PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE

AGENDA DATE: November 13, 2025

FROM: PLANNING & DEVELOPMENT SERVICES

AGENDA TIME: 1:30 PM/ No.1

INFORMATIONAL ONLY

Heber Field Company, LLC

PROJECT TYPE: CUP #25-0010 SUPERVISOR. DIST #2

LOCATION: 602 Dogwood Road APN: 059-020-001-000

Calexico , CA 92231 PARCEL SIZE: 106 AC portion of 240 AC

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

ZONE (existing) A-2-G-U ZONE (proposed) N/A

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: 11/13/25

INITIAL STUDY: #25-0024

☐ NEGATIVE DECLARATION ☐ MITIGATED NEG. DECLARATION ☒ EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	☒ NONE	☐ ATTACHED
AG COMMISSIONER	☒ NONE	☐ ATTACHED
APCD	☒ NONE	☐ ATTACHED
DEH/E.H.S.	☒ NONE	☐ ATTACHED
FIRE / OES	☒ NONE	☐ ATTACHED
OTHER		

REQUESTED ACTION:

(See Attached)

Planning & Development Services
801 MAIN ST., EL CENTRO, CA 92243 442-265-1736
(Jim Minnick, Director)

EEC ORIGINAL PKG

Initial Study and NOP

Heber 1 Parasitic Solar Energy Project

Initial Study #: 25-0024

CUP #: 25-0010

Imperial County, CA

October 2025

[redacted]

Reviewed by:

County of Imperial

Planning & Development Services Department

801 Main Street

El Centro, CA 92243

Prepared by:

HDR Engineering, Inc.

591 Camino de la Reina, Suite 300

San Diego, CA 92108

[redacted]

This page is intentionally blank.

Contents

This page is intentionally blank.

Introduction

A. Purpose

This document is a ☐ policy-level; ☒ project-level Initial Study for evaluation of potential environmental impacts resulting with the proposed Heber 1 Parasitic Solar 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:** Heber 1 Parasitic Solar Energy 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:** Alan Molina, Planner I, 442-265-1736
4. **Project location:** The proposed project would be located on one privately-owned parcel (Assessor Parcel Number [APN] 059-020-001) at 602 Dogwood Road in the southern portion of Imperial County, California. The project site is approximately 1.4 miles south of the community of Heber. The proposed solar energy facility would encompass approximately 106 acres in the southern portion of APN 059-020-001. The northern portion of APN 059-020-001 has been previously approved for development and operation of the Heber 2 Parasitic Solar and Dogwood Parasitic Solar Projects. The proposed solar energy facility would be developed southwest of the existing Heber 1 Geothermal Plant located on APN 054-250-036 at 895 Pitzer Road in Heber, California.

   Interstate 8 (I-8), located approximately 4.5 miles directly north, provides primary highway access to the project site. Dogwood Road stems off I-8 and provides immediate access to the project site. From the south, Willoughby Road runs west-east approximately 1,700 feet from the project site and connects to Dogwood Road, providing immediate site access.
5. **Project sponsor's name and address:** Heber Field Company, LLC, 947 Dogwood Road, Heber, CA 92249
6. **General Plan Designation:** Urban Area
7. **Zoning:** General Agriculture with a Geothermal Energy Zone Overlay in an Urban Area (A-2-G-U)
8. **Description of project:** The project applicant proposes to develop a 20 megawatt (MW) solar energy facility and interconnecting cable line (gen-tie line) that would provide parasitic load to the existing Heber 1 Geothermal Plant. The solar energy facility would provide behind-the-meter power used to offset the auxiliary load of the existing Heber 1 Geothermal Plant. The solar energy facility would not connect to or generate power that will enter the transmission grid; rather, the solar energy facility would be entirely behind-the-meter and would serve as an integrated part of the operation of the existing Heber 1 Geothermal Plant. There are three route options proposed, of which only one will be chosen, for the medium voltage cable that would connect the new 20 MW solar energy facility to the existing Heber 1 Geothermal Plant.

   Construction of the proposed project is anticipated to take approximately 16 to 19 months to complete. Facility construction would include demolition of an existing, but vacant, residence at the southwest corner of the project site and site preparation activities.

   Once constructed, the proposed project would generally be unstaffed but would require routine maintenance and unscheduled maintenance as needed. The solar energy facility would be monitored remotely with visitation on an as-needed basis, and security personnel will perform periodic site visits. Any required planned maintenance activities would generally consist of

equipment inspection and replacement and would be scheduled to avoid peak load periods. Any unplanned maintenance would be responded to as needed, depending on the event.

At the end of the permitted or useful life of the solar energy facility, the applicant will prepare a Site Reclamation and Restoration Plan that establishes the plan and protocol for dismantling, removing, abandoning, transporting, and disposing of the solar and transmission facilities, as well as the plan for performing site restoration activities after the facilities are removed. All facilities would be dismantled and the land involved would be restored to pre-project conditions.

9. **Surrounding land uses and setting: Briefly describe the project's surroundings:** Surrounding land uses in the project vicinity are primarily for industrial facilities, energy facilities, and agricultural cultivation. Agricultural operations are adjacent on all sides of the project site with geothermal pipelines and IID canals traversing the area. The northern portion of APN 059-020-001 has been previously approved for the development and operation of the Heber 2 Parasitic Solar and Dogwood Parasitic Solar Projects.

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

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.?**

    In accordance with Assembly Bill (AB) 52, the County sent a Notifications of Consultation Opportunity pursuant to Public Resources Code Section 21080.3.1(d) to the Campo Band of Mission Indians, Fort Yuma-Quechan Indian Tribe, and Agua Caliente Band of Cahuilla Indians on October 29, 2025. The AB 52 30-day review will end on November 28, 2025. The County is awaiting responses from these tribes.

Environmental Factors Potentially Affected

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

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

Environmental Evaluation Committee 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	YES	NO	ABSENT
PUBLIC WORKS	☐	☐	☐
ENVIRONMENTAL HEALTH	☐	☐	☐
OFFICE EMERGENCY SERVICES	☐	☐	☐
APCD	☐	☐	☐
AG	☐	☐	☐
SHERIFF DEPARTMENT	☐	☐	☐
ICPDS	☐	☐	☐

Jim Minnick, Director of Planning/EEC Chairman

Signature

Date:

Project Summary

Project Location

The proposed project would be located on one privately-owned parcel (APN 059-020-001) at 602 Dogwood Road in the southern portion of Imperial County, California (Figure 1). The project site is approximately 1.4 miles south of the community of Heber. The proposed solar energy facility would encompass approximately 106 acres in the southern portion of APN 059-020-001 (Figure 2). The northern portion of APN 059-020-001 has been previously approved for the Heber 2 Parasitic Solar and Dogwood Parasitic Solar Projects. The proposed solar energy facility would be developed southwest of the existing Heber 1 Geothermal Plant located on APN 054-250-036 at 895 Pitzer Road in Heber, California.

Interstate 8 (I-8), located approximately 4.5 miles directly north, provides primary highway access to the project site. Dogwood Road stems off I-8 and provides immediate access to the project site. From the south, Willoughby Road runs west-east approximately 1,700 feet from the project site and connects to Dogwood Road, providing immediate site access.

Project Summary

The project applicant proposes to develop a 20 megawatt (MW) solar energy facility and interconnecting cable line (gen-tie line) that would provide parasitic load to the existing Heber 1 Geothermal Plant (Figure 3). The solar energy facility would provide behind-the-meter power used to offset the auxiliary load of the existing Heber 1 Geothermal Plant. The solar energy facility would not connect to or generate power that will enter the transmission grid; rather, the solar energy facility would be entirely behind-the-meter and would serve as an integrated part of the operation of the existing Heber 1 Geothermal Plant. As shown in Figure 3, there are three route options proposed, of which only one will be chosen, for the medium voltage cable that would connect the new 20 MW solar energy facility to the existing Heber 1 Geothermal Plant.

Construction of the proposed project is anticipated to take approximately 16 to 19 months to complete. Facility construction would include demolition of an existing, but vacant, residence at the southwest corner of the project site and site preparation activities.

Once constructed, the proposed project would generally be unstaffed but would require routine maintenance and unscheduled maintenance as needed. The solar energy facility would be monitored remotely with visitation on an as-needed basis, and security personnel will perform periodic site visits. Any required planned maintenance activities would generally consist of equipment inspection and replacement and would be scheduled to avoid peak load periods. Any unplanned maintenance would be responded to as needed, depending on the event.

At the end of the permitted or useful life of the solar energy facility, the applicant will prepare a Site Reclamation and Restoration Plan that establishes the plan and protocol for dismantling, removing, abandoning, transporting, and disposing of the solar and transmission facilities, as well as the plan for performing site restoration activities after the facilities are removed. All facilities would be dismantled and the land involved would be restored to pre-project conditions.

Environmental Setting

Surrounding land uses in the project vicinity are primarily for industrial facilities, energy facilities, and agricultural cultivation. Agricultural operations are adjacent on all sides of the project site with geothermal pipelines and IID canals traversing the area. The northern portion of APN 059-020-001 has been previously approved for development and operation of the Heber 2 Parasitic Solar and Dogwood Parasitic Solar Projects.

General Plan Consistency

The proposed project is located within an unincorporated area of the County. The existing General Plan land use designation is "Urban Area." The project site is currently zoned A-2-G-U (General Agriculture with a Geothermal Energy Zone Overlay in an Urban Area). The Geothermal Energy Zone allows for "Major Geothermal Projects" to be permitted through a CUP process.

Figure 1. Regional Location

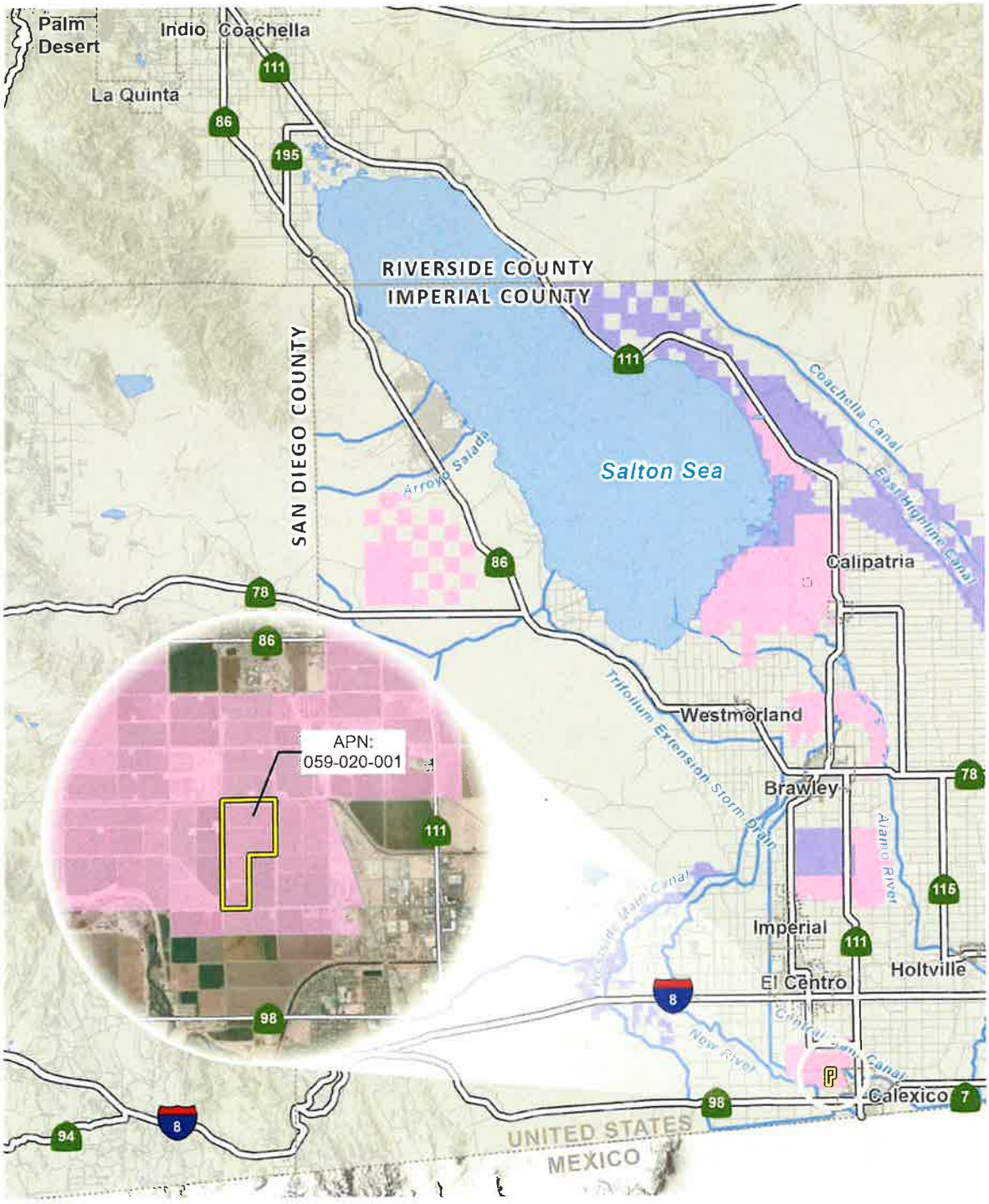


Figure 2. Project Site

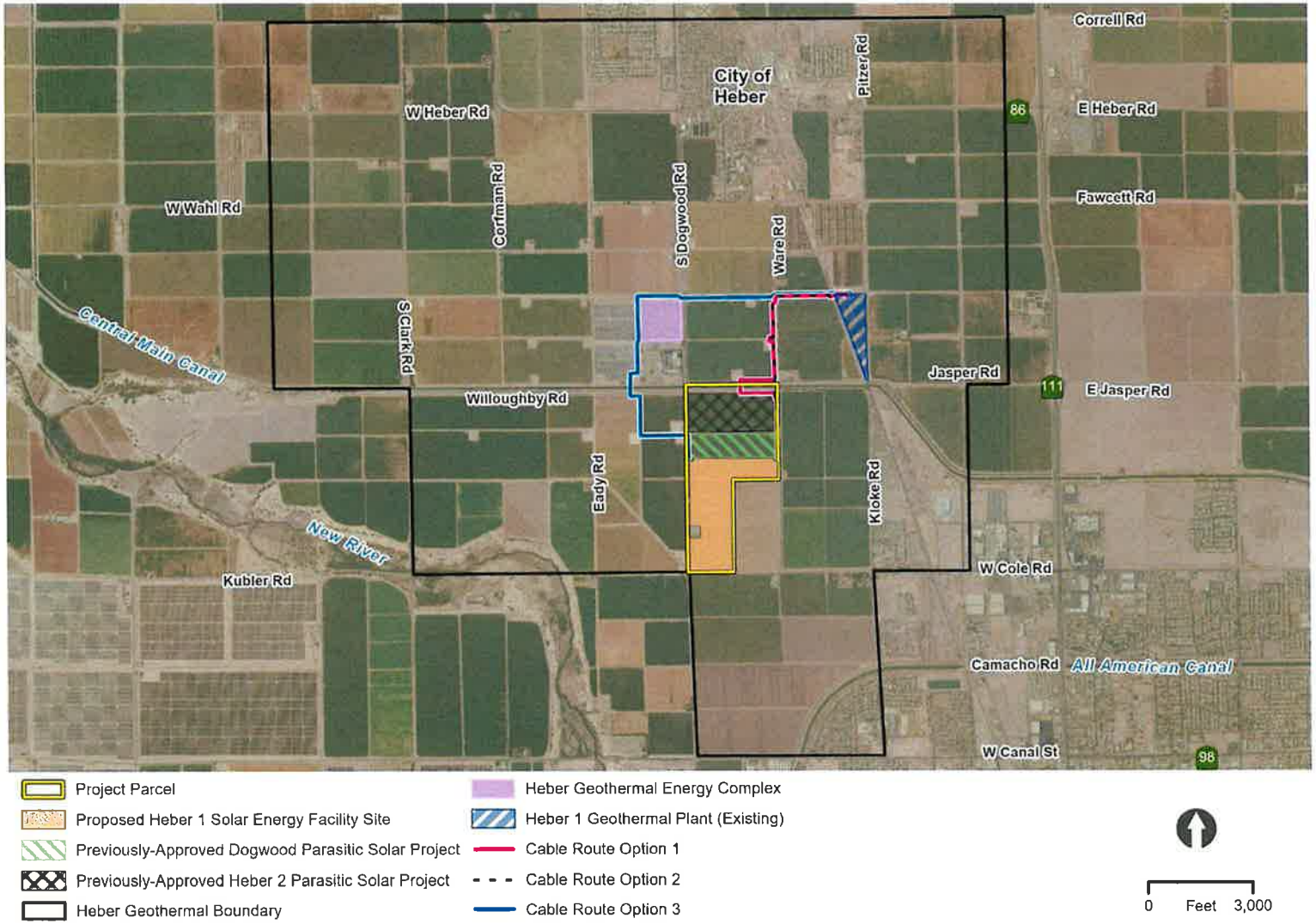
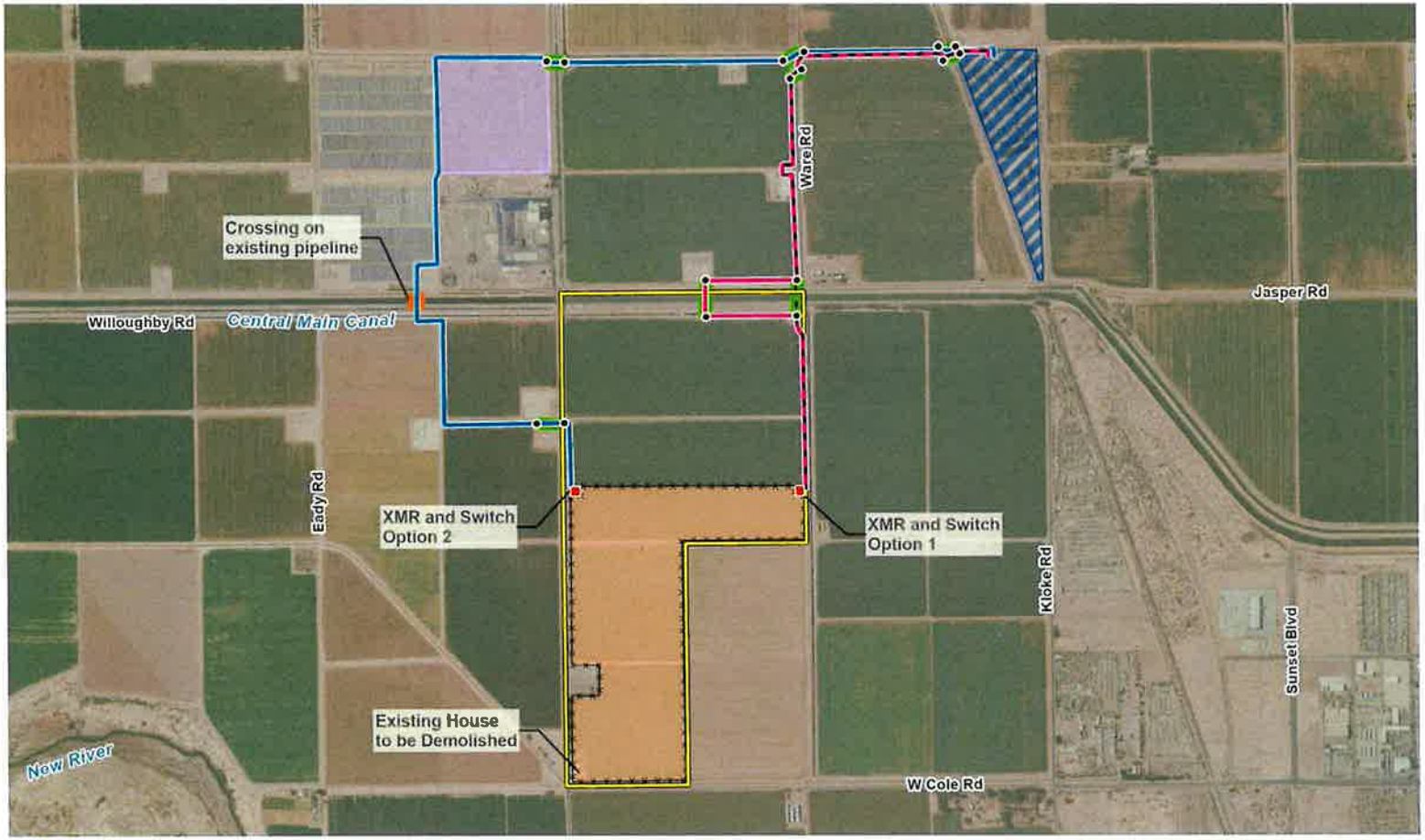


Figure 3. Proposed Site Plan



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
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?	☐	☐	☐	☒
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?	☒	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

Impact Analysis

a) **No Impact.** The project site is not located within an area that has been formally identified as a federal, state, or county scenic vista. 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 nearest eligible State scenic highway is the segment of the Sunset Cliffs Boulevard/State Route 98 west of Ocotillo. The project is located approximately 29 miles east of Ocotillo and therefore would not be visible from 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 area. Therefore, a potentially significant impact is identified for this issue area. A visual assessment will be prepared for the project and this issue will be addressed in the EIR.

d) **Potentially Significant Impact.** 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. 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 is no heavily traveled public roadway 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. Although the proposed project is not expected to create a new source of substantial light or glare affecting day or nighttime views, a glint and

glare assessment will be prepared for the project and this issue will be addressed in the EIR. Therefore, a potentially significant impact is identified for this issue area.

II. Agriculture and Forestry Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☒	☐	☐	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☒	☐	☐	☐
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☒	☐	☐	☐

Impact Analysis

a) **Potentially Significant Impact.** According to the California Department of Conservation's California Important Farmland Finder, portions of the project site are designated as Farmland of Statewide Importance and Prime Farmland (California Department of Conservation 2020). Therefore, implementation of the proposed project has potential to result in the conversion of Farmland of Statewide Importance and Prime Farmland to non-agricultural use. This is considered a potentially significant impact, and this issue will be further analyzed in the EIR.

b) **Potentially Significant Impact.** The project site is currently zoned A-2-G-U (General Agriculture with a Geothermal Energy Zone Overlay in an Urban Area). Pursuant to Title 9, Division 5, Chapter 8, the following uses are permitted in the A-2 zone subject to approval of a CUP from Imperial County:

- Electrical generation plants (less than 50 MW) excluding nuclear or coal fired and meeting requirements in Division 17.
- Facilities for the transmission of electrical energy (100—200 kv).
- Major Geothermal projects as per Division 17.
- Resource extraction and energy development as per Division 17.

Because the project is located on land designated for agricultural uses, this issue will be analyzed further in the EIR.

As of December 31, 2018, all Williamson Act contracts in Imperial County have been terminated. 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 is identified.

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
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. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
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?	☒	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

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. These temporary construction emissions have the potential to result in a significant air quality impact.

b) **Potentially Significant Impact.** The criteria pollutants for which the project area is in state nonattainment under applicable air quality standards are ozone (O_3) and respirable particulate matter (PM_{10}). 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. The CalEEMod air quality model will be utilized to estimate the project's air quality emissions and the results 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 land use to the project site is a single-family residence located approximately 300 feet northeast of the project site. Other nearby sensitive receptors include residences located approximately 0.57 miles north of the project site along E. Fawcett Road and Heber School located approximately 0.70 miles north of the project site. This issue is potentially significant and will be addressed in the EIR analysis.

d) **Less Than Significant 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 the proposed solar facility is not anticipated to result in odor emissions, and impacts would be less than significant.

