

PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE

AGENDA DATE: August 12, 2021

Informational Item Only

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

PROJECT TYPE: GPA #21-0003, ZC #21-0003, & CUP #20-0030 & WSA
SUPERVISOR DISTRICT 4

LOCATION: 1 mile north of City of Brawley APN: 037-140-006, 020, 021, 022 and 023
Brawley, CA 92227 PARCEL SIZE: 227 acres

GENERAL PLAN (existing) Agriculture/Geothermal Overlay Zone GENERAL PLAN (proposed) RE
ZONE (existing) A-2 G ZONE (proposed) A-2 G- 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: 08/122021
INITIAL STUDY: 20-0004

NEGATIVE DECLARATION MITIGATED NEG. DECLARATION EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	<input checked="" type="checkbox"/>	NONE	<input type="checkbox"/>	ATTACHED
AG / APCD	<input checked="" type="checkbox"/>	NONE	<input type="checkbox"/>	ATTACHED
E.H.S.	<input checked="" type="checkbox"/>	NONE	<input type="checkbox"/>	ATTACHED
FIRE / OES	<input checked="" type="checkbox"/>	NONE	<input type="checkbox"/>	ATTACHED
OTHER	(See Attached)			

REQUESTED ACTION:

SEE ATTACHED



Initial Study and NOP

Brawley Solar Energy Facility Project

Imperial County, CA

July 2021

Reviewed by:

County of Imperial
Planning & Development
Services Department
801 Main Street
El Centro, CA 92243

Prepared by:

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Introduction

A. Purpose

This document is a policy-level; project-level Initial Study for evaluation of potential environmental impacts resulting with the proposed Brawley Solar Energy Facility Project.

B. CEQA Requirements and the Imperial County's Rules and Regulations for Implementing CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's Rules and Regulations for Implementing CEQA, 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 result in potentially significant environmental impacts and therefore, an Environmental Impact Report is deemed as the appropriate document to provide necessary environmental evaluations and clearance for the proposed project.

This Initial Study and Notice of Preparation are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); the State CEQA Guidelines & County of Imperial's CEQA Regulations, Guidelines for the Implementation of CEQA; 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's CEQA Regulations, Guidelines for the Implementation of 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 and Notice of Preparation

This Initial Study and Notice of Preparation are informational documents which are 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.

The Initial Study and Notice of Preparation, prepared for the project will be circulated for a period of no less than 35 days for public and agency review and comments.

D. Contents of Initial Study and Notice of Preparation

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 significant impact, potentially significant impact, or no impact.

PROJECT SUMMARY, LOCATION AND ENVIRONMENTAL 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.

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. **Less Than Significant With 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 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]).

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 is 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]).

Environmental Checklist Form

1. **Project Title:** Brawley Solar Energy Facility Project
2. **Lead Agency name and address:** Imperial County Planning & Development Services
Department, 801 Main Street, El Centro, CA 92243
3. **Contact person and phone number:** David Black, Planner IV, 442-265-1746
4. **Project location:** The project site is located on approximately 227 acres of privately-owned land in the unincorporated area of Imperial County, CA. The site is approximately one mile north from the City of Brawley's jurisdictional limit. The project site is south of Baughman Road, west of Best Road, and north of Andre Road. The Union Pacific Railway transects the project site. The City of Brawley Wastewater Treatment Plant is located along the western edge of the project site.

The gen-tie line would originate from the southern edge of the project site and then head west along Andre Road to interconnect to the Imperial Irrigation District's (IID) existing North Brawley Geothermal Power Plant substation, located at Hovley Road and Andre Road. The gen-tie line route would be approximately 1.8 miles.

5. **Project sponsor's name and address:** ORNI 30, LLC, 6140 Plumas Street, Reno, Nevada 89519
6. **General Plan Designation:** Agriculture
7. **Zoning:** A-2-G (General Agricultural with a Geothermal Overlay)
8. **Description of project:** The project applicant, ORNI 30, LLC, proposes to construct and operate a 40 megawatt (MW) photovoltaic (PV) solar facility with an integrated 40 MW battery storage system (BESS) (not to exceed 80 MW) on approximately 227 acres of privately-owned land. The proposed project would be comprised of bifacial solar PV arrays panels, an on-site substation, BESS, fiberoptic line or microwave tower, inverters, transformers, underground electrical cables and access roads. The proposed project would connect to the existing North Brawley Geothermal Power Plant substation located southwest of the project site via an approximately 1.8-mile long aboveground 92 kilovolt generation tie line.
9. **Surrounding land uses and setting: Briefly describe the project's surroundings:** The project site contains alfalfa fields within different levels of harvest. North and east of the project site is undeveloped agricultural land. South of the project site is a mixture of undeveloped agricultural land and dirt lots used for staging activities. The Del Rio Country Club golf course is located to the south of the site. The City of Brawley Wastewater Treatment Plant is located along the western edge of the project site.
10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):**
 - Department of Public Works – Ministerial permits (building, grading, encroachment)
 - Imperial County Air Pollution Control District – Fugitive dust control plan, Authority to construct

- California Regional Water Quality Control Board – Notice of Intent for General Construction Permit
- Imperial Irrigation District – Water supply agreement/permit for water use lease agreement

11. 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 confidentiality, etc.?

Yes, the Torrez Martinez Desert Cahuilla Indians and Quechan Indian Tribe. These tribes were sent an AB 52 consultation request letter on July 20, 2021.



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.

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology / Water Quality | <input checked="" type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

Environmental Evaluation Committee Determination

After Review of the Initial Study, the Environmental Evaluation Committee (EEC) 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, because 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 GAME DE MINIMIS IMPACT FINDING:

Yes No

EEC VOTES

PUBLIC WORKS

YES

NO

ABSENT

ENVIRONMENTAL HEALTH

OFFICE EMERGENCY SERVICES

APCD

AG

SHERIFF DEPARTMENT

ICPDS

Jim Minnick, Director of Planning/EEC Chairman

Date:

Signature

Project Summary

Project Location

The project site is located on approximately 227 acres of privately-owned land in the unincorporated area of Imperial County, CA. The site is approximately one mile north from the City of Brawley's jurisdictional limit (Figure 1). As shown in Figure 2, the project site is south of Baughman Road, west of Best Road, and north of Andre Road. The Union Pacific Railway transects the project site. The City of Brawley Wastewater Treatment Plant is located along the western edge of the project site.

The gen-tie line would originate from the southern edge of the project site and then head west along Andre Road to interconnect to the Imperial Irrigation District's (IID) existing North Brawley Geothermal Power Plant substation, located at Hovley Road and Andre Road. The gen-tie line route would be approximately 1.8 miles.

Project Summary

The project applicant, ORNI 30, LLC, proposes to construct and operate a 40 megawatt (MW) photovoltaic (PV) solar facility with an integrated 40 MW battery storage system (BESS) (not to exceed 80 MW) on approximately 227 acres of privately-owned land. The proposed project would be comprised of bifacial solar PV arrays panels, an on-site substation, BESS building, fiberoptic line or microwave tower, inverters, transformers, underground electrical cables and access roads. The proposed project would connect to the existing North Brawley Geothermal Power Plant substation located southwest of the project site via an approximately 1.8-mile long aboveground 92 kilovolt generation tie line.


Environmental Setting

The project site contains alfalfa fields within different levels of harvest. North and east of the project site is undeveloped agricultural land. South of the project site is a mixture of undeveloped agricultural land and dirt lots used for staging activities. The Del Rio Country Club golf course is located to the south of the site. The City of Brawley Wastewater Treatment Plant is located along the western edge of the project site.

