagged, and a 500-foot buffer zone delineated, flagged, or otherwise marked. No work activity may occur within this buffer area, until a qualified biologist determines that the fledglings are independent of the nest.							
Cultural Resources								
CR-1	Prior to issuance of grading permits, the project applicant shall retain a qualified archaeologist defined as one meeting the Secretary of the Interior's Professional Qualification Standards (U.S. Department of the Interior 2008) to oversee Phase I cultural resources surveys for the Laurel Cluster, to determine if previously unidentified cultural resources exist within the project sites and to relocate and evaluate the previously identified resources that have not yet been evaluated. The methods and results of the surveys, as well as the records search, shall be summarized in a Phase I cultural resources survey report that follows the guidelines in *Archaeological Resource Management Reports: Recommended Contents and Format*, Department of Parks and Recreation, Office of Historic Preservation, State of California, 1990. The report shall address the requirements of CEQA.	Prior to issuance of a grading permit for each CUP site, Department of Planning and Development Services shall verify that a Phase I cultural resources survey has been conducted and report prepared.	Department of Planning and Development Services	Prior to issuance of a grading permit	Department of Planning and Development Services			
CR-2	If previously documented but unevaluated and/or newly documented archaeological resources are identified within the project sites, they should be evaluated for inclusion in the California Register of Historic Resources (CRHR) and/or as unique archaeological resources. Should newly documented archaeological resources be found eligible for listing in the CRHR and/or constitute unique archaeological resources, avoidance and preservation in place is the preferred manner of mitigation. If avoidance is not feasible, a treatment plan should be developed by the qualified archaeologist in coordination with the project applicant and the lead agency that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resources.	Prior to issuance of a grading permit for each CUP site, Department of Planning and Development Services shall verify that any recommendations for cultural resources treatment as a result of the Phase I survey required by MM CR-2, be implemented prior to grading.	Department of Planning and Development Services	Prior to issuance of a grading permit	Department of Planning and Development Services			
CR-3	Should the historic architectural resource (Liebert Road and Mandrapa Road) located within 60 feet of the LSF4 project site be subject to indirect visual impacts as a result of project implementation, a qualified architectural historian defined as one meeting the Secretary of the Interior's Professional Qualification Standards (U.S. Department of the Interior 2008) should be retained to evaluate the	Prior to issuance of a grading permit for the LSF4 CUP site, Department of Planning and Development Services shall verify that an architectural historian has evaluated the Liebert	Department of Planning and Development Services	Prior to issuance of a grading permit	Department of Planning and Development Services			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	resource for inclusion in the CRHR. If the resource is not found eligible for listing, then no further work would be required. Should the resource be found eligible, the qualified architectural historian will make recommendations to reduce indirect impacts on the resource to less than significant.	Road and Mandrapa Road for historical significance and if determined to be significant, proper measures, as recommended by the historian, are implemented to reduce the potential indirect visual impact to less than significant.						
CR-4	Development within the project sites shall avoid impacts on the following resources: P-13-008334 (Westside Main Canal) and -013760 (Westside Drain) located within or immediately adjacent to the project sites that have been previously determined or recommended as eligible for listing in the CRHR.	Prior to issuance of a grading permit for each CUP site, Department of Planning and Development Services shall verify that site plans and construction plans avoid impacts to these resoruces.	Department of Planning and Development Services	Prior to issuance of a grading permit	Department of Planning and Development Services			
CR-5	Pursuant to CEQA Guidelines §15064.5(f), in the event that previously unidentified unique archaeological resources are encountered during construction or operational repairs, archaeological monitors will be authorized to temporarily divert construction work within 100 feet of the area of discovery until significance and the appropriate mitigation measures are determined by a qualified archaeologist familiar with the resources of the region. Applicant shall notify the County within 24 hours. Applicant shall provide contingency funding sufficient to allow for implementation of avoidance measures or appropriate mitigation.	During grading and construction for each CUP site, the archaeological monitor shall have the authority to divert construction work, develop and implement appropriate mitigation, and notify the County within 24 hours.	Department of Planning and Development Services	During grading and construction	Department of Planning and Development Services			
CR-6	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. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, and scrapers) or tool making debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. After cessation of excavation, the contractor shall immediately contact the Imperial County	During grading and construction for each CUP site, the archaeological monitor shall have the authority to divert construction work, develop and implement appropriate mitigation (including a data recovery program, if necessary), and notify the County within 24 hours (per MM CR-5).	Department of Planning and Development Services	During grading and construction	Department of Planning and Development Services			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	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 areas shall not be grounds for a "stop work" notice or otherwise interfere with the projects' continuation except as set forth in this paragraph. 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.							

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
CR-7	A qualified paleontological monitor shall be present during excavation activities associated with project construction. The depth of excavation that requires paleontological monitoring shall be determined by the paleontological monitor and the construction contractor based on initial observations during construction earth moving. The paleontological monitor will be equipped to salvage fossils as they are unearthed (to help avoid construction delays). Monitors are empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Recovered specimens shall be prepared to a point of identification and permanent preservation. Fossil specimens shall be curated by accessioning them into an established, accredited museum repository with permanent retrievable paleontological storage. A report of findings with an appended itemized inventory of specimens will be prepared. The report and inventory, when submitted to the Imperial County Department of Planning and Development Services, along with confirmation of the curation of recovered specimens into an established, accredited museum repository, will signify completion of the program to mitigate impacts on paleontological resources.	During grading of each CUP site, a qualified paleontological monitor shall be on-site in accordance with this measure to implement this measure. A monitoring report shall be prepared and submitted to the County Department of Planning and Development Services for review and approval.	Department of Planning and Development Services	During grading	Department of Planning and Development Services			
CR-8	In the event that evidence of human remains is discovered, construction activities within 200 feet of the discovery will be halted or diverted and the Imperial County Coroner will be notified (Section 7050.5 of the Health and Safety Code [HSC]). If the Coroner determines that the remains are Native American, the Coroner will notify the Native American Heritage Commission (NAHC), which will designate a most likely descendant (MLD) for the project (Section 5097.98 of the PRC). The designated MLD then has 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains (AB 2641). If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 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 document with the county in which the property is located (Assembly Bill [AB] 2641).	During construction and operational repair period, discovery of human remains shall result work stoppage in that area until the coroner and the Native American Heritage Commission are contacted.	Department of Planning and Development Services	During construction and operations	Department of Planning and Development Services			

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MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
Geology and Soils								
GEO-1	**Prepare Geotechnical Report(s) for the Projects 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 geotechnical and/or civil engineering report shall address and make recommendations on the following: • Site preparation • Soil bearing capacity • Appropriate sources and types of fill • Potential need for soil amendments • Road, pavement, and parking areas • Structural foundations, including retaining-wall design • Grading practices • Soil corrosion of concrete and steel • Erosion/winterization • Seismic ground shaking • Liquefaction • Expansive/unstable soils 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 California Building Code (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 applicant.	Prior to the issuance of a grading permit for each CUP site, the Department of Planning and Development Services shall verify a Geotechnical Report has been completed by the Applicant.	Department of Planning and Development Services	Prior to issuance of a grading permit	Department of Planning and Development Services			
GEO-2	**Implement Corrosion Protection Measures.** As determined appropriate by a licensed geotechnical or civil engineer, the project applicant shall ensure that all underground metallic fittings, appurtenances, and piping include a cathodic protection system to protect these facilities from corrosion. Steel posts would need zinc coatings (galvanizing) or increased structural sections to compensate for metal loss because of corrosion.	During O&M, the Department of Planning and Development Services shall verify and approve a Geotechnical Report has been completed by the Applicant.	Department of Planning and Development Services	Prior to issuance of a grading permit	Department of Planning and Development Services			

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GEO-3	**Demonstrate Compliance with On-site Wastewater Treatment and Disposal Requirements.** The projects' wastewater treatment and disposal system(s) shall demonstrate compliance with the Imperial County performance standards as outlined in Title 9, Division 10, Chapters 4 and 12 of the Imperial County Code. Prior to construction, and again prior to operation, the project applicant will obtain all necessary permits and/or approvals from the Imperial County Public Health Department, Division of Environmental Health. The project applicant shall demonstrate that the system adequately meets County requirements, which have been designed to protect beneficial uses and ensure that applicable water quality standards are not violated. This shall include documentation that the system will not conflict with the Regional Water Quality Control Board's Anti-Degradation Policy.	Prior to construction and again prior to operation, the Imperial County Public Works Department shall verify that on-site wastewater system and disposal requirements adequately meets County requirements.	Imperial County Public Works Department	Prior to construction and again prior to operation	Department of Planning and Development Services			
Hazards and Hazardous Materials								
HAZ-1	**Phase II ESA:** A Phase II ESA (drilling, sampling, and analytical program) shall be completed if the LSF1 project is to be constructed in the area of the septic system. This ESA will assist to determine if the previous septic system is still onsite and if soil contamination exists.	Prior to issuance of a grading permit for the LSF1 CUP only, the Department of Planning and Development Services shall verify that a Phase II ESA has been completed.	Department of Planning and Development Services	Prior to issuance of a grading permit	Department of Planning and Development Services			
HAZ-2	**Hazardous Materials Discovery:** All construction contractor(s) shall be instructed to immediately stop all subsurface construction activities in the event that petroleum is discovered, an odor is identified, or significantly stained soil is visible during construction. Contractors shall be instructed to follow all applicable regulations regarding discovery and response for hazardous materials encountered during the construction process.	During construction, discovery of hazardous materials shall result in the immediate stop of all subsurface construction activities.	Department of Planning and Development Services and Certified Unified Program Agency (CUPA)	During construction	Department of Planning and Development Services			
Hydrology/Water Quality								
HYD-1	**Prepare SWPPP and Implement Best Management Practices (BMP) 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 National Pollution Discharge Elimination System (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	Prior to construction and site restoration for each CUP site, the Applicant shall acquire appropriate Clean Water Act regulatory permits; prepare SWPPP with incorporated control measures outlined in Mitigation Measure 4.9-1a; and implement BMPs.	Department of Planning and Development Services	Prior to issuance of a grading permit and site restoration	Department of Planning and Development Services			

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	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 project applicant 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(s) shall incorporate control measures in the following categories: • Soil stabilization and erosion control practices (e.g., hydroseeding, erosion control blankets, mulching) • Dewatering and/or flow diversion practices, if required (Mitigation Measure HYD-2) • Sediment control practices (temporary sediment basins, fiber rolls) • Temporary and post-construction on- and off-site runoff controls • Special considerations and BMPs for water crossings, wetlands, 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, 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 The SWPPP shall be prepared by a qualified SWPPP practitioner 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	Department of Planning and Development Services to confirm.						

Table 0.3-1. Mitigation Measures

MM No.	Mitigation Measure	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/Approval Party	Date Mitigation Measure Verified or Implemented	Location of Documents (Monitoring Record)	Completion Requirement
	cases where verification of contaminant reduction or elimination, (inadvertent petroleum release) is required to determine adequacy of the measure.							
HYD-2	**Properly Dispose of Construction Dewatering in Accordance with the Colorado River Basin Regional Water Quality Control Board.** If required, all construction dewatering shall be discharged to an approved land disposal area or drainage facility in accordance with Colorado River Basin RWQCB requirements. The project applicant or its construction contractor shall provide the Colorado River Basin RWQCB with the location, type of discharge, and methods of treatment and monitoring for all groundwater dewatering discharges. Emphasis shall be placed on those discharges that would occur directly or in proximity to surface water bodies and drainage facilities.	Prior to issuance of a grading permit for each CUP site, the Applicant shall provide Colorado River Basin Regional Water Quality Control Board with the location, type of discharge, and methods treatment and monitoring for all groundwater dewatering discharges if the project requires construction dewatering.	Department of Planning and Development Services	Post construction	Department of Planning and Development Services			
HYD-3	**Incorporate Post-Construction Runoff BMPs into Project Drainage Plan and Maximize Opportunities for Low Impact Development.** The project Drainage Plan shall adhere to County and IID guidelines to treat, control, and manage the on- and off-site discharge of stormwater to existing drainage systems. Low Impact Development opportunities, including, but not limited to infiltration trenches or bioswales, will be investigated and 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 treatment of runoff generated from project impervious surfaces prior to off-site discharge. The project applicant shall ensure the provision of sufficient outlet protection through the use of energy dissipaters, vegetated rip-rap, soil protection, and/or other appropriate BMPs to slow runoff velocities and prevent erosion at discharge locations, access roads, electrical distribution, and solar array locations. A long-term maintenance plan shall be developed and implemented to support the functionality of drainage control devices. The facility layout(s) shall also include sufficient container storage and on-site containment and pollution-control devices for drainage facilities to avoid the off-site release of water quality pollutants, including, but not limited to oil and grease, fertilizers, treatment chemicals, and sediment.	Post construction for each CUP site, the Applicant shall implement a Drainage Plan in accordance with the County and Imperial Irrigation District guidelines as outlined in Mitigation Measure 4.9-2. Department of Planning and Development Services and Imperial Irrigation District to confirm.	Department of Planning and Development Services	Post construction	Department of Planning and Development Services			

Attachment A.

CUP#21-0014/CUP#21-0013/

ZC#21-0002/LLA#00321/IS#21-0016

Application Documents

CHANGE OF ZONE

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

- APPLICANT MUST COMPLETE ALL NUMBERED (black & blue) SPACES – Please type or print -

1.	PROPERTY OWNER'S NAME John Kuhn	EMAIL ADDRESS jr@kuhnandkuhn.com	
2.	MAILING ADDRESS (Street / P O Box, City, State) 473 Savannah Highway, Charleston, SC	ZIP CODE 29407	PHONE NUMBER (843)-708-2188
3.	ENGINEER'S NAME N/A	CA. LICENSE NO.	EMAIL ADDRESS N/A
4.	MAILING ADDRESS (Street / P O Box, City, State) N/A	ZIP CODE N/A	PHONE NUMBER N/A

5.	ASSESSOR'S PARCEL NO. CA Apn 051-300-032	ZONING (existing) A2R & A-3 (split)	ZONING (proposed) A-3 - RE (all)
6.	PROPERTY (site) ADDRESS APN's 051-300-032, 051-300-035 and 051-300-036		SIZE OF PROPERTY (in acres or square foot) 247 acres (all parcels combined)
7.	GENERAL LOCATION (i.e. city, town, cross street) On the northwest corner of Vaughn Rd & Jessup Rd (approximately 8 miles southwest of El Centro, California)		
8.	LEGAL DESCRIPTION Please see the attached exhibit showing the proposed Lot Line Adjustment for APN's 051-300-032, 051-300-035 and 051-300-036, which will be submitted to Imperial County's Planning Services Department in parallel with this application.		

8. DESCRIBE CURRENT USE ON / OF PROPERTY (list and describe in detail)
All parcels are currently used for agriculture and farming purposes.

9. PLEASE STATE REASON FOR PROPOSED USE (be specific)
This Change of Zone application is being filed in support of the corresponding LLA application, which seeks to change the property lines of APNs 051-300-036, 051-300-032, and 051-300-035. Since APN 051-300-032 is being split and changed, we would like to change the zoning designation of the entire parcel to A-3. In doing so, all resulting parcels from the LLA application will have the same A-3 zoning designation.

10. DESCRIBE SURROUNDING PROPERTY USES
The surrounding land around APN 051-300-032 is also currently used for agriculture and farming purposes.

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT.

John Kuhn — Print Name
4/12/21 — Date
Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN
B. PRELIMINARY TITLE REPORT (6 months or newer)
C. FEE
D. OTHER

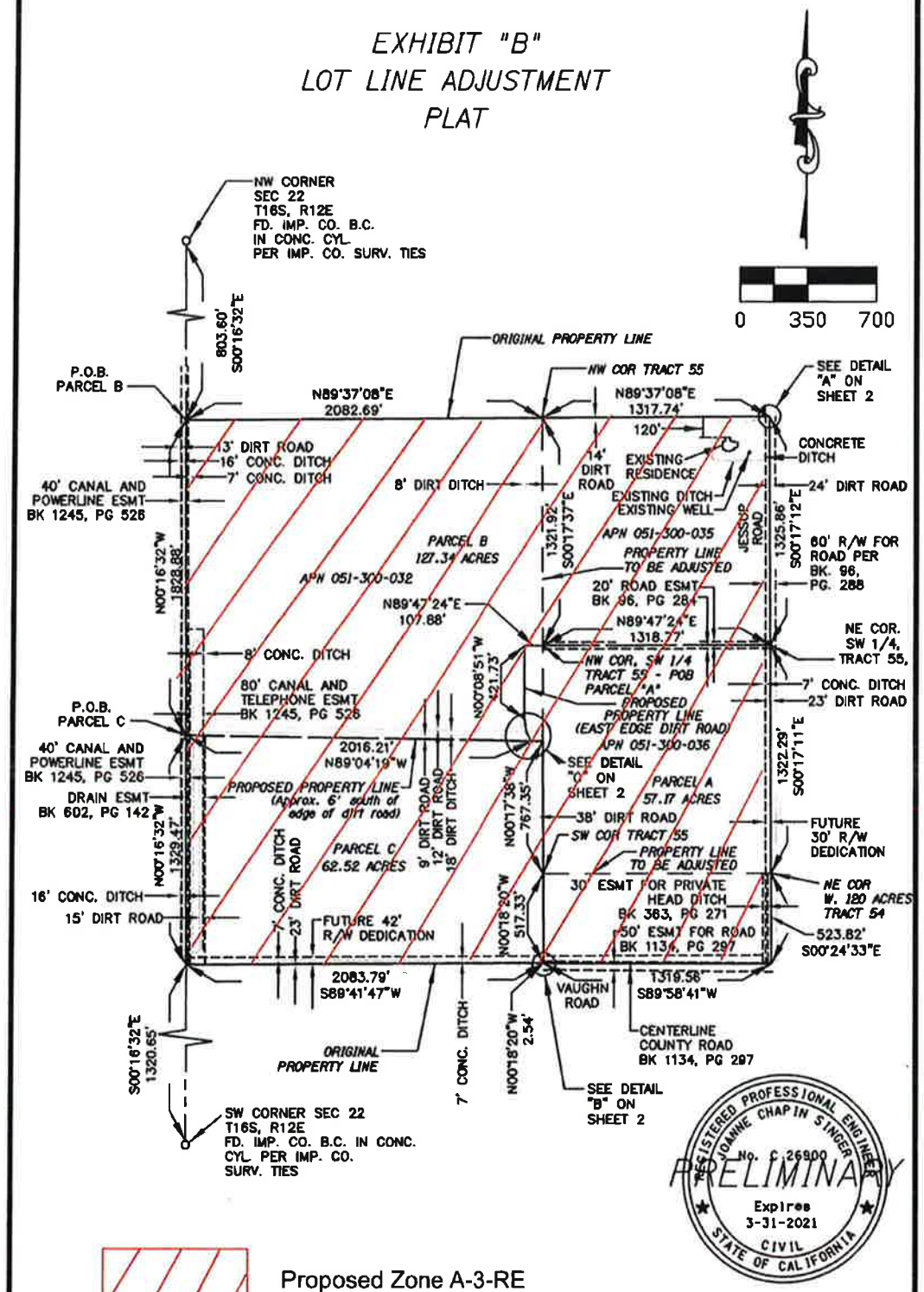
APPLICATION RECEIVED BY: — DATE 4/14/2021
APPLICATION DEEMED COMPLETE BY: — DATE
APPLICATION REJECTED BY: — DATE
TENTATIVE HEARING BY: — DATE
FINAL ACTION: ☐ APPROVED ☐ DENIED — DATE