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

Impact Analysis

a) **Potentially Significant Impact.** The project site has the potential to support native habitats and/or sensitive species. According to the Conservation and Open Space Element of the General Plan (County of Imperial 2016), numerous special-status plants and special-status species occur in the County of Imperial. Of particular concern is the western burrowing owl, which was recently named by the California Department of Fish and Wildlife as a candidate for potential listing as a protected species under the California Endangered Species Act. Burrowing owls and burrows are commonly found along canals and drains. The Central Main Canal, Dogwood Canal, and smaller Imperial Irrigation District (IID) canals and drains traverse the project

site. Therefore, the project site has the potential to be used as burrowing owl foraging habitat, as burrowing owls and burrows are commonly found along canals and drains. Thus, a potentially significant impact is identified for this issue area. A biological resources technical report that will address the proposed project's potential impacts on biological resources will be prepared and this issue will be addressed in the EIR.

b) **Potentially Significant Impact.** Refer to response IV. a) above.

c) **Potentially Significant Impact.** Being situated in an agricultural area, the project site and surrounding areas are traversed by a network of drains, canals, and other irrigation infrastructure administered by the IID, some of which constitute potentially jurisdictional features. An aquatic resources delineation that will address the proposed project's potential impacts on state or federally protected wetlands 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 located within the designated boundaries of the Desert Renewable Energy Natural Community Conservation Plan & Habitat Conservation Plan (NCCP/HCP). However, the project site is not located within or adjacent to an Area of Critical Environmental Concern. 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?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☒	☐	☐	☐

Impact Analysis

a) **Potentially Significant Impact.** The project site has been disturbed by past farming uses. Thus, the presence of significant or undamaged cultural resources on the project site is unlikely. Although the proposed project is not expected to cause a substantial adverse change in the significance of a historical or archaeological resource, this issue will be analyzed further in the EIR. Therefore, a potentially significant impact is identified for this issue area. 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 analysis.

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

Impact Analysis

a) **Less than Significant Impact.** The use of energy associated with the proposed project includes both construction and operational activities. Construction activities consume energy through the use of heavy construction equipment and truck and worker traffic. The proposed project will use several energy- and fuel-efficient design features that would help minimize inefficient or wasteful use of energy and increase conservation during construction. The project grading plan and on-site construction equipment would also minimize impacts to the surrounding transportation network that would result from truck traffic associated with soil import/export and mobilization/demobilization. Additionally, implementation and operation of the solar facility would promote the use of renewable energy and contribute incrementally to the reduction in demand for fossil fuel use for electricity-generating purposes. Therefore, the proposed project would generate renewable energy resources and is considered a beneficial effect.

Based on these considerations, the proposed project would not result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. A less than significant impact has been identified for this issue area.

b) **Less than Significant Impact.** Construction equipment would comply with federal, state, and regional requirements where applicable. With respect to truck fleet operations the United States Environmental Protection Agency and the National Highway Traffic Safety Administration have adopted fuel efficiency standards for medium- and heavy-duty trucks. Construction equipment and trucks are required to comply with the California Air Resources Board's regulations regarding heavy duty truck idling limits of five minutes at a location and the phase in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption for more fuel-efficient engines. Because one of the main objectives of the project is to assist the state in meeting its obligations under California's Renewables Portfolio Standard Program, the project would be consistent with the applicable recommended actions of CARB's 2022 Climate Change Scoping Plan, as well as applicable federal, state, and local policies. The project would assist the State and regulated utility providers to generate a greater portion of energy from renewable sources consistent with the Renewables Portfolio Standard. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency during construction and operations. Short-term and long-term impacts would be less than significant.

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?	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☒	☐	☐	☐
iii. Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

Impact Analysis

ai) **No Impact.** The project site is not located within or near an Alquist-Priolo Special Fault Study Zone. Therefore, no impact is identified for this issue area.

aii) **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 Imperial Fault Zone is the nearest active fault zone to the project site and is situated approximately 6.7 miles to the east. Due to the project's proximity to the Imperial Fault Zone, seismic hazards related to ground shaking could occur on the project site. Although the project is not designed for human occupancy, the project could pose a threat to emergency personnel. 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.

aiii) **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 of 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.

aiv) **No Impact.** According to Figure 3: Landslide Susceptibility in the Seismic and Public Safety Element of the General Plan (County of Imperial 2022), the project site is not located in an area that is prone to landslide hazards. Furthermore, the site topography is flat, and no ancient landslides have been mapped in the area. Development of the project would not directly or indirectly cause potential substantive adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impact is identified for this issue area.

b) **Less than Significant Impact.** 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 these 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 these soils are expansive. Therefore, this issue is potentially significant and will be analyzed in the EIR.

e) **No Impact.** The project does not include any septic tanks or wastewater disposal systems. Therefore, the project would have no impact on the project site soil and its capacity to adequately support the use of septic tanks or alternative wastewater disposal systems.

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

Impact Analysis

a) **Potentially Significant Impact.** The production of greenhouse gas (GHG) emissions associated with the proposed project includes both construction and operational activities. In the long-term, the project is expected to provide a benefit with respect to reduction of GHG emissions. However, construction of the project would generate GHG emissions over a 16-19 month construction period. Exhaust emissions would result from construction equipment and machinery as well as from the vehicular traffic generated by construction activities. Thus, a potentially significant impact is identified for this issue area. The CalEEMod air quality model will be utilized to estimate the project's GHG emissions and the results will be included in the EIR analysis.

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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

Impact Analysis

a) **Potentially Significant Impact.** Construction of the proposed project would require the use of construction vehicles, associated grease, oil, and fuels. Vehicle fuels, oils, and grease have the potential to be released into the environment through natural events or human error. This is considered a potentially significant impact and will be addressed in the EIR analysis.

b) **Potentially Significant Impact.** Refer to response IX. a) above.

c) **No Impact.** The project is not located within one-quarter mile of an existing school. The closest school is Heber School, located approximately 0.70 miles to the north of the nearest project component (cable route).

Therefore, the project would have no impact on emitting or handling hazardous or acutely hazardous materials substances or waste within one-quarter mile of an existing or proposed school.

d) **No Impact.** Based on a review of the Cortese List conducted in September 2025, the project site is not listed as a hazardous materials site (Department of Toxic Substances Control 2025, State Water Resources Control Board 2025). Therefore, implementation of the project would result in no impact related to the project site being located on a listed hazardous materials site pursuant to Government Code Section 65962.5.

e) **No Impact.** The nearest airport to the project site is the Calexico International Airport, located approximately two miles southeast of the project site. According to Figure 3B of the Imperial County Airport Land Use Compatibility Plan (ALUCP), no portion of the project site is located within the Calexico International Airport's land use compatibility zones (ALUC 1996). Therefore, implementation of the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area. No impact is identified for this issue area.

f) **Less Than Significant Impact.** The Imperial County Office of Emergency Services (OES) has provided three plans addressing evacuation and evacuation responsibilities for County Fire, Police, and the OES among other topics related to emergency preparedness that do not identify specific evacuation routes. The project applicant would coordinate any construction activities and use of oversized loads or movement of construction/decommissioning equipment with the Imperial County Department of Public Works (ICDPW) and/or California Department of Transportation (Caltrans) and the El Centro Highway Patrol office. Further, the project will coordinate with the ICDPW for any requested dedication of rights-of-way needed for Dogwood Road for the consideration of existing and any future road needs. Lastly, the project shall file for an encroachment permit for any work or proposed work in the affected County or Caltrans road rights-of-way and for any and all new, altered or unauthorized existing driveway(s) to access the lot and for any proposed road crossings. Thus, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and would result in a less than significant impact.

g) **No 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, the potential for a major fire in the unincorporated areas of the County is generally low (County of Imperial 2022). The project site is not located in areas considered wildlands, as the vast majority of the surrounding area is cultivated farmlands. According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the project area 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 2025). Therefore, there would be no impact associated with risk involving wildland fires.

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?	☒	☐	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Impact Analysis

a) **Potentially Significant Impact.** The proposed project has the potential to create urban non-point source discharge (e.g., synthetic/organic chemicals). Potentially significant water quality impacts have been identified and will be addressed in the EIR.

b) **No Impact.** Any water needed for fugitive dust control, or other BMPs that require water will be obtained through the project applicant's existing IID contract. No groundwater wells will be drilled, nor will the project require the use of ground water. No impact on groundwater supply or recharge would occur.

ci) **Less than Significant Impact.** The proposed project would result in the creation of impervious surfaces. Soil erosion could result during construction and earthmoving as well as during site reclamation. However, the project applicant is required to comply with the National Pollution Discharge Elimination System (NPDES) Construction General Permit and the Industrial General Permit, as well as Imperial County Land Use Ordinance, Title 9, Chapter 10 – Grading Regulations. County standards and compliance with the NPDES require the creation of a Stormwater Pollution Prevention Plan (SWPPP), and the use of best management practices (BMPs) to reduce impacts to surface and ground water quality attributed to erosion or siltation to a level less than significant. The Applicant's compliance with Imperial County and State standards would ensure the project does not significantly alter the site's drainage resulting in erosion or siltation on-or off-site, and impacts would be less than significant.

cii) **Less than Significant Impact.** Refer to response X. ci) above.

ciii) **Less than Significant Impact.** Refer to response X. ci) above.

civ) **Less Than Significant Impact.** According to the Federal Management Agency (FEMA) Flood Insurance Rate Map (Panel 06025C2075C), the project site is within Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain (FEMA 2008). Therefore, the proposed project would not impede or redirect flood flows and this is considered a less than significant impact.

d) **No Impact.** According to the FEMA Flood Insurance Rate Map (Panel 06025C2075C), the project site is within Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain (FEMA 2008). In addition, there are no large bodies of water near the project site. The Salton Sea is the closest body of water near the project site and is 28 miles away, and the Pacific Ocean is over 90 miles away. Therefore, the project would not risk release of pollutants due to project inundation by flood, tsunami or seiche. No impact would occur.

e) **Less Than Significant Impact.** No groundwater wells will be drilled, nor will the project require the use of ground water. Any water needed for fugitive dust control, or other BMPs that require water will be obtained through the project applicant's existing IID contract. Furthermore, the project is required to comply with County, State, and Federal water quality standards. The proposed project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This is considered a less than significant impact.

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?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Impact Analysis

a) **No Impact.** The project site is located in a sparsely populated, agriculturally zoned portion of Imperial County. There are no established residential communities located within or in the vicinity of the project site. The nearest established residential communities are located approximately 0.60 miles north of the project site along E Fawcett Road; and the closest residence is approximately 300 feet northeast of the solar site. Therefore, implementation of the project would not divide an established community and no impact would occur.

b) **Less than Significant Impact.** The project site is currently designated by the General Plan as "Urban Area" and is zoned A-2-G-U (General Agriculture with a Geothermal Zone Overlay in an Urban Area).

Pursuant to Title 9, division 5, Chapter 8, the following uses are permitted in the A-2 zone subject to approval of a CUP from Imperial County.

- Electrical generation plants (less than 50 MW) excluding nuclear or coal fired and meeting requirements in Division 17.
- Facilities for the transmission of electrical energy (100—200 kv).
- Major Geothermal projects per Division 17.
- Resource extraction and energy development as per Division 17.

The County Land Use Ordinance, Division 17, includes the Renewable Energy Overlay Zone, which authorizes the development and operation of renewable energy projects, with an approved CUP. With an approved CUP the project would conform with the standards presented in the Implementation Ordinance of the Renewable Energy and Transmission Element update. Therefore, implementation of the project would not 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 and impacts would be less than significant.

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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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. Thus, no impact is identified for this issue area and no further analysis is required.

b) **No Impact.** Refer to response XII. 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?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Impact Analysis

a) **Less than Significant Impact.** The Imperial County Title 9 Land Use Ordinance, Division 7, Chapter 2, Section 90702.00 - Sound level limits, establishes one-hour average sound level limits for the County's land use zones. Agricultural/industrial operations are required to comply with the noise levels prescribed under the general industrial zones. Therefore, the proposed project will be required to maintain noise levels below 75 decibels (dB) (averaged over one hour) during any time of day.

The proposed project will also be expected to comply with the Noise Element of the General Plan which states that construction noise, from a single piece of equipment or a combination of equipment, shall not exceed 75 dB, when averaged over an eight-hour period, and measured at the nearest sensitive receptor. Construction equipment operation is also limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m on Saturday. Nevertheless, the proposed project will result in the increase in ambient noise levels during construction. A noise report that will address the proposed project's potential noise impacts will be prepared and this issue will be addressed in the EIR.

b) **Less than Significant Impact.** Groundborne vibration and noise could originate from earth movement during the construction phase of the proposed project. However, significant vibration is typically associated with activities such as blasting or the use of pile drivers, neither of which would be required during project construction. Construction activities most likely to cause vibration include heavy construction equipment and site grading operations. Although all heavy, mobile construction equipment has the potential to cause at least some perceptible vibration when operating close to buildings, the vibration is usually short term and is not of sufficient magnitude to cause building damage. Heavy equipment such as dozers, loaders, and drill rig equipment would not be operated close enough to any residences or structures to cause vibration impact. Operation of the project would not result in vibrations perceptible to nearby receptors. As such, impacts would be less than significant.

c) **No Impact.** The nearest airport to the project site is the Calexico International Airport, located approximately two miles southeast of the project site. According to Figure 4G of the Imperial County ALUCP, the project site is located outside of the noise contours of the Calexico International Airport (ALUC 1996). Therefore, the proposed project would not expose people to excessive airport noise levels, and no impact would occur.

XIV. Population and Housing

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

Impact Analysis

a) **No Impact.** Project construction would require approximately 15 workers onsite during the construction period. After construction is complete, the solar facility would generally be unstaffed but would require routine maintenance and unscheduled maintenance as needed. It is assumed that the workforce would be from southern California and would likely not require long-term housing accommodations. The project is sited within the Geothermal Overlay Zone and the project does not involve the construction of any new housing or commercial areas that would attract new residents to the area, nor does it require the extension of roads or creation of other infrastructure. The project would not appear to induce population growth; therefore, the project would have no impact.

b) **Less than Significant Impact.** An existing single-family home is located in the southwest corner of the project site. This home would be demolished as part of the project. However, the home is vacant and owned by the applicant. Therefore, while the house would be removed, the project would not displace any residents. This is considered a less than significant impact.

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?	☐	☐	☒	☐
ii. Police Protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

Impact Analysis

ai) **Less than Significant Impact.** The project is located in an unincorporated area of Imperial County outside of Heber and Calexico, California. The project would not likely impact or displace the location of existing fire protection facilities. The project applicant will have a certified fire engineer review the proposed facility and existing fire response infrastructure to determine if the existing fire response facilities are adequate or if additional facilities (i.e., hydrants, access points) are necessary. The project will have a thorough Emergency Response Plan (ERP) created with consultation from the Imperial County Fire Department. The project ERP will address all emergencies likely to occur at the site and requires an Emergency Coordinator who can work with County Fire Protection. Therefore, impacts would be less than significant.

aii) **Less Than Significant Impact.** The project would not likely impact or displace the location of existing police protection facilities. The project would also include public safety mechanisms such as fences and gates to protect the facility and reduce unauthorized visitations. In addition, there will be a security service that monitors the property. Furthermore, the project applicant would be required to pay their share of local infrastructure improvement costs. Therefore, impacts would be less than significant.

aiii) **Less Than Significant Impact.** The proposed project does not include the development of residential land uses that would result in an increase in population or student generation. Also, the number of construction and operational workers coming to the region is low and is not expected to increase demand for schools or require the construction of new schools. Therefore, impacts would be less than significant.

aiv) **Less Than Significant Impact.** The number of construction and operational workers coming to the region is low and is not expected to increase demand on existing or future parks. Therefore, impacts would be less than significant.

av) **Less Than Significant Impact.** The number of construction and operational workers coming to the region is low and is not expected to increase demand for any public services (such as post offices). Therefore, impacts would be less than significant.

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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

a) **No Impact.** The project would not directly or indirectly increase the number of residents keeping the county compliant with the Quimby Act which requires 5 acres of parkland for every 1,000 residents. Project construction would likely require approximately 15 workers. After construction is complete, the solar facility would generally be unstaffed but would require routine maintenance and unscheduled maintenance as needed. These workers and employees are anticipated to come from existing populations that live in or commute from the surrounding local community. As there is no increase of residences or residents, it is reasonably foreseeable that the project would not lead to an increase of use or deterioration of existing neighborhood, regional, or other recreational facilities. Therefore, the project would have no impact on the use or deterioration of existing recreational resources.

b) **No Impact.** The project does not include nor require the construction of a recreational facility as the project does not alter the current ratio of parkland acres to residents. Therefore, the project will have no impact on the construction or expansion of recreational facilities which might have an adverse effect on the environment.

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?	☒	☐	☐	☐
b) Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☒	☐	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

Impact Analysis

a) **Potentially Significant Impact.** 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 impact study that will address the proposed project's potential impacts on traffic will be prepared, and this issue 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 impact study and EIR analysis.

c) **No Impact.** The project would not result in any changes to any roads, intersections, streets, highways, nor would it provide any incompatible uses to the street and highway system. All vehicles that would be used for travel to and from the project site would be licensed and comply with all appropriate transportation laws and regulations including obtaining and adhering to provisions of any required permits for oversized loads. As such, no impact related to transportation design hazards would occur.

d) **No Impact.** The proposed facility would be constructed within the property boundaries of the project site and would not affect emergency vehicle access to the facility or any roadway. Emergency vehicle access is identified and designated at the project site, and these areas would not be changed as result of the proposed project. Therefore, no impacts to emergency access to the site or surrounding area would occur under the project.

XVIII. Tribal Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
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)?	☒	☐	☐	☐
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?	☒	☐	☐	☐

Impact Analysis

a-b) **Potentially Significant Impact.** Assembly Bill 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 Campo Band of Mission Indians, Fort Yuma-Quechan Indian Tribe, and Agua Caliente Band of Cahuilla Indians on October 29, 2025. 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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Impact Analysis

a) **Less Than Significant Impact.** Operational use of water resources for the project would be limited to domestic use for solar panel washing and fire protection services. Impacts associated with water facilities would be less than significant. Construction of the proposed facility would not generate/discharge any wastewater. Impacts associated with water facilities would be less than significant.

The energy generated by the solar facility will be collected and then transferred to the existing Heber 1 Geothermal Plant via a transmission cable. The solar facility will effectively reduce the margin between gross and net geothermal energy generation, allowing for the more efficient generation of geothermal energy and allow more geothermal energy to enter the grid. Impacts associated with electric power facilities would be less than significant.

No natural gas facilities are located near the project and no natural gas hookup is required for the project. No impacts associated with natural gas facilities would occur. The project will not have an impact on any telecommunications.

The project would not 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, impacts would be less than significant.

b) **Potentially Significant Impact.** The project will obtain water for construction and decommissioning activities, including grading, and dust control through the project applicant's existing contract with IID. Once the project is operational, water will be required for solar panel washing and fire protection services. Although water for solar panel washing and fire protection services during project operation is not anticipated to result in a significant increase in water demand/use, IID would provide the water required for operations and maintenance and potable water will be trucked onto the site. Thus, a potentially significant impact is identified for the availability of sufficient water supplies to serve the proposed project for the reasonably foreseeable future. The proposed project's potential impacts on water supplies will be analyzed in the EIR.

c) **No Impact.** The proposed project would generate a minimal volume of wastewater during construction. During construction, portable chemical sanitary facilities will be used by all construction personnel. These facilities will be serviced by a local contractor. In addition, all construction liquids would be disposed of in compliance with all appropriate local, state and federal disposal regulations. Therefore, no impacts to the wastewater treatment utility's service capacity would occur.

d) **Less than Significant Impact.** Solid waste generation would be minor for the construction and operation of the proposed project. Solid waste during construction will be disposed of in an approved solid waste disposal site in accordance with Imperial County Environmental Health Department requirements. Waste will be routinely collected and disposed of at an authorized landfill by a licensed disposal contractor. Trash would likely be hauled to the Calexico Solid Waste Site (13-AA-0004) located approximately 1.25 miles southwest of the project site in Calexico, CA. The Calexico Solid Waste Site has approximately 1,921,178 cubic yards of remaining capacity and is estimated to remain in operation through 2200 (CalRecycle 2024). The project would not 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.

Additionally, because the proposed project would generate solid waste during construction and operation, the project 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
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

a) **No Impact.** According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the project area 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 2025). Therefore, the 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 project area 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 2025). The Seismic and Public Safety Element of the County General Plan also states that the potential for a major fire in the unincorporated areas of the County are generally low (County of Imperial 2022). The project site is located on flat land, which does not pose a fire risk due to slope conditions. The County's Multi-Jurisdictional Hazard Mitigation Plan (2021) recognizes and manages events of high winds and other extreme weather in Imperial County. The project would not exacerbate wildfire risks associated with slope or prevailing winds; no impact would occur.

c) **No Impact.** The project area 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 2025). All interconnection lines would be primarily situated along existing utility lines. All infrastructure would comply with existing regulations and would not exacerbate fire risk; no impacts would occur.

d) **No Impact.** Figure 3: Landslide Susceptibility in the Seismic and Public Safety Element of the General Plan (County of Imperial 2022), the project is not located in the area that is prone to landslide hazards. Furthermore, the site topography is flat, and no ancient landslides have been mapped in the area. The project would not alter the existing drainage pattern surrounding the project site and it would comply with regulations that reduce the potential for excess runoff waters from the project site. The project would not

expose people or structures to significant risks as a result of runoff, post-fire instability, or drainage changes; therefore no impact would occur.

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?	☒	☐	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

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, 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 hazards and hazardous materials. These potential environmental effects could cause substantial adverse effects on human beings. These issues will be further evaluated in the EIR.

References

California Department of Conservation (DOC). 2020. California Important Farmland Finder. Available on-line at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed September 26, 2025.

California Department of Forestry and Fire Protection. 2025. Fire Hazard Severity Zone Viewer. Available on-line at: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008. Accessed September 26, 2025.

California Department of Resources Recycling and Recovery (CalRecycle). 2024 Facility/Site Summary Details: Calexico Solid Waste Site (13-AA-0004). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4179?siteID=591. Accessed September 26, 2025.

California Department of Transportation (Caltrans). 2018. California Scenic Highway Mapping System. Available on-line at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. September 26, 2025.

County of Imperial. 2022. County of Imperial General Plan. Seismic and Public Safety Element. https://www.icpds.com/assets/GPA21-0004-Seismic-and-Public-Safety-Element-11-22-2022.pdf.

——— 2016. County of Imperial General Plan. Conservation and Open Space Element. Available on-line at: https://www.icpds.com/planning/land-use-documents/general-plan/conservation-and-open-space-element.

——— 2021. Imperial County Multi-Jurisdictional Hazard Mitigation Plan. January 2021. Available on-line at: https://firedept.imperialcounty.org/wp-content/uploads/2021/01/Imperial-County-MHMP-2021-Plan-Update-2021_01_11.pdf.

Department of Toxic Substances Control. 2025. EnviroStor. Available on-line at: https://www.envirostor.dtsc.ca.gov/public/. Accessed September 26, 2025.

Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Map (Panel 06025C2075C).

Imperial County Airport Land Use Commission (ALUC). 1996. Imperial County Airport Land Use Compatibility Plan. Available on-line at https://www.icpds.com/assets/hearings/airport-land-use-commission/aluc-compatibility-plan-1996-part-1.pdf.

State Water Resources Control Board. 2025. GeoTracker. Available on-line at: https://geotracker.waterboards.ca.gov/. Accessed on September 26, 2025.