General Plan Consistency

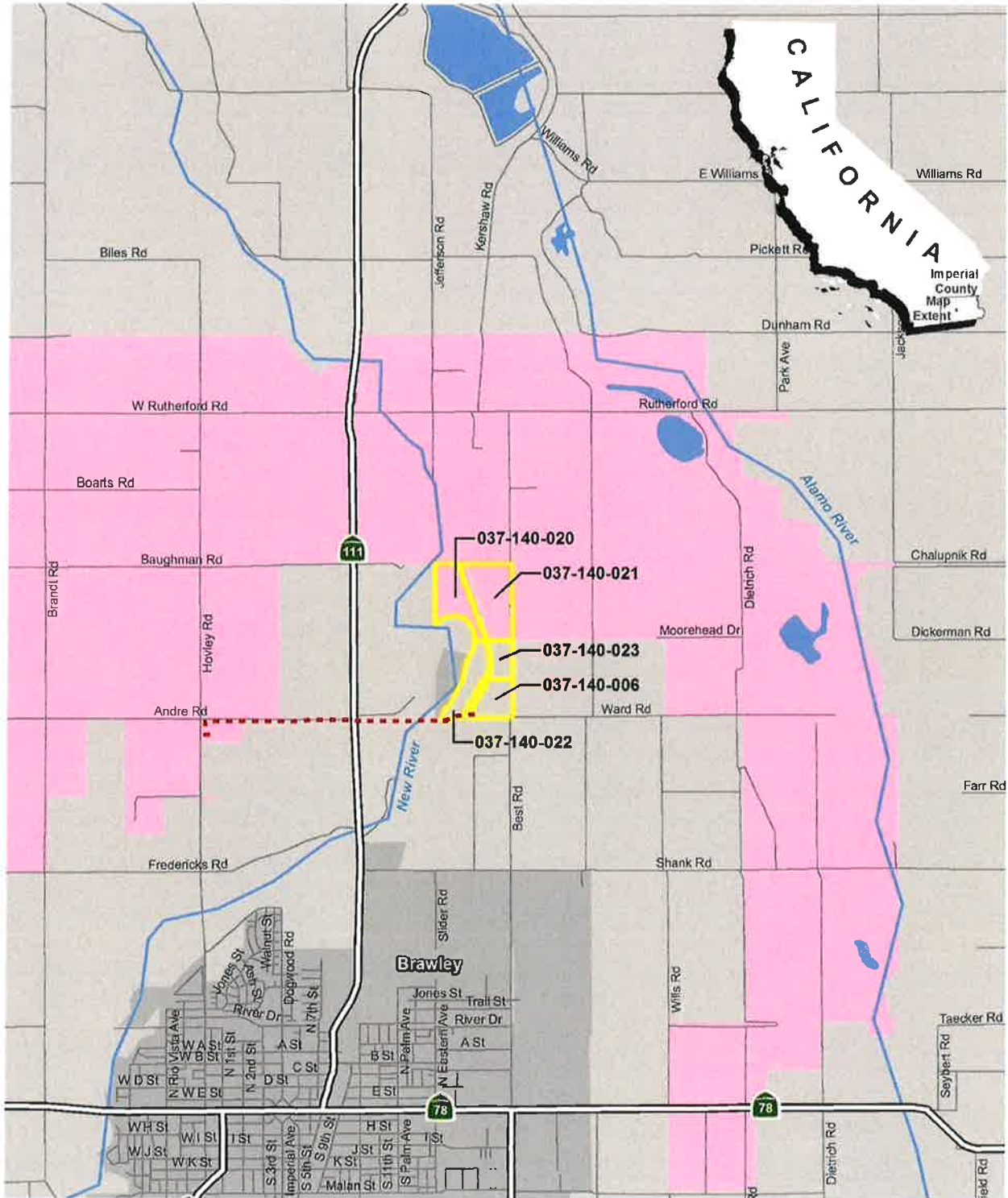
The proposed project is located within an unincorporated area of the County. The existing General Plan land use designation is Agriculture. The project site is currently zoned A-2-G (General Agricultural with a Geothermal Overlay). Construction of a solar facility would be allowed within the existing zoning under a Conditional Use Permit.

The County Land Use Ordinance, Division 17, includes the Renewable Energy (RE) Overlay Zone, which authorizes the development and operation of renewable energy projects, with an approved CUP. CUP applications proposed for specific renewable energy project not located in the RE Overlay Zone would not be allowed without an amendment to the RE Overlay Zone. As shown in Figure 1, the northern portion of the project site (APNs 037-140-020 and 037-140-021) is located within the Geothermal Overlay Zone. However, the entire project site (APNs 037-140-020, 037-140-021, 037-140-022, 037-140-023, and 037-140-006) is located outside of the RE Overlay Zone. Therefore, the proposed project requires a General Plan Amendment and Zone Change to



include/classify all five project parcels into the RE Overlay Zone. No change in the underlying General Plan land use (Agriculture) is proposed.

Figure 1. Regional Location



Legend




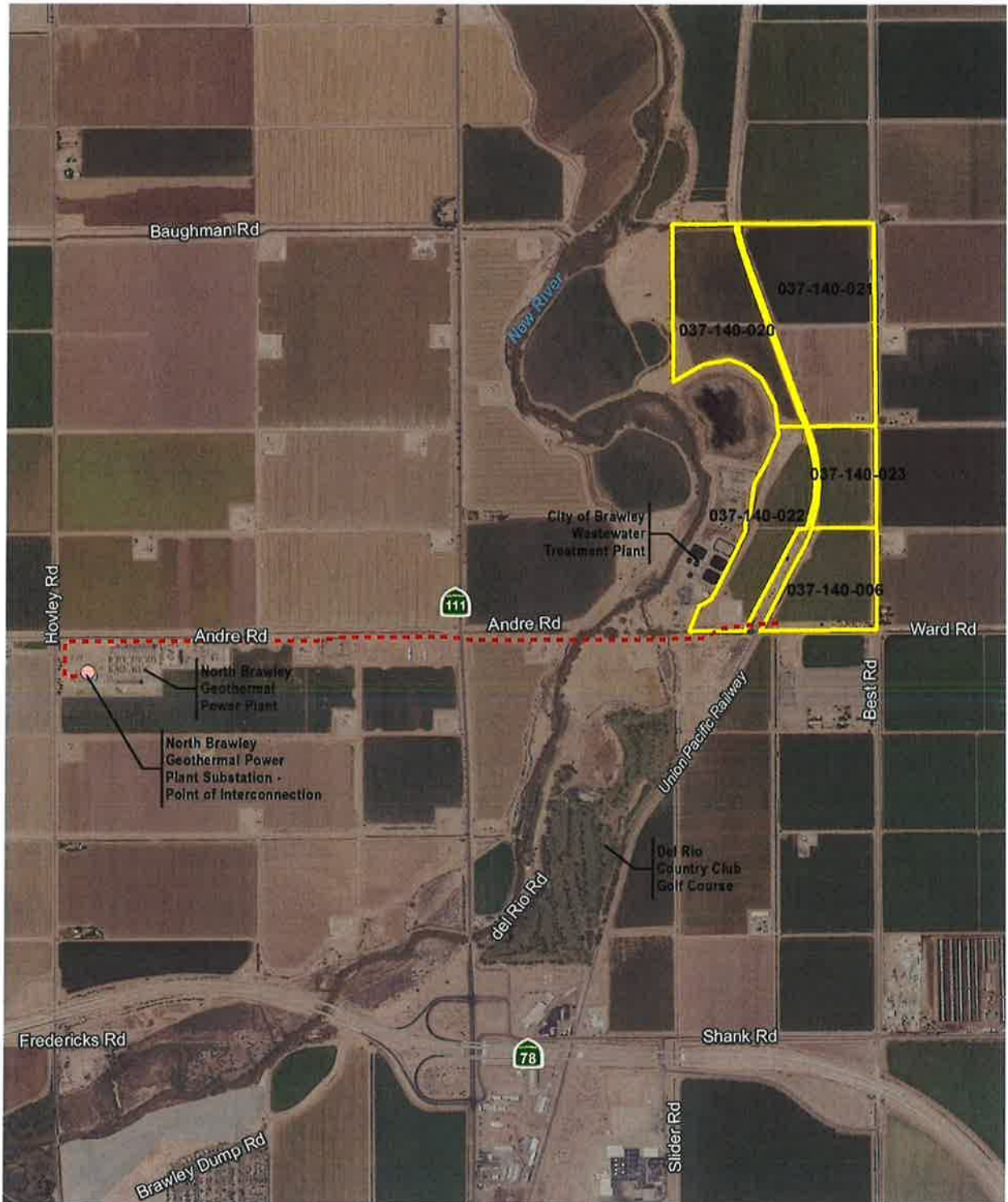



-  Project Location
-  Gen-Tie Line
-  Geothermal Overlay Zone



Figure 2. Project Site



Legend

-  Project Location
-  Gen-Tie Line
-  Point of Interconnection



0 Feet 2,000

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.