REVIEW / APPROVAL BY OTHER DEPT'S required
☐ P. W.
☐ E. H. S.
☐ A. P. C. D.
☐ O. E. S.
☐
☐

ZC # 21-0003

LSH 21-

EXHIBIT "B"
LOT LINE ADJUSTMENT
PLAT



REGISTERED PROFESSIONAL ENGINEER
JOANNE CHAPIN SINGER
No. C 26900
Expires 3-31-2021
CIVIL
STATE OF CALIFORNIA

PRELIMINARY

Proposed Zone A-3-RE

LEGEND

P.O.B	POINT OF BEGINNING
——— - - ———	SECTION LINE
———	ORIGINAL PROPERTY LINE
— — — — —	PROPERY LINE TO BE ADJUSTED
——— ———	PROPOSED PROPERTY LINE

EXHIBIT "B"

AZTEC TYPSA
2151 MICHELSON DR, SUITE 100 IRVINE, CA 92612
Tel 714-656-2805
website: www.aztecus

DR: GLG	CK: JCS	SHEET NO.	TOTAL SHEETS	
DATE: 03-31-21	REV:			
SCALE: 1"=700'		1	2	

LOT LINE ADJUSTMENT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT
801 Main Street, El Centro, CA 92243 (760) 482-4236

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES – Please type or print -

1.	PROPERTY OWNER'S "A" NAME John Kuhn	EMAIL ADDRESS jr@kuhnandkuhn.com	
2.	MAILING ADDRESS 473 Savannah Highway, Charleston, SC	ZIP CODE 29407	PHONE NUMBER (843)-708-2188

3.	PROPERTY OWNER'S "B" NAME John Kuhn	EMAIL ADDRESS jr@kuhnandkuhn.com	
4.	MAILING ADDRESS 473 Savannah Highway, Charleston, SC	ZIP CODE 29407	PHONE NUMBER (843)-708-2188

5.	PROPERTY "A" (site) ADDRESS CA Apn 051-300-036 and CA APN 051-300-032	LOCATION **APN -036**: 32°45'53"N, 115°43'26"W; **APN -032**: 32°45'42"N, 115°43'06"W
6.	PROPERTY "A" ASSESSOR'S PARCEL NO.(s) 051-300-036; 051-300-032: 051-300-035	SIZE OF PROPERTY (in acres or square foot) **APN -036**: 40.02 acres; APN -032: 166.90 acres: APN-035: 40 .08 acres
7.	PROPERTY "A" LEGAL DESCRIPTION (attach separate sheet if necessary) **APN -032**: See "Parcel B" in the Preliminary Title Report (page 3); **APN -036**: See "Parcel A" in the Preliminary Title Report (page 3)	

8.	PROPERTY "B" (site) ADDRESS CA Apn 051-300-032 and CA Apn 051-300-035	LOCATION **APN -032**: 32°45'42"N, 115°43'06"W; **APN -035**: 32°45'55.1"N 115°43'06.6"W
9.	PROPERTY "B" ASSESSOR'S PARCEL NO.(s) 051-300-032; 051-300-035	SIZE OF PROPERTY (in acres or square foot) **APN -036**: 40.02 acres; APN -032: 166.90 acres: APN-035: 40 .08 acres
10.	PROPERTY "B" LEGAL DESCRIPTION (attach separate sheet if necessary) **APN -032**: See "Parcel B" in the Preliminary Title Report (page 3); **APN -035**: See "Parcel 3" in the Preliminary Title Report (page 31)	

11.	PARCEL	PROPOSED SIZE	EXISTING USE	PROPOSED USE
	A	57.17 acres	Agriculture	Solar PV Generation
	B	127.34 acres	Agriculture	Solar PV Generation

12. EXPLAIN PROPOSED ADJUSTEMENT: Combine a portion of 051-300-032 with 051-300-036 and combine a portion of 051-300-032 with 051-300-035

13. EXPLAIN REASON FOR REQUEST: Landowner's request.

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT

John Kuhn — Print Name (owner "A") — Date 4/13/21

Signature (owner "A")

John Kuhn — Print Name (owner "B") — Date 4/13/21

Signature (owner "B")

REQUIRED SUPPORT DOCUMENTS

- A. MAP (20 copies – see instructions on back)
- B. PRELIMINARY TITLE REPORT (6 months or newer)
- C. NEW LEGAL DESCRIPTIONS – ONE TO DESCRIBE PARCEL "A" AND ONE FOR PARCEL "B"
- D. FEE _____
- E. OTHER _____

APPLICATION RECEIVED BY:		DATE	4/14/21
APPLICATION DEEMED COMPLETE BY:		DATE	
APPLICATION REJECTED BY:		DATE	
TENTATIVE HEARING BY:		DATE	
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE	

REVIEW / APPROVAL BY OTHER DEPT'S required.
- ☐ P. W.
- ☐ E. H. S.
- ☐ A. P. C. D
- ☐ O. E. S.
- ☐ _____
- ☐ _____

LLA# 00321

LOT LINE ADJUSTMENT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT
801 Main Street, El Centro, CA 92243 (760) 482-4236

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES – Please type or print -

(PARCEL C)

1.	PROPERTY OWNER'S "A" NAME (PARCEL C) John Kuhn	EMAIL ADDRESS jr@kuhnandkuhn.com	
2.	MAILING ADDRESS 473 Savannah Highway, Charleston, SC	ZIP CODE 29407	PHONE NUMBER (843)-708-2188

3.	PROPERTY OWNER'S "B" NAME	EMAIL ADDRESS	
4.	MAILING ADDRESS	ZIP CODE	PHONE NUMBER

(PARCEL C)

5.	PROPERTY "A" (site) ADDRESS(PARCEL C) CA Apn 051-300-032	LOCATION 32°45'42"N, 115°43'06"W
6.	PROPERTY "A" ASSESSOR'S PARCEL NO.(s) Portion of APN 051-300-032	SIZE OF PROPERTY (in acres or square foot) 166.9 acres (original parcel)
7.	PROPERTY "A" LEGAL DESCRIPTION (attach separate sheet if necessary) See "Parcel B" in the Preliminary Title Report (page 3)	

8.	PROPERTY "B" (site) ADDRESS	LOCATION
9.	PROPERTY "B" ASSESSOR'S PARCEL NO.(s)	SIZE OF PROPERTY (in acres or square foot)
10.	PROPERTY "B" LEGAL DESCRIPTION (attach separate sheet if necessary)	

11.	PARCEL	PROPOSED SIZE	EXISTING USE	PROPOSED USE
	C	62.52 acres	Agriculture	Solar PV Generation

12. EXPLAIN PROPOSED ADJUSTEMENT: Split a portion of APN 051-300-032 into a new separate parcel

13. EXPLAIN REASON FOR REQUEST: Landowner's request.

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT

John Kuhn — 4/13/21
Print Name (owner "A") — Date

Signature (owner "A")

John Kuhn — 4/13/21
Print Name (owner "B") — Date

Signature (owner "B") — 4/13/21

Signature Owner C (if necessary)

REQUIRED SUPPORT DOCUMENTS

- A. MAP (20 copies – see instructions on back)
- B. PRELIMINARY TITLE REPORT (6 months or newer)
- C. NEW LEGAL DESCRIPTIONS – ONE TO DESCRIBE PARCEL "A" AND ONE FOR PARCEL "B"
- D. FEE _____
- E. OTHER _____

APPLICATION RECEIVED BY:		DATE	
APPLICATION DEEMED COMPLETE BY:		DATE	
APPLICATION REJECTED BY:		DATE	
TENTATIVE HEARING BY:		DATE	
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE	

REVIEW / APPROVAL BY OTHER DEPT'S required.
- ☐ P. W
- ☐ E. H. S.
- ☐ A. P. C. D
- ☐ O. E. S.
- ☐ _____
- ☐ _____

LLA# 00371

EXHIBIT "C"
LOT LINE ADJUSTMENT
PARCEL A
LEGAL DESCRIPTION

That portion of Section 22, Township 16 South, Range 12 East, of the San Bernardino Base and Meridian, in an unincorporated area of the County of Imperial, in the State of California, more particularly described as follows:

COMMENCING at the Northwest corner of said Section 22 from which the Southwest corner of said Section 22 bears South 00 degrees 16 minutes 32 seconds East, a distance of 5282.60 feet;

THENCE along the West line of said Section 22, South 00 degrees 16 minutes 32 seconds East, a distance of 803.60 feet to the Northwest corner of Lot 4 of said Section 22,

THENCE leaving said West line, North 89 degrees 37 minutes 08 seconds East, a distance of 2082.69 feet to the Northwest corner of Tract 55;

THENCE leaving said North line, and along the West line of said Tract 55, South 00 degrees 17 minutes 37 seconds East, a distance of 1321.92 feet to the Northwest corner of the Southwest Quarter of said Tract 55, and the **Point of Beginning**;

THENCE leaving said West line, and along the North line of the Southwest Quarter of said Tract 55, North 89 degrees 47 minutes 24 seconds East, a distance of 1318.77 feet to the Northeast corner of the Southwest Quarter of said Tract 55;

THENCE leaving said North line, and along the East line of the Southwest Quarter of said Tract 55, South 00 degrees 17 minutes 11 seconds East, a distance of 1322.29 feet to the Northeast corner of the West 120 acres of Tract 54;

THENCE along the East line of the West 120 acres of said Tract 54, South 00 degrees 25 minutes 41 seconds East, a distance of 523.82 feet to the centerline of the County Road per Book 1134, Page 297, Official Records of Imperial County, California;

THENCE along said centerline, South 89 degrees 58 minutes 41 seconds West, a distance of 1319.74 feet to the West line of said Tract 54;

THENCE leaving said centerline, and along the West line of said Tract 54, North 00 degrees 18 minutes 20 seconds West, a distance of 519.87 feet to the Southwest corner of said Tract 55;

THENCE along the West line of said Tract 55, North 00 degrees 17 minutes 38 seconds West, a distance of 767.35 feet;

THENCE leaving said West line, North 89 degrees 04 minutes 19 seconds West, a distance of 67.53 feet;

THENCE North 31 degrees 42 minutes 39 seconds West, a distance of 58.48 feet;

THENCE North 07 degrees 56 minutes 20 seconds West, a distance of 82.37 feet;

THENCE North 00 degrees 08 minutes 51 seconds West, a distance of 421.73 feet;

THENCE North 89 degrees 47 minutes 24 seconds East, a distance of 107.88 feet to the **POINT OF BEGINNING.**

Said parcel contains 2,490,169 square feet or 57.17 acres of land, more or less.

Bearings are based on CCS Zone 6, NAD 83 (2010 epoch).

As shown on Exhibit "B" attached hereto and by this reference made a part hereof.

EXHIBIT "A"
LOT LINE ADJUSTMENT
PARCEL B
LEGAL DESCRIPTION

That portion of Section 22, Township 16 South, Range 12 East, of the San Bernardino Base and Meridian, in an unincorporated area of the County of Imperial, in the State of California, more particularly described as follows:

COMMENCING at the Northwest corner of said Section 22, from which the Southwest corner of said Section 22 bears South 00 degrees 16 minutes 32 seconds East, a distance of 5282.60 feet;

THENCE along the West line of said Section 22, South 00 degrees 16 minutes 32 seconds East, a distance of 803.60 feet to the Northwest corner of Lot 4 of said Section 22 and the **Point of Beginning**;

THENCE leaving said West line, North 89 degrees 37 minutes 08 seconds East, a distance of 2082.69 feet to the Northwest corner of Tract 55;

THENCE along the North line of said Tract 55, North 89 degrees 37 minutes 08 seconds East, a distance of 1317.74 feet to the Southeast corner of Tract 78;

THENCE continuing along the North line of said Tract 55, North 89 degrees 55 minutes 57 seconds East, a distance of 1.19 feet to the Northeast corner of the Northwest Quarter of said Tract 55;

THENCE along the East line of the Northwest Quarter of said Tract 55, South 00 degrees 17 minutes 11 seconds East, a distance of 1325.85 feet to the Northeast corner of the Southwest Quarter of said Tract 55;

THENCE along the North line of the Southwest Quarter of said Tract 55, South 89 degrees 47 minutes 24 seconds West, a distance of 1318.77 feet to the Northwest corner of the Southwest Quarter of said Tract 55;

THENCE continuing, South 89 degrees 47 minutes 24 seconds West, a distance of 107.88 feet;

THENCE South 00 degrees 08 minutes 51 seconds East, a distance of 421.73 feet;

THENCE South 07 degrees 56 minutes 20 seconds East, a distance of 82.37 feet;

THENCE South 31 degrees 42 minutes 39 seconds East, a distance of 58.48 feet;

THENCE North 89 degrees 04 minutes 19 seconds West, a distance of 2016.21 feet to the West line of said Section 22;

THENCE along said West line, North 00 degrees 16 minutes 32 seconds West, a distance of 1828.88 feet to the **POINT OF BEGINNING.**

Said parcel contains 5,546,745 square feet or 127.34 acres of land, more or less.

Bearings are based on CCS Zone 6, NAD 83 (2010 epoch).

As shown on Exhibit "B" attached hereto and by this reference made a part hereof.

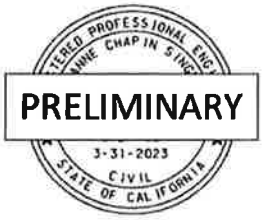


EXHIBIT "A"
LOT LINE ADJUSTMENT
PARCEL C
LEGAL DESCRIPTION

That portion of Section 22, Township 16 South, Range 12 East, of the San Bernardino Base and Meridian, in an unincorporated area of the County of Imperial, in the State of California, more particularly described as follows:

COMMENCING at the Northwest corner of said Section 22 from which the Southwest corner of said Section 22 bears South 00 degrees 16 minutes 32 seconds East, a distance of 5282.60 feet;

THENCE along the West line of said Section 22, South 00 degrees 16 minutes 32 seconds East, a distance of 2,632.48 feet to the **Point of Beginning**;

THENCE leaving said West line, South 89 degrees 04 minutes 19 seconds East, a distance of 2083.74 feet to the West line of Tract 55;

THENCE along last said West line, South 00 degrees 17 minutes 38 seconds East, a distance of 767.35 feet to the Southwest corner of said Tract 55;

THENCE along the West line of Tract 54, South 00 degrees 18 minutes 20 seconds East, a distance of 517.33 feet to the Southeast corner of Lot 6 of said Section 22;

THENCE leaving last said West line and along the South line of said Lot 6 and it's Westerly prolongation, South 89 degrees 41 minutes 47 seconds West, a distance of 2083.79 feet to the West line of said Section 22;

THENCE along last said West line, North 00 degrees 16 minutes 32 seconds West, a distance of 1329.47 feet to the **POINT OF BEGINNING.**

Said parcel contains 2,723,289 square feet or 62.52 acres of land, more or less.

Bearings are based on CCS Zone 6, NAD 83 (2010 epoch).

As shown on Exhibit "B" attached hereto and by this reference made a part hereof.

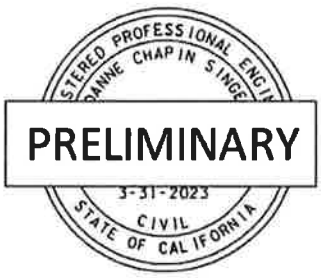
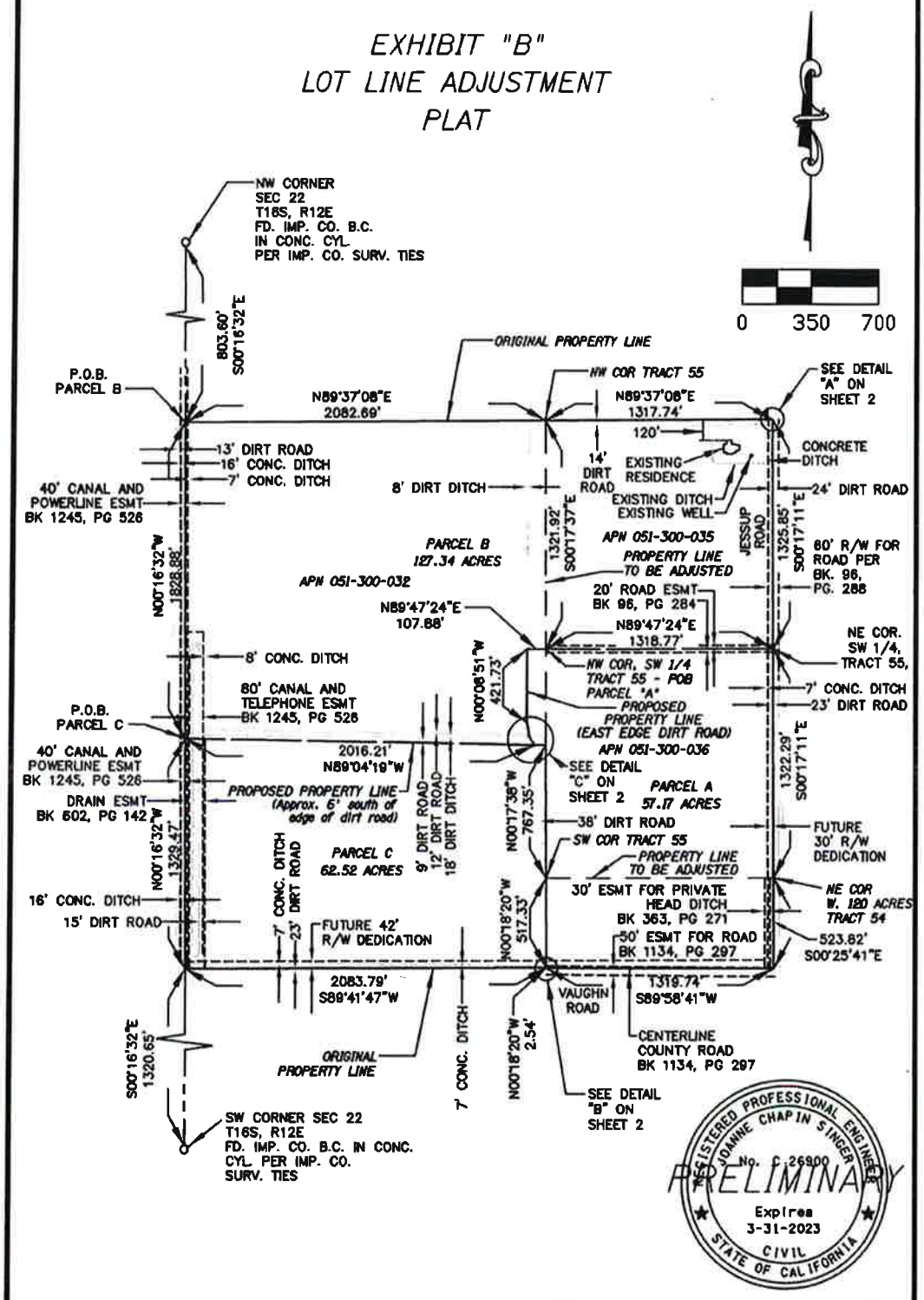