List of Preparers

This Initial Study was prepared for the Imperial County Planning and Development Services Department by HDR at 591 Camino de la Reina, Suite 300, San Diego, CA 92108. The following professionals participated in its preparation:

Imperial County Planning and Development Services Department

Jim Minnick, Director,

Michael Abraham, AICP, Assistant Director

Diana Robinson, Planning Division Manager

Alan Molina, Planner II

HDR

Tim Gnibus, Principal

Sharyn Hidalgo, Project Manager

Madison Gallagher, Environmental Planner

Ian Plascencia, Environmental Planner

Trent Lundberg, Geographic Information Systems Analyst

Katherine Turner, Document Production Administrator

This page is intentionally blank.

To: Office of Planning & Research
(Agency)

P.O. Box 3044, 1400 Tenth Street, Room 212
(Address)

Sacramento, CA 95812-3044

Subject: Notice of Preparation of a Draft Environmental Impact Report

Lead Agency:		**Consulting Firm** (If applicable):	
Agency Name	Imperial County, Planning & Dev Svcs.	Firm Name	HDR
Street Address	801 Main Street	Street Address	591 Camino de la Reina, Suite 300
City/State/Zip	El Centro, CA 92243	City/State/Zip	San Diego, CA 92108
Contact	Alan Molina	Contact	Tim Gnibus

The County of Imperial will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified below. We need to know the views of your agency as to the scope and content of the Environmental Information, which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study is attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but ***not later than 35 days*** after receipt of this notice.

Please send your response to Imperial County Planning & Development Services, Attn: Alan Molina at the address shown above. We will need the name for a contact person in your agency.

Project Title: Heber 1 Parasitic Solar Energy Project

Project Location: The proposed project would be located on one privately-owned parcel (Assessor Parcel Number [APN] 059-020-001) at 602 Dogwood Road in the southern portion of Imperial County, California. The project site is approximately 1.4 miles south of the community of Heber. The proposed solar energy facility would encompass approximately 106 acres in the southern portion of APN 059-020-001. The northern portion of APN 059-020-001 has been previously approved for the development and operation of the Heber 2 Parasitic Solar and Dogwood Parasitic Solar Projects. The proposed solar energy facility would be developed southwest of the existing Heber 1 Geothermal Plant located on APN 054-250-036 at 895 Pitzer Road in Heber, California.

Interstate 8 (I-8), located approximately 4.5 miles directly north, provides primary highway access to the project site. Dogwood Road stems off I-8 and provides immediate access to the project site. From the south, Willoughby Road runs west-east approximately 1,700 feet from the project site and connects to Dogwood Road, providing immediate site access.

Project Description (brief)**:** The project applicant proposes to develop a 20 megawatt (MW) solar energy facility and interconnecting cable line (gen-tie line) that would provide parasitic load to the existing Heber 1 Geothermal Plant. The solar energy facility would provide behind-the-meter power used to offset the auxiliary load of the existing Heber 1 Geothermal Plant. The solar energy facility would not connect to or generate power that will enter the transmission grid; rather, the solar energy facility would be entirely behind-the-meter and would serve as an integrated part of the operation of the existing Heber 1 Geothermal Plant. There are three route options proposed, of

which only one will be chosen, for the medium voltage cable that would connect the new 20 MW solar energy facility to the existing Heber 1 Geothermal Plant.

The County Land Use Ordinance, Division 17, includes the Renewable Energy Overlay Zone, which authorizes the development and operation of renewable energy projects, with an approved CUP. As shown in Figure 1, the project site is located within the Geothermal Overlay Zone, which is considered as part of the County's Renewable Energy Overlay Zone. 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.

Project Applicant: Heber Field Company, LLC

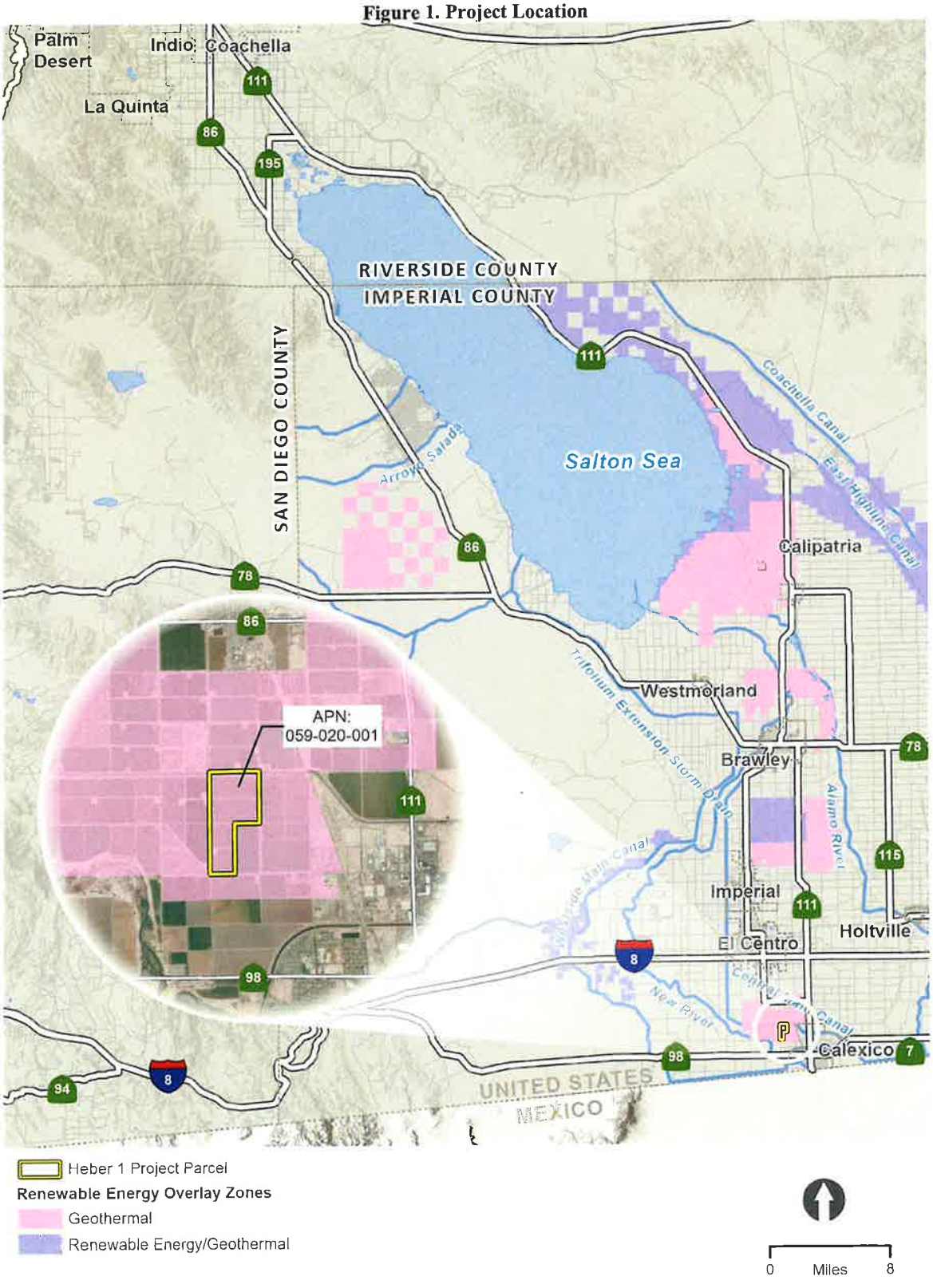
Date 10-24-2025 Signature [signature]

Title ICPDS Assistant Director

Telephone (442) 265-1736

Reference: California Administrative Code, Title 14, (CEQA Guidelines) Section 15082(a), 15103, 15375.

Figure 1. Project Location



2 Project Description

Chapter 2 provides a description of the Heber 1 Parasitic Solar Energy Project. This chapter also defines the goals and objectives of the proposed project, provides details regarding the individual components that together comprise the project, and identifies the discretionary approvals required for implementation of the project.

The Heber Field Company, LLC (project applicant), has filed one Conditional Use Permit (CUP) application with the County of Imperial for the construction and operation of a solar energy facility.

The project applicant proposes to develop a 20 megawatt (MW) solar energy facility and interconnecting cable line (gen-tie line) that would provide parasitic load to the existing Heber 1 Geothermal Plant. The solar energy facility would provide behind-the-meter power used to offset the auxiliary load of the existing Heber 1 Geothermal Plant. The solar energy facility would not connect to or generate power that will enter the transmission grid; rather, the solar energy facility would be entirely behind-the-meter and would serve as an integrated part of the operation of the existing Heber 1 Geothermal Plant. There are three route options proposed, of which only one will be chosen, for the medium voltage cable that would connect the new 20 MW solar energy facility to the existing Heber 1 Geothermal Plant.

2.1 Project Location

The proposed project would be located on one privately-owned parcel (Assessor Parcel Number [APN] 059-020-001) at 602 Dogwood Road in the southern portion of Imperial County, California (Figure 2-1). The project site is approximately 1.4 miles south of the community of Heber. The proposed solar energy facility would encompass approximately 106 acres in the southern portion of APN 059-020-001. As shown in Figure 2-2, the northern portion of APN 059-020-001 has been previously approved for the development and operation of the Heber 2 Parasitic Solar and Dogwood Parasitic Solar Projects. The proposed solar energy facility would be developed southwest of the existing Heber 1 Geothermal Plant located on APN 054-250-036 at 895 Pitzer Road in Heber, California.

Interstate 8 (I-8), located approximately 4.5 miles directly north, provides primary highway access to the project site. Dogwood Road stems off I-8 and provides immediate access to the project site. From the south, Willoughby Road runs west-east approximately 1,700 feet from the project site and connects to Dogwood Road, providing immediate site access.

2.1.1 Surrounding Land Uses

As shown in Figure 2-2, the proposed solar energy facility would be located southeast of the Heber Geothermal Energy Complex (HGEC). Currently, APN 059-020-001 is presently used for agricultural (alfalfa) production, geothermal energy wells/pipeline, and a vacant single-family residence owned by the project applicant. Surrounding land uses in the project vicinity are primarily for industrial facilities (i.e., aggregate/materials; geothermal energy), energy facilities, and agricultural cultivation. Agricultural operations are present on all sides of the proposed project site with geothermal well pads and pipelines also present throughout the local vicinity. However, the northern portion of APN 059-020-001 has been previously approved for the development and operation of the Heber 2 Parasitic Solar and Dogwood Parasitic Solar Projects. Imperial Irrigation District (IID) irrigation canals are also present throughout the project vicinity.

2.1.2 Renewable Energy Overlay Zone

In 2015, the County adopted the Imperial County Renewable Energy and Transmission Element, which includes a renewable overlay zone (RE Overlay). This General Plan element was created as part of the California Energy Commission Renewable Energy Grant Program to amend and update the County's General Plan to facilitate future development of renewable energy projects.

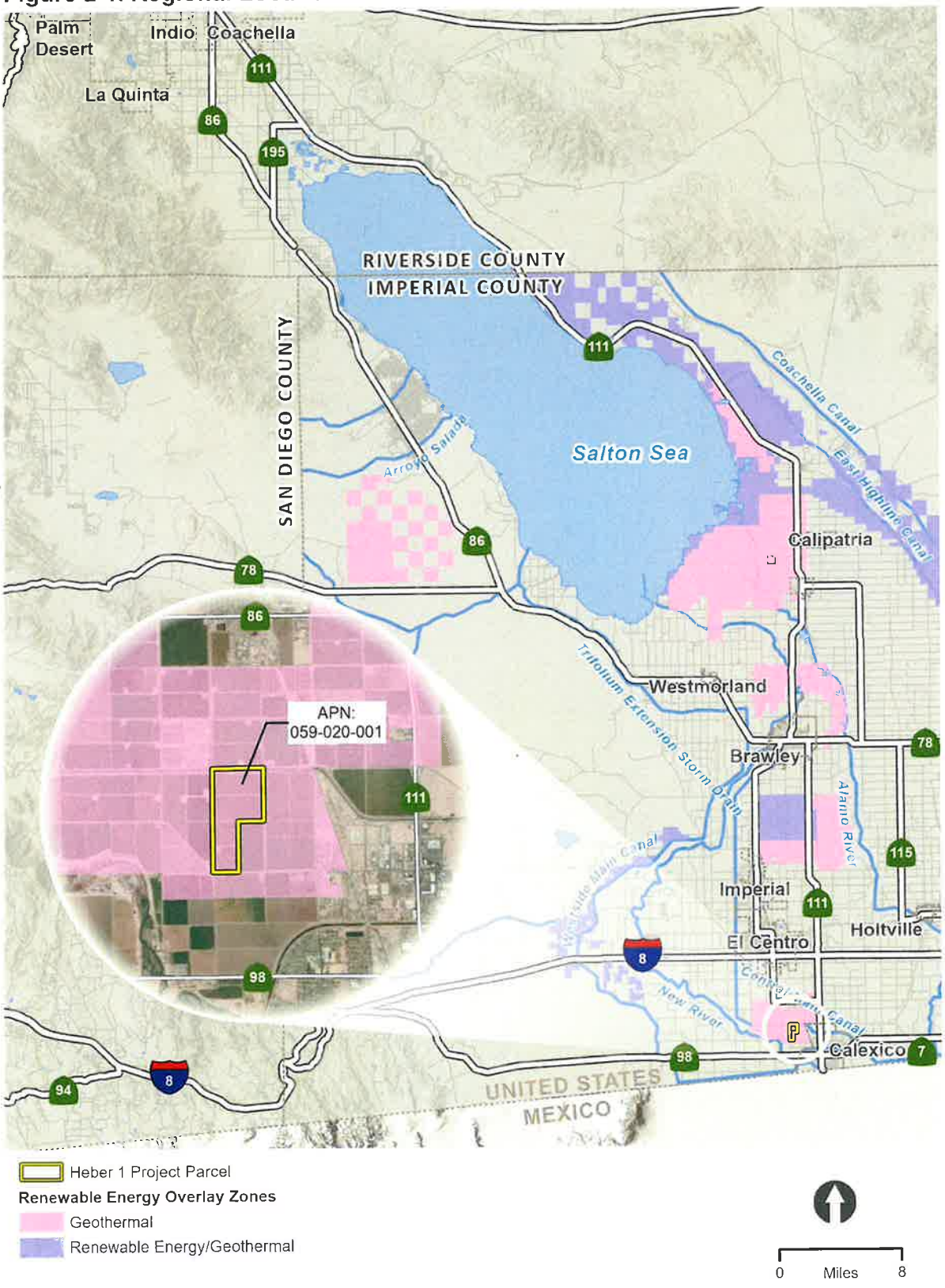
The County Land Use Ordinance, Division 17, includes the RE Overlay Zone, which authorizes the development and operation of renewable energy projects with an approved CUP. The RE Overlay Zone is concentrated in areas determined to be the most suitable for the development of renewable energy facilities while minimizing the impact on other established uses.

As shown in Figure 2-1, the project site is located within the Geothermal Overlay Zone, which is considered as part of the RE Overlay Zone. Therefore, no General Plan Amendment or Rezone would be required to implement the proposed project.

2.2 Project Objectives

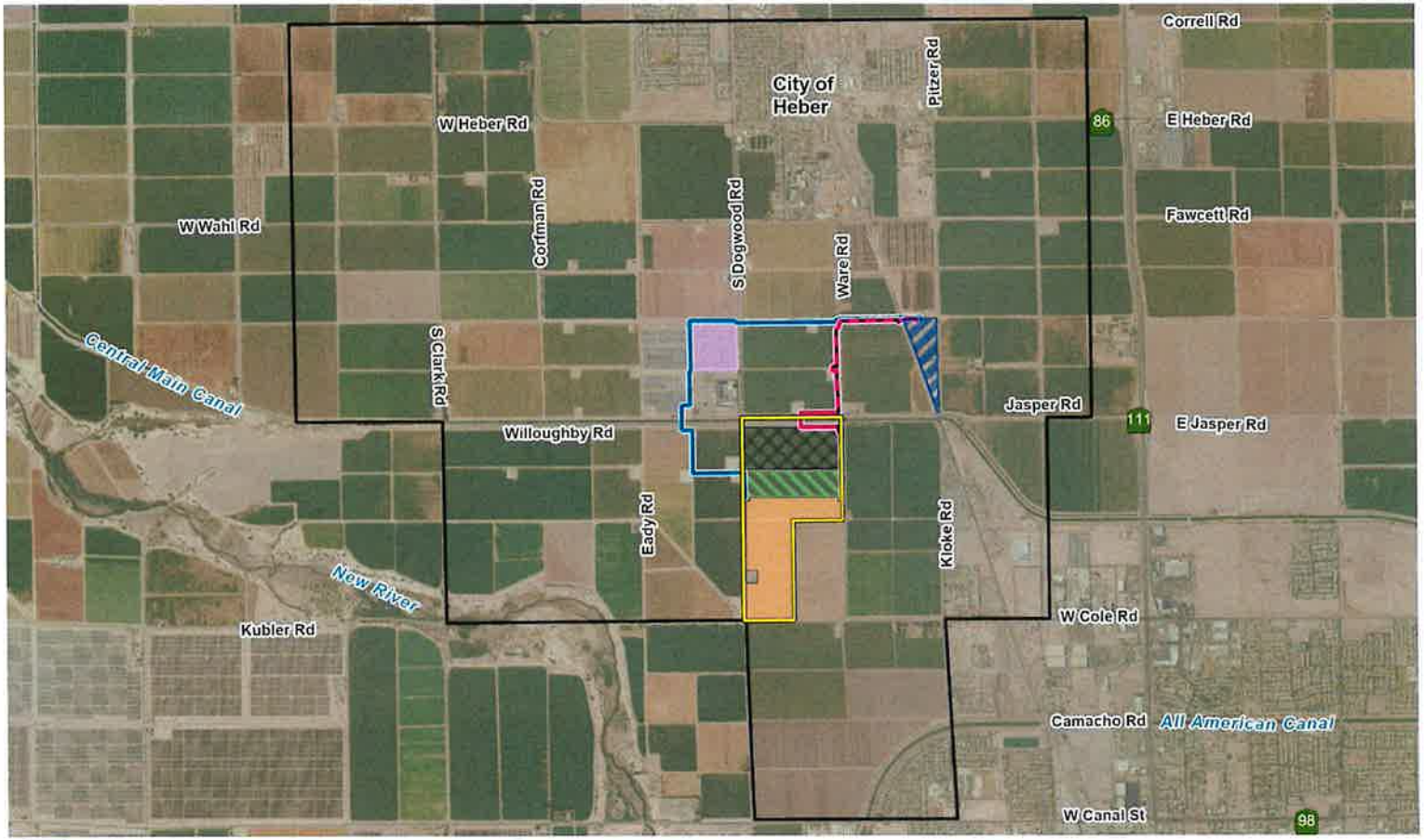
- Provide parasitic load to the existing Heber 1 Geothermal Plant for more efficient geothermal energy generation.
- Develop clean, renewable geothermal energy in the Heber Geothermal Zone pursuant to the Imperial County General Plan.
- Provide renewable baseload energy and capacity to assist the State of California with meeting the objectives of Senate Bill 100 (100% Clean Energy Act of 2018) and the State's Renewables Portfolio Standard program.

Figure 2-1. Regional Location



This page is intentionally blank.

Figure 2-2. Project Site



EEC ORIGINAL PKG

This page is intentionally blank.

2.3 Project Facilities

2.3.1 Parasitic Solar Energy Facility

The 20 MW solar energy facility would be developed to provide parasitic load to the existing Heber 1 Geothermal Plant. The solar energy facility is proposed as exclusive behind-the-meter and would provide supplemental energy directly to the Heber 1 geothermal units via a medium voltage distribution cable. The solar energy facility would not connect to or generate power that will enter the transmission grid; rather, the solar energy facility would be entirely behind-the-meter and would serve as an integrated part of the operation of the existing Heber 1 Geothermal Plant.

2.3.2 XMD Switch and Medium Voltage Cable

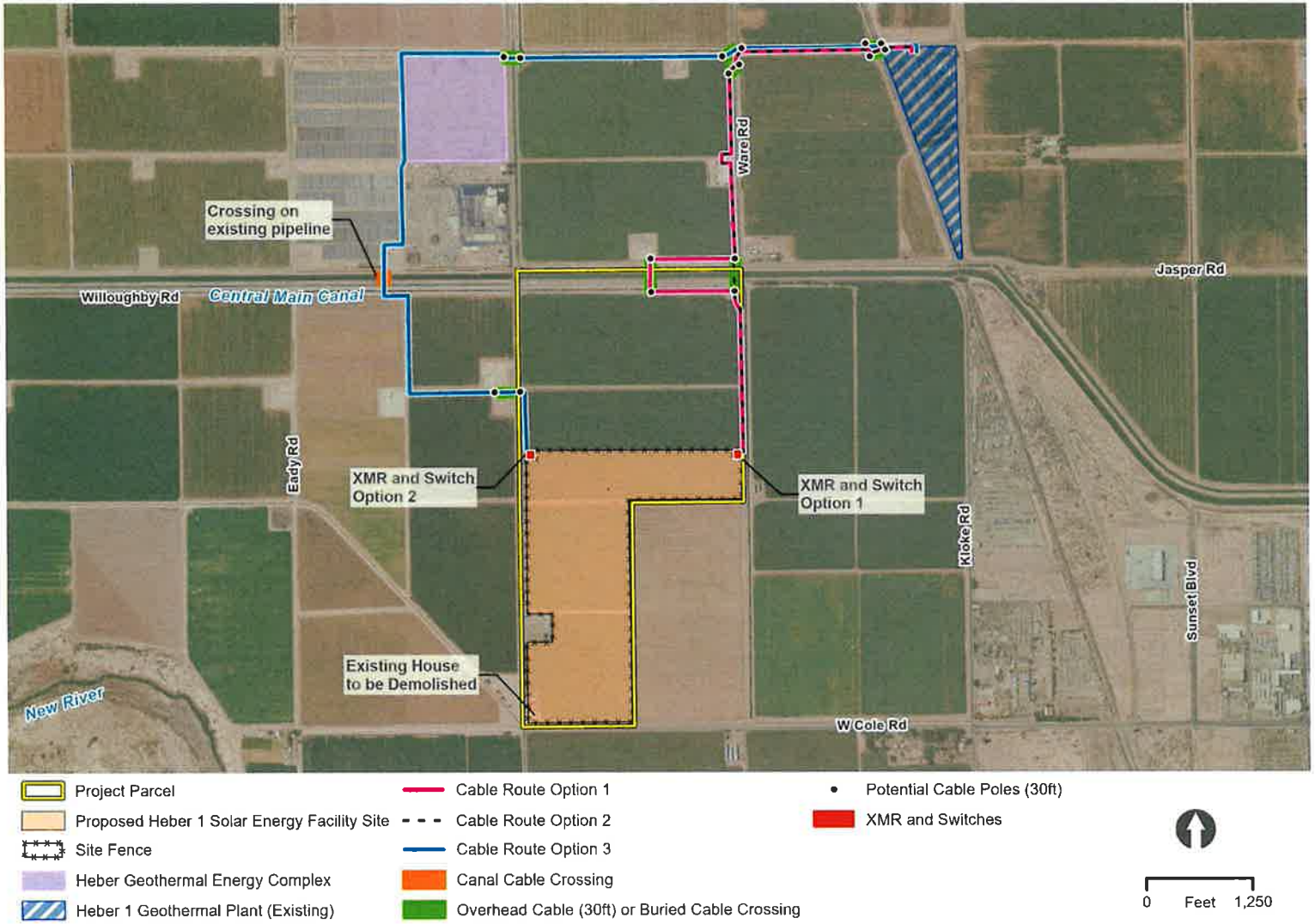
The energy generated by the solar energy facility would be collected at an on-site XMD switch and transmitted along a medium voltage cable. There are three route options proposed to connect the solar energy facility to the existing Heber 1 Geothermal Plant. To minimize ground disturbance, the cable would be attached via trays to existing pipelines or be buried, as feasible. The XMD switch would be located on either the northwest or northeast corner of the project site, depending on which cable route alternative is selected. All road, canal, and rail crossings would be overhead via 30' monopoles or would be directionally buried underground, if feasible.