I. Aesthetics

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **No Impact.** According to the Conservation and Open Space Element of the Imperial County General Plan, the project site is not located within an area that has been formally identified as a federal, state, or county scenic vista (County of Imperial 2016). No scenic vistas or areas with high visual quality would be disrupted. Thus, no impact is identified for this issue area and no further analysis is warranted.
- b) **No Impact.** According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System (Caltrans 2018), the project site is not located within a state scenic highway corridor, nor are there any state scenic highways located in proximity to the project site. The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway. Therefore, no impact is identified for this issue area and no further analysis is warranted.
- c) **Potentially Significant Impact.** Although the project site is not located near a scenic highway or designated scenic vista, the proposed project may result in a change to the look and rural character of the surrounding area. Therefore, a potentially significant impact is identified for this issue area. A visualization study will be prepared for the project and this issue will be addressed in the EIR.
- d) **Potentially Significant Impact.** Minimal lighting is required for project operation and is limited to safety and security functions. All lighting will be directed away from any public right-

of-way; however, there are no heavily traveled public roadways in immediate proximity to the project site.

The solar panels will be constructed of low reflective materials; therefore, it is not anticipated that they would result in creating glare. Additionally, the proposed project is located in a rural undeveloped area of Imperial County. There are no established residential neighborhoods immediately adjacent to the project site. However, there are three residences located immediately east of the project site along Best Road. Although the proposed project is not expected to create a new source of substantial light or glare affecting day or nighttime views, a glare study will be prepared for the proposed project and this issue will be addressed in the EIR. Therefore, a potentially significant impact is identified for this issue area.

The Brawley Municipal Airport is located approximately 1.5 miles south of the project site. Although the solar panels will be constructed of low reflective materials, the potential for glare to impact aircraft will be analyzed further in the EIR.



II. Agriculture and Forestry Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>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:</i></p>				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** According to the farmland maps prepared by the California Department of Conservation (DOC) (California DOC 2018), the majority of the project site is designated as Farmland of Statewide Importance, with a pocket of Prime Farmland located in the southern portion of the project site. Therefore, implementation of the proposed project

may result in a potentially significant impact associated with the conversion of Prime Farmland and Farmland of Statewide Importance to non-agricultural use.

- b) **Potentially Significant Impact.** The project site is currently designated by the General Plan as "Agriculture" and is zoned A-2-G (General Agricultural with a Geothermal Overlay). Pursuant to Title 9, Division 5, Chapter 8 (County of Imperial 2019a), the following uses are permitted in the A-2 zone subject to approval of a CUP from Imperial County: solar energy electrical generator, battery storage facility, electrical substations, communication towers, and facilities for the transmission of electrical energy. Because the project site is located on lands designated for agricultural uses, this issue will be analyzed in further detail in the EIR.

According to the 2016/2017 Imperial County Williamson Act Map produced by the California Department of Conservation's Division of Land Resource Protection (California DOC 2016), the project site is not located on Williamson Act contracted land. Therefore, the proposed project would not conflict with a Williamson Act contract and no impact would occur.

- c) **No Impact.** There are no existing forest lands, timberlands, or timberland zoned "Timberland Production" within or immediately adjacent to the project site that would conflict with existing zoning or cause rezoning. Therefore, no impact is identified for this issue area.
- d) **No Impact.** There are no existing forest lands within or immediately adjacent to the project site. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area.
- e) **Potentially Significant Impact.** Refer to response II. a) above.




III. Air Quality

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i>				
<i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** The project site is located within the jurisdiction of Imperial County Air Pollution Control District (ICAPCD) in the Imperial County portion of the Salton Sea Air Basin. Construction of the proposed project would create temporary emissions of dust, fumes, equipment exhaust, and other air contaminants that may conflict with the ICAPCD’s rules and regulations. No stationary source emissions are proposed from the proposed project; however, temporary construction emissions have the potential to result in a significant air quality impact. An air quality and greenhouse gas study will be prepared to analyze the proposed project’s consistency with air quality plans, and will be included in the EIR analysis.
- b) **Potentially Significant Impact.** Currently, the Salton Sea Air Basin is either in attainment or unclassified for all federal and state air pollutant standards, with the exception of the federal ozone (O₃), particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) standards, and state standards for O₃ and PM₁₀. Air pollutants transported into the Salton Sea Air Basin from the adjacent South Coast Air Basin (Los Angeles County, San Bernardino County, Orange County, and Riverside County) and Mexicali (Mexico) substantially contribute to the non-attainment conditions in the Salton Sea Air Basin. A potentially significant impact is identified for this issue area. An air quality and greenhouse gas study will be prepared to analyze the proposed project’s potential air quality impacts and will be included in the EIR analysis.
- c) **Potentially Significant Impact.** The project site is located in a rural agricultural area of Imperial County. The nearest sensitive receptor to the project site is a single-family home located as near as 40 feet to the north side of the project site (near the northwest corner of the project site). There are also homes located on the east side of Best Avenue that are as near as 120 feet east of the project site. This issue will be addressed in the air quality and greenhouse gas study and EIR analysis.

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- d) **No Impact.** Land uses commonly considered to be potential sources of odorous emissions include wastewater treatment plants, sanitary landfills, food processing facilities, chemical manufacturing plants, rendering plants, paint/coating operations, and concentrated agricultural feeding operations and dairies. The construction and operation of a solar facility is not an odor producer. Therefore, no impact is identified for this issue area.



IV. Biological Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** According to the Conservation and Open Space Element of the General Plan (County of Imperial 2016), numerous special-status species occur in the County, and of particular concern is the western burrowing owl which may have the potential to occur within the project site. Burrowing owls and burrows are commonly found along canals and drains. Although there are no Imperial Irrigation District (IID) canals located within

the project site, access roads, canals, and other drainages are located in the project vicinity, such as the Best Canal and Livesley Drain, which are immediately east and south of the project site, respectively. Thus, a potentially significant impact is identified for this issue area. A biological resources report that will address the proposed project's potential impacts on biological resources will be prepared and included in the EIR analysis.

- b) **Potentially Significant Impact.** Refer to response IV. a) above.
- c) **Potentially Significant Impact.** Currently, the project site contains alfalfa fields at different levels of harvest. The Best Canal and existing drain structure(s) would not be removed, relocated or impacted; and no washes are found within the project site.

The project site is adjacent to the New River and according to the United States Fish and Wildlife Service (USFWS) National Wetland Inventory, there are also several project adjacent freshwater ponds. There does not appear to be ponds within the project site; however, the project site has drainage channels that could potentially be considered jurisdictional waters by California Department of Fish and Wildlife (CDFW) and United States Army Corps of Engineers (USACE). Therefore, a potentially significant impact is identified for this issue area. A jurisdictional waters/wetlands delineation report will be prepared and included in the EIR analysis.

- d) **Potentially Significant Impact.** Refer to response IV. a) above
- e) **Potentially Significant Impact.** Refer to response IV. a) above
- f) **No Impact.** The project site is not located in a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact is identified for this issue area.



V. Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** Currently, the project site contains alfalfa fields at different levels of harvest. The disturbed nature of the site indicates that the presence of significant or undamaged cultural resources on the site is unlikely. Although the proposed project is not expected to cause a substantial adverse change in the significance of a historical resource or archaeological resource, a potentially significant impact could occur if an unanticipated find is discovered. A cultural resources report that will address the proposed project’s potential impacts on historic and prehistoric resources will be prepared and this issue will be addressed in the EIR.
- b) **Potentially Significant Impact.** Refer to response V. a) above.
- c) **Potentially Significant Impact.** Although unlikely, there is a potential for unknown human remains to be unearthed during earthwork activities. This issue is potentially significant and will be addressed in the EIR.

VI. Energy

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Less than Significant Impact.** Information contained in this section is summarized from the *Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis* prepared for the project (Vista Environmental 2021a). The proposed project would impact energy resources during construction and operation. Energy resources that would be potentially impacted include electricity, and petroleum-based fuel supplies and distribution systems. The proposed project would not utilize any natural gas during either construction or operation of the proposed project, and no further analysis of natural gas is provided in this analysis.

The following discussion calculates the potential energy consumption associated with the construction and operation of the proposed project and analyzes if any energy utilized by the proposed project is wasteful, inefficient, or unnecessary consumption of energy resources.

Construction Energy

The construction activities for the proposed project are anticipated to include: 1) Site Preparation; 2) PV System Installation and Testing, and 3) Site Clean-up and Restoration. The proposed project would consume energy resources during construction in three (3) general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, as well as delivery and haul truck trips (e.g., hauling of construction waste material to off-site reuse and disposal facilities);
2. Electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power; and,
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction-Related Electricity

During construction of the proposed project, electricity would be consumed to construct the new structures and infrastructure. Electricity would be supplied to the project site by IID and

would be obtained from the existing electrical lines in the vicinity of the project site. The use of electricity from existing power lines rather than temporary diesel or gasoline powered generators would minimize impacts on energy use. Electricity consumed during project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities include electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Overall, construction activities associated with the proposed project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

The proposed project would include installation of an approximately 1.8 mile long overhead power line from the southwest corner of the project site to the North Brawley 1 Substation, which would provide adequate capacity to handle the power generated and utilized by the proposed project. Where feasible, the new service installations and connections would be scheduled and implemented in a manner that would not result in electrical service interruptions to other properties. Compliance with County and IID guidelines and requirements would ensure that the proposed project fulfills its responsibilities relative to infrastructure installation, coordinates any electrical infrastructure removals or relocations, and limits any impacts associated with construction of the project. Construction of the project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Construction-Related Petroleum Fuel Use

Petroleum-based fuel usage represents the highest amount of transportation energy potentially consumed during construction, which would be utilized by both off-road equipment operating on the project site and on-road automobiles transporting workers to and from the project site and on-road trucks transporting equipment and supplies to the project site.

The off-road equipment utilized during construction of the proposed project would consume 84,890 gallons of fuel. The on-road trips generated from construction of the proposed project would consume 77,046 gallons of fuel. As such, the combined fuel used from off-road construction equipment and on-road construction trips for the proposed project would result in the consumption of 161,935 gallons of petroleum fuel. This equates to 0.17 percent of the gasoline and diesel consumed annually in Imperial County. As such, the construction-related petroleum use would be nominal, when compared to current county-wide petroleum usage rates.

Construction activities associated with the proposed project would be required to adhere to all State and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant.

Operations-Related Electricity

Operation of the proposed project would result in consumption and production of electricity at the project site. The proposed PV solar panels will generate 97,333,333 kWh per year of electricity and operation of the project will use 1,946,667 kWh per year of electricity, which would result in the net generation of 95,386,667 kWh per year of electricity. This equates to 2.8 percent of the electricity consumed annually by IID. As such, the operations-related electricity use would provide a significant renewable resource for the IID and would help IID achieve the State' Renewable Portfolio Standards requirement for non-carbon sources of electricity. No impact would occur from electricity-related energy consumption from the proposed project.

Operations-Related Vehicular Petroleum Fuel Usage

Operation of the proposed project would result in increased consumption of petroleum-based fuels related to vehicular travel to and from the project site. The proposed project would consume 1,036 gallons of petroleum fuel per year from vehicle travel. This equates to 0.001 percent of the gasoline and diesel consumed in Imperial County annually. As such, the operations-related petroleum use would be nominal, when compared to current petroleum usage rates

It should be noted that, the proposed project would comply with all Federal, State, and County requirements related to the consumption of transportation energy and would provide a non-carbon source of electricity to power electric vehicles in Imperial County. Thus, impacts with regard transportation energy supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

- b) **Less than Significant Impact.** The proposed project would help California meet its Renewable Portfolio Standard of 60 percent of retail electricity sales from renewable sources by the end of 2030 and 100 percent by 2045. The electricity generation process associated with the project would utilize solar technology to convert sunlight directly into electricity. Solar PV technology is consistent with the definition of an "eligible renewable energy resource" in Section 399.12 of the California Public Utilities Code (CPUC) and the definition of "in-state renewable electricity generation facility" in Section 25741 of the CPUC. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy of energy efficiency. This is considered a less than significant impact.



VII. Geology and Soils

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- ai) **No Impact.** According to the California Earthquake Hazards Zone Application (California DOC 2019), the project site is not located within a State of California, Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Earthquake Fault Zone is located approximately 4.75 miles from the project site. Therefore, no impact is identified for this issue area.
- a ii) **Potentially Significant Impact.** The project site is located in the seismically-active Imperial Valley in Southern California and considered likely to be subjected to moderate to strong ground motion from earthquakes in the region. The project site could be affected by the occurrence of seismic activity to some degree but no more than the surrounding properties. A potentially significant impact has been identified for this issue area. A geotechnical report that will address the proposed project's potential impacts on geology and soils will be prepared and this issue will be addressed in the EIR.
- a iii) **Potentially Significant Impact.** Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as vibratory motion produced by earthquakes. With strong ground shaking, an increase in pore water pressure develops as the soil tends to reduce in volume. If the increase in pore water pressure is sufficient to reduce the vertical effective stress (suspending the soil particles in water), the soil strength decreases, and the soil behaves as a liquid (similar to quicksand). Liquefaction can produce excessive settlement, ground rupture, lateral spreading, or failure of shallow bearing foundations.

Four conditions are generally required for liquefaction to occur:

- 1) The soil must be saturated (relatively shallow groundwater).
- 2) The soil must be loosely packed (low to medium relative density).
- 3) The soil must be relatively cohesionless (not clayey).
- 4) Groundshaking of sufficient intensity must occur to function as a trigger mechanism.

All these conditions may exist to some degree at the project site. Therefore, there is a potentially significant impact associated with liquefaction. A geotechnical report that will address the proposed project's potential impacts on geology and soils will be prepared and this issue will be addressed in the EIR.

- a iv) **No Impact.** According to Figure 2: Landslide Activity in the Seismic and Public Safety Element of the General Plan (County of Imperial 1997), the project site is not located in an area that is prone to landslide hazards. Furthermore, the project site and surrounding area is relatively flat. Therefore, no impact is identified for this issue area.
- b) **Less than Significant Impact.** According to Figure 3: Erosion Activity in the Soil the Seismic and Public Safety Element of the General Plan (County of Imperial 1997), the project site is within a generally flat area with low levels of natural erosion. However, soil erosion can result during construction as grading and construction can loosen surface soils and make soils susceptible to wind and water movement across the surface. Impacts are not considered significant because erosion would be controlled on-site in accordance with Imperial County standards including preparation, review, and approval of a grading plan by the Imperial County Engineer. Implementation of Imperial County standards would reduce the potential impacts to a less than significant level.
- c) **Potentially Significant Impact.** Near surface soils within the project site will need to be identified to determine if the soils are unstable. Therefore, this issue is potentially significant and will be analyzed in the EIR.
- d) **Potentially Significant Impact.** Near surface soils within the project site will need to be identified to determine if they consist of soils having expansion potential. Therefore, this issue is potentially significant and will be analyzed in the EIR.
- e) **No Impact.** The proposed project would not require the installation of septic tanks or alternative wastewater disposal systems. The proposed solar facility would be remotely

operated, controlled and monitored and with no requirement for daily on-site employees. Therefore, no impact is identified for this issue area.