EXHIBIT "B"
LOT LINE ADJUSTMENT
PLAT



REGISTERED PROFESSIONAL ENGINEER
JOANNE CHAPIN SINGER
No. C 26900
Exp. 3-31-2023
CIVIL
STATE OF CALIFORNIA

PRELIMINARY

LEGEND

P.O.B	POINT OF BEGINNING
——— - - ———	SECTION LINE
———	ORIGINAL PROPERTY LINE
— — — — —	PROPERY LINE TO BE ADJUSTED
——— ——— ———	PROPOSED PROPERTY LINE

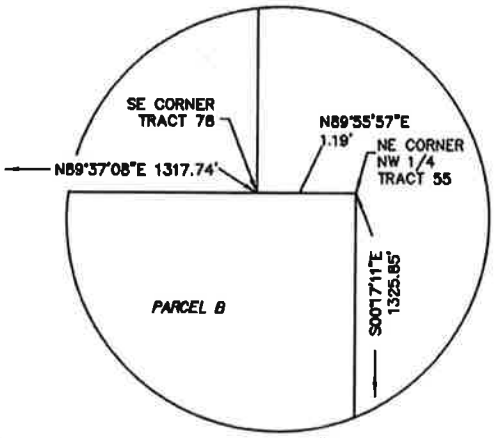
EXHIBIT "B"

AZTEC TYPSA
2151 MICHELSON DR, SUITE 100 IRVINE, CA 92612
Tel 714-656-2805
website: www.aztecus

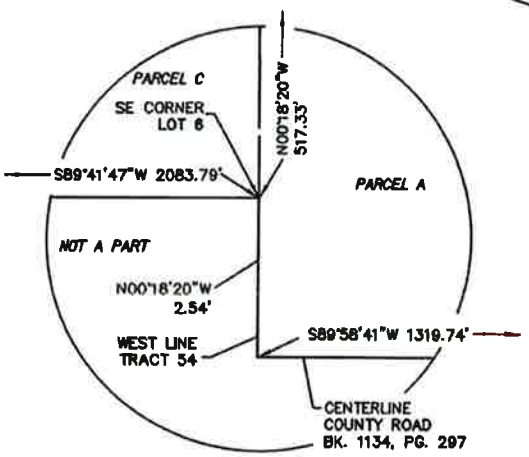
DR: GLG	CK: JCS	SHEET NO.	TOTAL SHEETS	
DATE: 06-08-21	REV:			
SCALE: 1"=700'		1	2	

EXHIBIT "B"
LOT LINE ADJUSTMENT
PLAT

NOT TO SCALE



DETAIL "A"
N.T.S.



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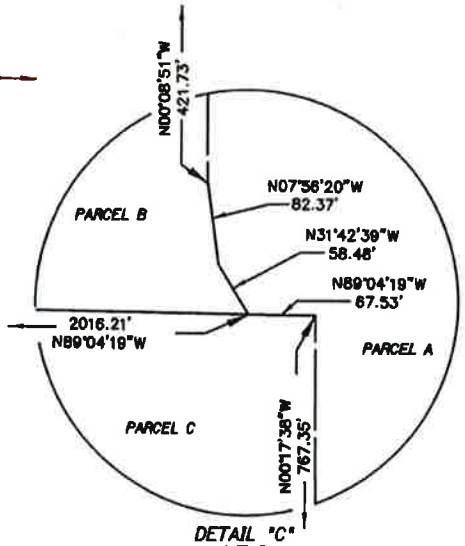


DETAIL "C"
N.T.S.

REGISTERED PROFESSIONAL ENGINEER
JOANNE CHAPIN SINGER
No. C 26900
Expires
3-31-2023
CIVIL
STATE OF CALIFORNIA

PRELIMINARY

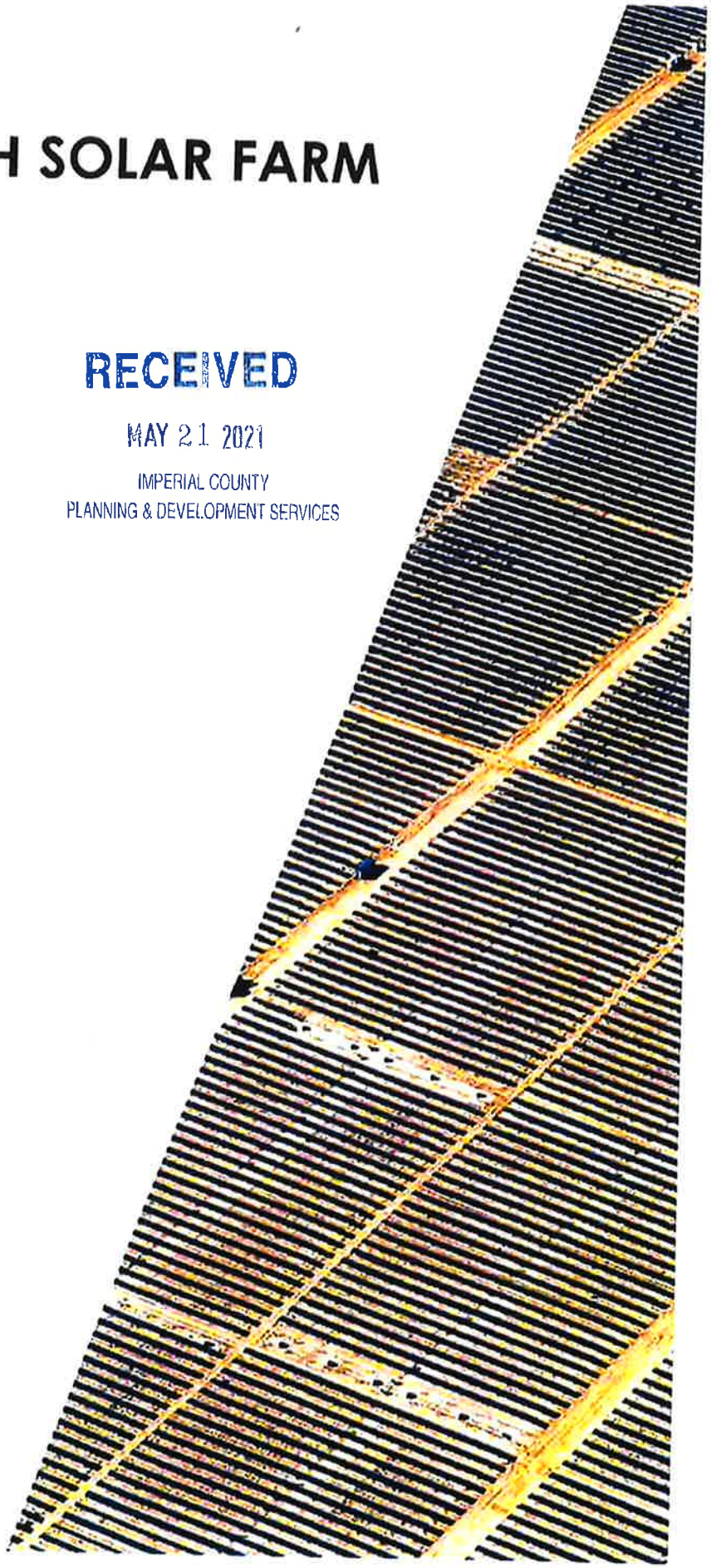
EXHIBIT "B"

AZTEC TYRRA
2151 MICHELSON DR, SUITE 100 IRVINE, CA 92612
Tel 714-656-2605
website: www.aztec.us

DR: GLG	CK: JCS	SHEET NO.	TOTAL SHEETS	
DATE: 08-08-21	REV:			
SCALE: N.T.S.		2	2	

LAUREL 2 SOUTH SOLAR FARM
CUP Application

April 2021



Submitted by:
92JT 8me, LLC
c/o 8minutenergy Renewables
c/o 8minute Solar Energy
5455 Wilshire Boulevard, Suite 2010
Los Angeles, CA 90036
(323) 525-0900

8minutenergy
RENEWABLES

TABLE OF CONTENTS

PROJECT INFORMATION

92JT 8me LLC (the Applicant) is seeking approval of a Conditional Use Permit (CUP) for the construction of an up to 40 megawatt-alternating current (MW-AC) utility-scale solar farm known as Laurel 2 South Solar Farm (Project) in Imperial County, California. The Applicant proposes to construct, own, and operate the Project.

The site of the Project is located on land within the boundary of the previously approved Laurel Cluster Solar Farm project area (Figure 1). The Laurel Cluster Solar Farm project consisted of multiple CUP applications including CUP No. 17-0029 that covers the Laurel 2 South Solar Farm site. The Laurel Cluster Solar Farm was considered by the County Board of Supervisors who certified an EIR and approved the CUPs in January 15, 2019. Now, the Applicant proposes to subdivide a subset of land within the Laurel Cluster Solar Farm. Two new CUP applications have been prepared (each a "Project") and are described as follows: Laurel 2 North ("L2N") totaling approximately 120 acres and Laurel 2 South ("L2S") totaling approximately 160 acres. This CUP application covers L2S.

Site Information

The Project is proposed across the entirety of assessor's parcel 051-310-027 and 051-310-028 (Project Area) totaling approximately 160 gross acres. The topography of the Project Area is relatively flat, and the site is located near to active agricultural land and operating solar farms. The land permanently disturbed by the Project (including infrastructure) would be less than the gross acreage of the Project Area.

CUP Parcels: Laurel 2 South Solar Farm

APN	Owner	Land Use Zoning	Gross Acreage
051-310-027	John Kuhn	A-2-R	120
051-310-028	John Kuhn	A-2-R	40

Location

The Project Site is located in the unincorporated area of Imperial County, north of West Diehl Road, west of Derrick Road, and east of Jessup Road. Primary access to the site occurs via Jessup Road. Secondary access could be obtained via Derrick Road and West Diehl Road. The Project Site is approximately eight miles southwest of the City of El Centro and three miles south of Seeley, a census-designated place.

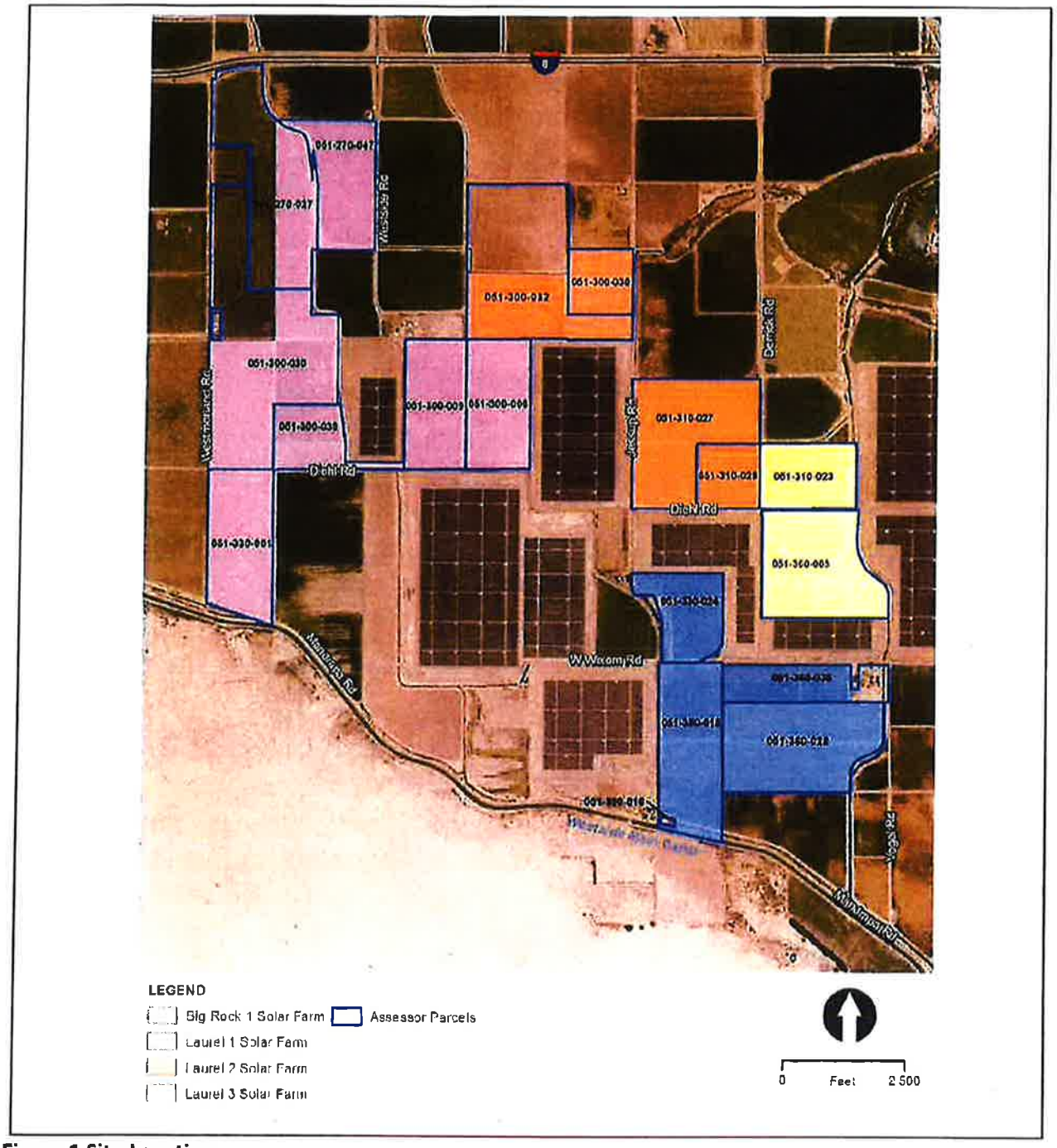


Figure 1 Site Location

SECTION I:

CUP Application

8minutenergy

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES – Please type or print -

1. PROPERTY OWNER'S NAME John Kuhn	EMAIL ADDRESS jr@kuhnandkuhn.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 473 Savannah Highway Charleston, SC	ZIP CODE 29407	PHONE NUMBER 843 708-2188
3. APPLICANT'S NAME 92JT 8me, LLC	EMAIL ADDRESS tom@8minutenergy.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 5455 Wilshire Blvd. Suite 2010 Los Angeles, Ca	ZIP CODE 90036	PHONE NUMBER 323 525-0900
4. ENGINEER'S NAME CA. LICENSE NO. TBD	EMAIL ADDRESS	
5. MAILING ADDRESS (Street / P O Box, City, State)	ZIP CODE	PHONE NUMBER

6. ASSESSOR'S PARCEL NO. 051-310-027, 051-310-028	SIZE OF PROPERTY (in acres or square foot) 160 acres	ZONING (existing) A-2-R
7. PROPERTY (site) ADDRESS		
8. GENERAL LOCATION (i.e. city, town, cross street) The project site is located in the unincorporated area of Imperial County,north of West Diehl Road, west of Derrick Road, and east of Jessup Road.		
9. LEGAL DESCRIPTION See attached		

PLEASE PROVIDE CLEAR & CONCISE INFORMATION (ATTACH SEPARATE SHEET IF NEEDED)

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail) Applicant proposes to construct and operate a 40 MW solar farm with energy storage.	
11. DESCRIBE CURRENT USE OF PROPERTY	Farmland
12. DESCRIBE PROPOSED SEWER SYSTEM	Septic tank with leachfield
13. DESCRIBE PROPOSED WATER SYSTEM	IID distribution system, private water treatment facility
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	Above ground water tank with capacity of 10,000 gallons
15. IS PROPOSED USE A BUSINESS? ☑ Yes ☐ No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? 5 or fewer

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT

John Kuhn — Print Name
5/20/21 — Date
Signature

Print Name — Date
Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN
B. FEE ~~see application~~ attached
C. OTHER
D. OTHER

APPLICATION RECEIVED BY:		DATE		REVIEW / APPROVAL BY OTHER DEPT'S required.
APPLICATION DEEMED COMPLETE BY:		DATE		☐ P. W ☐ E. H. S ☐ A. P. C. D. ☐ O. E. S. ☐ ☐
APPLICATION REJECTED BY:		DATE		
TENTATIVE HEARING BY:		DATE		
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE		

CUP #
21-0013

IS21-0020

LEGAL DESCRIPTION
CUP – LAUREL 2 SOUTH

Tract 53, Township 16 South, Range 12 East, according to the Official Plat thereof.

Excepting therefrom the North 40 acres thereof.

APN 051-310-027

AND

The West half of Tract 45-B, Township 16 South, Range 12 East, according to the Official Plat thereof.

APN 051-310-028

Being portions of Sections 22, 23, 26, and 27, Township 16 South, Range 12 East, of the San Bernardino Base and Meridian, in an unincorporated area of the County of Imperial, in the State of California, more particularly described as follows:

COMMENCING at the Northwest corner of said Section 27 from which the Northeast corner of said Section 27 bears North 89 degrees 38 minutes 29 seconds East, a distance of 5282.17 feet;

THENCE along the North line of said Section 27, North 89 degrees 38 minutes 29 seconds East, a distance of 3,404.49 feet to the West line of Tract 53, and the **Point of Beginning**;

THENCE leaving said North line, and along the West line of Tract 53, North 00 degrees 08 minutes 48 seconds West, a distance of 511.21 feet to the Northwest corner of Tract 53 except the North 40 acres thereof;

THENCE leaving said West line, and along the North line of Tract 53 except the North 40 acres thereof, North 89 degrees 43 minutes 58 seconds East, a distance of 2638.63 feet to the Northeast corner of Tract 53 except the North 40 acres thereof;

THENCE leaving said last said North line, and along the East line of Tract 53, South 00 degrees 14 minutes 43 seconds East, a distance of 1321.53 feet to the Northeast corner of the West half of Tract 45-B;

THENCE along the East line of the West half of Tract 45-B, South 00 degrees 10 minutes 52 seconds East, a distance of 1322.52 feet to the Southeast corner of the West half of said Tract 45-B;

THENCE along the South line of the West half of Tract 45-B, South 89 degrees 47 minutes 09 seconds West, a distance of 1321.39 feet to the Southwest corner of the West half of said Tract 45-B;

THENCE along the South line of Tract 53, South 89 degrees 42 minutes 48 seconds West, a distance of 1320.31 feet to the Southwest corner of said Tract 53;

THENCE leaving last said South line, and along the West line of said Tract 53, North 00 degrees 08 minutes 48 seconds West, a distance of 2132.07 feet to the **POINT OF BEGINNING.**

Said parcel contains 6,979,590 square feet or 160.23 acres of land, more or less.