The three alternatives for the proposed cable route are described as follows and shown in Figure 2-3.

- ***Route 1*** – The medium voltage cable would exit the northeast corner of the solar energy facility and travel north along an existing raised berm. Before Willoughby Road, the cable would turn west for approximately 0.15 miles and then the cable would either be directionally buried or strung on monopoles to cross Willoughby Road and the Central Main Canal to an existing geothermal well pad. The cable would run east along an existing pipeline alignment and then turn north along the same pipeline alignment along Ware Road for approximately 0.33 miles where it would meet an existing pipeline alignment that runs to the Heber 1 Geothermal Plant.
- ***Route 2*** – The medium voltage cable would exit the northeast corner of the solar energy facility and travel north along an existing raised berm. The cable would either be directionally buried or strung on monopoles to cross the Central Main Canal and Willoughby Road. The cable would continue along Ware Road for approximately 0.33 miles where it would meet an existing pipeline alignment that runs to the Heber 1 Geothermal Plant.
- ***Route 3*** – The medium voltage cable would cross Dogwood Road and be attached via trays to the existing pipeline that runs west before turning north to cross the Beech Drain and Central Main Canal at the existing above-ground pipeline crossing. The cable would continue to follow the existing pipeline alignment to the HGEC and travel along the northern boundary to exit the HGEC's northeast corner. The cable would not connect to any HGEC energy facilities, but the cable would pass through the site. The cable would then cross back over Dogwood Road and continue down an existing pipeline alignment to the Heber 1 Geothermal Plant.

This page is intentionally blank.

Figure 2-3. Proposed Site Plan



This page is intentionally blank.

2.4 Project Construction

2.4.1 Construction Schedule

Construction of the proposed project is anticipated to take 16 to 19 months. Facility construction would include demolition of a vacant residential structure at the southwest corner of the project site and site preparation activities. Table 2-1 provides a breakdown of the proposed construction schedule by phase and duration. Some construction activities will occur concurrently as facilities are installed simultaneously, as noted by the Phase Duration column not summing Activity Durations perfectly.

Table 2-1. Project Construction Process/Phasing

Construction Phase	Construction Activity	Activity Duration	Phase Duration
Site Preparation	Construction Kick-Off/Staging	1 week	2 months
	Demolition/Site Clearing	1 week	
	Site Preparation/Rough Grading	2 weeks	
	Fine/Pad Graving, Excavation for Underground Conduit/Utilities, Stormwater	1 month	
Project Construction	Parasitic Solar Construction	6 months	11 months
	Gen-Tie Distribution Cable	4 months	
	Landscaping, Lighting, Architectural Finishes	1 month	
Switch Development and Interconnection	Switch Development	5 months	6 months
	Interconnection with Grid	2 weeks	
	Testing	2 weeks	

2.4.2 Construction Equipment

Construction of the proposed project would require heavy and light-duty equipment, as well as hand tools. Heavy construction equipment, including drill rigs, drilling equipment, semi-truck trailers, flatbed trucks, forklifts, excavators/bulldozers, rollers, and cranes will be used to deliver and place the proposed facility equipment on the project site. Smaller powered hand tools, such as drills, compressors, and welding equipment will also be used. Table 2-2 provides a breakdown of the construction equipment to be used in each phase of project development, by estimated quantity and usage (days; hours per day). Additionally, Table 2-3 provides estimates for the number of daily vehicle trips the construction phase will require, by number of trips and estimated trip length(s).

Construction activities will be limited to 7:00 a.m. through 7:00 p.m. Construction noise from project development will not exceed the County threshold of 75 decibels at any time of (County of Imperial Codified Ordinances § 90702.00 – Sound Level Limits).

Table 2-2. Project Construction Phases and Equipment

Construction Phase	Equipment	Quantity	Engine Horsepower	No. Days Used	No. Hours Operated Per Day
Site Preparation (2 months)	Heavy Duty Trucks	3	402	30	5
	Excavator	1	97	30	8
	Roller	2	200	30	8
	Light-Duty Truck	8	350	30	4
Project Construction (11 months)	Aerial Man Lifts	8	63	160	6
	Excavator	1	97	40	8
	Crane	2	231	160	6
	Forklift	1	89	40	8
	Forklift	6	89	245	8
	Generator Set	1	84	320	8
	Grader	1	187	30	8
	Heavy Duty Trucks	2	402	90	8
	Rubber Tired Loader	1	203	30	8
	Backhoe	1	97	30	8
	Welders	15	46	245	6
	Light Duty Truck	1	350	40	4
	Light Duty Truck	15	350	245	4
Switch Development and Interconnection (6 months)	Crane	1	231	80	8
	Drill/Bore Rig	1	221	80	8
	Aerial Lift	2	63	80	8
	Heavy Duty Trucks (Delivery)	2	402	20	4
	Backhoe	1	97	14	8
	Forklift	1	89	80	8
	Ditch Digger	1	13	20	8
	Generator Set	2	84	80	8
	Light Duty Truck	5	350	80	4

Table 2-3. Construction Vehicle Trips

Construction Phase	Trip Type	Number of Trips Per Day	One-Way Trip Length (miles)[2]
Site Preparation	Workers[1]	46	10.2
	Vendors	10	11.9
	Haul	8	20
Project Construction	Workers[1]	46	10.2
	Vendors	40	225
	Haul	2	20
Switch Development and Interconnection	Workers[1]	46	10.2
	Vendors	10	11.9
	Haul[3]	0	20

Notes:

1 Trip generation rate is calculated at roughly 3 trips/worker (assumed 50 percent of 15 workers leave/return once during the day) for a total of 46 trips, and 2 trips/vehicle (in/out) for vendor and haul trips.

2 Trip lengths consist of default CalEEMod values with exception of vendors for delivery of project equipment during construction, with deliveries of solar panels, etc. assumed to originate at Port of Long Beach, approximately 225 miles from project site.

3 All truck trips are assigned to vendor deliveries.

2.4.3 Construction Personnel

Project construction would likely require a maximum of 15 workers for each phase of construction. After construction is complete, the facility would not be staffed and would only require workers as needed for schedule maintenance and repairs.

2.4.4 Water Use

A Water Quality Management Plan (WQMP) was prepared for both the construction and operations phases of the project. The WQMP includes numerous "good housekeeping" and preventative maintenance, employee training, safe handling/storage, and spill response measures to prevent and minimize any unintended releases.

Water required for facility construction activities, including grading and dust control, will be obtained from the project applicant's existing contract with IID. Up to 5,000 gallons per day (gpd) of water will be required for the first 2-4 months of development of the facility. Approximately 2,000 gpd will be consumed during the remaining development schedule of approximately 12-19 months. Thus, approximately 1.1 million gallons of water (10.1 acre-feet) will be used on-site during construction. Once operating, up to approximately 325 gpd (0.36 acre-feet per year) of non-potable water will be required and provided by the project applicant's existing IID contract/allocation. The project will not require additional water from IID for operations and will be covered under the existing contract.

2.5 Operations and Maintenance

Once the project is complete, the solar energy facility would generally be unstaffed but would require routine maintenance and unscheduled maintenance as needed. The solar energy facility would be monitored remotely with visitation on an as-needed basis and security personnel will perform periodic

site visits. Any required planned maintenance activities would generally consist of equipment inspection and replacement, and would be scheduled to avoid peak load periods. Any unplanned maintenance would be responded to as needed, depending on the event.

2.6 Restoration of the Project Site

At the end of the permitted or useful life of the solar energy facility, the project applicant will prepare a Site Reclamation and Restoration Plan that establishes the plan and protocol for dismantling, removing, abandoning, transporting, and disposing of the solar and transmission facilities, as well as the plan for performing site restoration activities after the facilities are removed. Further, within three years of the cessation of operations, all facilities will be dismantled and the land involved will be made compatible with the surrounding uses or as requested by the County Planning Director.

The general objective of the final reclamation phase is to return the site as close as possible to pre-project conditions. Reclamation activities would be planned and conducted in accordance with County requirements.

2.7 Applicant Proposed Measures and Best Management Practices

All project and contractor personnel will be informed of the Applicant's policy regarding environmental protection, safety plans, and emergency response protocols. Collectively, these measures minimize unintended impacts and events as result of facility construction and operation.

2.7.1 Surface and Groundwater Quality

- A Water Quality Management Plan (WQMP) was prepared for both the construction and operations phases of the proposed project. The WQMP includes numerous "good housekeeping" and preventative maintenance, employee training, safe handling/storage, and spill response measures to prevent and minimize any unintended releases.
- The site will be designed and prepared to provide adequate stormwater conveyance and/or infiltration.
- Any spills or unintended releases of chemicals used during project construction and/or operation will be cleaned up with the appropriate materials (i.e., absorbent pads, foams/gels) and the affected area remediated to prevent contact with groundwater resources.
- No vehicle fueling or maintenance will take place on exposed soil.

2.7.2 Wildlife

- Speed limits of 5 miles per hour (mph) will be observed on the site in order to minimize dust, avoid collision, and incidental mortality of local wildlife.
- Burrowing owls were identified on the southern boundary of the project site. The following measures are being considered by the project applicant to minimize and avoid potentially significant impacts on the species and its habitat.

- *Avoidance.* A primary goal is to design and implement projects to seasonally and spatially avoid negative impacts and disturbances that could result in take of burrowing owls, nests, or eggs. Avoidance measures may include but are not limited to:
  - Avoid disturbing occupied burrows during the nesting period, from February 1 through August 31.
  - Avoid impacting burrows occupied during the non-breeding season by migratory or nonmigratory resident burrowing owls.
  - Avoid direct destruction of burrows through chaining (dragging a heavy chain over an area to remove shrubs), disking, cultivation, and urban, industrial, or agricultural development.
  - Place visible markers near burrows to ensure that farm equipment and other machinery does not collapse burrows.
  - Do not fumigate, use treated bait or other means of poisoning nuisance animals in areas where burrowing owls are known or suspected to occur (e.g., sites observed with nesting owls, designated use areas).
  - Restrict the use of treated grain to poison mammals to the months of January and February.
- *Pre-construction avoidance surveys.* Surveys should be completed according to CDFW guidance within 14 days prior to site grading to detect any owls using the project site at the time of construction and determine any additional avoidance measures required.
- *Seasonal timing restrictions.* To the extent feasible, vegetation removal should take place outside of the breeding season, which is February 1 to August 31 (CDFW 2012). This would avoid harming owls during vegetation removal activities, which include grubbing, blading, and grading.
- *Worker awareness program.* Develop and implement a worker awareness program to increase the on-site worker's recognition of and commitment to burrowing owl protection.
- *Minimizing (Buffer Areas).* If burrowing owls and their habitat can be protected in one place on or adjacent to a project site, the use of buffer zones, visual screens, or other measures while project activities are occurring can minimize disturbance impacts. Conduct site-specific monitoring to inform development of buffers.
- *Biological monitoring.* Conduct biological monitoring to avoid disturbance to burrowing owls. Additionally, if any active burrowing owl nests are present within the project construction area, they must be avoided by establishing a non-disturbance buffer until the young fledge or the nest fails (CDFW 2012). Any nesting owls that are adjacent to construction will also be avoided by establishing buffer areas. Buffer areas should be marked using flagging to facilitate avoidance.

2.7.3 Vegetation

- Vegetation control, including invasive species eradication, will be implemented to prevent growth under or near the proposed facilities.

2.7.4 Air Quality

- The project will adhere to the Imperial County Air Pollution Control District's (ICAPCD) Regulation VIII, Fugitive Dust Rules, which are designed to mitigate PM_{10} emissions during construction.
- The Applicant shall submit a Construction Dust Control Plan and notify the ICAPCD 10 days prior to the start of any construction activities.
- Any equipment breakdown resulting in air emissions shall be reported to ICAPCD and promptly corrected (within 24 hours when possible).
- To minimize unnecessary emissions, project equipment and worker vehicles shall be turned off when not in use and not left idling.
- Water shall be applied to the development site and during preparation and construction to control fugitive dust.
- Earth moving work shall be completed in phases (as necessary) to minimize the amount of disturbed area at one time.
- Construction vehicles and heavy equipment that use non-surfaced facility roads and areas will be restricted to 5 mph to control fugitive dust.
- During windy conditions, barriers shall be constructed and/or additional watering will occur to minimize fugitive dust.
- Vehicle access shall be restricted to the disturbance area via signage and/or fencing.
- Equipment shall be operated according to best practices and maintained according to design specifications.
- Construction equipment shall be equipped with an engine designation of EPA Tier 3 (Tier 3) if commercially available and feasible. If a Tier 3 engine is not certified for a particular piece of equipment or not commercially available, then the equipment shall be either equipped with a Tier 2 engine or equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides (NOx) and diesel particulate matter (DPM) to no more than Tier 2 levels. Prior to the issuance of a grading permit, the project applicant will submit a list of all construction equipment, including off road equipment, by make, model, year, horsepower, expected/actual hours of use, and EPA to the County Planning and Development Services Department and ICAPCD.
- The project shall implement the following measures as part of its construction Best Management Practices (BMPs): providing Valley Fever awareness training for workers; providing respirators to workers when requested, including the provision of necessary training; use of closed-cab earth-moving vehicles equipped with HEPA-filtered air systems; employee testing for Valley Fever as needed; and conducting earth-moving activities downwind of workers when possible.

2.7.5 Cultural Resources

- The project site is entirely disturbed from cultivation and the probability of encountering an unanticipated cultural resource is low. As a safeguard, project construction personnel will monitor areas during surface disturbing activities. In the event any potential cultural or archaeological resources (e.g., bones, ceramics) are discovered, all construction affecting the

discovery site will be suspended immediately until a qualified archaeologist has reviewed the findings. An Unanticipated Discoveries Plan will be prepared prior to resuming construction.

2.7.6 Waste Management

- Workers will be required to properly dispose of all refuse and trash to prevent any litter on the project site.
- During construction, portable chemical sanitary facilities will be used by all construction personnel. These facilities will be serviced by a local contractor.
- All construction wastes, liquid and solid, will be disposed of in compliance with all appropriate local, state, and federal disposal regulations.
- Solid wastes will be disposed of in an approved solid waste disposal site in accordance with Imperial County Environmental Health Department requirements. Waste will be routinely collected and disposed of at an authorized landfill by a licensed disposal contractor.

2.7.7 Fire Prevention

- An Emergency Response Plan covering possible emergencies (e.g. blow-outs, major fluid spills, impacts due to earthquakes, and other emergencies) shall be maintained. At least one Emergency Coordinator, responsible for coordinating all emergency response measures, will be on call and able to quickly reach the project at all times. The Emergency Coordinator shall be thoroughly familiar with all aspects of the Emergency Response Plan and have the authority to commit the resources needed to carry out the contingency plan. Adequate personnel and equipment shall be available to respond to emergencies and to ensure compliance with CUP conditions, including appropriate first aid employee training and other provisions during Project construction and operation. All construction equipment will be equipped with exhaust spark arresters.
- Safety Data Sheets for all known chemicals of concern will be maintained and available to workers and first responders.
- Personnel will not be allowed to smoke outside of designated areas.
- A list of emergency phone numbers will be available on-site.
- Adequate firefighting equipment (i.e., a shovel, a Pulaski, standard fire extinguisher[s], and an ample water supply) will be kept readily available at each active construction site.
- Vehicle catalytic converters (on vehicles that enter and leave the construction site on a regular basis) will be inspected often and cleaned of all flammable debris.
- All cutting/welding torch use, electric-arc welding, and grinding operations will be conducted in an area free from vegetation. An ample water supply and shovel will be on hand to extinguish any fires created from sparks. At least one person in addition to the cutter/welder/grinder will be at the work site to promptly detect fires created by sparks.
- A survey and analysis of the proposed fire suppression and detection equipment will be performed by a certified fire protection engineer to evaluate the proposed fire response system's performance. An evaluation of the proposed fire suppression and detection

equipment in conjunction with existing equipment will also occur. A full report of findings will be provided to Imperial County Fire Department for review.

- An approved automatic fire detection system shall be installed as per the California Fire Code as adopted by the Imperial County Code. All fire detection systems shall be installed and maintained to the current fire code and regulations adopted by Imperial County.
- Fire Department access roads and gates will be in accordance with the current fire code adopted by Imperial County and the facility will maintain a Knox Box or a similar, Department-approved device for site access.

2.7.8 Geotechnical and Geologic Hazards

- A formal geotechnical investigation of the site's soil characteristics, seismic conditions, stormwater infiltration, site stability, and potential for liquefaction will be developed.

2.7.9 Public Health and Safety

- The project site would be fenced to prevent unauthorized people from accessing and tampering with the electrical equipment and facilities.
- Signage, such as "No Trespassing" and "Danger – High Voltage" warnings, will continue to be posted at the site to provide notice to unauthorized people to keep out.
- The Applicant will designate an employee to serve as the on-call Emergency Coordinator who fully comprehends the ERP and would be prepared to enact the ERP in the event of an emergency.
- Minor leaks or spills of fluids from construction equipment will be quickly contained and cleaned up.
- All hazardous materials will be used, transported, and disposed of in accordance with applicable safe handling and disposal regulations.

2.7.10 Traffic and Transportation

- Project personnel will coordinate that movement of any required oversized load on Imperial County roads with the Imperial County Department of Public Works (ICDPW) and/or on State highways with the California Department of Transportation (Caltrans) and the El Centro California Highway Patrol office. Transportation of oversized equipment will be minimized to the greatest extent feasible. Oversized equipment and/or large vehicles which impose greater than legal roads on riding surfaces, including bridges, shall require a transportation permit.
- The project shall consider traffic safety in transporting equipment and materials to the permitted facilities to include temporary signs warning motorists on adjacent roadways and flagmen shall be used when equipment is being brought to and from the project site.
- The project shall coordinate with DPW for any requested dedication of rights-of-way needed for Dogwood Road and/or Ware Road for the consideration of existing and any future road needs.

- The project shall file for an encroachment permit for any work or proposed work in the affected County or Caltrans Road rights-of-way and for any and all new, altered or unauthorized existing driveway(s) to access the lot or lots and for any proposed road crossings.

2.8 Required Project Approvals

2.8.1 Imperial County

The following are the primary discretionary approvals required for implementation of the project:

1. **Approval of CUP.** Implementation of the project would require the issuance of a CUP (No. 25-0010) by the County to allow for the construction and operation of the proposed 20 MW solar energy facility and one of the three interconnection line routes from the solar facility to the existing Heber 1 Geothermal Plant. The project site would be located on a privately-owned legal parcel zoned General Agricultural with a Geothermal Energy Zone Overlay in an Urban Area (A-2-G-U).

   Pursuant to Title 9, Division 5, Chapter 8, the following uses are permitted in the A-2 zone subject to approval of a CUP from Imperial County:

   - *Electrical generation plants (less than 50 MW) excluding nuclear or coal fired and meeting requirements in Division 17.*
   - *Facilities for the transmission of electrical energy (100—200 kv).*
   - *Major Geothermal projects as per Division 17.*
   - *Resource extraction and energy development as per Division 17.*

2. **Certification of the EIR.** After the required public review for the Draft EIR, the County will respond to written comments, edit the document, and produce a Final EIR to be certified by the Planning Commission and Board of Supervisors prior to making a decision on approval or denial of the project.

   Subsequent ministerial approvals may include, but are not limited to:

   - Grading and clearing permits
   - Building permits
   - Encroachment permits
   - Transportation permit(s)

2.8.2 Discretionary Actions and Approvals by Other Agencies

Responsible Agencies are those agencies that have discretionary approval over one or more actions involved with development of the project. Trustee Agencies are state agencies that have discretionary approval or jurisdiction by law over natural resources affected by a project. These agencies may include, but are not limited to the following:

- California RWQCB – Notice of Intent for General Construction Permit, CWA 401 Water Quality Certification
- ICAPCD – Fugitive Dust Control Plan, Rule 801 Compliance
- CDFW (Trustee Agency) – ESA Compliance, Section 1600 Streambed Alteration Agreement

- USFWS – ESA Compliance
- USACE – Section 404 of the CWA Permit

APPLICANT SUBMITTAL

EEC ORIGINAL PKG

May 6, 2025

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

Subject: Conditional Use Permit Application for the Heber 1 Parasitic Solar Project
602 Dogwood Road, Heber, CA (APN 059-020-001)

Dear Mr. Minnick:

The Heber Field Company, LLC (Applicant; a subsidiary of Ormat Nevada Inc. [Ormat]) proposes to develop a 20 megawatt (MW; net generation) solar energy facility that will provide parasitic load to the existing Heber 1 geothermal energy facility (Heber 1 Plant) via a new medium voltage cable. As a behind-the-meter parasitic solar facility, the proposed solar field would serve as an extension of the existing Heber 1 geothermal facility. The solar facility would be developed on APN 059-020-001, which is owned by the Applicant.

The following materials are enclosed for Imperial County Planning and Development Services' (ICPDS) review, comment, and determination on the permitting requirements for the proposed solar development:

- CUP Application Form and Fee
- Imperial County Planning and Development Services General Indemnification Agreement
- Attachment A – Figures and Site Plan
- Attachment B – Project Description (Project Location & Site Access; Project Objectives; Project Benefits; Site Description; Zoning & Conformance; Facility Descriptions; Construction Schedule; Construction Equipment and Noise; Abandonment; Environmental Protection Measures)
- Attachment C – Site Photographs
- Attachment D – Water Quality Management Plan
- Attachment E – Imperial County Reclamation Plan

We are in the process of preparing the following technical resource reports to support the CEQA process. We anticipate submitting the following reports and documents by the end of August 2025, as follows:

- Draft CEQA Document
- Preliminary Jurisdictional Determination
- Biological Resources Report
- Burrowing Owl Report
- Cultural Resources Report
- Avian Point Count Report
- Bat Count/Presence Report
- Air Quality/GHG Emissions Technical Memorandum
- Glint and Glare Model and Assessment
- Geotechnical Memorandum

- Transportation Impact Technical Memorandum
- Noise Impact Technical Report
- Visual Resources Baseline and Sensitivity Analysis

Thank you and please contact me if you have any questions regarding the proposed project or this CUP Application.