- f) **Potentially Significant Impact.** Many paleontological fossil sites are recorded in Imperial County and have been discovered during construction activities. Paleontological resources are typically impacted when earthwork activities, such as mass excavation cut into geological deposits (formations) with buried fossils. It is not known if any paleontological resources are located on the project site. The proposed project's potential to impact paleontological resources will be addressed in the EIR.

VIII. Greenhouse Gas Emissions

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** In the long-term, the proposed project is expected to provide a benefit with respect to reduction of greenhouse gas emissions. However, the proposed project has the potential to generate greenhouse gas emissions during construction, in addition to construction worker trips to and from the project site. Thus, a potentially significant impact is identified for this issue area. An air quality and greenhouse gas study will be prepared for the proposed project, and this issue will be addressed in the EIR.
- b) **Potentially Significant Impact.** Refer to response VIII. a) above.

IX. Hazards and Hazardous Materials

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Less than Significant Impact.** Construction of the proposed project will involve the limited use of hazardous materials, such as fuels and greases to fuel and service construction equipment. No extremely hazardous substances are anticipated to be produced, used, stored, transported, or disposed of as a result of project construction. Operation of the proposed project will be conducted remotely. Therefore, no habitable structures (e.g. housing or operation and maintenance [O&M] building) are proposed on the project site.

Regular and routine maintenance of the proposed project may result in the potential to handle hazardous materials. However, the hazardous materials handled on-site would be limited to small amounts of everyday use cleaners and common chemicals used for maintenance. The applicant will be required to comply with State laws and County Ordinance restrictions, which regulate and control hazardous materials handled on-site. Such hazardous wastes would be transported off-site for disposal according to applicable State and County restrictions and laws governing the disposal of hazardous waste during construction and operation of the project. Therefore, this is considered a less than significant impact.

- b) **Less than Significant Impact.** Refer to response IX. a) above.
- c) **No Impact.** The project site is not located within 0.25 mile of an existing or proposed school. No impact is identified for this issue area.
- d) **No Impact.** Based on a review of the Cortese List conducted in May 2021, the project site is not listed as a hazardous materials site. No impact is identified for this issue area.
- e) **Potentially Significant Impact.** The project site is within 2 miles of a public airport. The nearest public airport is the Brawley Municipal Airport located approximately 1.5 miles south of the project site. However, the project site is outside of the airport compatibility zones of the Brawley Municipal Airport (County of Imperial 1996). Although the solar panels will be constructed of low reflective materials, the potential for glare to impact aircraft will be analyzed further in the EIR.
- f) **Less than Significant Impact.** The proposed project is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project applicant will be required, through the conditions of approval, to prepare a street improvement plan for the project that will include emergency access points and safe vehicular travel. In addition, local building codes would be followed to minimize flood, seismic, and fire hazard. Therefore, the proposed project would result in a less than significant impact associated with the possible impediment to emergency plans.
- g) **Less than Significant Impact.** The project site is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan (County of Imperial 1997), the potential for a major fire in the unincorporated areas of the County is generally low.

Proposed project facilities would be designed, constructed, and operated in accordance with applicable fire protection and other environmental, health, and safety requirements (e.g., CPUC safety standards). Primary access to the project site would be located off Best Avenue. A secondary emergency access road would be located in the northwest portion of the project site. Access roads would also be constructed with an all-weather surface, to meet the County Fire Department's standards. Points of ingress/egress would be accessed via locked gates that can be opened by any emergency responders. Additionally, water for emergency fire suppression would likely be provided by water trucks during construction and the existing ground storage tank on-site which is filled by the Best Canal during operation. Based on these considerations, a less than significant impact is identified for this issue area.

X. Hydrology and Water Quality

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** The proposed project has the potential to create urban non-point source discharge (e.g., synthetic/organic chemicals). As runoff flows over developed surfaces, water can entrain a variety of potential pollutants including, but not limited to, oil

and grease, pesticides, trace metals, and nutrients. These pollutants can become suspended in runoff and carried to receiving waters. If they are not intercepted or are left uncontrolled, the polluted runoff would otherwise freely sheet flow from the project site to the IID Imperial Valley Drains and could result in the accumulation of these pollutants in the receiving waters. Potentially significant water quality impacts have been identified and will be addressed in the EIR.

- b) **Less than Significant Impact.** During construction, potable water would be brought to the site for drinking and domestic needs. The approximate 20,000 to 30,000 gallons of water per day required during construction would be obtained from the existing ground storage tank on-site which is filled by the Best Canal. This water would be used for earthwork, soil conditioning, dust suppression, and compaction efforts. Because the solar panels will be pole-mounted above ground, they are not considered "hardscape", such as roads, building foundations, or parking areas, as they do not require a substantial amount of impervious material. Estimated annual water consumption for operation and maintenance of the proposed project, including periodic PV module washing, would be approximately 0.81-acre annually, which would be trucked to the project site as needed. Therefore, the panels and their mounting foundation would not impede groundwater recharge. A less than significant impact is identified for this issue area.
- ci) **Less than Significant Impact.** The proposed project would not substantially alter the existing drainage pattern of the site. It is anticipated that the proposed drainage patterns would be similar to the existing site conditions. The project applicant would be required to implement on-site erosion control measures in accordance with Imperial County standards which require preparation, review, and approval of a grading plan by the Imperial County Engineer. Therefore, the proposed project would not result in substantial erosion or siltation on- or off-site. A less than significant impact is identified for this issue area.
- cii) **Less than Significant Impact.** The proposed project is not anticipated to generate a significant increase in the amount of runoff water from water use involving solar panel washing. Water will continue to percolate through the ground, as a majority of the surface on the project site will remain pervious. Therefore, the proposed project would not substantially increase the rate of runoff in a manner which would result in flooding on- or off-site or exceed the capacity of existing or planned stormwater drainage systems and provide substantial additional sources of polluted runoff. A less than significant impact is identified for this issue area.
- ciii) **Less than Significant Impact.** Refer to response X. cii) above.
- civ) **No Impact.** According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (Panel 06025C1025C) (FEMA 2008), the project site is within Zone X, which is an area determined to be outside of the 0.2 percent annual chance of a flood. The proposed project does not propose the placement of structures within a 100-year flood hazard area. Therefore, the proposed project would not impede or redirect flood flows. No impact is identified for this issue area and no further analysis is warranted.
- d) **No Impact.** The project site is within Zone X, which is an area determined to be outside of the 0.2 percent annual chance of a flood. The project site is not located near any large bodies of water. The Salton Sea is located approximately 12 miles northwest of the project site. Furthermore, the relatively flat project site is approximately 100 miles inland from the Pacific Ocean. Therefore, the proposed project would not risk release of pollutants due to inundation by flood, tsunami or seiche. No impact is identified for this issue area.
- e) **No Impact.** The proposed project will not involve the use of groundwater nor require dewatering activities. Water to be used during project-related construction activities will be obtained from the existing ground storage tank on-site which is filled by the IID Best Canal for earthwork, soil conditioning, dust suppression, and compaction efforts. Water provided by the IID Best Canal would be obtained in conformance with IID construction water acquisition requirements. Therefore, the proposed project will not conflict with or obstruct



implementation of a water quality control plan or sustainable groundwater management plan. No impact is identified for this issue area.