Bearings are based on CCS Zone 6, NAD 83 (2010 epoch).

SECTION II:

Project Description

DESCRIPTION OF PROPOSED PROJECT

The Laurel 2 South Project site consists of two parcels totaling 120 acres within the central portion of the Big Rock Cluster Solar Farms project area. As shown above on Figure 1, the Project Site is generally located north of West Diehl Road, west of Derrick Road, and east of Jessup Road. Primary access occurs via Jessup Road. Secondary access could be obtained via Derrick Road and West Diehl Road.

The Applicant proposes to develop a photovoltaic energy facility (up to 40 MW-AC) with up to 160 MW hour (MWh) Energy Storage System on the Project Site (Figure 2). Power generated by the Project will be delivered from the Site via 230 kV overhead and/or underground electrical transmission line(s) originating from an on-site substation/switchyard and terminating at the proposed Imperial Irrigation District (IID) Fern Substation.

The Project may share operations & maintenance (O&M), substation, and/or transmission facilities as necessary with one or more nearby solar projects, and/or may be remotely operated. Any "unused" O&M, substation, and/or transmission facility areas on-site could be covered by solar panels under such scenarios.

The Applicant has considered the following in its selection of the Site for detailed evaluation:

- Land availability (approximately 160 gross acres)
- Land Use Designations: A-2-R (General Agricultural Rural Zone)
- Proximity to interconnecting substation: near to planned substation
- Historic land use pattern: The Project Area is not encumbered by Williamson Act contracts and the project would place solar facilities in an area where utility-scale facilities already exist

Up to five (5) full-time employees will operate the facility (split between daytime and nighttime shifts). Typically, up to three (3) staff will work during the day shift (sunrise to sunset) and the remainder during the night shifts and weekend. As noted earlier, it is possible that the Project would share O&M, substation, and/or transmission facilities with one or more nearby solar projects, and/or may be remotely operated. In such scenarios, the Project's on-site staff could be reduced.

After the useful life of the Project, the panels will be disassembled from the mounting frames and the Site restored to its pre-development condition. The L2S project may share an operations & maintenance (O&M) building, a substation, and/or transmission facilities, as necessary, with one or more nearby solar projects, and/or may be remotely operated. Any "unused" O&M building, substation, and/or transmission facility areas on-site may be covered by solar panels under such scenarios.

PV Module Configuration

L2S will utilize photovoltaic panels or modules[1] on mounting frameworks to convert sunlight directly into electricity. Individual panels will be installed on either fixed-tilt or tracker mount systems (single- or dual-axis, using galvanized steel or aluminum). If the panels are configured for fixed tilt, the panels will be oriented toward the south. For tracking configurations, the panels will rotate to follow the sun over the course of the day. The panels will stand up to 20 feet high, depending on mounting system used.

[1] Including but not limited to concentrated photovoltaic (CPV) technology

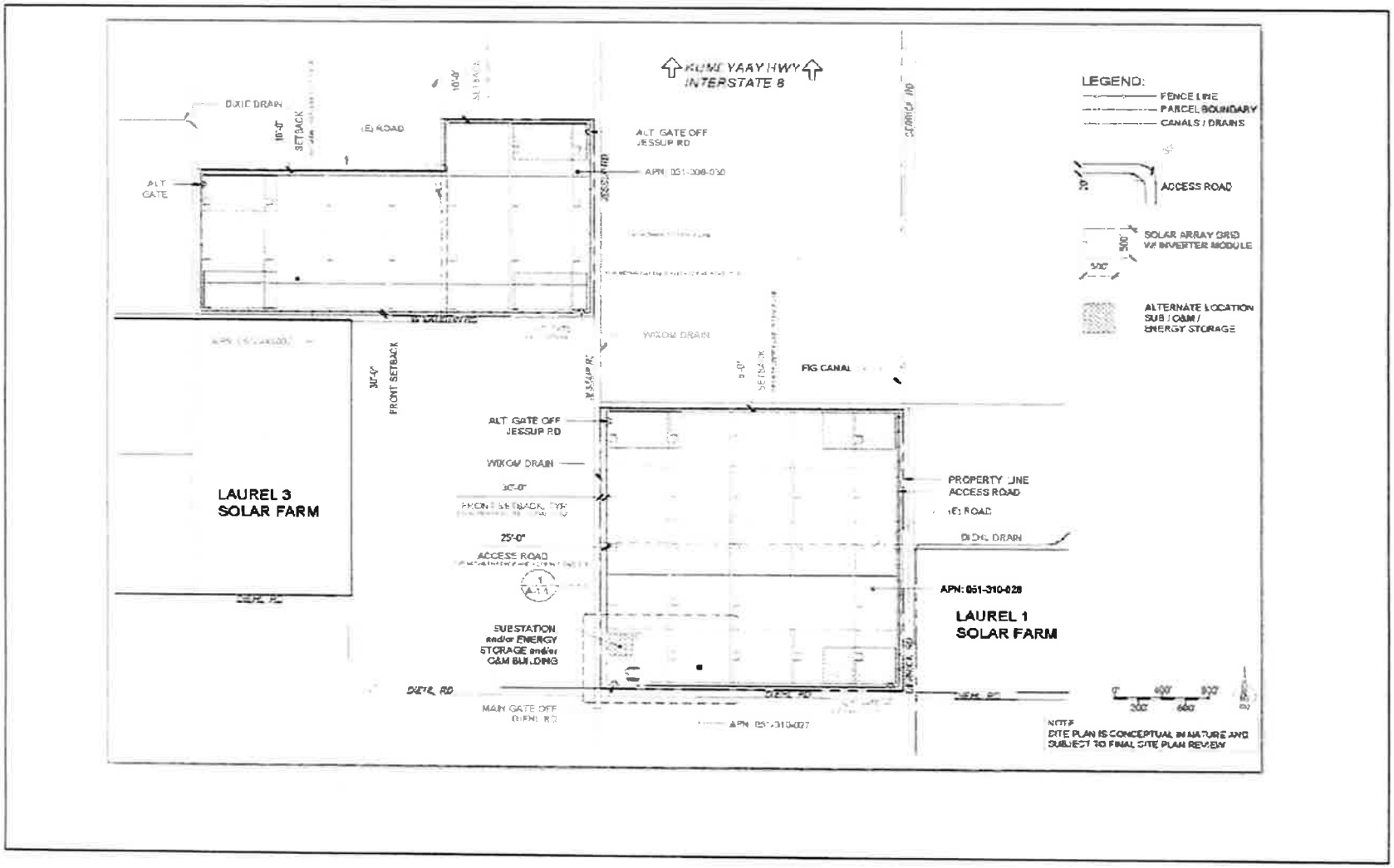


Figure 2 Site Plan

Typical fixed-tilt solar panel rows

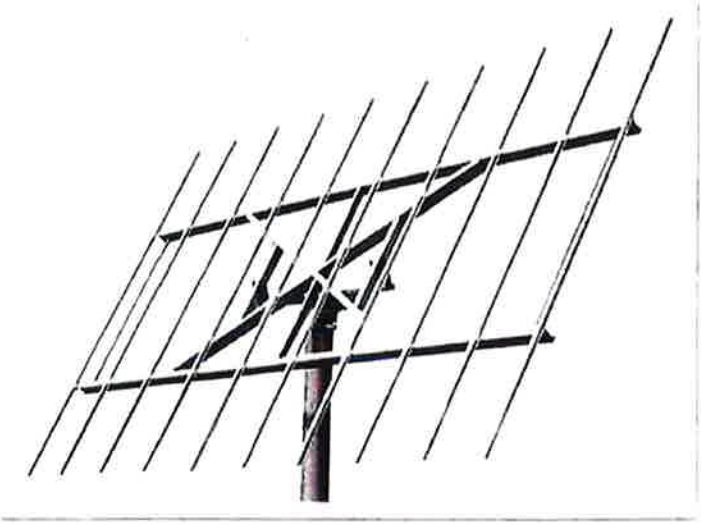
Typical single axis tracking solar panels

Typical dual axis tracking solar panels

The solar array fields will be arranged in groups called "blocks," with inverter stations generally located centrally within the blocks. Blocks will produce direct electrical current (DC), which is converted to alternating electrical current (AC) at the inverter stations.

Each PV module will be placed on a fixed-tilt or tracker mounting structure. The foundations for the mounting structures can extend up to 8 feet below ground, depending on the structure, soil conditions, and wind loads, and may be encased in concrete or utilize small concrete footings. Final solar panel layout and spacing will be optimized for Project Area characteristics and the desired energy production profile.

Typical fixed tilt mounting structure



Typical dual axis mounting structure

Inverter Stations

Photovoltaic energy is delivered via cable to inverter stations, generally located near the center of each block. Inverter stations are typically comprised of one or more inverter modules with a rated power of up to 2 MW each, a unit transformer, and voltage switch gear. The unit transformer and voltage switch gear are housed in steel enclosures, while the inverter module(s) are housed in cabinets. Depending on the vendor selected, the inverter station may lie within an enclosed or canopied metal structure, typically on a skid or concrete mounted pad. Refer to Figure 3 for a typical inverter station layout.

Typical inverter stations

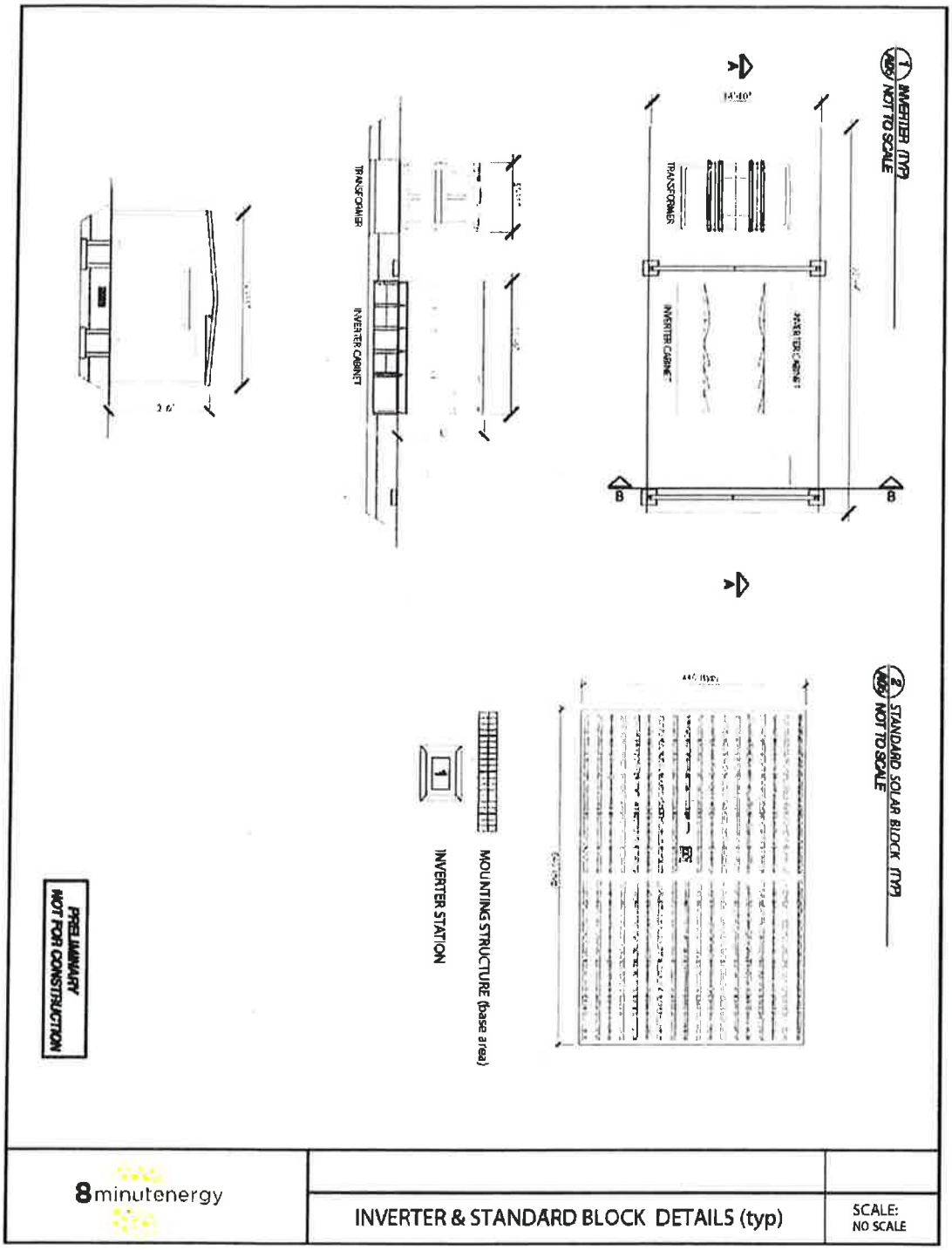
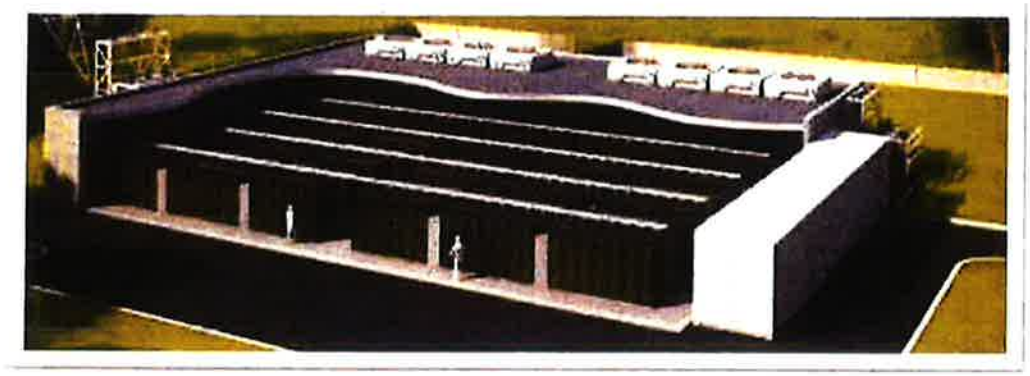


Figure 3 Typical Inverter Detail

Energy Storage System

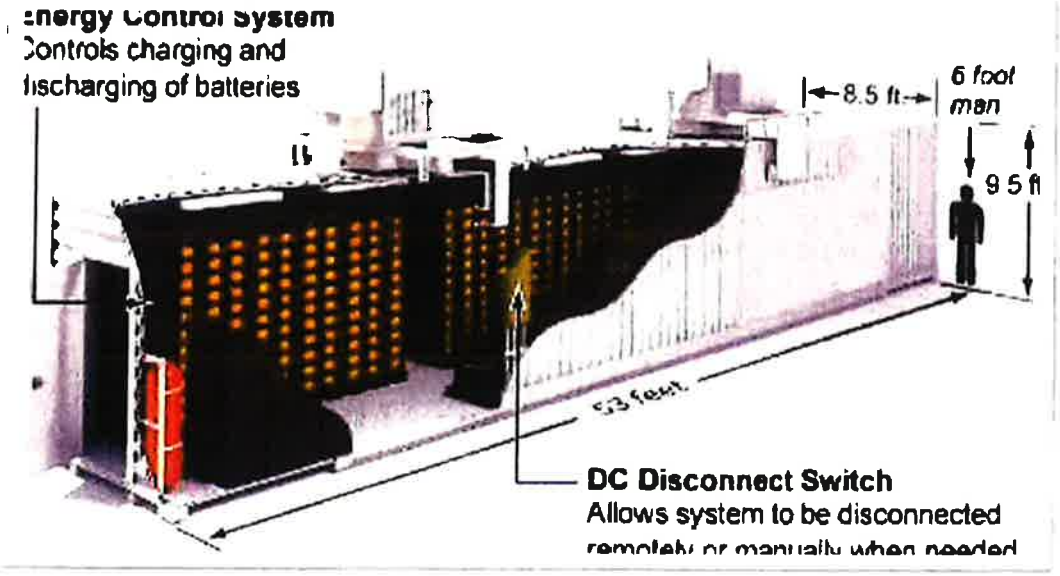
The Project may include one or more energy storage systems (ESSs), located at or near a substation (onsite or shared) and/or at the inverter stations. Such large-scale ESSs would consist of modular and scalable battery packs and battery control systems that conform to U.S. national safety standards. The ESS modules, which may include commercially available flow batteries, typically consist of ISO standard containers (approximately 40'L x 8'W x 8'H) housed in pad- or post-mounted, stackable metal structures, but may also be housed in a dedicated building in compliance with applicable regulations. The maximum height of a structure is not expected to exceed 25 feet. The dimensions and number of energy storage modules and structures vary depending on the application, supplier, and configuration chosen, as well as on offtaker/power purchase agreement requirements and County building standards. L2S may share an ESS with one or more nearby solar projects or may operate one or more standalone ESS facilities within the Project Site.



ESS Installed in Dedicated Structure

Modular ESS Installed on Concrete Pad

Modular ESS Installed on Multiple Concrete Pads



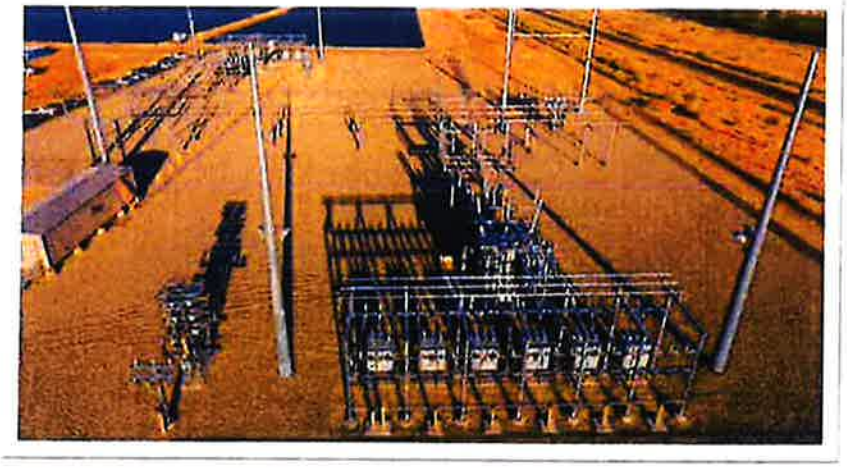
Typical ESS module configuration

Typical ESS

Substation

Output from the inverter stations will be transferred via electrical conduits and electrical conductor wires to one or more on-site substation(s). As shown in Figure 4, each substation may contain several components, including auxiliary power transformers, distribution cabinets, revenue metering systems, a microwave transmission tower, and voltage switch gear. Each substation will occupy an area of approximately 200' x 200', secured separately by an additional chain-link fence, and located along the perimeter of the project. The final location(s) will be determined before issuance of building permits.