Sincerely,

Alissa Sanchez
Director Business Development - Environmental Permitting
ORMAT Technologies, Inc.
PHONE: (775) 356-9029 (ext. 32234)
EMAIL: asanchez@ormat.com

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (442) 265-1736

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

1. PROPERTY OWNER'S NAME Heber Field Company	EMAIL ADDRESS asanchez@ormat.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 947 Dogwood Road, Heber, CA	ZIP CODE 92249	PHONE NUMBER 775-356-9029, ext. 32234
3. APPLICANT'S NAME Heber Field Company	EMAIL ADDRESS asanchez@ormat.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 947 Dogwood Road, Heber, CA	ZIP CODE 92249	PHONE NUMBER 775-356-9029, ext. 32234
4. ENGINEER'S NAME CA. LICENSE NO. Avi Lessner	EMAIL ADDRESS alessner@ormat.com	
5. MAILING ADDRESS (Street / P O Box, City, State) 6140 Plumas Street, Reno, NV	ZIP CODE 89519	PHONE NUMBER 775-356-9029

6. ASSESSOR'S PARCEL NO. 059-020-001	SIZE OF PROPERTY (in acres or square foot) ~230 acres	ZONING (existing) A-2-G-SPA
7. PROPERTY (site) ADDRESS 602 Dogwood Road, Heber, CA 92249		
8. GENERAL LOCATION (i.e. city, town, cross street) Heber, near intersection of Dogwood Road and W. Cole Road		
9. LEGAL DESCRIPTION Track 44, Township 16 South, Range 14 East; SBB&M		

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

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail) Parasitic solar facility for existing Heber 1 geothermal power plant.	
11. DESCRIBE CURRENT USE OF PROPERTY	Alfalfa cultivation, geothermal wells/pipeline, vacant residence, canals
12. DESCRIBE PROPOSED SEWER SYSTEM	No changes to existing sewer system
13. DESCRIBE PROPOSED WATER SYSTEM	No changes to existing water system
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	Fire response system for solar facilities
15. IS PROPOSED USE A BUSINESS? ☒ Yes ☐ No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? Approximately 10-15 for construction, none for operations

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

Alissa Sanchez — Print Name
June 9, 2025 — Date
Alissa Sanchez — Signature

Print Name — Date
Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN
B. FEE
C. OTHER
D. OTHER

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

CUP # 25-0010
I525-0024

EEC ORIGINAL PKG

ATTACHMENT "A"

STATEMENT OF NOTIFICATION

I, the undersigned, have notified all owners of the possessory interest in the land of the proposed use (s) or potential uses identified in Item No. 26 of the Reclamation Plan.

Signed this 29th day

of July, ~~2005.~~ 2025

Robert E. Adams

Operator or Operator's Agent

ATTACHMENT "B"

STATEMENT OF RESPONSIBILITY

I, the undersigned, hereby agree to accept full responsibility for reclaiming all mined lands as described and submitted herein with any modifications requested by the County of Imperial as conditions of approval.

Signed this 29th day

of July, ~~2005.~~ 2025

Operator or Operator's Agent

MAIN OFFICE: 801 Main Street El Centro, CA 92243 (760) 482-4236 FAX: (760) 353-8338 E-MAIL: planning@imperialcounty.net
ECON. DEV. OFFICE: 838 Main Street El Centro, CA 92243 (760) 482-4900 FAX: (760) 337-8507

IMPERIAL COUNTY PLANNING & DEVELOPMENT SERVICES
GENERAL INDEMNIFICATION AGREEMENT

As part of this application, applicant and real party in interest, if different, agree to defend, indemnify, hold harmless, and release the County of Imperial ("County"), its agents, officers, attorneys, and employees (including consultants) from any claim, action, or proceeding brought against any of them, the purpose of which is to attack, set aside, void, or annul the approval of this application or adoption of the environmental document which accompanies it. This indemnification obligation shall include, but not be limited to, damages, costs, expenses, attorney fees, or expert witness fees that may be asserted by any person or entity, including the applicant, arising out of or in connection with the approval of this application, whether or not there is concurrent negligence on the part of the County, its agents, officers, attorneys, or employees (including consultants).

If any claim, action, or proceeding is brought against the County, its agents, officers, attorneys, or employees (including consultants), to attack, set aside, void, or annul the approval of the application or adoption of the environmental document which accompanies it, then the following procedures shall apply:

1. The Planning Director shall promptly notify the County Board of Supervisors of any claim, action or proceeding brought by an applicant challenging the County's action. The County, its agents, attorneys and employees (including consultants) shall fully cooperate in the defense of that action.

2. The County shall have the final determination on how to best defend the case and will consult with applicant regularly regarding status and the plan for defense. The County will also consult and discuss with applicant the counsel to be used by County to defend it, either with in-house counsel, or by retaining outside counsel provided that the County shall have the final decision on the counsel retained to defend it. Applicant shall be fully responsible for all costs incurred. Applicant shell be entitled to provide his or her own counsel to defend the case, and said independent counsel shall work with County Counsel to provide a joint defense.

Executed at 947 Dogwood Road, Heber, California on May 24, 2024, 201____

APPLICANT

Name: Heber Field Company (ORMAT subsidiary)

By Alissa Sanchez

Title Env. Manager

Mailing Address:

947 Dogwood Road, Heber, CA 92249

REAL PARTY IN INTEREST
(If different from Applicant)

Name _____

By _____

Title _____

Mailing Address:

ACCEPTED/RECEIVED BY _____ Date _____

PROJECT ID NO _____ APN ___ ___ ___-___ ___ ___-___ ___

S:\FORMS _ LISTS\General Indemnification FORM 041516.doc

EEC ORIGINAL PKG

IMPERIAL COUNTY PLANNING & DEVELOPMENT SERVICES
GENERAL INDEMNIFICATION AGREEMENT

As part of this application, applicant and real party in interest, if different, agree to defend, indemnify, hold harmless, and release the County of Imperial ("County"), its agents, officers, attorneys, and employees (including consultants) from any claim, action, or proceeding brought against any of them, the purpose of which is to attack, set aside, void, or annul the approval of this application or adoption of the environmental document which accompanies it. This indemnification obligation shall include, but not be limited to, damages, costs, expenses, attorney fees, or expert witness fees that may be asserted by any person or entity, including the applicant, arising out of or in connection with the approval of this application, whether or not there is concurrent negligence on the part of the County, its agents, officers, attorneys, or employees (including consultants).

If any claim, action, or proceeding is brought against the County, its agents, officers, attorneys, or employees (including consultants), to attack, set aside, void, or annul the approval of the application or adoption of the environmental document which accompanies it, then the following procedures shall apply:

1. The Planning Director shall promptly notify the County Board of Supervisors of any claim, action or proceeding brought by an applicant challenging the County's action. The County, its agents, attorneys and employees (including consultants) shall fully cooperate in the defense of that action.

2. The County shall have the final determination on how to best defend the case and will consult with applicant regularly regarding status and the plan for defense. The County will also consult and discuss with applicant the counsel to be used by County to defend it, either with in-house counsel, or by retaining outside counsel provided that the County shall have the final decision on the counsel retained to defend it. Applicant shall be fully responsible for all costs incurred. Applicant shell be entitled to provide his or her own counsel to defend the case, and said independent counsel shall work with County Counsel to provide a joint defense.

Executed at 947 Dogwood Road, Heber, California on July 29th, 2025

APPLICANT	***REAL PARTY IN INTEREST*** (If different from Applicant)
Name: Heber Field Company (ORMAT subsidiary)	Name _____
By Elizabeth Helms	By _____
Title: Corporate Secretary	Title _____
Mailing Address: 947 Dogwood Road, Heber, CA 92249	Mailing Address: _____

ACCEPTED/RECEIVED BY _____ Date _____

PROJECT ID NO _____ APN ___-___-___

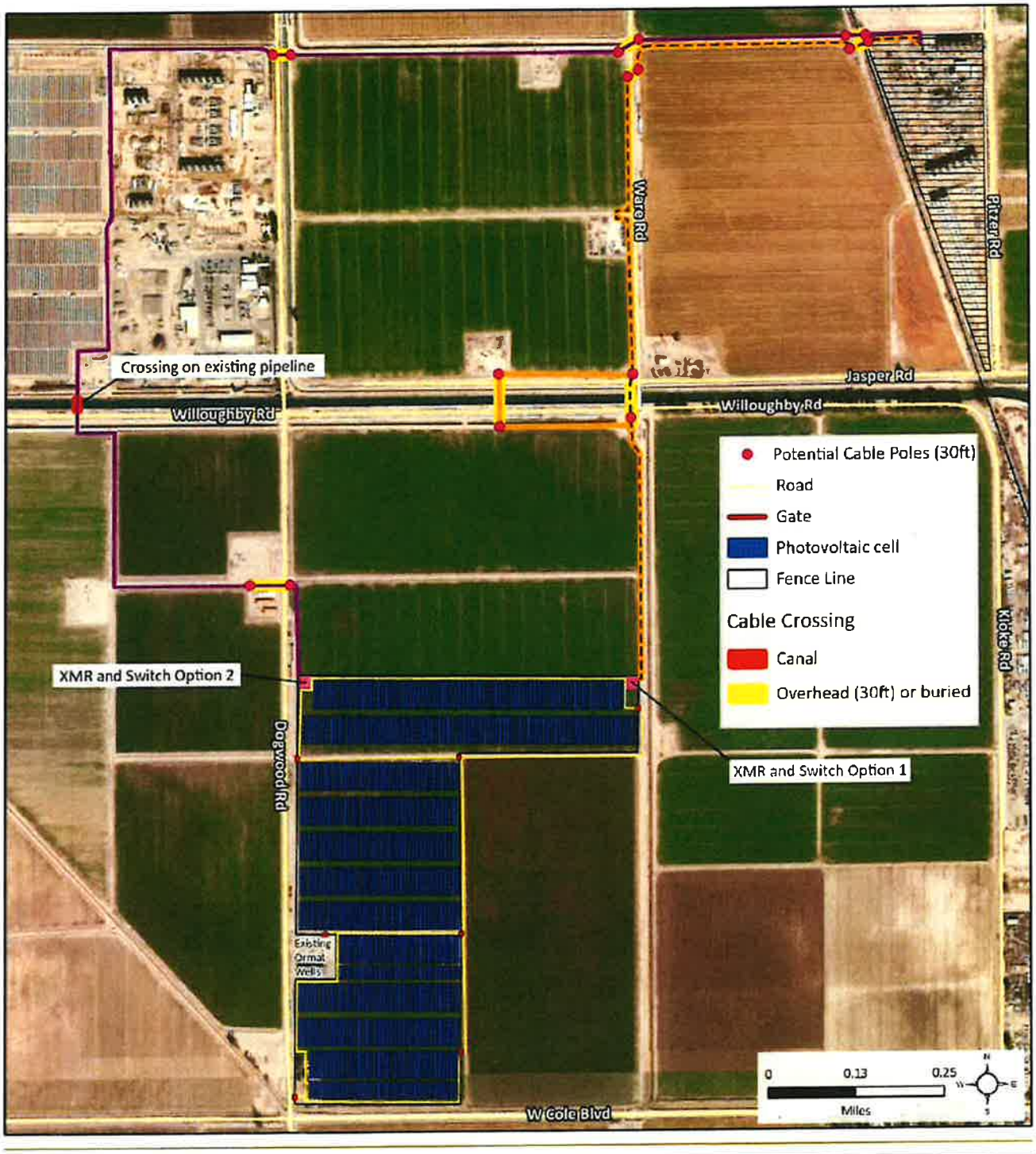
S:\FORMS _ LISTS\General Indemnification FORM 041516.doc

EEC ORIGINAL PKG

Attachment A

Figures

EEC ORIGINAL PKG

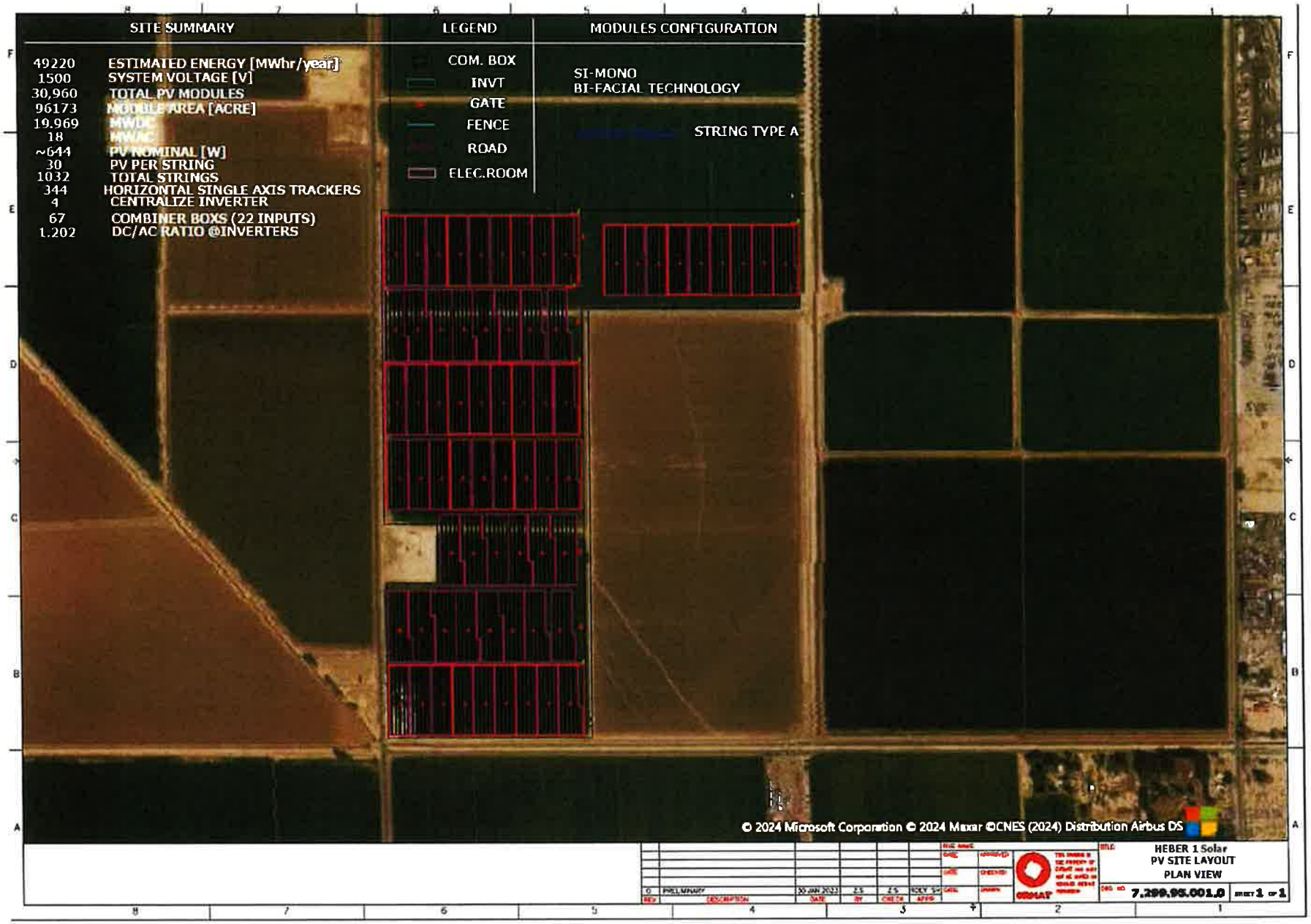


Legend

- Cable Route Option 1
- Cable Route Option 2
- Cable Route Option 3
- Heber 1 Geothermal Plant

SITE PLAN
HEBER 1 PARASITIC
SOLAR PROJECT

Catalyst



EEC ORIGINAL PKG

Attachment B

Project Description

Catalyst

INTRODUCTION

The Heber Field Company, LLC (Applicant; a subsidiary of Ormat Nevada Inc.), proposes to develop a 20 megawatt (MW; net generation) solar energy facility that will provide parasitic load to the existing Heber 1 geothermal energy facility (Heber 1 Plant) via a new medium voltage cable (Project). As a *behind-the-meter* parasitic solar facility, the proposed solar field would serve as an extension of the existing Heber 1 geothermal facility. The solar facility would be developed on APN 059-020-001 which is owned by the Applicant.

PROJECT LOCATION & ACCESS

The proposed 20 MW solar energy facility would be located on APN 059-020-001 at 602 Dogwood Road, Heber, CA. Three route options for the cable are proposed, of which only one would be developed, that would connect the new solar facility to the existing Heber 1 geothermal power plant, located on APN 054-250-036 at 895 Pitzer Road, Heber, CA (**Attachment A – Figures; Site Location**).

PROJECT OBJECTIVES

The objectives of the Heber 1 Parasitic Solar Project are to:

- Provide parasitic load to the existing Heber 1 geothermal plant for more efficient geothermal energy generation.
- Develop clean, renewable geothermal energy in the Heber Geothermal Zone pursuant to the Imperial County General Plan.
- Provide renewable baseload energy and capacity to assist the State of California with meeting the objectives of Senate Bill 100 (100% Clean Energy Act of 2018) and the State's Renewables Portfolio Standard program.

PROJECT BENEFITS

As provided in the list below, the Heber 1 Project would provide significant state and local benefits, including, but not limited to:

- Increasing the employment base of Imperial County by creating both construction and operations positions, pursuant to Goal 2 of the Imperial County Strategic Plan (2020).
- Increasing the Imperial County tax base.
- Displacing fossil fuel consumption within the State.
- Meeting the State's climate change goals by reducing emissions of greenhouse gases associated with electrical generation.
- Promoting stable retail rates for electric service.
- Meeting the State's need for a diversified and balanced energy generation portfolio.
- Meeting the State's resource adequacy requirements.
- Contributing to the safe and reliable operation of the electrical grid, including providing predictable electrical supply, voltage support, lower line losses, and congestion relief.

SITE DESCRIPTION

The solar site is presently used for agricultural (alfalfa) production, geothermal energy wells/pipeline, and a single residence owned by HFC (**Attachment B – Site Pictures**). Surrounding land uses in the Project vicinity are primarily for industrial facilities (i.e., aggregate/materials; geothermal energy), energy facilities, and agricultural cultivation. Agricultural operations are present on all sides of the proposed Project Site with geothermal well pads and

pipelines also present throughout the local vicinity. Imperial Irrigation District (IID) irrigation canals are also present throughout the Project vicinity.

ZONING & PROJECT CONFORMANCE

The Project Site is zoned as A-2-G-U, which includes the Geothermal Overlay Zone (G) and allows for "Major Geothermal Projects" to be permitted through a Conditional Use Permit (CUP) process. As a behind-the-meter parasitic solar facility, the proposed solar field would serve as an extension of the existing Heber 1 geothermal facility. Therefore, the proposed Project conforms to the standards and goals set forth in the Imperial County General Plan and the Renewable Energy and Transmission Element of County of Imperial General Plan (2015).

PROJECT DESCRIPTION

The Applicants propose the following actions:

- Twenty (20) megawatt (MW) solar photovoltaic field exclusively dedicated to providing parasitic load to the existing Heber 1 geothermal plant.
- Medium voltage cable from new solar facility to the Heber 1 geothermal plant. Three possible routes are proposed as alternatives from the solar facility to the geothermal plant.
- Demolition of a single-family home for solar development.

As provided in Table 1 below, the total project disturbance from the proposed development varies from 114.9 to–to 121.5 acres depending on the cable route/alternative. The figures in **Attachment A** provide a site plan of the proposed facilities and brief descriptions of each facility are provided below.

Table 1 – Heber 1 Parasitic Solar Project Disturbance Estimate

Facility	*Disturbance (Acres)*
Parasitic Solar Field	106.2
Medium Voltage Cable*	
Route Option 1	11.1
Route Option 2	8.7
Route Option 3	15.3

Notes: *assumes a 25-foot disturbance width.

Site Preparation

The Heber 1 solar site is currently used for alfalfa cultivation, geothermal energy wells/pipelines, and irrigation canals. After the crops are collected, the site would be cleared and a chain-link security fence would be installed around the solar construction site. To ensure the proposed facilities are situated on safe and stable surfaces, minor excavation and compaction activities would be performed. Material and equipment staging areas would be established on-site. The staging area would include an airconditioned temporary construction office, a first-aid station and other temporary facilities including, but not limited to, sanitary facilities, worker parking, 10,000-gallon water storage tank, truck loading and unloading, and a designated area for assembling the support structures for the placement of PV modules. On-site soil that has been piled during excavation will be used as backfill material, as necessary. Only soil free of debris and deleterious matter would be used as backfill material. The proposed facilities would be placed on shallow spread footers and wall footers to support the structures. All

site preparation and fill placement activities will be monitored by a qualified geotechnical engineer to detect undesirable materials and/or site conditions that may arise during site preparation.

Parasitic Solar Energy Facility

The 20 MW solar photovoltaic energy field would be developed to provide parasitic load to the existing Heber 1 Plant. These solar facilities are proposed as exclusive *behind-the-meter* and would provide supplemental energy directly to the Heber 1 geothermal units (OEC); this energy would not be sold or enter the transmission grid. The solar facility would effectively allow for the more efficient generation of geothermal energy.

XMD Switch and Medium Voltage Cable

The energy generated by the solar facility would be collected at an on-site XMD switch and transmitted along a medium voltage cable. Three route options are proposed to connect the solar facility to the Heber 1 geothermal facility (**Attachment A – Figures; Proposed Project**). Only one route would be developed, and the final route would be selected as result of the CEQA process. To minimize ground-disturbance, the cable would be attached via trays to existing pipelines as feasible, but the Applicant is also open to burying the cable, as feasible, to minimize impacts. The XMD switch would be located on either the northwest or northeast corner of the Project Site, depending on which cable route alternative is selected.

Route 1 – the medium voltage cable would exit the northeast corner of the solar site and travel north along an existing raised berm. The cable would either be directionally buried or strung on monopoles to cross the Central Main Canal and Willoughby Road. The cable would continue along Ware Road for approximately a third of a mile where it would meet an existing pipeline alignment that runs to the Heber 1 Plant. All road, canal, and rail crossings would be overhead via 30' monopoles or would be directionally buried underground if feasible.

Route 2 – the medium voltage cable would exit the northeast corner of the solar site and travel north along an existing raised berm. Before Willoughby Road, the cable would turn west for approximately 0.15 miles and then the cable would either be directionally buried or strung on monopoles to cross Willoughby Road and the Central Main Canal to an existing geothermal well pad. The cable would run east along an existing pipeline alignment and then turn north along the same pipeline alignment along Ware Road for approximately a third of a mile where it would meet an existing pipeline alignment that runs to the Heber 1 Plant. All road, canal, and rail crossings would be overhead via 30' monopoles or would be directionally buried underground if feasible.

Route 3 – the medium voltage cable would cross Dogwood Road and be attached via trays to the existing pipeline that runs west before turning north to cross the Beech Drain and Main Canal at the existing above-ground pipeline crossing. The cable would continue to follow the existing pipeline alignment to the Heber Geothermal Energy Complex and travel along the northern boundary to exit the HGEC's northeast corner. The cable would not connect to any HGEC energy facilities, simply pass through the site. The cable would then cross back over Dogwood Road and continue down an existing pipeline alignment to the Heber 1 Plant. All road and rail crossings would be overhead via 30' monopoles or would be directionally buried underground if feasible.

Water Use and Source

Water required for facility construction activities, including grading and dust control, will be obtained from the Applicant's existing contract with IID. Up to 5,000 gallons per day (gpd) of water will be required for the first 2-4 months of development of the facility. Approximately 2,000 gpd will be consumed during the remaining development schedule of approximately 12-18 months. Thus, approximately 1.1 million gallons of water (10.1 acre-feet) will be used on-site during construction with also a 10,000-gallon storage tank for fire readiness. Once

operating, up to approximately 325 gpd (0.36 acre-feet per year) of non-potable water will be required and provided by the Applicant's existing IID contract/allocation.

Construction Schedule

As provided in the table below, the Project is anticipated to take 16 to 18 months to install, test, and become fully operational. Construction will commence immediately after all permits are secured.

Project Phasing Table

Project Activity/Phase	Duration	Total Duration
Site Preparation	1-2 months	16 to 18 months
Project Construction	11-12 months	
Switch Development and Connection	4 months	

Construction Equipment and Noise

Heavy construction equipment, including drill rigs, drilling equipment, semi-truck trailers, flatbed trucks, forklifts, excavators/bulldozers, rollers, and cranes will be used to deliver and place the proposed facility equipment on the Project Site. Smaller powered hand tools, such as drills, compressors, and welding equipment will also be used. Employee vehicles will be used to transport workers to the Project Site and parked at the designated parking locations.