XI. Land Use and Planning

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **No Impact.** The proposed project is located in a sparsely populated, agriculturally zoned portion of unincorporated Imperial County. There are no established residential communities located within or in the vicinity of the project site. Therefore, implementation of the proposed project would not divide an established community. No impact is identified for this issue area.
- b) **Potentially Significant Impact.** The project parcels are currently zoned as A-2-G (General Agricultural with a Geothermal Overlay). Pursuant to Title 9, Division 5, Chapter 8 (County of Imperial 2019a), the following uses are permitted in the A-2 zone subject to approval of a CUP from Imperial County: solar energy electrical generator, battery storage facility, electrical substations, communication towers, and facilities for the transmission of electrical energy.

The County Land Use Ordinance, Division 17, includes the Renewable Energy (RE) Overlay Zone, which authorizes the development and operation of renewable energy projects, with an approved CUP. CUP applications proposed for specific renewable energy project not located in the RE Overlay Zone would not be allowed without an amendment to the RE Overlay Zone. As shown in Figure 1, the northern portion of the project site (APNs 037-140-020 and 037-140-021) is located within the Geothermal Overlay Zone. However, the entire project site (APNs 037-140-020, 037-140-021, 037-140-022, 037-140-023, and 037-140-006) is located outside of the RE Overlay Zone.

Implementation of the project requires an amendment to the County's General Plan Renewable Energy and Transmission Element, Zone Change, and approval of a CUP, as described below:

- **General Plan Amendment:** The applicant is requesting a General Plan Amendment to include/classify all five project parcels (Assessor Parcel Nos. [APN] 037-140-006, -020, -021, -022, and -023) into the RE Overlay Zone. No change in the underlying General Plan land use (Agriculture) is proposed.
- **Zone Change:** The entire project site is currently zoned General Agricultural with a Geothermal Overlay (A-2-G). The applicant is requesting a Zone Change to include/classify all five project parcels into the Renewable Energy/Geothermal (REG) Overlay Zone (A-2-REG).
- **Conditional Use Permit:** Implementation of the project would require the approval of a CUP by the County to allow for the construction and operation of the proposed solar energy facility with an integrated BESS on land zoned General Agricultural with a REG Overlay Zone (A-2-REG).



The proposed General Plan Amendment and Zone Change may result in a conflict with an applicable land use plan, policy or regulation. A potentially significant impact has been identified for this issue, and this issue will be addressed in the EIR.

XII. Mineral Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **No Impact.** The project site is not used for mineral resource production. According to Figure 8: Imperial County Existing Mineral Resources of the Conservation and Open Space Element of the General Plan (County of Imperial 2016), no known mineral resources occur within the project site nor does the project site contain mapped mineral resources. Therefore, the proposed project would not result in the loss of availability of any known mineral resources that would be of value to the region and the residents of California nor would the proposed project result in the loss of availability of a locally important mineral resource.
- b) **No Impact.** Refer to Response XIII. a) above.



XIII. Noise

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **Less than Significant Impact.** Information contained in this section is summarized from the Noise Impact Analysis prepared for the project (Vista Environmental 2021b). The following section analyzes the potential noise emissions associated with the temporary construction activities and long-term operations of the proposed project and compares the noise levels to the County standards.

Construction-Related Noise

The construction activities for the proposed project are anticipated to include: 1) Site Preparation; 2) PV System Installation and Testing, and 3) Site Clean-up and Restoration. Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest sensitive receptors to the project site are single-family homes located as near as 40 feet to the north side of the project site (near the northwest corner of the project site). There are also homes located on the east side of Best Avenue that are as near as 120 feet east of the project site.

The General Plan Noise Element includes Construction Noise Standards that limits the noise created from construction equipment to 75 dB Leq, averaged over an eight (8) hour period at the nearest sensitive receptor. In addition, the Construction Noise Standards limit construction equipment operation to between the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. Saturday. No commercial construction operations are permitted on Sunday or holidays.

For each phase of construction, all construction equipment was analyzed based on being placed in the middle of the project site, which is based on the analysis methodology detailed in FTA Manual for a General Assessment. Since the County’s construction noise standard is based on the noise level over an 8-hour period and in a typical day the proposed construction equipment would operate over the entire project site, the use of the methodology detailed in the FTA Manual for a General Assessment would provide a reasonable estimate of the construction-related noise levels created by the proposed project.

Table 1 shows that greatest construction noise impacts would be as high as 53 dBA Leq during the PV system installation and testing phase at the nearest homes to the northwest, northeast, and southeast of the project site. All calculated construction noise levels shown in Table 1 are within the County’s construction noise standard of 75 dBA and would also be below the existing ambient daytime noise levels in the vicinity of the nearby homes. Therefore, through adherence to the limitation of allowable construction times provided in the General Plan Noise Element, construction-related noise levels would not exceed any standards established in the General Plan or Noise Ordinance nor would construction activities create a substantial temporary increase in ambient noise levels from construction of the proposed project. Impacts would be less than significant.

Table 1. Construction Noise Levels at the Nearby Homes

Construction Phase	Construction Noise Level (dBA Leq) at:		
	Home to Northwest ¹	Home to Northeast ²	Home to Southeast ³
Site Preparation	52	52	52
PV System Installation and Testing	53	53	53
Site Clean-Up and Restoration	52	52	52
Construction Noise Threshold⁴	75	75	75
Ambient Daytime Noise Level	66.5	60.2	62.0
Exceed Thresholds?	No	No	No

¹ The distance from the center of the project site to the home to the northwest was measured at 2,900 feet.
² The distance from the center of the project site to the homes to the northeast was measured at 2,900 feet.
³ The distance from the center of the project site to the home to the southeast was measured at 2,850 feet.
⁴ Construction Noise Threshold obtained from the General Plan Noise Element (County of Imperial, 2015).
 Source: Vista Environmental 2021b

Operational-Related Noise

The proposed project would consist of the development of a solar facility with a BESS and a substation. Since the proposed project would be operated on an unstaffed basis and monitored remotely from the Brawley Geothermal Power Plant control room, operation of the proposed project would not typically generate any additional vehicle traffic on the nearby roadways. As such, potential noise impacts associated with the operations of the proposed project would be limited to onsite noise sources. The proposed PV solar panels do not create any operational noise, however the proposed BESS Enclosures (AC Unit noise), Power Conversion System (PCS), Power Distribution Center (PDC) that would be located at the BESS, and auxiliary transformers, and Battery Step Up Transformer that would be located at the proposed substation are known sources of noise that have been analyzed below.

Both the General Plan Noise Element and Section 90702.00 provide the same noise level limits at the property line of the nearby homes of 50 dBA Leq-1hour between 7 a.m. and 10 p.m. and 45 dBA Leq-1hour between 10 p.m. and 7 a.m. When the ambient noise level is equal to or exceeds the above noise standards, the proposed noise source shall not exceed the ambient plus 3 dB Leq.

In order to determine the noise impacts from the operation of onsite noise making equipment, noise specifications from previously prepared noise reports were obtained and are shown in Table 2. The noise levels from each source were calculated through use of standard geometric spreading of noise from a point source with a drop-off rate of 6 dB for each doubling of the distance between the source and receiver.

Table 2 shows that the proposed project's onsite operational noise from the anticipated onsite noise sources would not exceed the applicable noise standards at the nearby homes. Therefore, operational onsite noise impacts would be less than significant.