Substations typically include a small control building (roughly 500 square feet) standing approximately 10 feet tall. The building is either prefabricated concrete or steel with rooms for the voltage switch gear and the metering equipment, a room for the station supply transformer, and a separate control technology room in which the main computer, the intrusion detection system, and the main distribution equipment are housed. Components of this building (e.g., control technology room and intrusion detection system) may instead be located at an O&M building described later in this document.



Typical Substation

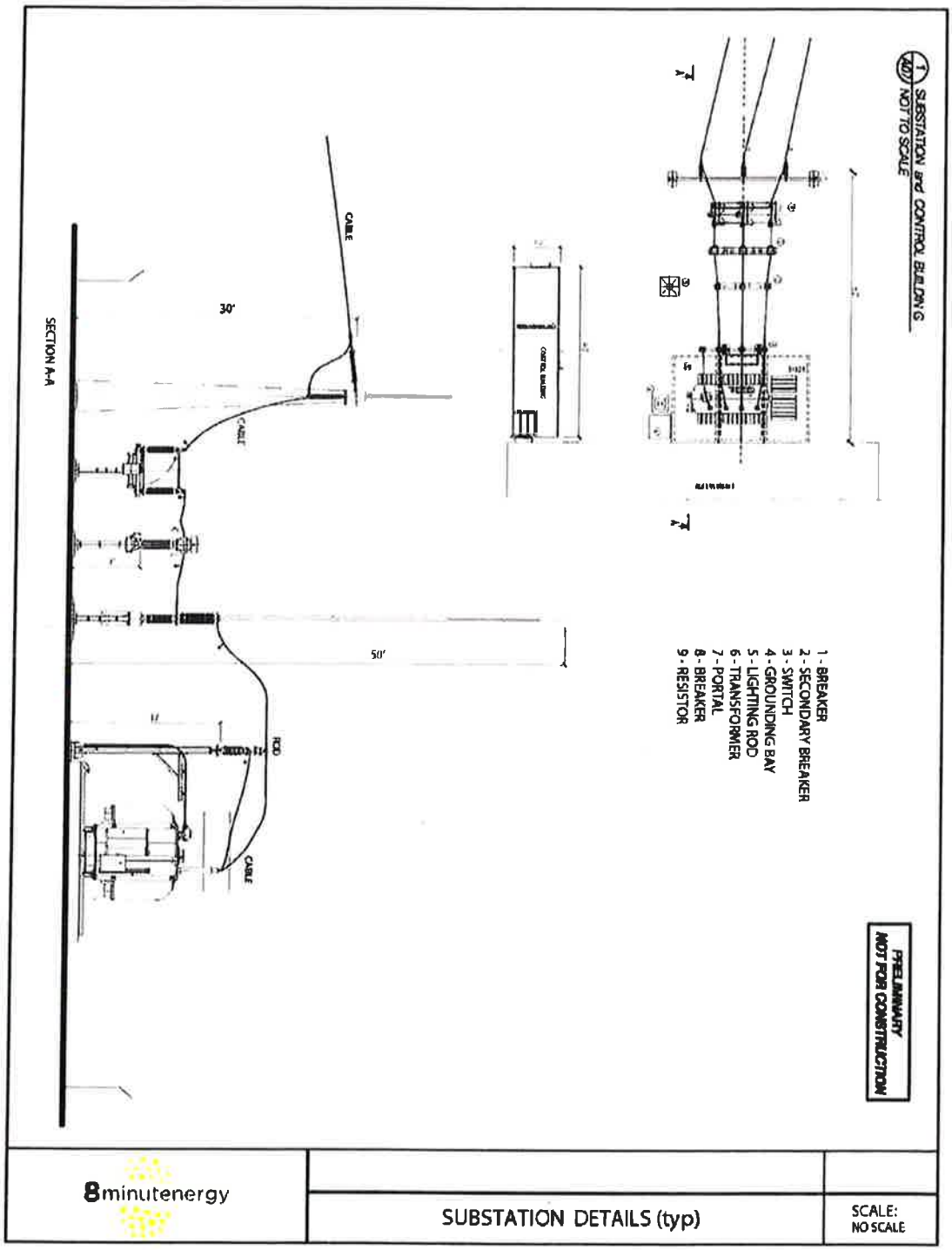


Figure 4 Typical Substation

Transmission Line

From one or more Project substations, power will be transmitted to the proposed IID Fern Substation, adjacent to Big Rock 1 Solar Farm, via up to 230 kV overhead and/or underground line(s). The gen-tie may involve installation of an appropriate number of 230 kV transmission tower structures, associated insulator/hardware assemblies, appropriate number of spans of conductor and optical ground wiring, among other appurtenances, between the last Project structure and the dead-end substation structure at Fern Substation. Final number and location of the transmission tower structures and spans of conductor and optical ground wire will be determined by IID following completion of final engineering of the Interconnection Facilities.

IID or one or both Applicants on behalf of IID would construct the Fern Substation and associated facilities to interconnect the Projects. Only planning level assumptions for Fern are available at this time, and further details will be made available upon completion of preliminary and final engineering, using the most current IID design and construction practices, identification of field conditions, verification of availability of materials and equipment, and compliance with applicable environmental and permitting requirements. Fern will involve construction of a 230 kV switchyard, including all relevant switchyard design features and appurtenances, on up to 25 acres of real estate. The switchyard will loop in the Imperial Valley Substation – Campo Verde (CVIV) 230 kV Transmission Line, which would necessarily include the construction of various transmission line structures and appurtenances. Maximum height of the various structures is not expected to exceed approximately 200 feet. Fern may also include telecommunications facilities, fiber optic communication cables, equipment, and associated structures for diverse path routing of communications. IID anticipates working typical construction schedules during construction; however, the actual construction hours may vary based on workforce resources and activities.

As alternatives to Fern, power from the Projects may be transmitted by 230 kV line(s) to SDG&E's Imperial Valley Substation, Drew Switchyard, or Imperial Solar Energy Center West Substation. Figure 5 provides the locations of these points of interconnection.

Water Usage

Water demand for panel washing and O&M domestic use is not expected to exceed 13 acre-feet per year. Water usage during construction, primarily for dust-suppression purposes, is not expected to exceed 43 acre-feet. Water will be obtained from the landowner's water supply or delivered via truck from off-site source(s). If off-site water is used, it will likely be obtained from a commercial source. If the Applicant determines that off-site water will be used, the Applicant will submit a Will Serve Letter from the proposed off-site water purveyor(s). A small water treatment system may be installed to provide deionized water for panel washing.

Water Storage Tank(s)

One or more above-ground water storage tanks with a total capacity of up to 10,000 gallons may be placed on-site near the O&M building. The storage tank(s) near the O&M building will have the appropriate fire department connections in order to be used for fire suppression purposes.

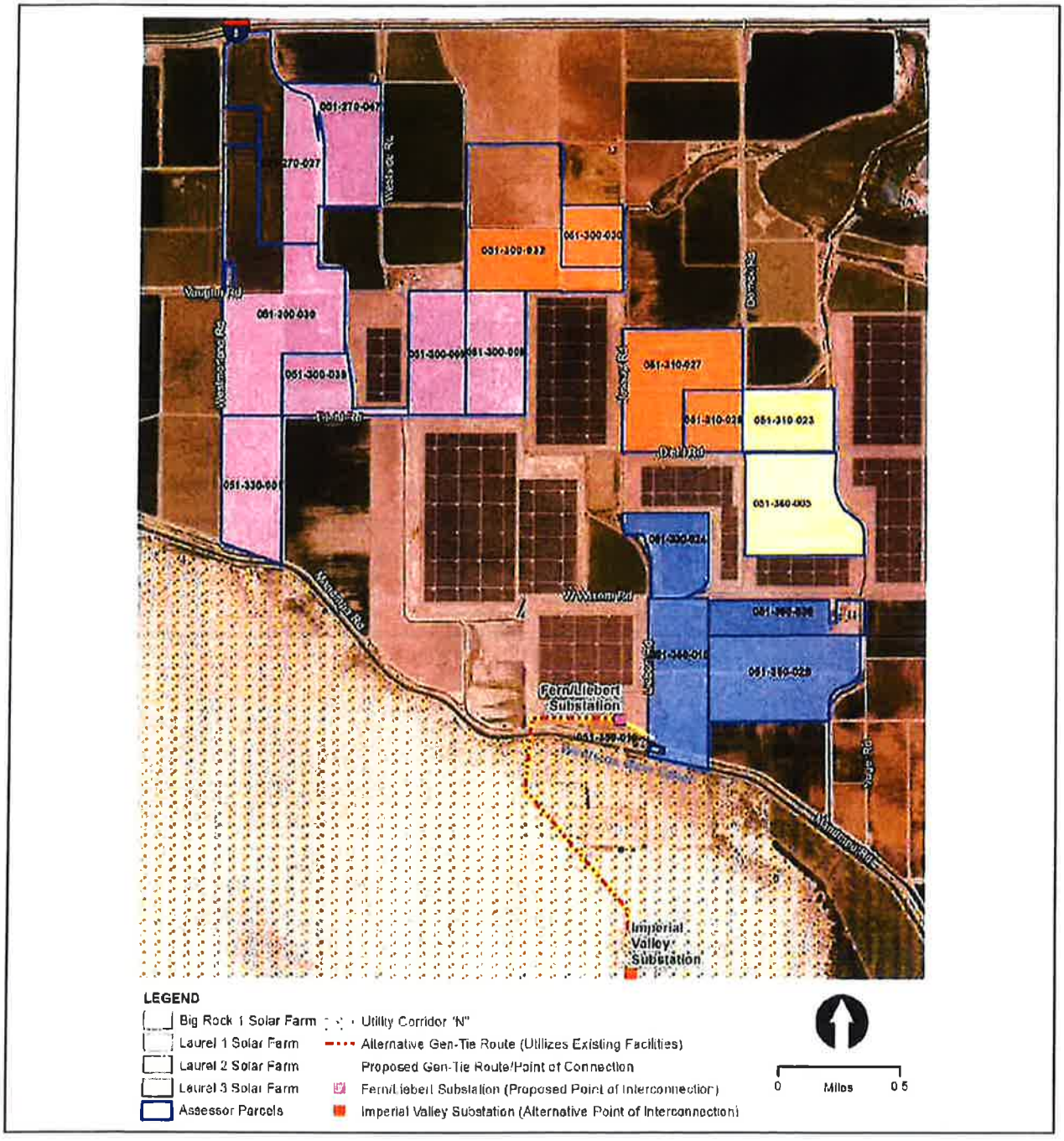


Figure 5 Points of Interconnection

Operations and Maintenance Building

The Project is intended to feature an O&M building of approximately 40' x 80' in size, with associated on-site parking. The O&M building will be steel framed, with metal siding and roof panels. The O&M building may include the following:

1. Office
2. Repair building/parts storage
3. Control room
4. Restroom
5. Septic tank and leach field

Roads, driveways and parking lot entrances will be constructed in accordance with Imperial County improvement standards. Parking spaces and walkways will be constructed in conformance with all California Accessibility Regulations.

As noted earlier, Big Rock may share O&M facilities and/or staff with one or more nearby solar projects, and/or may be remotely operated. Any "unused" O&M areas on-site could be covered by solar panels.

Project Site Security and Fencing

The Site will be enclosed with a chain link fence with barbed wire measuring up to eight (8) feet in height (from finished grade). An intrusion alarm system comprised of sensor cables integrated into the perimeter fence, intrusion detection cabinets placed approximately every 1,500 feet along the perimeter fence, and an intrusions control unit, located either in the substation control room or at the O&M Building, or similar technology, will be installed. Additionally, L2S may include additional security measures including, but not limited to, barbed wire, low voltage fencing with warning reflective signage, controlled access points, security alarms, security camera systems, and security guard vehicle patrols to deter trespassing and/or unauthorized activities that could interfere with operation of the Projects.

Controlled access gates will be maintained at the main entrance to the Site. Site access will be provided to offsite emergency response teams that respond in the event of an "after-hours" emergency. Enclosure gates would be manually operated with a key provided in an identified key box location.

Project Site Lighting

All Project Site lighting will be directed away from any public rights-of-way. Lighting used on-site will be minimal. Site lighting may include motion sensor lights for security purposes. Lighting used on-site will be of the lowest intensity foot candle level, in compliance with any applicable regulations, measured at the property line after dark.

Annual Production

L2S will generate electrical power during daylight hours. Peak electricity demand in California corresponds with air conditioning use on summer afternoons when ambient temperatures are high. The Project's peak generating capacity corresponds to this time-period. There is no generating capacity between sunset and sunrise due to the lack of solar energy, though power may be released from the energy storage system.

L2S will have a nominal output capacity of up to40 MW-AC, sufficient to power roughly 15,000 homes and displacing 45,000 tons of carbon dioxide equivalent (CO_2e) per year when compared to a gas-fired power plant or 90,000 tons when compared to a coal-fired power plant.

CONSTRUCTION ACTIVITIES

The construction period for Big Rock, from site preparation through construction, testing, and commercial operation, is expected to commence as early as Q4 2021 and will extend for approximately 6 months.

Construction of the facility will include the following activities:

- Site preparation
- Grading and earthwork
- Concrete foundations
- Structural steel work
- Electrical/instrumentation work
- Collector line installation
- Architecture and landscaping

No roadways will be affected by Big Rock, except during the Project's construction period. Construction traffic will access the Site from Jessup Road. It is estimated that up to 60 workers per day (during peak construction periods) will be required during the construction of the Project.

Heavy construction is expected to occur between 6:00 am and 5:00 pm, Monday through Friday. Additional hours may be necessary to make up schedule deficiencies or to complete critical construction activities. Some activities may continue 24 hours per day, seven days per week. Low level noise activities may potentially occur between the hours of 10:00 pm and 7:00 am. Nighttime activities could potentially include, but are not limited to, refueling equipment, staging material for the following day's construction activities, quality assurance/control, and commissioning.

Materials and supplies will be delivered to the Site by truck. Truck deliveries will normally occur during daylight hours. However, there will be offloading and/or transporting to the Site on weekends and during evening hours.

Earthmoving activities are expected to be limited to the construction of the access roads, any O&M building, any substation, and any storm water protection or storage (detention) facilities. Final grading may include revegetation with low lying grass or applying earth-binding materials to disturbed areas.

WORK FORCE

Once constructed, maintenance will generally be limited to the following:

1. Cleaning of PV panels
2. Monitoring electricity generation
3. Providing Site security
4. Facility maintenance - replacing or repairing inverters, wiring, and PV modules

It is expected that the Project will require an operational staff of up to five full-time employees. As noted earlier, it is possible that the Project would share O&M, substation, and/or transmission facilities with one or more nearby projects. In such a scenario, the projects c/would share personnel, thereby potentially reducing the Project's on-site staff.

The facility would operate seven days a week, 24 hours a day, generating electricity during normal daylight hours when the solar energy is available. Maintenance activities may occur seven days a week, 24 hours a day to ensure PV panel output when solar energy is available.

PROJECT FEATURES AND BEST MANAGEMENT PRACTICES

The following sections describe standard Project features and best management practices that will be applied during construction and long-term operation of L2S to maintain safety and minimize or avoid environmental impact.

Waste and Hazardous Materials Management

L2S will have minimal levels of materials on-site that have been defined as hazardous under 40 CFR, Part 261. The following materials are expected to be used during the construction, operation, and long-term maintenance of the Project:

- Insulating oil – used for electrical equipment
- Lubricating oil – used for maintenance vehicles
- Various solvents/detergents – equipment cleaning
- Gasoline – used for maintenance vehicles

Hazardous materials and wastes will be managed, used, handled, stored, and transported in accordance with applicable local and State regulations. All hazardous wastes will be maintained at quantities below the threshold requiring a Hazardous Material Management Program (HMMP) (one 55-gallon drum). Though not expected, should any on-site storage of hazardous materials exceed one 55-gallon drum, an HMMP would be prepared and implemented.

Spill Prevention and Containment

Hazardous materials stored on-site will be in quantities of less than 55 gallons. Spill prevention and containment for construction and operation of L2S will adhere to the Environmental Protection Agency's (EPA's) guidance on Spill Prevention Control and Countermeasures (SPCC).

Wastewater/Septic System

A standard on-site septic tank and leach field may be used at the O&M building to dispose sanitary wastewater, designed to meet operation and maintenance guidelines required by Imperial County laws, ordinances, regulations, and standards.

Inert Solids

Inert solid wastes resulting from construction activities may include recyclable items such as paper, cardboard, solid concrete and block, metals, wire, glass, type 1-4 plastics, drywall, wood, and lubricating oils.

Non-recyclable items include insulation, other plastics, food waste, vinyl flooring and base, carpeting, paint containers, packing materials, and other construction wastes. A Construction Waste Management Plan will be prepared for review by the County. Consistent with local regulations and the California Green Building Code, the Plan would provide for diversion of a minimum of 50% of construction waste from landfill.

Chemical storage tanks (if any) would be designed and installed to meet applicable local and state regulations. Any wastes classified as hazardous such as solvents, degreasing agents, concrete curing compounds, paints, adhesives, chemicals, or chemical containers will be stored (in an approved storage facility/shed/structure) and disposed of as required by local and state regulations. Material quantities of hazardous wastes are not expected.