During construction, noise emissions will be periodic and temporary, depending on the use of heavy equipment. Smaller hand tools will be used consistently during the construction phase.

Construction activities will be limited to 7:00am through 7:00pm. Construction noise from Project development will not exceed the County threshold of 75 decibels at any time of (County of Imperial Codified Ordinances § 90702.00 – Sound Level Limits). There are no sensitive receptors (i.e., schools, churches, hospitals, parks, etc.) in close proximity (i.e., within 1 mile radius) to the Project Site. The closest residence is approximately 2,000 feet (approximately 1/3 mile) to the north of the solar site.

Abandonment

At the end of the Project's useful life, all equipment and facilities will be properly abandoned and dismantled. The solar site will be returned to its existing use for agricultural production or open space.

Environmental Protection Measures

All Applicant and contractor personnel will be informed of ORMAT's policy regarding environmental protection, safety plans, and emergency response protocols. Collectively, these measures minimize unintended impacts and events as result of facility construction and operation.

Surface and Ground Water Quality

- A draft Water Quality Management Plan (WQMP) is attached to this application for both the construction and operations phases of the Project. The WQMP includes numerous "good housekeeping" and preventative maintenance, employee training, safe handling/storage, and spill response measures to prevent and minimize any unintended releases.
- The site will be designed and prepared to provide adequate stormwater conveyance and/or infiltration.

- Any spills or unintended releases of chemicals used during Project construction and/or operation will be cleaned up with the appropriate materials (i.e., absorbent pads, foams/gels) and the affected area remediated to prevent contact with groundwater resources.
- No vehicle fueling or maintenance will take place on exposed soil.

Wildlife

- Speed limits of 5 mph will be observed on the site in order to minimize dust and avoid collision and incidental mortality of local wildlife.
- Burrowing owls were identified on the southern boundary of the Project Site. The following measures are being considered by the Applicant to minimize and avoid potentially significant impacts to the species and its habitat.
    - *Avoidance*. A primary goal is to design and implement projects to seasonally and spatially avoid negative impacts and disturbances that could result in take of burrowing owls, nests, or eggs. Avoidance measures may include but not be limited to:
        - Avoid disturbing occupied burrows during the nesting period, from 1 February through 31 August.
        - Avoid impacting burrows occupied during the non-breeding season by migratory or nonmigratory resident burrowing owls.
        - Avoid direct destruction of burrows through chaining (dragging a heavy chain over an area to remove shrubs), disking, cultivation, and urban, industrial, or agricultural development.
        - Place visible markers near burrows to ensure that farm equipment and other machinery does not collapse burrows.
        - Do not fumigate, use treated bait or other means of poisoning nuisance animals in areas where burrowing owls are known or suspected to occur (e.g., sites observed with nesting owls, designated use areas).
        - Restrict the use of treated grain to poison mammals to the months of January and February.
    - *Pre-construction avoidance surveys*. Surveys should be completed according to CDFW guidance within 14 days prior to site grading to detect any owls using the Project site at the time of construction and determine any additional avoidance measures required.
    - *Seasonal timing restrictions*. To the extent feasible, vegetation removal should take place outside of the breeding season, which is February 1 to August 31 (CDFW 2012). This would avoid harming owls during vegetation removal activities, which include grubbing, blading, and grading.
    - *Worker awareness program*. Develop and implement a worker awareness program to increase the onsite worker's recognition of and commitment to burrowing owl protection.
    - *Minimizing (Buffer areas)*. If burrowing owls and their habitat can be protected in place on or adjacent to a Project site, the use of buffer zones, visual screens, or other measures while project activities are occurring can minimize disturbance impacts. Conduct site-specific monitoring to inform development of buffers.

- *Biological monitoring*. Conduct biological monitoring to avoid disturbance to burrowing owls. Additionally, if any active burrowing owl nests are present within the Project construction area, they must be avoided by establishing a non-disturbance buffer until the young fledge or the nest fails (CDFW 2012). Any nesting owls that are adjacent to construction will also be avoided by establishing buffer areas. Buffer areas should be marked using flagging to facilitate avoidance.

Vegetation

- Vegetation control, including invasive species eradication, will be implemented to prevent growth under or near the proposed facilities.

Air Quality

- The Project will adhere to the Imperial County Air Pollution Control District's (ICAPCD) Regulation VIII, Fugitive Dust Rules, which are designed to mitigate PM10 emissions during construction.
- ORMAT shall submit a Construction Dust Control Plan and notify the ICAPCD 10 days prior to the start of any construction activities.
- Any equipment breakdown resulting in air emissions shall be reported to ICAPCD and promptly corrected (within 24 hours when possible).
- To minimize unnecessary emissions, Project equipment and worker vehicles shall be turned off when not in use and not left idling.
- Water shall be applied to the development site and during preparation and construction to control fugitive dust.
- Earth moving work shall be completed in phases (as necessary) to minimize the amount of disturbed area at one time.
- Construction vehicles and heavy equipment that use non-surfaced facility roads and areas will be restricted to 5 mph to control fugitive dust.
- During windy conditions, barriers shall be constructed and/or additional watering will occur to minimize fugitive dust.
- Vehicle access shall be restricted to the disturbance area via signage and/or fencing.
- Equipment shall be operated according to best practices and maintained according to design specifications.
- Construction equipment shall be equipped with an engine designation of EPA Tier 3 (Tier 3) if commercially available and feasible. If a Tier 3 engine is not certified for a particular piece of equipment or not commercially available, then the equipment shall be either equipped with a Tier 2 engine or equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides (NOx) and diesel particulate matter (DPM) to no more than Tier 2 levels. Prior to the issuance of a grading permit, ORMAT will submit a list of all construction equipment, including off road equipment, by make, model, year, horsepower, expected/actual hours of use, and EPA to the County Planning and Development Services Department and ICAPCD.
- The Project shall implement the following measures as part of its construction Best Management Practices (BMPs): providing Valley Fever awareness training for workers; providing respirators to workers when requested, including the provision of necessary training; use of closed-cab earth-moving vehicles

equipped with HEPA-filtered air systems; employee testing for Valley Fever as needed; and conducting earth-moving activities downwind of workers when possible.

Cultural Resources

- The Project Site is entirely disturbed so the probability of encountering an unanticipated cultural resource is low. As a safeguard, project construction personnel will monitor areas during surface disturbing activities. In the event any potential cultural or archaeological resources (e.g., bones, ceramics) are discovered, all construction affecting the discovery site will be suspended immediately until a qualified archaeologist has reviewed the findings. An Unanticipated Discoveries Plan will be prepared prior to resuming construction.

Waste Management

- Workers will be required to properly dispose of all refuse and trash to prevent any litter on the Project Site.
- During construction, portable chemical sanitary facilities will be used by all construction personnel. These facilities will be serviced by a local contractor.
- All construction wastes, liquid and solid, will be disposed of in compliance with all appropriate local, state, and federal disposal regulations.
- Solid wastes will be disposed of in an approved solid waste disposal site in accordance with Imperial County Environmental Health Department requirements. Waste will be routinely collected and disposed of at an authorized landfill by a licensed disposal contractor.

Fire Prevention

- An Emergency Response Plan covering possible emergencies (e.g. blow-outs, major fluid spills, impacts due to earthquakes, and other emergencies) shall be maintained. At least one Emergency Coordinator, responsible for coordinating all emergency response measures, will be on call and able to quickly reach the Project at all times. The Emergency Coordinator shall be thoroughly familiar with all aspects of the Emergency Response Plan and have the authority to commit the resources needed to carry out the contingency plan. Adequate personnel and equipment shall be available to respond to emergencies and to ensure compliance with CUP conditions, including appropriate first aid employee training and other provisions during Project construction and operation. All construction equipment will be equipped with exhaust spark arresters.
- Safety Data Sheets for all known chemicals of concern will be maintained and available to workers and first responders.
- Personnel will not be allowed to smoke outside of designated areas.
- A list of emergency phone numbers will be available onsite.
- Adequate firefighting equipment (i.e., a shovel, a pulaski, standard fire extinguisher[s], and an ample water supply) will be kept readily available at each active construction site.
- Vehicle catalytic converters (on vehicles that enter and leave the construction site on a regular basis) will be inspected often and cleaned of all flammable debris.
- All cutting/welding torch use, electric-arc welding, and grinding operations will be conducted in an area free from vegetation. An ample water supply and shovel will be on hand to extinguish any fires created

from sparks. At least one person in addition to the cutter/welder/grinder will be at the work site to promptly detect fires created by sparks.

- A survey and analysis of the proposed fire suppression and detection equipment will be performed by a certified fire protection engineer to evaluate the proposed fire response system's performance. An evaluation of the proposed fire suppression and detection equipment in conjunction with existing equipment will also occur. A full report of findings will be provided to Imperial County Fire Department for review.
- An approved automatic fire detection system shall be installed as per the California Fire Code as adopted by the Imperial County Code. All fire detection systems shall be installed and maintained to the current fire code and regulations adopted by Imperial County.
- Fire Department access roads and gates will be in accordance with the current fire code adopted by Imperial County and the facility will maintain a Knox Box or a similar, Department-approved device for Site access.

Geotechnical and Geologic Hazards

- A formal geotechnical investigation of the Site's soil characteristics, seismic conditions, stormwater infiltration, site stability, and potential for liquefaction will be developed.

Public Health and Safety

- The Site is fenced to prevent unauthorized people and wildlife from accessing and tampering with the electrical equipment and facilities.
- Signage, such as "No Trespassing" and "Danger – High Voltage" warnings, will continue to be posted at the Site to provide notice to unauthorized people to keep out.
- ORMAT will designate an employee to serve as the on-call Emergency Coordinator who fully comprehends the ERP and would be prepared to enact the ERP in the event of an emergency.
- Minor leaks or spills of fluids from construction equipment will be quickly contained and cleaned up.
- All hazardous materials will be used, transported, and disposed of in accordance with applicable safe handling and disposal regulations.

Traffic and Transportation

- Project personnel will coordinate that movement of any required oversized load on Imperial County roads with the Imperial County Department of Public Works (ICDPW) and/or on State highways with the California Department of Transportation (CalTrans) and the El Centro California Highway Patrol office. Transportation of oversized equipment will be minimized to the greatest extent feasible. Oversized equipment and/or large vehicles which impose greater than legal roads on riding surfaces, including bridges, shall require a transportation permit.
- The Project shall consider traffic safety in transporting equipment and materials to the permitted facilities to include temporary signs warning motorists on adjacent roadways and flagmen shall be used when equipment is being brought to and from the Project Site.
- The Project shall coordinate with DPW for any requested dedication of rights-of-way needed for Dogwood Road and/or Ware Road for the consideration of existing and any future road needs.

- The Project shall file for an encroachment permit for any work or proposed work in the affected County or CalTrans road rights-of-way and for any and all new, altered or unauthorized existing driveway(s) to access the lot or lots and for any proposed road crossings.

Attachment C

Site Photographs

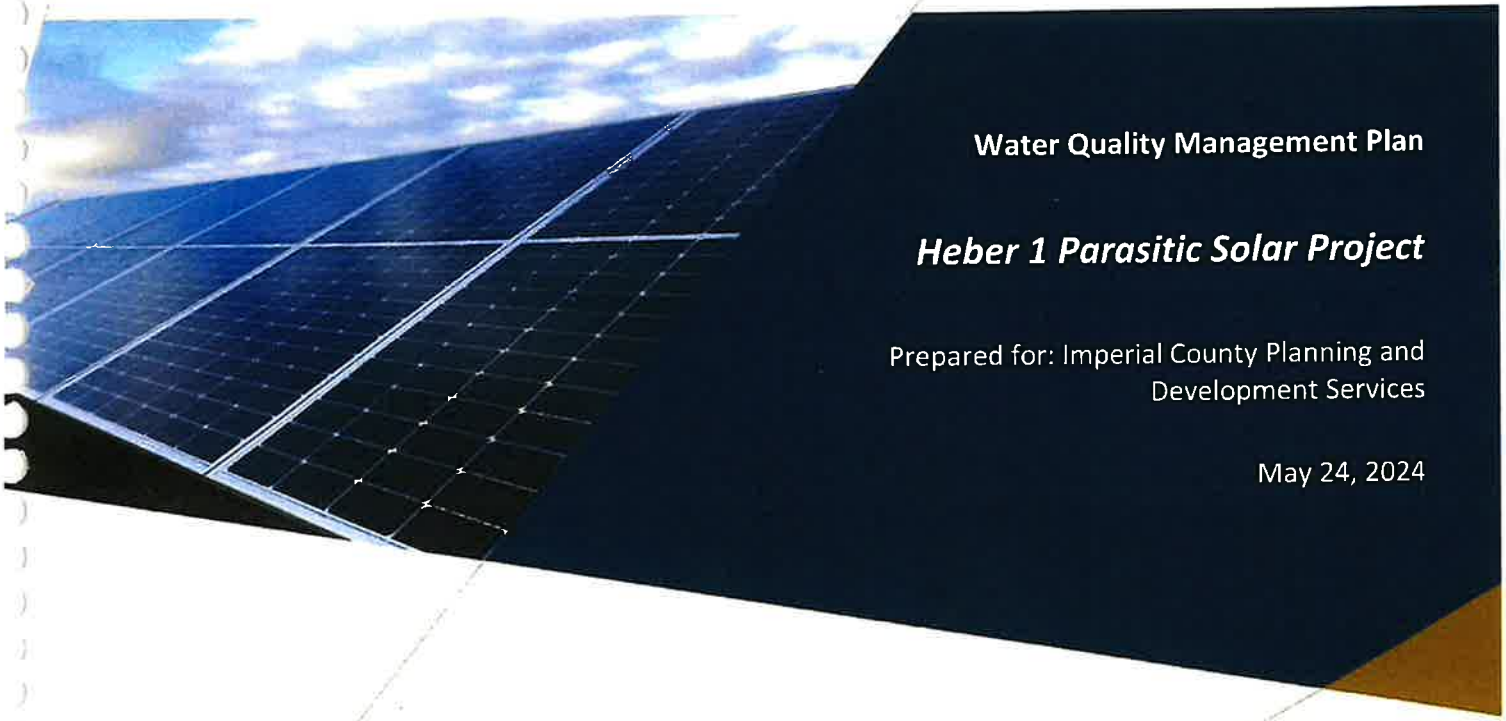
Catalyst
ENVIRONMENTAL SOLUTIONS

EEC ORIGINAL PKG

Attachment D

Water Quality Management Plan

Catalyst



Water Quality Management Plan

Heber 1 Parasitic Solar Project

Prepared for: Imperial County Planning and Development Services

May 24, 2024

Innovative solutions for a complex world

Catalyst

Document Information

Prepared for	Heber Field Company (a wholly owned subsidiary of Ormat Technologies, Inc.)
Project Name	Heber 1 Parasitic Solar Project APN 059-020-001
Address	ORMAT 6140 Plumas Street Reno, NV 89519-6075
Project Manager	Ben Pogue bpogue@ce.solutions
Project Engineer	Paden Voget, P.E. pvoget@ce.solutions State of California Professional Engineer #69238
Date	May 24, 2024

Professional Certification

Water Quality Management Plan

Heber 1 Parasitic Solar Project

This report has been prepared by Catalyst Environmental Solutions Corporation under the professional supervision of the Principal(s) and/or staff whose signature(s) appear hereon.

The scope of work and specifications are presented in accordance with generally accepted professional engineering practice and those of the California State Water Resources Control Board Order No. 2013-001-DWQ. There is no other warranty either expressed or implied.

Paden Voget, PE
State of California Professional Engineer #69238

May 2024

EEC ORIGINAL PKG

Project Owner's Certification

This Water Quality Management Plan (WQMP) has been prepared for Heber Field Company, LLC (HFC) (a subsidiary of Ormat Technologies, Inc. [ORMAT]) by Catalyst Environmental Solutions Corporation. This WQMP seeks compliance with the stormwater management requirements of the County of Imperial and the Phase II Small MS4 General Permit Imperial Valley Watershed. The undersigned, while it owns the subject property, is responsible for the implementation of the provisions of the site consistent with the Phase II Small MS4 Permit and the intent of the County of Imperial and the unincorporated community of Heber. Once the undersigned transfers its interest in the property, its successors in interest and the city/county/town shall be notified of the transfer. The new owner will be informed of its responsibility under this WQMP. A copy of the approved WQMP shall be available on the subject site in perpetuity.

"I certify under a penalty of law that the provisions (implementation, operation, maintenance, and funding) of the WQMP have been accepted and that the plan will be transferred to future successors."

Project Data			
Permit/Application Number(s):	New CUP for Heber 1 Parasitic Solar Project	Grading Permit Number(s)	N/A
Tract/Parcel Map Number(s):	APN 059-020-001	Building Permit Number(s)	N/A
CUP, SUP, and/or APN:			
Owner's Signature			
Owner Name:	Alissa Sanchez		
Title:	Senior Manager, Environmental Permitting		
Company:	ORMAT		
Address:	6140 Plumas Road, Reno, NV		
Email:	asanchez@ormat.com		
Telephone:	775-356-9029 ext. 32234		
Signature:		Date:	May 24, 2024

Table of Contents

Tables

Figures

SECTION 1 Project Description

Heber Field Company, LLC (Applicant; a subsidiary of Ormat Technologies, Inc. [ORMAT]), proposes to develop a 20 megawatt (MW; net generation) solar energy facility that will provide parasitic load to the existing Heber 1 geothermal energy facility (Heber 1 Plant) via a new medium voltage cable (Project) in unincorporated Imperial County (**Figure 1**). As a behind-the-meter parasitic solar facility, the proposed solar field would serve as an extension of the existing Heber 1 geothermal facility. The solar facility would be developed on APN 059-020-001 which is owned by the Applicant.

The Applicants propose the following actions:

- Twenty (20) megawatt (MW) solar photovoltaic field exclusively dedicated to providing parasitic load to the existing Heber 1 geothermal plant.
- Medium voltage cable from new solar facility to the Heber 1 geothermal plant. Three possible routes are proposed as alternatives from the solar facility to the geothermal plant.
- Demolition of a single-family home for solar development.

As provided in Table 1 below, the total project disturbance from the proposed development varies from 114.9 to– to 121.5 acres depending on the cable route/alternative.

Table 1: Heber 1 Parasitic Solar Project Disturbance Estimate

Facility	*Disturbance (Acres)*
Parasitic Solar Field	106.2
Medium Voltage Cable*	
Route Option 1	11.1
Route Option 2	8.7
Route Option 3	15.3

Notes: *assumes a 25-foot disturbance width.

Site Preparation

The Heber 1 solar site is currently used for alfalfa cultivation, geothermal energy wells/pipelines, and irrigation canals. After the crops are collected, the site would be cleared and a chain-link security fence would be installed around the solar construction site. To ensure the proposed facilities are situated on safe and stable surfaces, minor excavation and compaction activities would be performed. Material and equipment staging areas would be established on-site. The staging area would include an airconditioned temporary construction office, a first-aid station and other temporary facilities including, but not limited to, sanitary facilities, worker parking, 10,000-gallon water storage tank, truck loading and unloading, and a designated area for assembling the support structures for the placement of photovoltaic (PV) modules. On-site soil that has been stockpiled during excavation will be used as backfill material, as necessary. Only soil that is free of debris and deleterious matter would be used as backfill material. The proposed facilities would be placed on shallow spread footers and wall footers to support the structures. All site preparation and fill placement activities will be monitored by a qualified geotechnical engineer to detect undesirable materials and/or site conditions that may arise during site preparation.

Parasitic Solar Energy Facility

The 20 MW solar photovoltaic energy field would be developed to provide parasitic load to the existing Heber 1 Plant. These solar facilities are proposed as exclusive *behind-the-meter* and would provide supplemental energy directly to the Heber 1 geothermal units (i.e., OECs); this energy would not be sold or enter the transmission grid. The solar facility would effectively allow for the more efficient generation of geothermal energy.

XMD Switch and Medium Voltage Cable

The energy generated by the solar facility may be collected at an on-site XMD switch and transmitted along a medium voltage cable. There are three route options proposed to connect the solar facility to the Heber 1 Plant as illustrated in **Figure 2**. The intent of proposing three route alternatives is to obtain feedback from Imperial County or IID on potential impacts and land use implications of each route so that the preferred alternative(s) is submitted in the CUP Application. To minimize ground-disturbance, the cable would be attached via trays to existing pipelines as feasible, but the Applicant is also open to burying the cable, as feasible, to minimize impacts. The XMD switch would be located on either the northwest or northeast corner of the Project Site, depending on which cable route alternative is selected.

Route 1 – the medium voltage cable would exit the northeast corner of the solar site and travel north along an existing raised berm. The cable would either be directionally buried or strung on monopoles to cross the Central Main Canal and Willoughby Road. The cable would continue along Ware Road for approximately a third of a mile where it would meet an existing pipeline alignment that runs to the Heber 1 Plant. All road, canal, and rail crossings would be overhead via 30' monopoles or would be directionally buried underground if feasible.

Route 2 – the medium voltage cable would exit the northeast corner of the solar site and travel north along an existing raised berm. Before Willoughby Road, the cable would turn west for approximately 0.15 miles and then the cable would either be directionally buried or strung on monopoles to cross span Willoughby Road and the Central Main Canal to an existing geothermal well pad. The cable would run east along an existing pipeline alignment and then turn north along the same pipeline alignment along Ware Road for approximately a third of a mile where it would meet an existing pipeline alignment that runs to the Heber 1 Plant. All road, canal, and rail crossings would be overhead via 30' monopoles or would be directionally buried underground if feasible.

Route 3 – the medium voltage cable would cross Dogwood Road and be attached via trays to the existing pipeline that runs west before turning north to cross the Beech Drain and Main Canal at the existing above-ground pipeline crossing. The cable would continue to follow the existing pipeline alignment to the Heber Geothermal Energy Complex (HGEC) and travel along the northern boundary to exit the HGEC's northeast corner. The cable would not connect to any HGEC energy facilities, simply pass through the site. The cable would then cross back over Dogwood Road and continue down an existing pipeline alignment to the Heber 1 Plant. All road and rail crossings would be overhead via 30' monopoles or would be directionally buried underground if feasible.

Water Use and Source

Water required for facility construction activities, including grading and dust control, will be obtained from the Applicant's existing contract with IID. Up to 5,000 gallons per day (gpd) of water will be required for the first 2-4 months of development of the facility. Approximately 2,000 gpd will be consumed during the remaining development schedule of approximately 12-18 months. Thus, approximately 1.1 million gallons of water (10.1 acre-feet) will be used on-site during construction. A 10,000 gallon water storage tank may also be staged onsite for fire readiness. Once operating, up to approximately 325 gpd (0.36 acre-feet per year) of non-potable water will be required and provided by the Applicant's existing IID contract/allocation.

1.1 SITE LOCATION

The proposed 20 MW solar energy facility would be located on APN 059-020-001 at 602 Dogwood Road, Heber, CA (**Figure 1**). There are three route options proposed (refer to **Figure 2**), of which only one will be chosen, for the medium voltage cable that would connect the new Heber 1 solar facility to the existing Heber 1 geothermal power plant, located on APN 054-250-036 at 895 Pitzer Road, Heber, CA. The site is within the Heber quadrangle of the U.S. Geological Survey (USGS) 7.5" topographic map, and sits within Township 16 South, Range 14 East of the San Bernardino Base and Meridian in Imperial County, California.