Table 2. Operational Noise Levels at the Nearby Homes

Noise Source	Home to Northwest		Home to Northeast		Home to Southeast	
	Distance - Source to Home (feet)	Noise Level ¹ (dBA Leq)	Distance - Source to Home (feet)	Noise Level ¹ (dBA Leq)	Distance - Source to Home (feet)	Noise Level ¹ (dBA Leq)
BESS Enclosures ²	5,050	25	5,100	25	850	40
Power Conversion System ³	5,050	22	5,100	22	850	38
Power Distribution Center ⁴	5,050	22	5,100	22	850	38
Auxiliary Transformers ⁵	5,030	31	5,280	31	1,150	44
Battery Step up Transformer ⁶	5,030	31	5,280	31	850	47
Combined Noise Levels		35		35		50
County Noise Standard⁷ (day/night)		69.5/67.9		63.2/58.6		65.0/59.2
Exceed County Noise Standards?		No/No		No/No		No/No
<p>Notes:</p> <p>¹ The noise levels were calculated through use of standard geometric spreading of noise from a point source with a drop-off rate of 6 dB for each doubling of the distance between the source and receiver.</p> <p>² BESS Enclosures is based on a reference noise measurement of 88.6 dBA at 1 meter.</p> <p>³ Power Conversion System is based on a reference noise measurement of 86.1 dBA at 1 meter.</p> <p>⁴ Power Distribution Center is based on a reference noise measurement of 86.1 dBA at 1 meter.</p> <p>⁵ Auxiliary Transformers are based on a reference noise measurement of 95.1 dBA at 1 meter.</p> <p>⁶ Battery Step up Transformer is based on a reference noise measurement of 95.1 dBA at 1 meter.</p> <p>⁷ County Noise Standard based on ambient noise level shown in Error! Reference source not found. plus 3 dB at the nearby homes.</p> <p>Source: Vista Environmental 2021b</p>						

- b) **Less than Significant Impact.** The following analyzes the potential vibration impacts associated with the construction and operations of the proposed project.

Construction-Related Vibration Impacts

Vibration impacts from construction activities associated with the proposed project would typically be created from the operation of heavy off-road equipment. The nearest sensitive receptor to the project site is a single-family home located as near as 40 feet to the north side of the project site (near the northwest corner of the project site).

Since neither the Municipal Code nor the General Plan provides any thresholds related to vibration, Caltrans guidance has been utilized, which defines the threshold of perception from transient sources at 0.25 inch per second PPV.

The primary source of vibration during construction would be from the operation of a bulldozer. A large bulldozer would create a vibration level of 0.089 inch per second PPV at 25 feet. Based on typical propagation rates, the vibration level at the nearest home (40 feet away) would be 0.06 inch per second PPV. The vibration level at the nearest home, would be below the 0.25 inch per second PPV threshold detailed above. Impacts would be less than significant.

Operations-Related Vibration Impacts

The proposed project would consist of the operation of a solar energy facility. The on-going operation of the proposed project would not include the operation of any known vibration sources. Therefore, a less than significant vibration impact is anticipated from the operation of the proposed project.

- c) **No Impact.** The project site is located within 2 miles of a public airport. The nearest airport is the Brawley Municipal Airport located approximately 1.5 miles south of the project site. However, the project site is outside of the airport compatibility zones of the Brawley Municipal Airport (County of Imperial 1996). Therefore, the proposed project would not expose people residing or working in the project area to excess noise levels and no impact is identified for this issue area.



XIV. Population and Housing

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **Less than Significant Impact.** Development of housing is not proposed as part of the proposed project. No full-time employees are required to operate the proposed project since the project facility will be monitored remotely. However, it is anticipated that maintenance of the facility will require minimal site presence to perform periodic visual inspections and minor repairs. On intermittent occasions, the presence of additional workers may be required for repairs or replacement of equipment and panel cleaning; however, due to the nature of the facility, such actions will likely occur infrequently and would likely come from the existing local workforce. Therefore, the proposed project would not result in a substantial growth in the area, as the number of employees required to operate and maintain the facility is minimal. A less than significant impact is identified for this issue area.
- b) **No Impact.** No housing exists within the project site. Therefore, the proposed project would not displace any existing people or housing, which would require the construction of replacement housing elsewhere. No impact is identified for this issue area.

XV. Public Services

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire Protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Police Protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- ai) **Potentially Significant Impact.** Fire protection and emergency medical services in the project area are provided by the Imperial County Fire Department. The project site is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan (County of Imperial 1997), the potential for a major fire in the unincorporated areas of the County is generally low. Primary access to the project site would be located off Best Avenue. A secondary emergency access road would be located in the northwest portion of the project site. All access roads and the area around the solar blocks (no greater than 500 by 500 feet) would be constructed with all-weather surface and meet the County Fire Department's standards. Points of ingress/egress would be accessed via locked gates that can be opened by any emergency responders. Although the proposed project would be designed, constructed, and operated in accordance with applicable fire protection and other environmental, health, and safety requirements (e.g., CPUC safety standards), the project applicant will be required to consult with the Fire Department to address any fire safety and service concerns (i.e, battery energy storage system) so that adequate service is maintained. The project's potentially significant impacts on fire services will be addressed in the EIR.
- a ii) **Less than Significant Impact.** Police protection services in the project area is provided by the Imperial County Sheriff's Department. Although the potential is low, the proposed project may attract vandals or other security risks and the increase in construction related traffic could increase demand on law enforcement services. Therefore, on-site security systems would be provided and access would be limited to the areas surrounding the project site during construction and operation, thereby minimizing the need for police surveillance. Six-foot high chain link fencing topped with barbed wire would be installed around the perimeter of the project site at the commencement of construction and site access would be limited to authorized site workers. Points of ingress/egress would be accessed via locked gates. In addition, a motion detection system and closed-circuit camera system may also be installed.

The site would be remotely monitored 24 hours per day, 7 days per week. In addition, routine unscheduled security rounds may be made by the security team monitoring the site security. Based on these considerations, the proposed project would not result in a need for police protection facility expansion and a less than significant impact is identified for this issue area.

- a) **No Impact.** The proposed project does not include the development of residential land uses that would result in an increase in population or student generation. Additionally, construction of the proposed project would not result in an increase in student population within the Imperial County's School District since it is anticipated that construction workers would commute in during construction operations. Therefore, no impact is identified for this issue area and no further analysis is warranted.
- aiv) **No Impact.** Although maintenance of the project facility will require minimal site presence to perform periodic visual inspections and minor repairs, no full-time employees are required to operate the proposed project because the project facility will be monitored remotely. Therefore, substantial permanent increases in population that would adversely affect local parks is not expected. No impact is identified for this issue area and no further analysis is warranted.
- av) **No Impact.** Although maintenance of the project facility will require minimal site presence to perform periodic visual inspections and minor repairs, no full-time employees are required to operate the proposed project because the project facility will be monitored remotely. Therefore, substantial permanent increases in population that would adversely affect libraries and other public facilities (such as post offices) is not expected. The proposed project is not expected to have an impact on other public facilities such as post offices, and libraries. No impact is identified for this issue area and no further analysis is warranted.

XVI. Recreation

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **No Impact.** The proposed project would not generate new employment on a long-term basis. As such, the proposed project would not significantly increase the use or accelerate the deterioration of regional parks or other recreational facilities. The temporary increase of population during construction that might be caused by an influx of workers would be minimal and not cause a detectable increase in the use of parks. Additionally, the proposed project would not include or require the expansion of recreational facilities. No impact is identified for this issue area and no further analysis is warranted.
- b) **No Impact.** Refer to response XVI. a) above.



XVII. Transportation

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** Operation and maintenance would be conducted remotely, with minimal trips to the project site for panel washing and other solar maintenance. Construction of the proposed project would result in a small increase of traffic to the area, which may result in a potentially significant impact. Therefore, a traffic study will be prepared and this issue area will be addressed in the EIR.
- b) **Potentially Significant Impact.** Section 15064.3(b) of the CEQA Guidelines provides guidance on determining the significance of transportation impacts and focuses on the use of vehicle miles traveled (VMT), which is defined as the amount and distance of automobile travel associated with a project. Given the nature of the project, after construction, there would be a nominal amount of vehicle trips generated by the project. Once the proposed project is implemented, the proposed project would require intermittent maintenance requiring a negligible amount of traffic trips on an annual basis. However minimal, the proposed project would increase the number of vehicular trips related to construction and the need for intermittent maintenance on an annual basis. Therefore, this issue is potentially significant and will be addressed in the traffic study and EIR analysis.
- c) **Less than Significant Impact.** To accommodate emergency access, PV panels would be spaced to maintain proper clearance. Proposed project facilities would be designed, constructed, and operated in accordance with applicable fire protection, CPUC safety standards, and other environmental, health, and safety requirements. Primary access to the project site would be located off Best Avenue. All access roads and the area around the solar blocks (no greater than 500 by 500 feet) would be constructed with all-weather surface and meet the County Fire Department's standards. Points of ingress/egress would be accessed via locked gates that can be opened by any emergency responders. Additionally, the project site is split vertically by the existing Union Pacific Railway and already contains an existing roadway off of Best Avenue that traverses across the railroad at-grade. This at-grade crossing would be maintained for access between the eastern and western portions of the project site. Therefore, the proposed project would not increase hazards because of incompatible uses or design features, and impacts are considered less than significant. A

haul truck route study will be required which will determine the appropriate construction route.