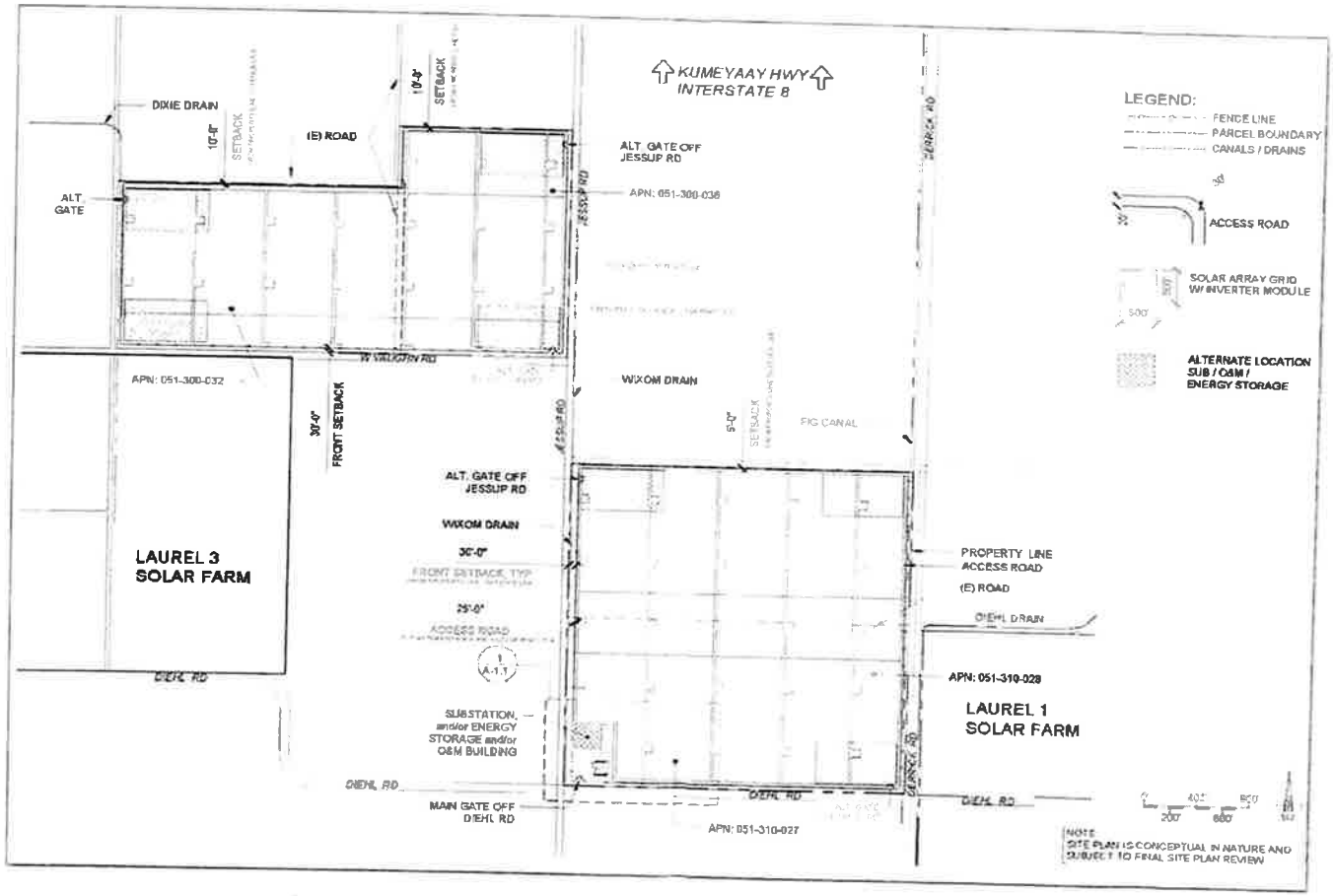
Health and Safety

Safety precautions and emergency systems will be implemented as part of the design and construction of L2S to ensure safe and reliable operation. Administrative controls will include classroom and hands-on training in operating and maintenance procedures, general safety items, and a planned maintenance program. These will work with the system design and monitoring features to enhance safety and reliability.

L2S will have an Emergency Response Plan (ERP). The ERP will address potential emergencies including chemical releases, fires, and injuries. All employees will be provided with communication devices, cell phones, or walkie-talkies, to provide aid in the event of an emergency.

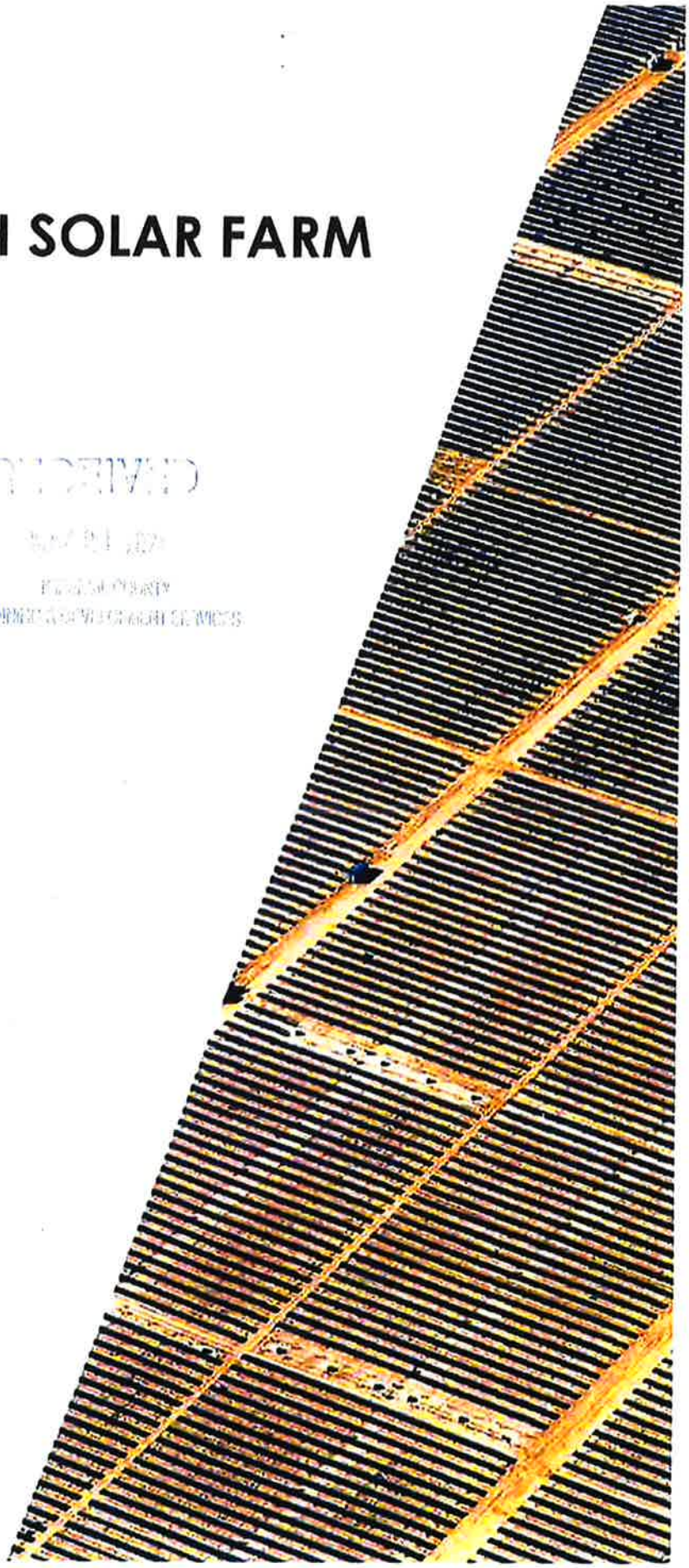
L2S is located within the jurisdiction of Imperial County Fire Department. On-site fire protection would be provided via portable and fixed fire suppression systems throughout each of the projects. Portable fire extinguishers would be provided at various locations throughout the solar farms, while fixed fire suppressions systems would be available in the form of dedicated 10,000-gallon on-site storage tank(s). Water from the on-site water storage tank would be intended for the fire protection of the O&M building. The O&M building would have access to a wet-fire connection to provide sufficient fire protection. Both the access and service roads (along the perimeter of the project facilities) would have turnaround areas to allow clearance for fire trucks per fire department standards (70 feet by 70 feet, and 20-foot-wide access road).

Figure 3-7. Laurel 2 Solar Farm – Site Layout



LAUREL 2 NORTH SOLAR FARM
CUP Application

April 2021



Submitted by:
38KM 8me LLC
c/o 8minutenergy Renewables
c/o 8minute Solar Energy
5455 Wilshire Boulevard, Suite 2010
Los Angeles, CA 90036
(323) 525-0900

8minutenergy
RENEWABLES

TABLE OF CONTENTS

PROJECT INFORMATION

38KM 8me LLC (the Applicant) is seeking approval of a Conditional Use Permit (CUP) for the construction of an up to 30 megawatt-alternating current (MW-AC) utility-scale solar farm known as Laurel 2 North Solar Farm (Project) in Imperial County, California. The Applicant proposes to construct, own, and operate the Project.

The site of the Project is located on land within the boundary of the previously approved Laurel Cluster Solar Farm project area (Figure 1). The Laurel Cluster Solar Farm project consisted of multiple CUP applications including CUP No. 17-0029 that covers the Laurel 2 North Solar Farm site. The Laurel Cluster Solar Farm was considered by the County Board of Supervisors who certified an EIR and approved the CUPs on January 15, 2019. Now, the Applicant proposes to subdivide a subset of land within the Laurel Cluster Solar Farm. Two new CUP applications have been prepared (each a "Project") and are described as follows: Laurel 2 North ("L2N") totaling approximately 120 acres and Laurel 2 South ("L2S") totaling approximately 160 acres. This CUP application covers L2N.

Site Information

The Project proposes to develop the entirety of assessor's parcel 051-300-036 and a portion of 051-300-032 (Project Area) totaling approximately 120 gross acres. The topography of the Project Area is relatively flat, and the site is located near to active agricultural land and operating solar farms. The amount of land permanently disturbed by development of the solar facility and associated infrastructure (Project Site) would be less than the gross acreage of the Project Area.

CUP Parcels: Laurel 2 North Solar Farm

APN	Owner	Land Use Zoning	Gross Acreage
051-300-036	**John Kuhn**	A-3	40
051-300-032	John Kuhn	A-2-R	80

Location

The Project Site is located in the unincorporated area of Imperial County, south of I-8, west of Jessup Road, north of West Vaughn Road and east of Fern Canal. The Project Site is approximately eight miles southwest of the City of El Centro and three miles south of Seeley, a census-designated place.

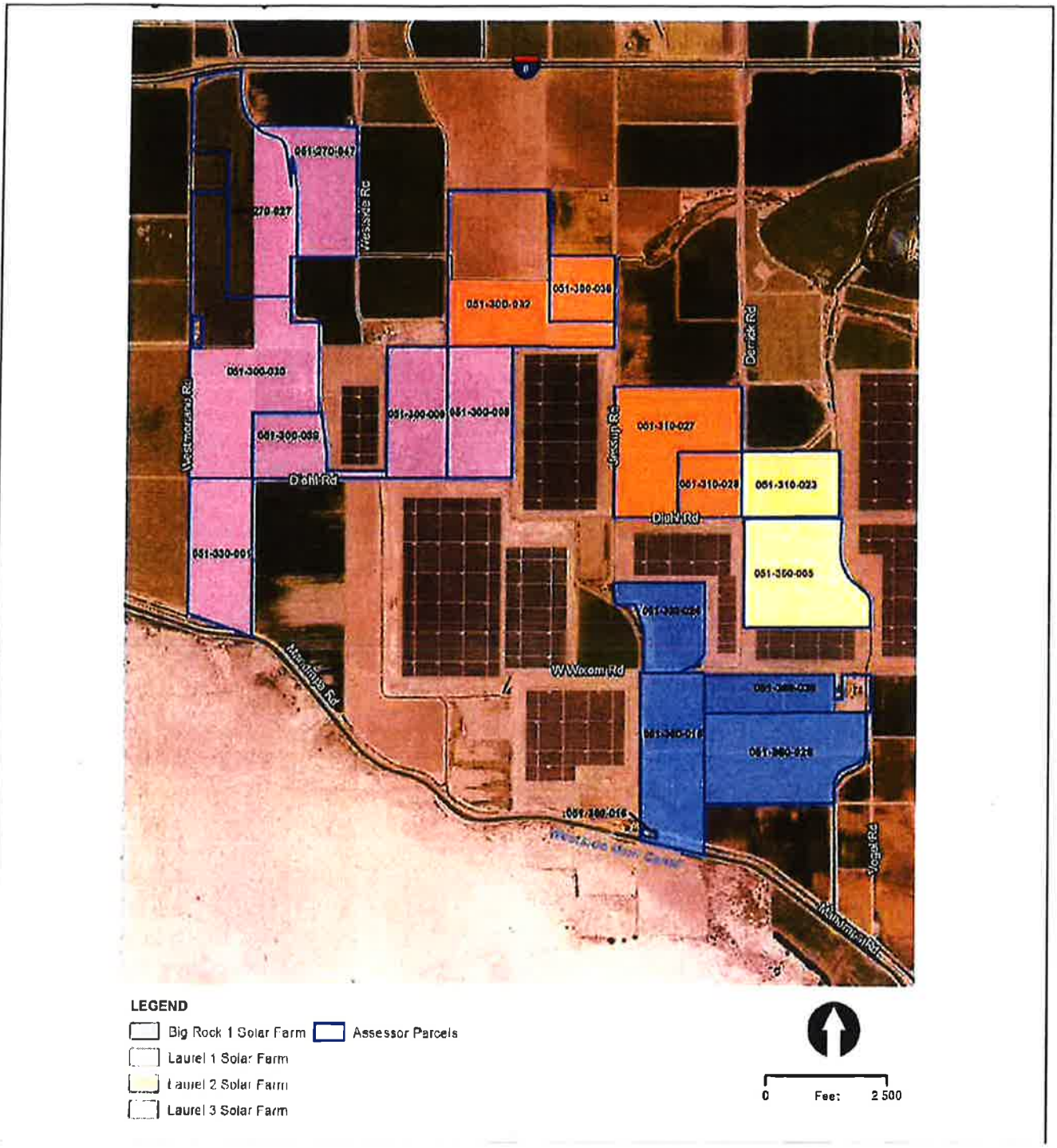


Figure 1 Site Location

SECTION I:

CUP Application

8minutenergy

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES – Please type or print -

1. PROPERTY OWNER'S NAME John Kuhn	EMAIL ADDRESS jr@kuhnandkuhn.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 473 Savannah Highway, Charlston SC	ZIP CODE 29407	PHONE NUMBER 843 708-2188
3. APPLICANT'S NAME 38KM 8me LLC	EMAIL ADDRESS tom@8minutenergy.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 5455 Wilshire Blvd. Suite 2010, Los Angeles, Ca	ZIP CODE 90036	PHONE NUMBER 323 525-0900
4. ENGINEER'S NAME CA. LICENSE NO. TBD	EMAIL ADDRESS	
5. MAILING ADDRESS (Street / P O Box, City, State)	ZIP CODE	PHONE NUMBER

6. ASSESSOR'S PARCEL NO. 051-300-032 (portion), 051-300-036	SIZE OF PROPERTY (in acres or square foot) 120	ZONING (existing) A-2-R, A-3
7. PROPERTY (site) ADDRESS		
8. GENERAL LOCATION (i.e. city, town, cross street) The project site is located in the unincorporated area of Imperial County, north of W. Vaughn Road, west of Jessup Road, south of I-8, and east of Fern Canal		
9. LEGAL DESCRIPTION see attached		

PLEASE PROVIDE CLEAR & CONCISE INFORMATION (ATTACH SEPARATE SHEET IF NEEDED)

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail)
Applicant proposes to construct and operate a 30 MW solar farm with energy storage.

11. DESCRIBE CURRENT USE OF PROPERTY	Farmland
12. DESCRIBE PROPOSED SEWER SYSTEM	Septic tank with leachfield
13. DESCRIBE PROPOSED WATER SYSTEM	IID distribution system, private water treatment facility
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	Above ground water tank with capacity of 10,000 gallons

15. IS PROPOSED USE A BUSINESS? ☒ Yes ☐ No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? 5 or fewer

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT

John Kuhn — Print Name — 5/20/21 — Date

Signature

Print Name — Date

Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN
B. FEE see application submitted by 92JT
C. OTHER
D. OTHER

APPLICATION RECEIVED BY:		DATE	
APPLICATION DEEMED COMPLETE BY:		DATE	
APPLICATION REJECTED BY:		DATE	
TENTATIVE HEARING BY:		DATE	
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE	

REVIEW / APPROVAL BY OTHER DEPT'S required
☐ P W
☐ E H. S
☐ A. P. C D
☐ O. E. S.
☐
☐

CUP # 21-0014

IS 21-0021

LEGAL DESCRIPTION
CUP – LAUREL 2 NORTH

That portion of Section 22, Township 16 South, Range 12 East, of the San Bernardino Base and Meridian, in an unincorporated area of the County of Imperial, in the State of California, more particularly described as follows:

COMMENCING at the Northwest corner of said Section 22 from which the Southwest corner of said Section 22 bears South 00 degrees 16 minutes 32 seconds East, a distance of 5282.60 feet;

THENCE along the West line of said Section 22, South 00 degrees 16 minutes 32 seconds East, a distance of 2,632.48 feet to the **Point of Beginning**;

THENCE leaving said West line, South 89 degrees 04 minutes 19 seconds East, a distance of 2016.21 feet;

THENCE North 31 degrees 42 minutes 39 seconds West, a distance of 58.48 feet;

THENCE North 07 degrees 56 minutes 20 seconds West, a distance of 82.37 feet;

THENCE North 00 degrees 08 minutes 51 seconds West, a distance of 421.73 feet;

THENCE North 89 degrees 47 minutes 24 seconds East, a distance of 107.88 feet to the Northwest corner of the Southwest Quarter of Tract 55;

THENCE along the North line of the Southwest Quarter of Tract 55, North 89 degrees 47 minutes 24 seconds East, a distance of 1318.77 feet to the Northeast corner of the Southwest Quarter of Tract 55;

THENCE leaving said North line, and along the East line of the Southwest Quarter of Tract 55, South 00 degrees 17 minutes 11 seconds East, a distance of 1322.29 feet to the Northeast corner of the West 120 acres of Tract 54;

THENCE along the East line of the West 120 acres of Tract 54, South 00 degrees 24 minutes 33 seconds East, a distance of 523.82 feet to the centerline of the County Road per Book 1134, Page 297, Official Records of Imperial County, California;

THENCE along said centerline, South 89 degrees 58 minutes 41 seconds West, a distance of 1319.56 feet to the West line of Tract 54;

THENCE leaving said centerline, and along the West line of Tract 54, North 00 degrees 18 minutes 20 seconds West, a distance of 2 54 feet to the Southeast corner of Lot 6 of said Section 22;

THENCE leaving said West line, South 89 degrees 41 minutes 47 seconds West, a distance of 2083.79 feet to the West line of said Section 22;

THENCE along last said West line, North 00 degrees 16 minutes 32 seconds West, a distance of 1329.47 feet to the **POINT OF BEGINNING.**

Said parcel contains 5,213,412 square feet or 119.68 acres of land, more or less.

Bearings are based on CCS Zone 6, NAD 83 (2010 epoch).

SECTION II:

Project Description

DESCRIPTION OF PROPOSED PROJECT

The Laurel 2 North Project is proposed on two parcels totaling 120 acres within the central portion of the Big Rock Cluster Solar Farms project area. As shown above on Figure 1, the Project Site is located south of I-8, west of Jessup Road, north of West Vaughn Road, and east of the Fern canal. Primary access would be taken via Jessup Road while secondary access may be obtained off West Vaughn Road.

The Applicant proposes to develop a photovoltaic energy facility (up to 30 MW-AC) with up to 120 MW hour (MWh) Energy Storage System on the Project Site (Figure 2). Power generated by the Project will be delivered from the Site via 230 kV overhead and/or underground electrical transmission line(s) originating from an on-site substation/switchyard and terminating at the proposed Imperial Irrigation District (IID) Fern Substation.

The Project may share operations & maintenance (O&M), substation, and/or transmission facilities as necessary with one or more nearby solar projects, and/or may be remotely operated. Any "unused" O&M, substation, and/or transmission facility areas on-site could be covered by solar panels under such scenarios.