1.2 LAND USE AND TOPOGRAPHY

The Project site is zoned as A-2-G SPA, for General Agriculture (A-2) and Geothermal Overlay Zone (G). The Project site lies at an elevation of approximately 5 feet below mean sea level (msl) in the Imperial Valley region of the California low desert. The surrounding properties lie on flat terrain, part of a large agricultural valley. The Site is currently cultivated and is actively disturbed as part of historic agricultural activities.

1.3 SITE GEOLOGY, HYDROGEOLOGY, AND SOILS

The part of Imperial County containing Heber lies within the Pliocene to Holocene, Q Geologic Unit (McCrink et al. 2011). Three natural geomorphic provinces underlay Imperial County, including the Peninsular Ranges, the Colorado Desert, and the Mojave Desert. The Colorado Desert geomorphic province spans central Imperial County and contains the Salton Sea and the Imperial valley. This Basin and Range province, sometimes referred to as the Salton Trough, is composed of a low-lying barren desert basin located between alluvium-covered, active branches of the San Andreas Fault containing Cenozoic sedimentary rocks and alluvial, lacustrine, and eolian deposits. The surface of sediments in the middle of the trough are about 275 feet below sea-level (bsl) (Digital Desert 2019).

Surface water in the area of the Site consists of canals and agricultural drains operated and maintained by the Imperial Irrigation District. Canals adjacent to the Project Site include Dogwood Canal, Beach Canal, Date Drain No. 3, and Beech Drain as illustrated in **Figure 3**. These canals ultimately drain to the Alamo River, a tributary to the Salton Sea. Surface runoff within the Project Site occurs primarily as sheetflow across the lot generally to the north, eventually flowing into the adjoining ditches.

The regional groundwater flow direction within the Imperial Valley is toward the Salton Sea, a closed basin with a surface elevation of approximately 225 feet below sea level. Groundwater flow in the Project area flows in a general northwest direction.

Imperial silty clay and Imperial Glembar silty clay loams dominate the project site surface, typically to a depth of 60 inches. These silty clays are considered moderately well drained (Natural Resources Conservation Service 2024).

1.4 HYDROMODIFICAITON APPLICABILITY

For construction of the parasitic solar field, limited grading is proposed for the Project that would not result in changes to the permeability of the site nor alter the existing drainage patterns. As such, the post-development runoff volume, time of concentration, and peak flow velocity would not be altered from that of the pre-development condition.

1.5 POTENTIAL STORMWATER POLLUTANTS

Table 2 summarizes expected stormwater pollutants of concern based on land use and site activities.

Table 2: Pollutants of Concern

Pollutant	Potential to Impact Stormwater (Y/N)	Additional Information and Comments
Pathogens (Bacterial/Virus)	N	--
Nutrients – Phosphorous	N	--
Nutrients - Nitrogen	N	--
Noxious Aquatic Plants	N	--
Sediment	Y	Overland flows over unpaved surface may result in sediment in stormwater runoff
Metals	Y	Leaks/spills in Project area may result in metals in stormwater runoff
Oil and Grease	Y	Leaks/spills in Project area may result in oil and grease in stormwater runoff
Trash/Debris	Y	Improperly disposed of trash/debris may result in trash in stormwater runoff
Pesticides/Herbicides	N	--
Other	N	--

SECTION 2 Best Management Practices

This section describes the Best Management Practices (BMPs) that will be implemented and maintained throughout the life of the project. The BMPs will be used to prevent and minimize water pollution that can be caused by stormwater runoff. **Table 3** details the BMPs selected to be implemented at the Project site based on the potential pollutants. Because the Project does not propose any changes to the existing stormwater volume, peak flow velocity, time of concentration or drainage patterns, no structural BMPs are proposed.

Table 3: Non-Structural Source Control BMPs

Pollutant Source	Pollutant	BMP	Existing?	New/Revised?
Stormwater run-on and runoff	Erosion, sediment, contaminated stormwater	• Stabilize drainage with rocks, gravel, vegetation, or riprap • Provide perimeter control to isolate sediment (loose dirt). Includes earthen berms, fiber rolls, silt fence, etc.	X	
Vehicle Track Out	Sediment, Dust	• Provide tracking control devise • Conduct street sweeping	X	
Work Areas	Trash	• Regularly monitor and clean trash • Provide employee training for good housekeeping	X	
Equipment Areas (PV panels, XMD Switch and cable)	Sediment	• Control drainage patterns with berms • Use water truck for dust control • Conduct routine inspections	X	X
Stored materials and equipment maintenance	Oil, grease, hydraulic fluid, anti-freeze, metals	• Provide good housekeeping training • Store materials in secondary containment • Spill kit and response training	X	

In addition to the activities listed above, the Applicant follows all approved operational guidelines that are currently in place. Temporary and permanent soil erosion control BMPs will be implemented in conformance with the BMP Fact Sheets provided in the California Stormwater Quality Association (CASQA) Stormwater Best Management Practice Handbook – Industrial and Commercial (2019).

2.1 NON-STRUCTURAL BMPS

Sections 3 through 10 provide prevention practices utilized to minimize the probability of pollution of stormwater discharge.

SECTION 3 Good Housekeeping

As a component of this program, good housekeeping practices are performed so that facility is kept in a clean and orderly condition. Proper housekeeping practices include:

- Periodic cleanup of equipment, as needed, based upon facility inspections,
- Sweeping impervious surfaces, as needed, based upon facility inspections,
- Proper waste disposal practices and covering of waste storage areas at all times,
- Proper storage and covering of materials at all times,
- Removal of any oil-stained soil/gravel, especially around equipment locations and loading areas,
- Cleaning of significant oil and grease stains on surfaces that drain to the stormwater drainage areas, and
- Cleaning the exterior of oil containers on hydraulic machinery upon discovery of an accumulation of hydraulic fluid.

SECTION 4 Preventative Maintenance

As a component of this program, operations and maintenance staff perform preventative maintenance of stormwater management devices to assure their proper operation. Preventative maintenance of stormwater management devices includes the following:

- Cleaning of accumulated sediment, potential contaminants, and debris from the Site;
- Inspection of secondary containment structures as part of the regular daily visual inspections;
- Maintenance and inspection of secondary containment structures, as needed, based upon inspections;
- Daily inspection and maintenance of equipment and associated piping and valves as required by preventive maintenance procedures;
- Inspection and maintenance of rainfall protection coverings for waste storage bins and receptacles on a periodic basis; and
- A comprehensive preventive maintenance schedule is performed on all facility operations equipment as part of routine procedures.

SECTION 5 Spill Response

Spill prevention and response is performed according to the facility's SPCC Plan. Copies of this plan are located in the ORMAT office at 947 Dogwood Road, Heber, CA.

A limited amount of spill cleanup equipment is stored onsite. This equipment is found within hazardous material storage areas. Detailed information concerning spill cleanup equipment and resources is included in the SPCC Plan.

The volume of containment areas surrounding each potential source is designed to hold the contents of a spill from the largest vessel / container. The SPCC Plan summarizes the capacity of potential sources and volume of the respective secondary containment areas.

SECTION 6 Material Handling and Storage

Construction and operation activities may include use and storage of common chemicals such as fertilizers, solvents, paints, cleaners, and automotive products. All hazardous waste generated onsite would be stored in 55-gallon drums and other Department of Transportation (DOT) approved packaging within a contained area located on the Site. Stormwater that accumulates within the hazardous material and hazardous waste containment area is collected via vacuum truck and disposed of off-site or recycled back into the production system. A bill of lading, non-hazardous waste manifest or uniform hazardous waste manifest is used to document all such shipments.

SECTION 7 Employee Training

A combined annual Storm Water Compliance / SPCC Plan training program is conducted for the Pollution Prevention Team members and operations personnel. Participants undergo stormwater management training for all areas and operations at this facility, as well as reviewing the spill response, control and countermeasure procedures. Other stormwater training is done on an as-needed basis.

SECTION 8 Waste Handling/Recycling

If any product or oily waste streams are transferred from the facility in 55-gallon drums, a bill of lading, non-hazardous waste manifest or uniform hazardous waste manifest must be used to document all such shipments. Operations or contractor personnel closely monitor loading of transport vehicles. Collection and satellite accumulation containers for hazardous and non-hazardous waste are kept covered to prevent contact with stormwater. Appropriate spill control equipment and supplies are kept readily available in case of a spill.

SECTION 9 Record Keeping and Internal Reporting

All inspection, sampling, maintenance, corrective action records, and any other information that is a part of this plan are maintained at the facility office. All records are maintained for a period of at least three (3) years.

SECTION 10 Erosion Control and Site Stabilization

Permanent BMPs used at the existing HGEC facility to prevent soil erosion include routing runoff along earthen swales or drainage areas, and preventing run-off with berms along certain sections of the property line. Temporary BMPs used at the Site to prevent soil erosion include the use of sandbags, crushed rock, and silt fence. These BMPs are used as and where needed, especially in areas that are undeveloped or in the process of being developed.

SECTION 11 Operation and Maintenance Plan

The following non-structural water quality best management practices (BMPs) are proposed for the Project:

- Good Housekeeping
- Preventative Maintenance
- Spill Response
- Material Handling and Storage
- Employee Training
- Waste Handling/Recycling
- Record Keeping and Internal Reporting
- Erosion Control and Site Stabilization

11.1 MAINTENANCE RESPONSIBILITY

The Heber Field Company (subsidiary of ORMAT) is the property owner and is responsible for BMP maintenance. Since HFC/ORMAT is the owner, no access agreement or easement is necessary to maintain the BMPs. HFC/ORMAT funds will be used to support Operation and Maintenance (O&M) activities to maintain BMP functionality. HFC/ORMAT maintenance staff are expected to perform the maintenance.

11.2 MAINTENANCE ACTIONS AND FREQUENCY

Maintenance actions are generally grouped into two categories: routine and intermittent.

Routine Maintenance

Routine inspections of the Project facilities and grounds will be performed annually. During these inspections staff evaluate if there is significant accumulation of trash, debris, or sediment that would need to be removed. Cleaning is done as needed based on the results of the inspections. The inspection frequency may be adjusted based on experience at the site (e.g., if inspections rarely find any material that needs to be cleaned out, then the inspection frequency can be reduced).

Intermittent Maintenance

Intermittent maintenance activities include more substantial maintenance that is not required as frequently as routine maintenance. The most likely form of intermediate maintenance is removal of sediment from existing drainage infrastructure and detention basins where necessary to maintain the capacity of the basins. Given that the Project Site is pervious and will not be graded or significantly altered and that rain is infrequent in Heber, this type of maintenance is expected to be required approximately once every year.

11.3 MAINTENANCE PROCEDURES

During each maintenance visit, the maintenance crew will evaluate existing drainage paths and infrastructure by inspecting for the maintenance indicators in **Table 4**. When a maintenance indicator is observed, the action described in the "Maintenance Actions" column will be taken.

Note that regardless of the projected maintenance type (routine or intermittent) described in the previous section, when a maintenance indicator is observed, the required maintenance action will be taken. For example, if significant sediment accumulation is observed in year three instead, then the accumulated sediment will still be cleaned out, even though the estimated frequency was once every year.

Table 4: Maintenance Indicators and Actions for BMPs

Typical Maintenance Indicator	Maintenance Action
Erosion due to concentrated stormwater runoff flow	Repair eroded areas and make appropriate corrective measures such as adding berm or stone at flow entry points, or re-grading as necessary.
Accumulated sediment, litter, or debris	Remove and properly dispose of accumulated materials, without damage to stormwater drainage structures.
Standing water	Remove any obstructions or debris or invasive vegetation, loosing or replace top-soil to allow for better infiltration, or minor re-grading for proper drainage.
Obstructed inlet or outlet structures	Clear obstructions.
Damage to structural components such as inlet or outlet structures	Repair or replace as applicable.

SECTION 12 References

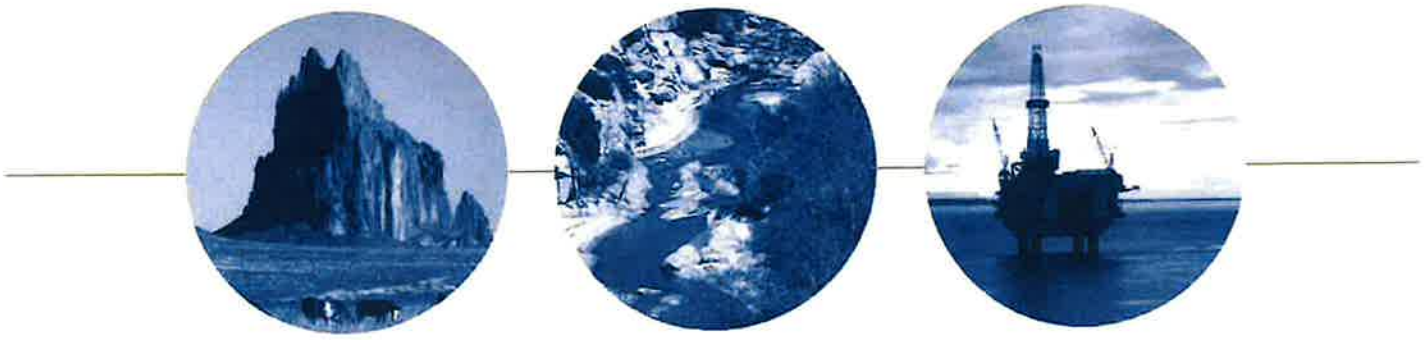
California Stormwater Quality Association (CASQA). 2019. Industrial and Commercial Best Management Handbook. 2019.

Digital Desert. 2019. Ecological Sections: Mojave Desert. Available online at: http://digital-desert.com/ecosections/322c.htm).

McCrink, T.P., Pridmore, C.L., Tinsley, J.C., Sickler, R.R., Brandenberg, S.J., and J.P. Stewart. 2011. Liquefaction and other ground failures in Imperial County, California, from the April 4, 2010, El Mayor–Cucapah earthquake: U.S. Geological Survey Open-File Report 2011–1071 and California Geological Survey Special Report 220, 94 p. pamphlet, 1 pl., scale 1:51,440. Available online at http://pubs.usgs.gov/of/2011/1071.

Natural Resources Conservation Service. 2024. Web Soil Survey. Available online at: https://websoilsurvey.nrcs.usda.gov/app/.

Figures



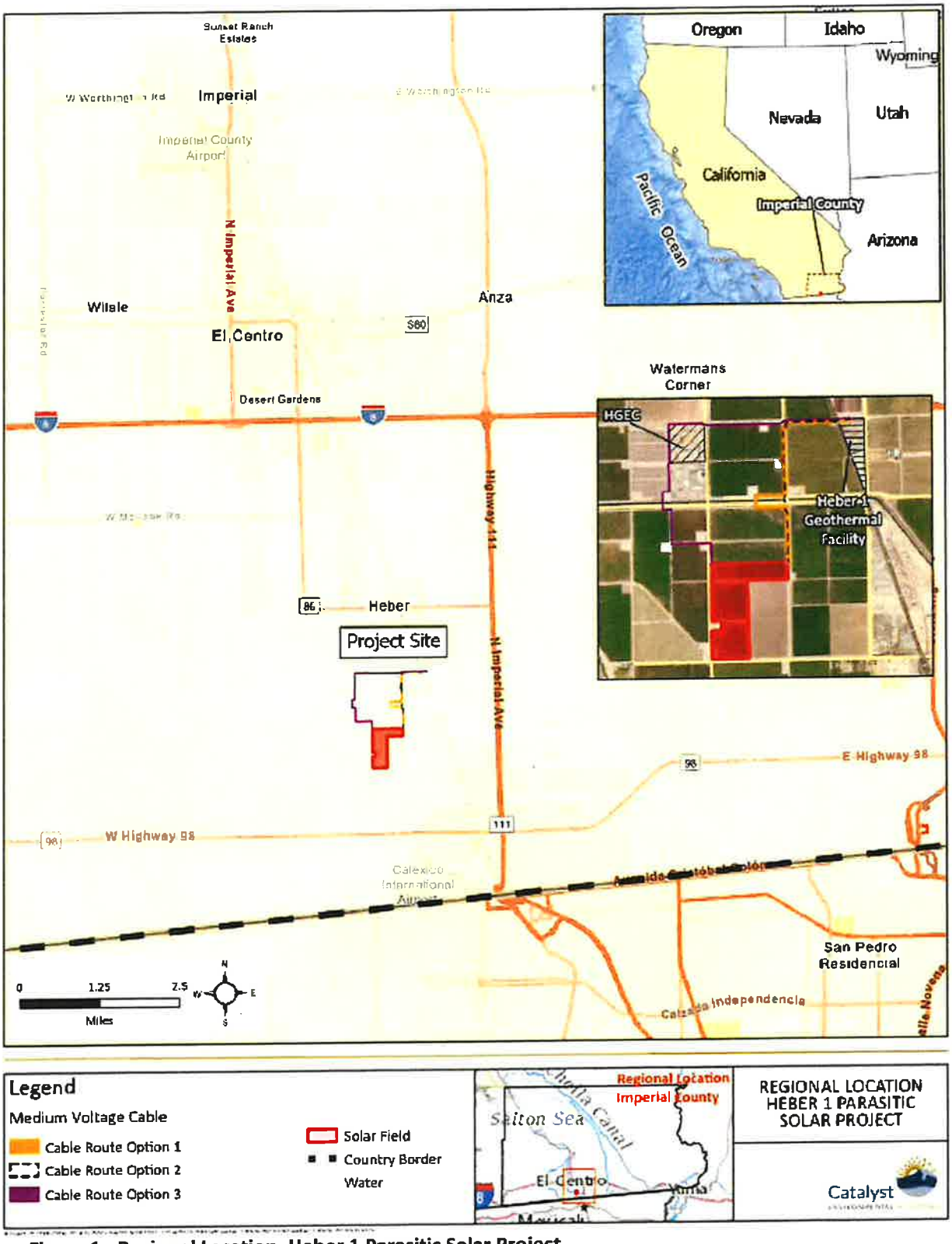


Figure 1: Regional Location, Heber 1 Parasitic Solar Project

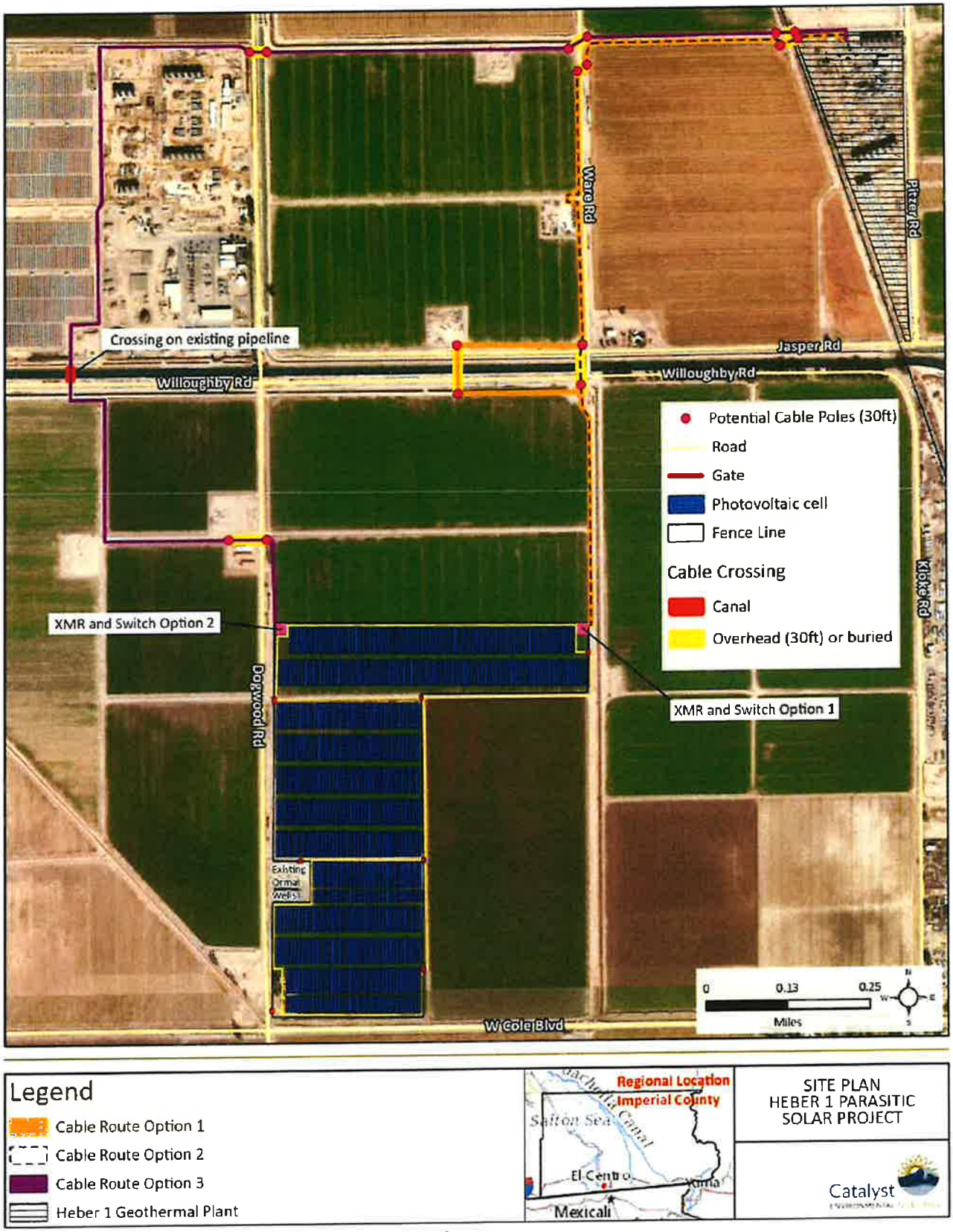
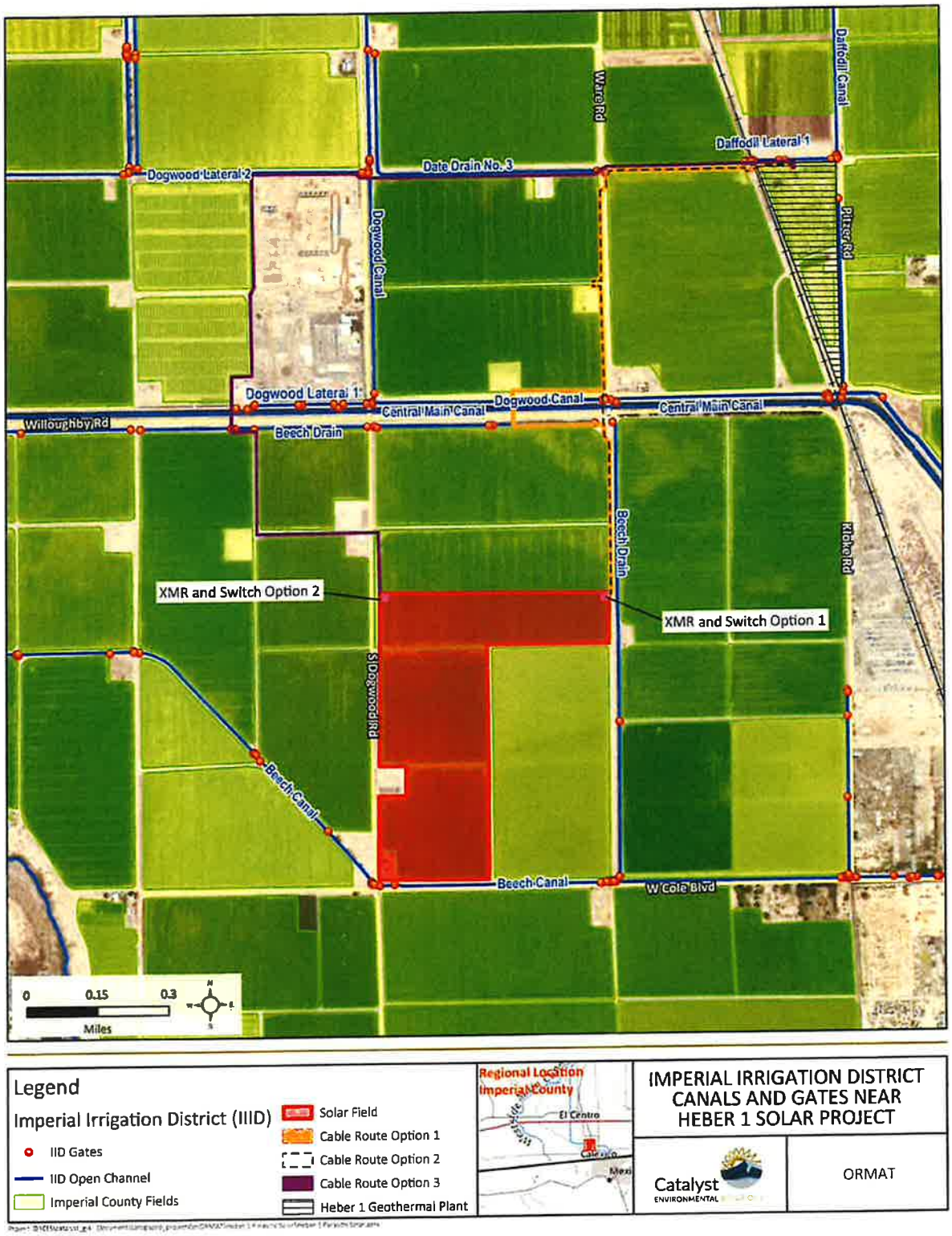