- d) **Less than Significant Impact.** As previously stated, the PV panels would be spaced to maintain proper clearance. Proposed project facilities would be designed in accordance with applicable fire protection, CPUC safety standards, and other environmental, health, and safety requirements. Primary access to the project site would be located off Best Avenue. A secondary emergency access road would be located in the northwest portion of the project site. All access roads and the area around the solar blocks (no greater than 500 by 500 feet) would be constructed with all-weather surface and meet the County Fire Department's standards. Points of ingress/egress would be accessed via locked gates that can be opened by any emergency responders. Based on this context, impacts are considered less than significant.



XVIII. Tribal Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>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>				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) 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 in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a-b) **Potentially Significant Impact.** AB 52 was passed in 2014 and took effect July 1, 2015. It established a new category of environmental resources that must be considered under CEQA called tribal cultural resources (Public Resources Code 21074) and established a process for consulting with Native American tribes and groups regarding those resources. Assembly Bill 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.

In accordance with AB 52, Imperial County, as the CEQA lead agency, sent an AB 52 consultation request letter to the Torrez Martinez Desert Cahuilla Indians and Quechan Indian Tribe on July 20, 2021. This issue will be further analyzed in the EIR.

XIX. Utilities and Service Systems

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** Approximately 20,000 to 30,000 gallons of water per day would initially be required for grading, dropping to much less for the remainder of the project construction. Construction water needs would be limited to earthwork, soil conditioning, dust suppression, and compaction efforts. Water for construction and operation of the project would be obtained from an existing ground storage tank on-site which is filled by the Best Canal. The proposed project would not require the relocation, expansion, or construction of new storm drainage facilities because the proposed solar facility would not generate a significant increase in the amount of impervious surfaces that would increase runoff during storm events and exceed the capacity of existing or planned stormwater drainage systems. Water from solar panel washing would continue to percolate through the ground, as a majority of the surfaces within the project site would remain pervious.

The wastewater generated during construction would be contained within portable toilet facilities and disposed of at an approved site. The minimal volume of wastewater generated

during construction would not require the relocation expansion, or construction of wastewater treatment facilities.

Further, no habitable structures (e.g. housing or O&M buildings) are proposed on the project site. Therefore, the proposed project would not require or result in the relocation or construction of new or expanded electric power or natural gas.

New telecommunications equipment would be installed at the project substation within the unmanned Mechanical and Electrical Equipment Room. The proposed fiber optic telecommunications cable, once past the POI, would utilize existing transmission lines to connect to the North Brawley substation. The length of this proposed fiber optic telecommunications cable route would be approximately 1.8 miles. Alternatively, a microwave tower 40 to 100-feet tall could replace the need for a fiberoptic line to transmit data offsite. If selected, this microwave tower would be located within the project substation footprint. The project's potential impact on the construction of new telecommunication facilities will be addressed in the EIR.

Once fully constructed, estimated annual water consumption for operation and maintenance of the proposed project, including periodic PV module washing, would be approximately 0.81-acre feet annually (af/y), which would be trucked to the project site as needed. Although water for solar panel washing and fire protection during project operation is not anticipated to result in a significant increase in water demand/use, the proposed project's potential impacts on water supplies will be addressed in the water supply assessment and EIR analysis.

- b) **Potentially Significant Impact.** Refer to response XIX. a) above.
- c) **Less than Significant Impact.** The proposed project would generate a minimal volume of wastewater during construction. During construction activities, wastewater would be contained within portable toilet facilities and disposed of at an approved site. Further, no habitable structures (e.g. housing or O&M buildings) are proposed on the project site; therefore, there would be no wastewater generation from the proposed project during operation. The proposed project would not exceed wastewater treatment requirements of the RWQCB. Therefore, a less than significant impact is identified for this issue area.
- d) **Less than Significant Impact.** Solid waste generation would be minor for the construction and operation of the proposed project. Solid waste will be disposed of using a locally-licensed waste hauling service, most likely Allied Waste. Trash would likely be hauled to the Imperial Landfill (13-AA-0019) located approximately 11 miles south of the proposed project in Imperial. The Imperial Landfill has approximately 12,384,000 cubic yards of remaining capacity and is estimated to remain in operation through 2040 (CalRecycle 2021). Therefore, there is ample landfill capacity in the County to receive the minor amount of solid waste generated by construction and operation of the proposed project.

Additionally, because the proposed project would generate solid waste during construction and operation, they will be required to comply with state and local requirements for waste reduction and recycling; including the 1989 California Integrated Waste Management Act and the 1991 California Solid Waste Reuse and Recycling Access Act of 1991. Also, conditions of the conditional use permit will contain provisions for recycling and diversion of Imperial County construction waste policies. Therefore, a less than significant impact is identified for this issue area.

- e) **Less than Significant Impact.** Refer to response XIX. d) above.

XX. Wildfire

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **No Impact.** According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the proposed project is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2020). Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact is identified for this issue area.
- b) **No Impact.** The proposed project is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2020). Therefore, the proposed project would not exacerbate wildfire risks. No impact is identified for this issue area.
- c) **Less than Significant Impact.** Fire protection and emergency medical services in the area are provided by the Imperial County Fire Department. The proposed project is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2020). Further, the proposed project is located in an unincorporated area of Imperial County, which has a generally low potential for a major fire (County of Imperial 2016).

The project involves the installation of solar PV panels, an on-site substation, BESS, inverters, transformers, and a 1.8-mile-long aboveground 92 kV gen-tie line. To accommodate emergency access, PV panels would be spaced to maintain proper clearance.

Proposed project facilities would be designed, constructed, and operated in accordance with applicable fire protection, CPUC safety standards, and other environmental, health, and safety requirements. Primary access roads would be located off Best Avenue from the east and would be constructed with an all-weather surface, to meet the County Fire Department's standards. Points of ingress/egress would be accessed via locked gates that can be opened by any emergency responders. The existing east to west roadway that traverses over the existing railroad and connects the two halves of the project site would be maintained. This would serve as a secondary emergency access road. Further, water for emergency fire suppression would likely be provided by water trucks during construction and the existing ground storage tank on-site which is filled by the Best Canal during operation. Therefore, operation and maintenance would not affect the ability of fire personnel to respond to fires or exacerbate fire risk and would continue to be adequately supported by the existing fire protection services. A less than significant impact is identified for this issue area.

- d) **No Impact.** The proposed project is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2020). Additionally, the proposed project 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. No impact is identified for this issue area and no further analysis is warranted.

XXI. Mandatory Findings of Significance

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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 or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** The proposed project has the potential to result in significant environmental effects on biological resources and cultural resources, which could directly or indirectly cause adverse effects on the environment. These issues will be further evaluated in the EIR.
- b) **Potentially Significant Impact.** Implementation of the proposed project has the potential to result in impacts related to: aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use/planning, public services, transportation, tribal cultural resources, and utilities/service systems. The proposed project has the potential to result in cumulative impacts with regards to the identified issue areas. Cumulative impacts will be discussed and further analyzed in the EIR.
- c) **Potentially Significant Impact.** Implementation of the proposed project has the potential to result in impacts related to: air quality, geology/soils and GHG. These potential environmental effects could cause substantial adverse effects on human beings. These issues will be further evaluated in the EIR.

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