The Applicant has considered the following in its selection of the Site for detailed evaluation:

- Land availability (approximately 120 gross acres)
- Land Use Designations: A-2-R (General Agricultural Rural Zone) and A-3 (Heavy Agriculture)
- Proximity to interconnecting substation: near to planned substation
- Historic land use pattern: The Project Area is not encumbered by Williamson Act contracts and the project would place solar facilities in an area where utility-scale facilities already exist

Up to five (5) full-time employees will operate the facility (split between daytime and nighttime shifts). Typically, up to three (3) staff will work during the day shift (sunrise to sunset) and the remainder during the night shifts and weekend. As noted earlier, it is possible that the Project would share O&M, substation, and/or transmission facilities with one or more nearby solar projects, and/or may be remotely operated. In such scenarios, the Project's on-site staff could be reduced.

After the useful life of the Project, the panels will be disassembled from the mounting frames and the Site restored to its pre-development condition. The L2N project may share an operations & maintenance (O&M) building, a substation, and/or transmission facilities, as necessary, with one or more nearby solar projects, and/or may be remotely operated. Any "unused" O&M building, substation, and/or transmission facility areas on-site may be covered by solar panels under such scenarios.

PV Module Configuration

L2N will utilize photovoltaic panels or modules[1] to convert sunlight into electricity. Individual panels will be installed on either fixed-tilt or tracker mount systems (single- or dual-axis, using galvanized steel or aluminum). If the panels are configured for fixed tilt, the panels will be oriented toward the south. For tracking configurations, the panels will rotate to follow the sun over the course of the day. The panels will stand up to 20 feet high, depending on mounting system used.

[1] Including but not limited to concentrated photovoltaic (CPV) technology

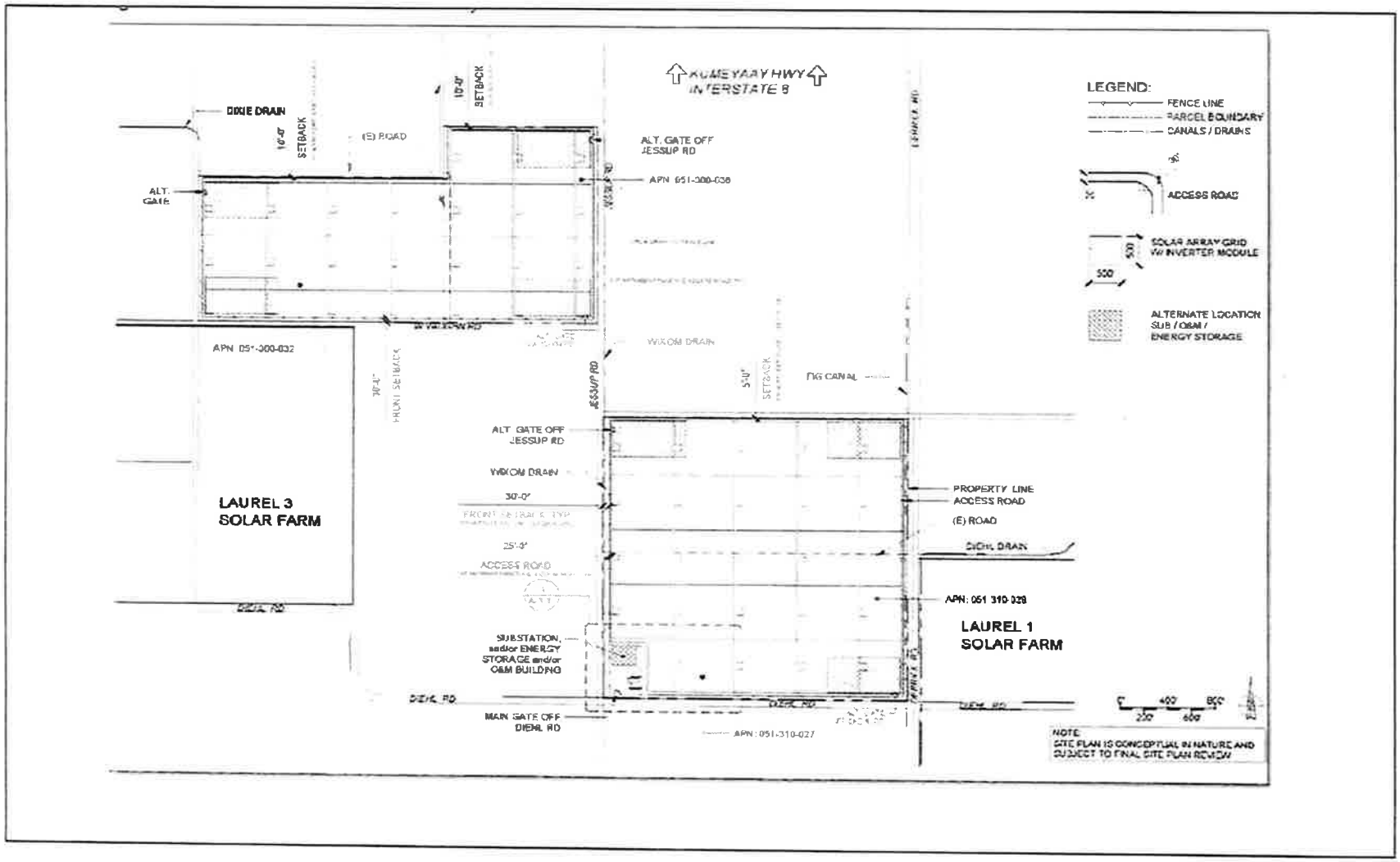


Figure 2 Site Plan

Typical fixed-tilt solar panel rows

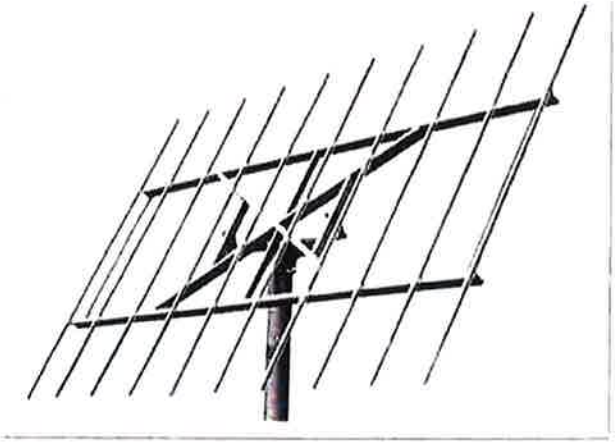
Typical single axis tracking solar panels

Typical dual axis tracking solar panels

The solar array fields will be arranged in groups called "blocks," with inverter stations generally located centrally within the blocks. Blocks will produce direct electrical current (DC), which is converted to alternating electrical current (AC) at the inverter stations.

Each PV module will be placed on a fixed-tilt or tracker mounting structure. The foundations for the mounting structures can extend up to 8 feet below ground, depending on the structure, soil conditions, and wind loads, and may be encased in concrete or utilize small concrete footings. Final solar panel layout and spacing will be optimized for Project Area characteristics and the desired energy production profile.

Typical fixed tilt mounting structure

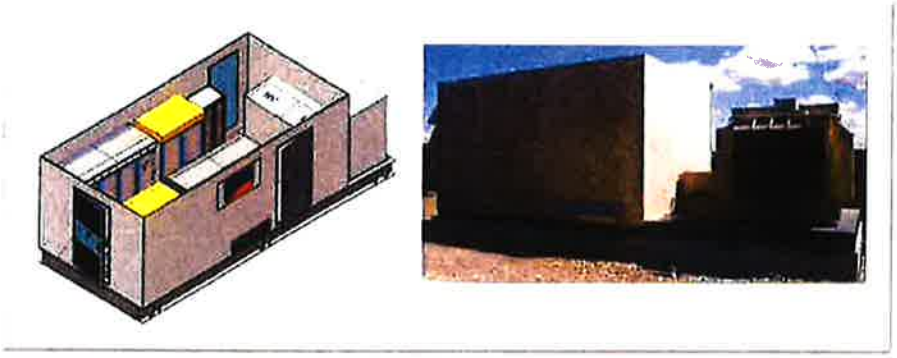


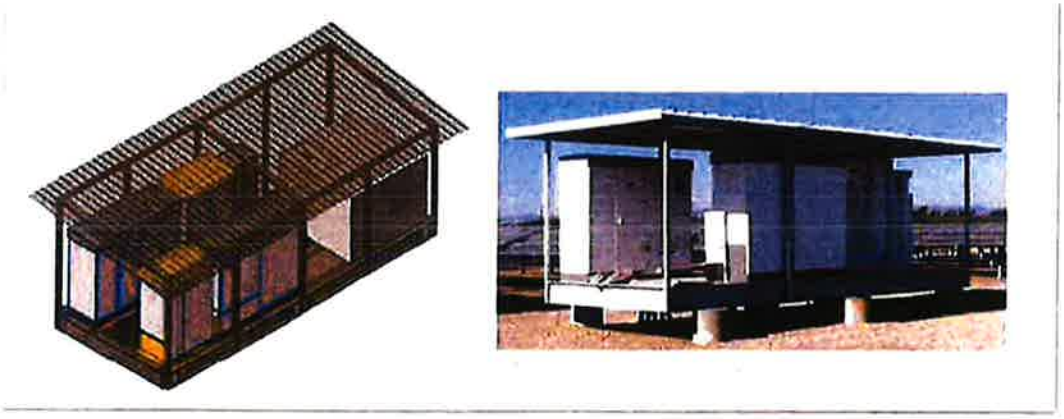
Typical dual axis mounting structure

Inverter Stations

Photovoltaic energy is delivered via cable to inverter stations, generally located near the center of each block. Inverter stations are typically comprised of one or more inverter modules with a rated power of up to 2 MW

each, a unit transformer, and voltage switch gear. The unit transformer and voltage switch gear are housed in steel enclosures, while the inverter module(s) are housed in cabinets. Depending on the vendor selected, the inverter station may lie within an enclosed or canopied metal structure, typically on a skid or concrete mounted pad.





Typical inverter stations

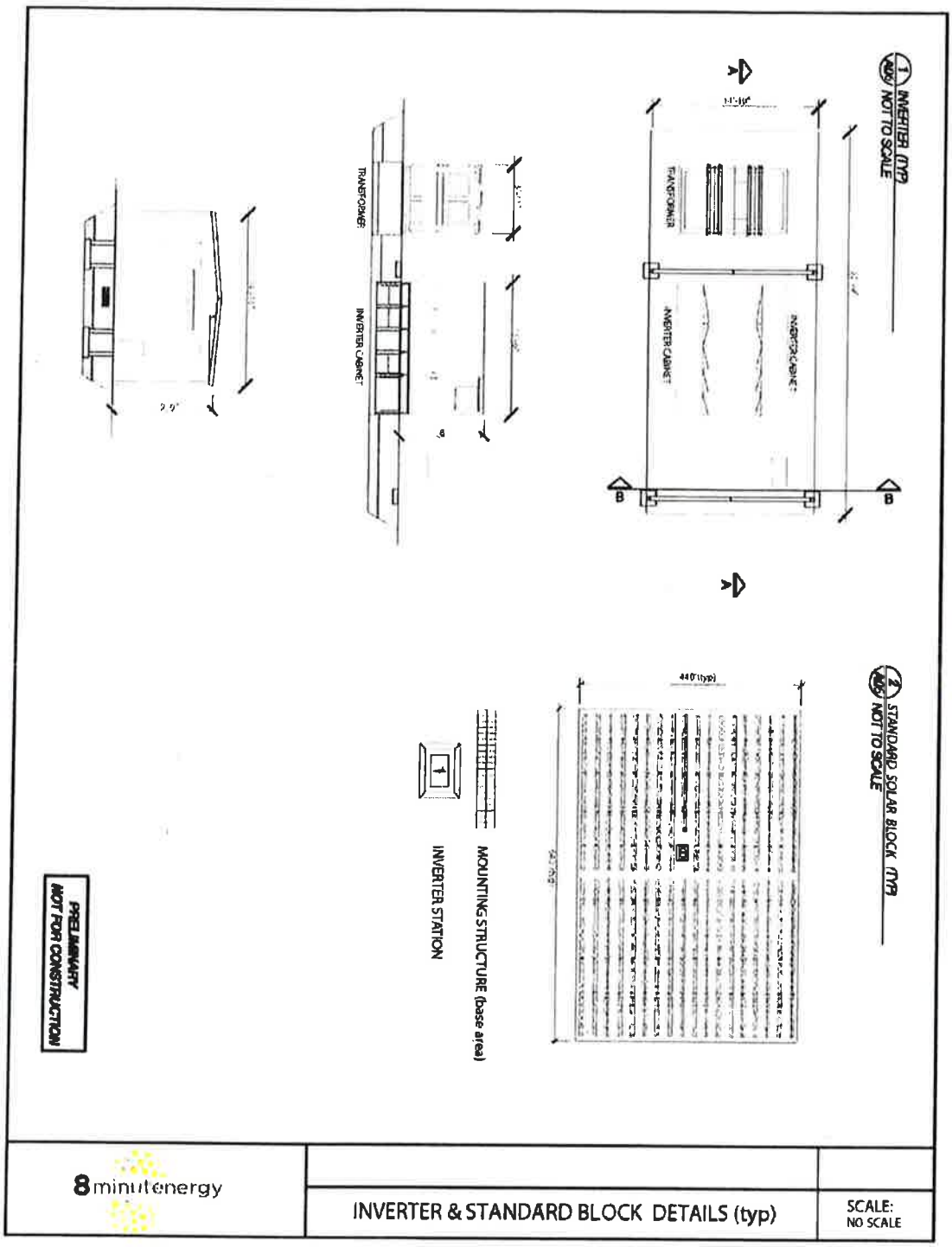
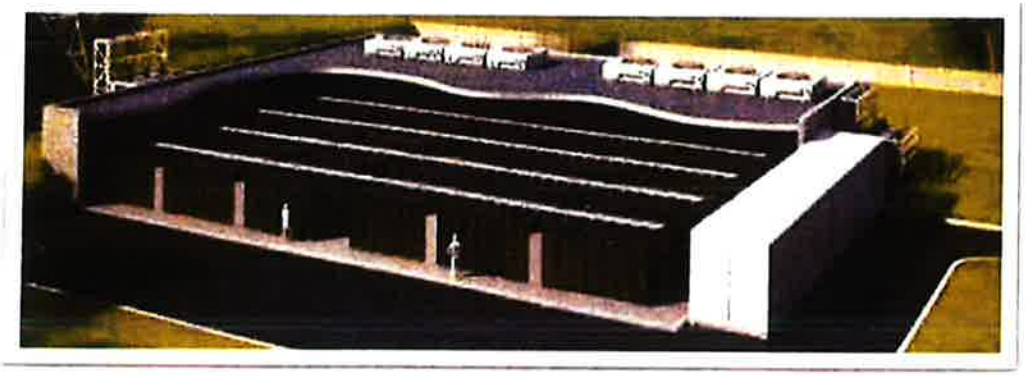


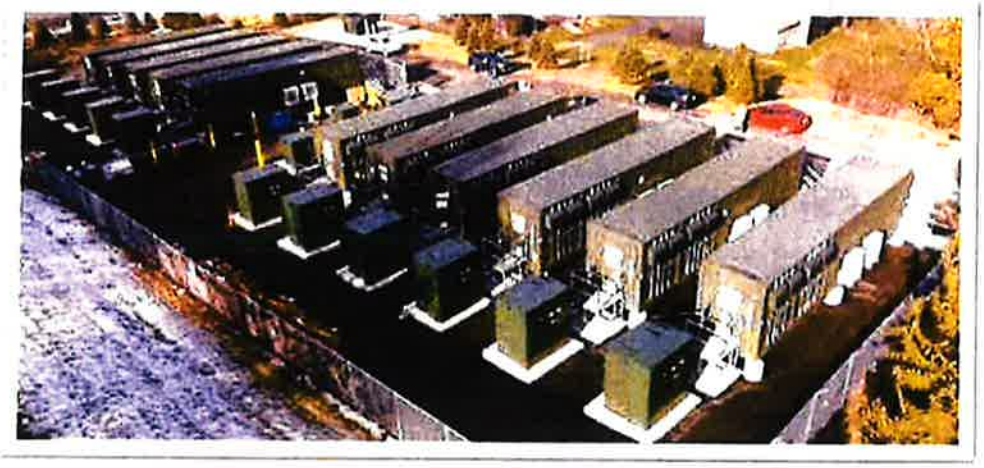
Figure 3 Typical Inverter Detail

Energy Storage System

The Project may include one or more energy storage systems (ESSs), located at or near a substation (onsite or shared) and/or at the inverter stations, but possibly elsewhere onsite. Such large-scale ESSs would consist of modular and scalable battery packs and battery control systems that conform to U.S. national safety standards. The ESS modules, which may include commercially available flow batteries, typically consist of ISO standard containers (approximately 40'L x 8'W x 8'H) housed in pad- or post-mounted, stackable metal structures, but may also be housed in a dedicated building in compliance with applicable regulations. The maximum height of a dedicated structure is not expected to exceed 25 feet. The actual dimensions and number of energy storage modules and structures vary depending on the application, supplier, and configuration chosen, as well as on offtaker/power purchase agreement requirements and County building standards. L2N may share an ESS with one or more nearby solar projects or may operate one or more standalone ESS facilities within the Project Site.

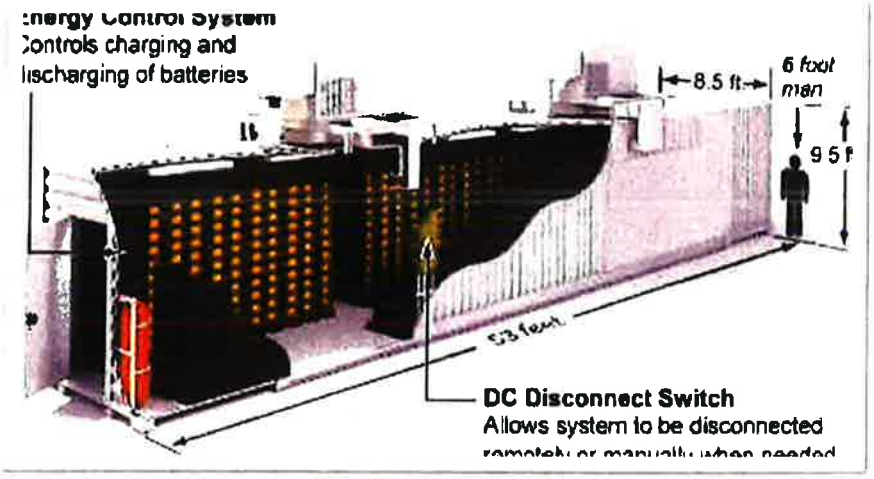


ESS Installed in Dedicated Structure



Modular ESS Installed on Concrete Pad

Modular ESS Installed on Multiple Concrete Pads



Typical ESS module configuration

Typical ESS

Substation

Output from the inverter stations will be transferred via electrical conduits and electrical conductor wires to one or more on-site substation(s). Each substation may contain several components, including auxiliary power transformers, distribution cabinets, revenue metering systems, a microwave transmission tower, and voltage switch gear. Each substation will occupy an area of approximately 200' x 200', secured separately by an additional chain-link fence, and located along the perimeter of the project. The final location(s) will be determined before issuance of building permits.