Figure 2: Site Plan, Heber 1 Parasitic Solar Project

Figure 3: IID Canals and Drains, Heber 1 Parasitic Solar Project



Attachment E

Imperial County Reclamation Plan

Catalyst
ENVIRONMENTAL SOLUTIONS

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES DEPARTMENT

Reclamation Plan Application

OWNER, OPERATOR AND AGENT:

1. Applicant (Name, Mailing Address and Telephone Number):
   Heber Field Company
   947 Dogwood Road, Heber, CA 92249

2. Property Owner (s), or owner of Surface Rights (Name, Mailing Address and Telephone Number): [if different from applicant]
   See 1

3. Owner of Mineral Rights (Name, Mailing Address and Telephone Number): [if different than applicant]
   See 1

5. Lessee (Name, Mailing Address and Telephone Number):
   N/A

6. Operator (Name, Mailing Address and Telephone Number): [if different than applicant]
   See 1

7. Agent of Process (Name, Mailing Address and Telephone Number):
Alissa Sanchez
6140 Plumas Street, Reno, NV 89519

LOCATION:

8. Legal Description: (must be full legal)
Track 44, Township 16 South, Range 14 East, SBB&M

Assessor Parcel No.: 059-020-001

Longitude: -115.529951

Latitude: 32.706665

Elevation: near zero

9. Size of the land(s) that will be affected by mining operation. Total acreage:
Approximately 121 acres

10. Describe existing and proposed access to the mine site: (please be specific)
alfalfa cultivation, access roads present throughout area

GEOLOGICAL BACKGROUND:

11. Mineral commodity to be minded:
N/A - solar energy

12. General Geological description of the area:
The site is located within the Piliocene to Holocene, Q Geologic Unit. The Colorado Desert geomorphic province spans central Imperial County, where the site is located, often referred to as the Salton Trough. Low-lying barren desert located between alluvium-covered, active branches of the San Andreas Fault.

13. Detailed description of the geology of the actual site in which surface mining is to be conducted:
Site is underlain by Cenozoic sedimentary rocks and alluvial, lacustrine, and eolian deposits. Surface sediments are about 275 feet below sea level.

14. Brief description of the environmental setting of the site and the surrounding areas. Existing land uses, soil, vegetation, ground water elevation and surface water characteristics.
site is entirely used for alfalfa cultivation with IID canals and geothermal wells and pipelines present throughout project area/vicinity.

MINING OPERATION AND PRODUCTION:

15. Proposed starting date of operation: October 2024

Estimated life of operation: 15-30 years

Termination Date: 2054

Duration of first phase: _____

Second phase: _____

Third phase: _____

Fourth phase: _____

16. Operation will be (include days and hours of operation):

Continuous: continous solar energy generation 24 hours/day, 7 days per week

Intermittent: _____

Seasonal: _____

EEC ORIGINAL PKG

17. Maximum anticipated annual production (Tons or Cubic Yards):
N/A

18. Total anticipated production:

Minerals: N/A cubic yards/tons 0

Tailings retained on site: cubic yards/tons 0

Tailings disposed off site: cubic yards/tons 0

Maximum anticipated depth (indicate on map location of benchmarks to verify mine depth):
N/A

19. Describe mining method:
N/A

20. Describe nature of processing and explain disposal of tailings or waste. N/A

21. Do you plan to use cyanide or other toxic materials in your operations? No

Do you plan to use or store petroleum products or other hazardous materials on the site?
No

Describe refueling and maintenance of vehicles.
Construction equipment will be fueled on-site, as necessary. Fuel will be limited to diesel and gasoline, to fuel heavy and light equipment. Repairs to construction equipment will be performed on-site by certified mechanics. Spill prevention BMPs and safe handling techniques will be employed throughout the construction phase

EEC ORIGINAL PKG

22. Indicate the quantity of water to be used, source of water, method of conveyance to the mine site, the quantity, quality and method of disposal of used and/or surplus water. Indicate if water well to be used for mine operation (drilling, reactivation, changing use or increasing volume of water well may require Conditional Use Permit approval).

Water will be used for construction and maintenance activities, not to exceed 2,000 gallons per day for dust control activities during construction. All water will be provided by the Applicant under its existing IID contract.

23. Describe phases of mining if applicable and concurrent reclamation including time schedule for concurrent activities.

N/A - interim reclamation activities will occur after the solar facilities are developed. Stored/piled topsoil would be used as backfill and spreading material.

24. Describe the types of equipment that will be used in the operation, including the estimated average daily trips (ADT) that will be generated by the operation.

Backhoes, excavators, trucks, light vehicles, compactors, hand tools, welding equipment, water truck, and light duty crane.

25. Include the following maps: (NOTE: Without these the application is automatically incomplete.)

(1) Topographic Map with overlay showing proposed area to be mined.

(2) Site Plan showing mine layout and dimensions.

(3) General Vicinity Map showing the location of the mine site in Imperial County.

(4) Cross Section Map.

RECLAMATION:

26. Indicate by overlay of map of Item No. 24, or by color or symbol on map those areas to be covered by the reclamation plan:

Total acreage: Approx. 121 acres

27. Describe the ultimate physical condition of the site and specify the proposed use (s) or potential uses of the land after reclamation. Explain if utilities, haul or access roads will be removed or reclaimed.

Currently used for agricultural production. Project proposes to develop a 20MW solar energy facility on the site. The site would be returned to a natural or arable state at the conclusion of the facility's life cycle.

28. Describe relationship of the interim uses than mining and the ultimate physical condition to:

(a) Imperial County Zoning Ordinance

(b) Imperial County General Plan

The site is zoned as A-2-G-SPA and is within the County Geothermal Energy Overlay Zone. The proposed parasitic solar facilities are consistent with the County General Plan and Zoning/Land Use Element.

29. Notarized statement that all owners of the possessory interest in the land have been notified of the proposed uses or potential uses identified in Item No. 25 (see Attachment "A").

Heber Field Company is a wholly owned subsidiary of ORMAT and no other parties have an interest in the property.

30. Describe soil conditions and proposed topsoil salvage plan.

Silty clays and loams. Used for alfalfa cultivation. All topsoils would be piled during construction and used for interim reclamation after the solar facilities are developed.

31. Describe the methods, their sequence and timing, to be used in bringing the reclamation of the land to its end state. Indicate on map (Items Nos. 24 and 25) or on diagrams as necessary. Include discussion of the pertinent items listed below.

(a) Backfilling and grading

(b) Stabilization of slopes

(c) Stabilization of permanent waste dumps, tailings, etc.

(d) Rehabilitation of pre-mining drainage

(e) Removal, disposal or utilization of residual equipment, structure, refuse, etc.

(f) Control and disposal of contaminants, especially with regard to surface runoff and ground water

(g) Treatment of streambeds and streambanks to control erosion and sedimentation

(h) Removal or minimization of residual hazards

(i) Resoiling, revegetation with evidence that selected plants can survive given the site's topography, soil and climate:

See Attachment D.

32. If applicant has selected a short term phasing of his reclamation, describe in detail the specific reclamation to be accomplished during the first phase:

Interim reclamation would include using stored topsoils as backfill and spreading material.

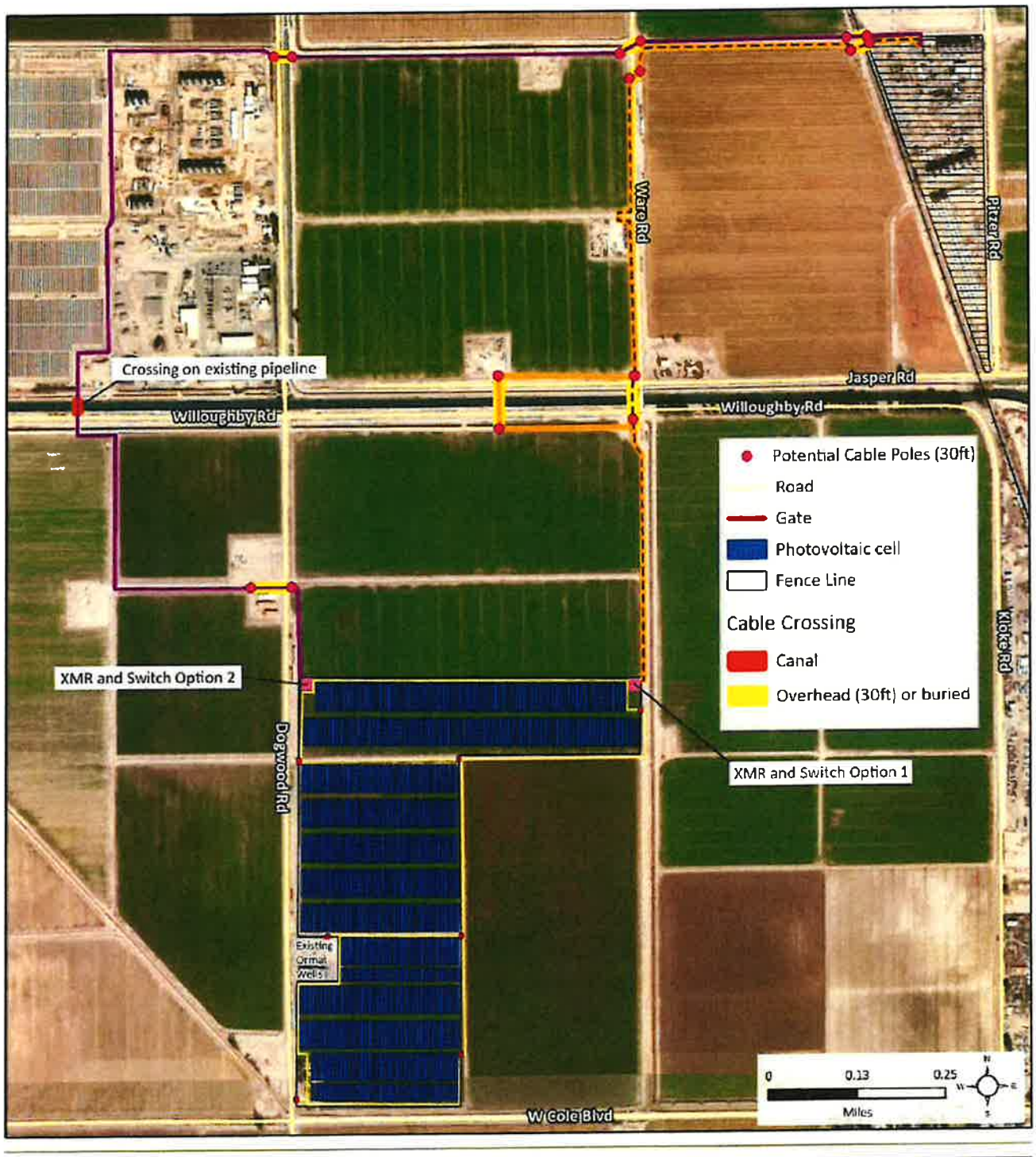
33. Describe how reclamation of this site in this manner may affect future mining at this site and in the surrounding area:

All solar facilities would be removed from the site and the site would be reclaimed back to a natural or arable state. Project would not impeded any future mining or geothermal operations on the site or in the vicinity.

34. Notarized statement that the person submitting the plan accepts responsibility for reclaiming the mined lands in accordance with the Reclamation Plan (Attachment "B"):
Attached.

35. Include Reclamation Cost Calculations as Attachment "C":
Attached.

36. Describe proposed Revegetation Plan (attach as "Attachment D" if necessary):
See Attachment D.



Legend

- Cable Route Option 1
- Cable Route Option 2
- Cable Route Option 3
- Heber 1 Geothermal Plant

SITE PLAN
HEBER 1 PARASITIC
SOLAR PROJECT

Catalyst

EEC ORIGINAL PKG

ATTACHMENT "A"

STATEMENT OF NOFICATION

I, the undersigned, have notified all owners of the possessory interest in the land of the proposed use (s) or potential uses identified in Item No. 26 of the Reclamation Plan.

Signed this _____ day

of _____, 2005.

_____

Operator or Operator's Agent

MAIN OFFICE: 801 Main Street El Centro, CA 92243 (760) 482-4236 FAX: (760) 353-8338 E-MAIL: planning@imperialcounty.net
ECON. DEV. OFFICE: 856 Main Street El Centro, CA 92243 (760) 482-4900 FAX: (760) 337-8907

ATTACHMENT "B"

STATEMENT OF RESPONSIBILITY

I, the undersigned, hereby agree to accept full responsibility for reclaiming all mined lands as described and submitted herein with any modifications requested by the County of Imperial as conditions of approval.

Signed this _____ day

of _____, 2005.

_____

Operator or Operator's Agent

MAIN OFFICE: 801 Main Street El Centro, CA 92243 (760) 482-4236 FAX: (760) 353-8338 E-MAIL: planning@imperialcounty.net
ECON. DEV. OFFICE: 836 Main Street El Centro, CA 92243 (760) 482-4590 FAX: (760) 337-8907

ATTACHMENT "C"

RECLAMATION COST ANALYSIS

MAIN OFFICE: 801 Main Street El Centro, CA 92243 (760) 482-4236 FAX: (760) 353-8538 E-MAIL: planning@imperialcounty.net
ECON. DEV. OFFICE: 836 Main Street El Centro, CA 92243 (760) 482-4900 FAX: (760) 337-8907

Catalyst
ENVIRONMENTAL SOLUTIONS

Reclamation Cost Estimate for Heber 1 Parasitic Solar Project

Date: May 24, 2024

RE: **Reclamation Cost Estimate for the Heber 1 Parasitic Solar Project**

This cost estimate has been prepared for the Heber 1 Parasitic Solar Project and provides a general estimate to perform well abandonment and site reclamation/revegetation for the entire 121-acre solar site.

Site Reclamation and Revegetation

- Cost of Reclaiming 120 acres

  $5,635/acre[2] for 120 acres = **$681,835**

References

[1] California Department of Conservation Oil, Gas, and Geothermal Resources. April 2019. California Code of Regulations, Section 1723. Available online at: https://www.conservation.ca.gov/index/Documents/DOGGR-SR-1%20Web%20Copy.pdf

[2] New Mexico Energy, Minerals, and Natural Resources Department. 2013. Guidance for Estimating Reclamation Costs. Available online at: http://www.emnrd.state.nm.us/MMD/MARP/documents/MMD_Part3FAGuidelines_Sept2013.pdf

Reclamation estimates provided in this document were increased by 15% to account for six years of inflation and potential contingency costs.

ATTACHMENT "D"

REVEGATION PLAN

(REVISED MARCH 25, 2005)
JH/lh/S:/forms_lists/reclamation plan aplication

MAIN OFFICE: 801 Main Street El Centro, CA 92243 (760) 482-4236 FAX: (760) 339-8238 E-MAIL: planning@imperialcounty.net
ECON. DEV. OFFICE: 836 Main Street El Centro, CA 92243 (760) 482-4900 FAX: (760) 337-8807

Catalyst
ENVIRONMENTAL SOLUTIONS

Revegetation Plan for Heber 1 Parasitic Solar Project

Date: May 24, 2024

From: Catalyst Environmental Solutions (on behalf of ORMAT)

RE: **Revegetation Plan for the Heber 1 Parasitic Solar Energy Project**

INTRODUCTION

The Heber Field Company LLC (Applicant; wholly owned subsidiary of Ormat Technologies, Inc. [Ormat]) proposes to develop a 20-megawatt (MW) solar energy facility that will provide a parasitic load to the existing Heber 1 geothermal power plant (Project). The solar energy would be transmitted to the existing Heber 1 power plant (ORMAT Energy Converter – OEC) via a medium voltage distribution cable.

This Revegetation Plan Application has been prepared as part of the CUP Application for the Heber 1 Parasitic Solar Project and pursuant to Imperial County's municipal code.

Project Location and Site Description

The proposed solar facilities would be located on APN 059-020-001, approximately 0.5 miles due south of the existing Heber 1 plant located at 895 Pitzer Road, Heber, CA. All proposed facilities are located within the Imperial County Geothermal Overlay Zone that allows for *Major Geothermal Projects* (Imperial County General Plan; Renewable Energy and Transmission Element of County of Imperial General Plan, 2015) (**Site Location** figure below).

The 121-acre Heber 1 Solar site is presently used for alfalfa cultivation with irrigation ditches and dirt access roads present (**Attachment B** of CUP Application – Site Pictures). Surrounding land uses in the Project vicinity are primarily geothermal energy facilities and agricultural cultivation. Agricultural cultivation is adjacent to the Project site on all sides, with Imperial Irrigation District (IID) irrigation canals are also present throughout the Project vicinity. Geothermal wells and pipelines are also present throughout the immediate Project area.

Reclamation, Abandonment, and Revegetation Schedule

Reclamation, abandonment, and revegetation activities would commence at the closure of the Heber 1 Plant. Activities would commence after all solar and energy facilities have been dismantled and removed from the site. If necessary, reseeding would be held off until the appropriate season (e.g. fall, spring). Activities would take approximately four to six months to complete.

Site Preparation

After all energy facilities (including existing geothermal wells present on the site) have been plugged and facilities are removed from the site, any soil piles or grades will be evened out by an excavator. The site is near zero elevation and is very flat and absent of topography. Reclamation activities will mimic the existing grade of the site and not introduce a new gradient/slope to the area. The site will then be rolled

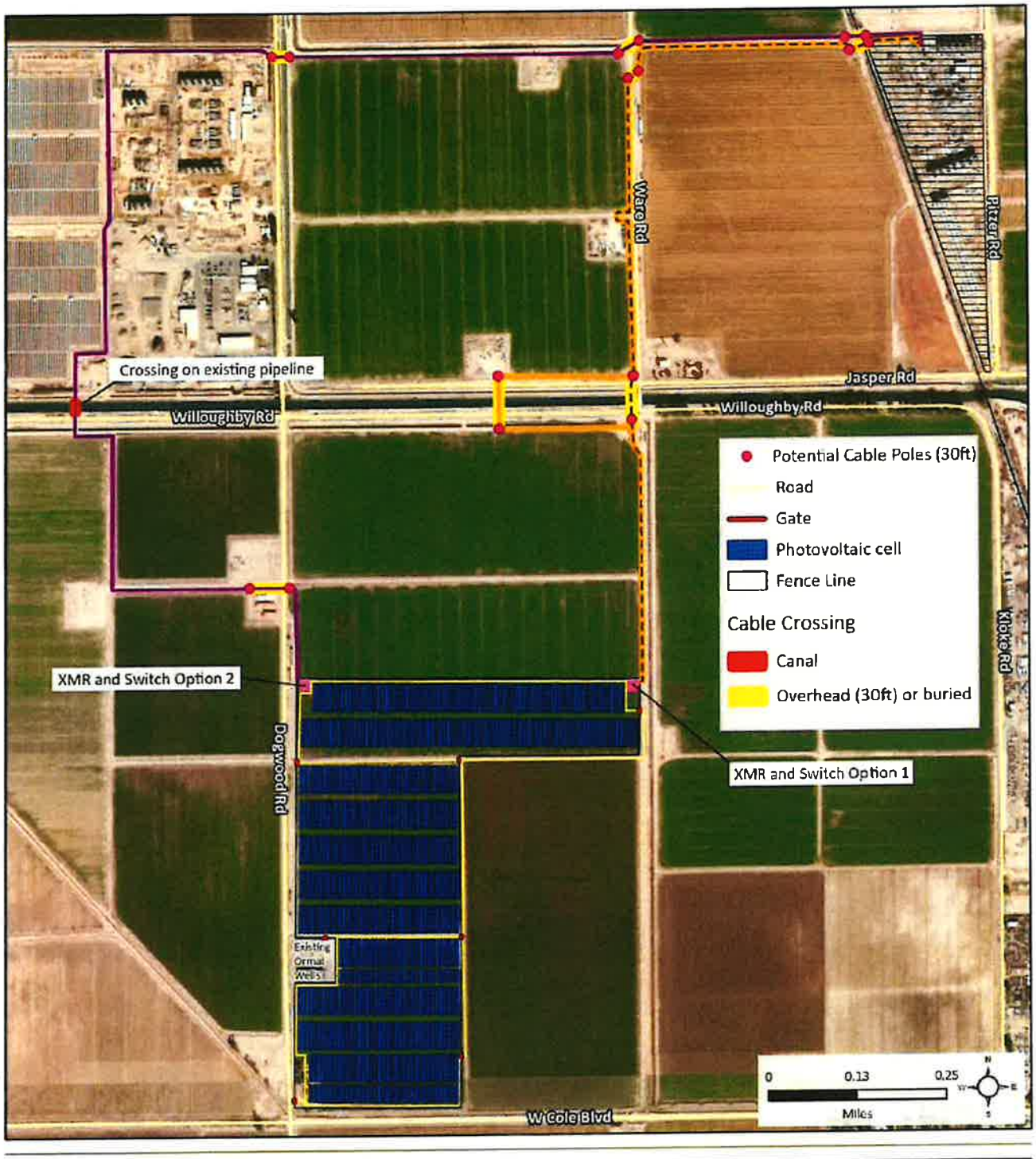
with a soil aerator/loosener. After site reclamation, topsoil will be transported to the site and deposited evenly across the site.

Selection of Plant Materials

The Heber 1 solar site is presently used for alfalfa cultivation. The surrounding area is dominated by agricultural production and no natural areas are in the immediate vicinity of the Project Site. HFC/ORMAT will reseed the entire site with a seed mix approved by Imperial County or return the land to an arable state for cultivation once more.

Irrigation and Maintenance

Revegetation of the site will be maintained by a contractor every two weeks to conduct weeding, watering, and removing trash/debris. The site will be irrigated by water truck as necessary to establish the new vegetation.



Legend

- Cable Route Option 1
- Cable Route Option 2
- Cable Route Option 3
- Heber 1 Geothermal Plant

SITE PLAN
HEBER 1 PARASITIC
SOLAR PROJECT

Catalyst