Substations typically include a small control building (roughly 500 square feet) standing approximately 10 feet tall. The building is either prefabricated concrete or steel housing with rooms for the voltage switch gear and the metering equipment, a room for the station supply transformer, and a separate control technology room in which the main computer, the intrusion detection system, and the main distribution equipment are housed. Components of this building (e.g., control technology room and intrusion detection system) may instead be located at an O&M building described later in this document.

Typical Substation

Transmission Line

From one or more Project substations, power will be transmitted to the proposed IID Fern Substation, adjacent to Laurel 4 Solar Farm, via 230 kV overhead and/or underground line(s). The gen-tie may involve installation of an appropriate number of 230 kV transmission tower structures, associated insulator/hardware assemblies, appropriate number of spans of conductor and optical ground wiring, among other appurtenances, between the last Project structure and the dead-end substation structure at Fern Substation. Final number and location of the transmission tower structures and spans of conductor and optical ground wire will be determined by IID following completion of final engineering of the Interconnection Facilities.

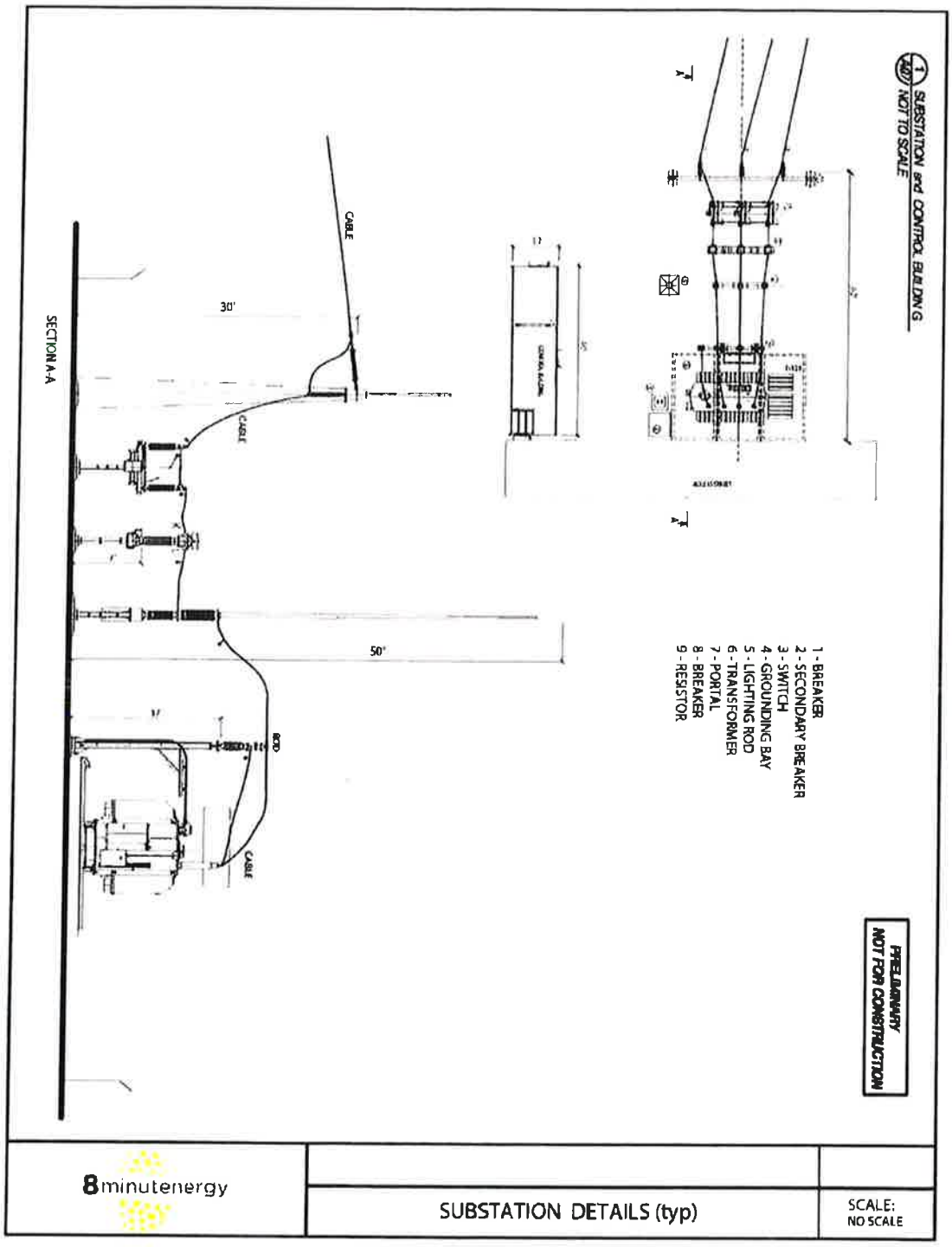


Figure 4 Typical Substation

IID or one or both Applicants on behalf of IID would construct the Fern Substation and associated facilities to interconnect the Projects. Only planning level assumptions for Fern are available at this time, and further details will be made available upon completion of preliminary and final engineering, using the most current IID design and construction practices, identification of field conditions, verification of availability of materials and equipment, and compliance with applicable environmental and permitting requirements. Fern will involve construction of a 230 kV switchyard, including all relevant switchyard design features and appurtenances, on up to 25 acres of real estate. The switchyard will loop in the Imperial Valley Substation – Campo Verde (CVIV) 230 kV Transmission Line, which would necessarily include the construction of various transmission line structures and appurtenances. Maximum height of the various structures is not expected to exceed approximately 200 feet. Fern may also include telecommunications facilities, fiber optic communication cables, equipment, and associated structures for diverse path routing of communications. IID anticipates working typical construction schedules during construction; however, the actual construction hours may vary based on workforce resources and activities.

As alternatives to Fern, power from the Projects may be transmitted by 230 kV line(s) to SDG&E's Imperial Valley Substation, Drew Switchyard, or Imperial Solar Energy Center West Substation. Figure 5 provides the locations of these points of interconnection.

Water Usage

Water demand for panel washing and O&M domestic use is not expected to exceed 13 acre-feet per year. Water usage during construction, primarily for dust-suppression purposes, is not expected to exceed 43 acre-feet. Water will be obtained from the landowner's water supply or delivered via truck from off-site source(s). If off-site water is used, it will likely be obtained from a commercial source. If the Applicant determines that off-site water will be used, the Applicant will submit a Will Serve Letter from the proposed off-site water purveyor(s). A small water treatment system may be installed to provide deionized water for panel washing.

Water Storage Tank(s)

One or more above-ground water storage tanks with a total capacity of up to 10,000 gallons may be placed on-site near the O&M building. The storage tank(s) near the O&M building will have the appropriate fire department connections in order to be used for fire suppression purposes.

Operations and Maintenance Building

The Project is intended to feature an O&M building of approximately 40' x 80' in size, with associated on-site parking. The O&M building will be steel framed, with metal siding and roof panels. The O&M building may include the following:

1. Office
2. Repair building/parts storage
3. Control room
4. Restroom
5. Septic tank and leach field

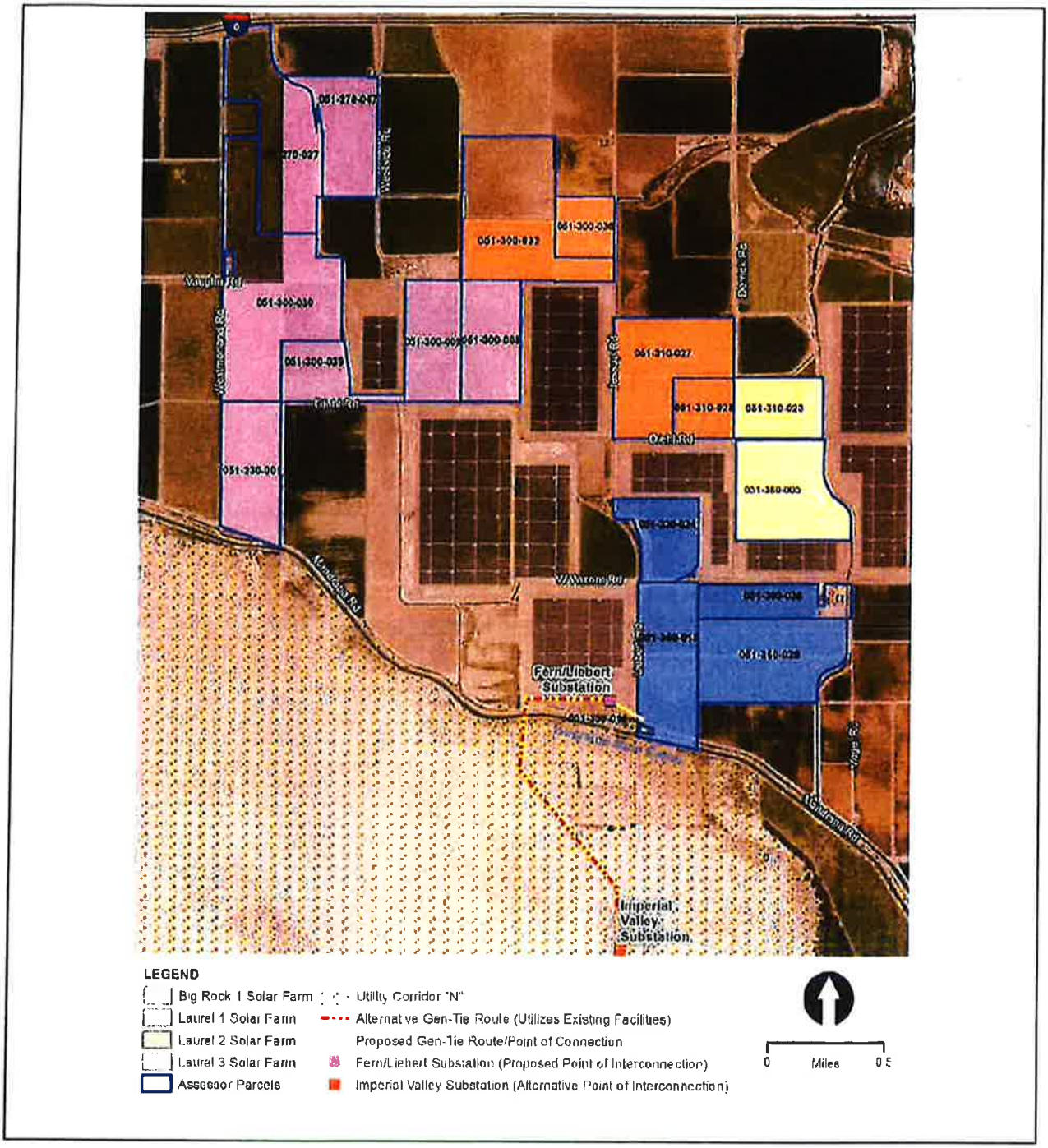


Figure 5 Points of Interconnection

Roads, driveways and parking lot entrances will be constructed in accordance with Imperial County improvement standards. Parking spaces and walkways will be constructed in conformance with all California Accessibility Regulations.

As noted earlier, L2N may share O&M facilities and/or staff with one or more nearby solar projects, and/or may be remotely operated. Any "unused" O&M areas on-site could be covered by solar panels.

Project Site Security and Fencing

The Site will be enclosed with a chain link fence with barbed wire measuring up to eight (8) feet in height (from finished grade). An intrusion alarm system comprised of sensor cables integrated into the perimeter fence, intrusion detection cabinets placed approximately every 1,500 feet along the perimeter fence, and an intrusions control unit, located either in the substation control room or at the O&M Building, or similar technology, will be installed. Additionally, L2N may include additional security measures including, but not limited to, barbed wire, low voltage fencing with warning reflective signage, controlled access points, security alarms, security camera systems, and security guard vehicle patrols to deter trespassing and/or unauthorized activities that could interfere with operation of the Projects.

Controlled access gates will be maintained at the main entrance to the Site. Site access will be provided to offsite emergency response teams that respond in the event of an "after-hours" emergency. Enclosure gates would be manually operated with a key provided in an identified key box location.

Project Site Lighting

All Project Site lighting will be directed away from any public rights-of-way. Lighting used on-site will be minimal. Site lighting may include motion sensor lights for security purposes. Lighting used on-site will be of the lowest intensity foot candle level, in compliance with any applicable regulations, measured at the property line after dark.

Annual Production

L2N will generate electrical power during daylight hours. Peak electricity demand in California corresponds with air conditioning use on summer afternoons when ambient temperatures are high. The Project's peak generating capacity corresponds to this time-period. There is no generating capacity between sunset and sunrise due to the lack of solar energy, though power may be released from the energy storage system.

L2N will have a nominal output capacity of up to 30 MW-AC, sufficient to power roughly 15,000 homes and displacing 45,000 tons of carbon dioxide equivalent (CO_2e) per year when compared to a gas-fired power plant or 90,000 tons when compared to a coal-fired power plant.

CONSTRUCTION ACTIVITIES

The construction period for L2N, from site preparation through construction, testing, and commercial operation, is expected to commence as early as Q4 2021 and will extend for approximately 6 months.

Construction of the facility will include the following activities:

- Site preparation
- Grading and earthwork
- Concrete foundations
- Structural steel work
- Electrical/instrumentation work
- Collector line installation
- Architecture and landscaping

No roadways will be affected L2N, except during the Project's construction period. Construction traffic will access the Site from Liebert Road. It is estimated that up to 60 workers per day (during peak construction periods) will be required during the construction of the Project.

Heavy construction is expected to occur between 6:00 am and 5:00 pm, Monday through Friday. Additional hours may be necessary to make up schedule deficiencies or to complete critical construction activities. Some activities may continue 24 hours per day, seven days per week. Low level noise activities may potentially occur between the hours of 10:00 pm and 7:00 am. Nighttime activities could potentially include, but are not limited to, refueling equipment, staging material for the following day's construction activities, quality assurance/control, and commissioning.

Materials and supplies will be delivered to the Site by truck. Truck deliveries will normally occur during daylight hours. However, there will be offloading and/or transporting to the Site on weekends and during evening hours.

Earthmoving activities are expected to be limited to the construction of the access roads, any O&M building, any substation, and any storm water protection or storage (detention) facilities. Final grading may include revegetation with low lying grass or applying earth-binding materials to disturbed areas.

WORK FORCE

Once L2N is constructed, maintenance will generally be limited to the following:

1. Cleaning of PV panels
2. Monitoring electricity generation
3. Providing Site security
4. Facility maintenance - replacing or repairing inverters, wiring, and PV modules

It is expected that the Big Rock facility will require an operational staff of up to five full-time employees. As noted earlier, it is possible that the Project would share O&M, substation, and/or transmission facilities with one or more nearby projects. In such a scenario, the projects c/would share personnel, thereby potentially reducing the Project's on-site staff.

The facility would operate seven days a week, 24 hours a day, generating electricity during normal daylight hours when the solar energy is available. Maintenance activities may occur seven days a week, 24 hours a day to ensure PV panel output when solar energy is available.

PROJECT FEATURES AND BEST MANAGEMENT PRACTICES

The following sections describe standard Project features and best management practices that will be applied during construction and long-term operation of L2N to maintain safety and minimize or avoid environmental impact.

Waste and Hazardous Materials Management

L2N will have minimal levels of materials on-site that have been defined as hazardous under 40 CFR, Part 261. The following materials are expected to be used during the construction, operation, and long-term maintenance of the Project:

- Insulating oil – used for electrical equipment
- Lubricating oil – used for maintenance vehicles
- Various solvents/detergents – equipment cleaning
- Gasoline – used for maintenance vehicles

Hazardous materials and wastes will be managed, used, handled, stored, and transported in accordance with applicable local and State regulations. All hazardous wastes will be maintained at quantities below the threshold requiring a Hazardous Material Management Program (HMMP) (one 55-gallon drum). Though not expected, should any on-site storage of hazardous materials exceed one 55-gallon drum, an HMMP would be prepared and implemented.

Spill Prevention and Containment

Hazardous materials stored on-site will be in quantities of less than 55 gallons. Spill prevention and containment for construction and operation of L2N will adhere to the Environmental Protection Agency's (EPA's) guidance on Spill Prevention Control and Countermeasures (SPCC).

Wastewater/Septic System

A standard on-site septic tank and leach field may be used at the O&M building to dispose sanitary wastewater, designed to meet operation and maintenance guidelines required by Imperial County laws, ordinances, regulations, and standards.

Inert Solids

Inert solid wastes resulting from construction activities may include recyclable items such as paper, cardboard, solid concrete and block, metals, wire, glass, type 1-4 plastics, drywall, wood, and lubricating oils. Non-recyclable items include insulation, other plastics, food waste, vinyl flooring and base, carpeting, paint containers, packing materials, and other construction wastes. A Construction Waste Management Plan will be prepared for review by the County. Consistent with local regulations and the California Green Building Code, the Plan would provide for diversion of a minimum of 50% of construction waste from landfill.

Chemical storage tanks (if any) would be designed and installed to meet applicable local and state regulations. Any wastes classified as hazardous such as solvents, degreasing agents, concrete curing compounds, paints, adhesives, chemicals, or chemical containers will be stored (in an approved storage facility/shed/structure) and disposed of as required by local and state regulations. Material quantities of hazardous wastes are not expected.

Health and Safety

Safety precautions and emergency systems will be implemented as part of the design and construction of L2N to ensure safe and reliable operation. Administrative controls will include classroom and hands-on training in operating and maintenance procedures, general safety items, and a planned maintenance program. These will work with the system design and monitoring features to enhance safety and reliability.

L2N will have an Emergency Response Plan (ERP). The ERP will address potential emergencies including chemical releases, fires, and injuries. All employees will be provided with communication devices, cell phones, or walkie-talkies, to provide aid in the event of an emergency.

L2N is located within the jurisdiction of Imperial County Fire Department. On-site fire protection would be provided via portable and fixed fire suppression systems throughout each of the projects. Portable fire extinguishers would be provided at various locations throughout the solar farms, while fixed fire suppressions systems would be available in the form of dedicated 10,000-gallon on-site storage tank(s). Water from the on-site water storage tank would be intended for the fire protection of the O&M building. The O&M building would have access to a wet-fire connection to provide sufficient fire protection. Both the access and service roads (along the perimeter of the project facilities) would have turnaround areas to allow clearance for fire trucks per fire department standards (70 feet by 70 feet, and 20-foot-wide access road).

Figure 3-7. Laurel 2 Solar Farm – Site Layout