

EXECUTIVE SUMMARY

ES.1 PROJECT OVERVIEW

This Programmatic Environmental Impact Report (EIR) has been prepared in compliance with the California Environmental Quality Act (CEQA) Public Resources Code Section 21000 *et seq.*, the CEQA Guidelines (Section 15000 *et seq.*) as promulgated by the California Resources Agency, and the Governor's Office of Planning and Research. The purpose of this Programmatic EIR is to assess the potential environmental impacts associated with the 2015 *Renewable Energy and Transmission Element* update (proposed Project) and to propose mitigation measures, where required, to reduce significant impacts.

The proposed Project provides a comprehensive update of the existing 2006 Geothermal/Alternative Energy and Transmission Element and would serve as the primary policy statement by the County Board of Supervisors for implementing development policies for geothermal and other renewable energy land uses in Imperial County. The proposed Project consists of two key elements that have been developed to guide future development of future renewable energy facilities in Imperial County: (1) The *Renewable Energy and Transmission Element Overlay Zone*, and (2) The *Renewable Energy and Transmission Element's* Goals and Objectives. Each of these project components is described in greater detail in Chapter 2.0 – Project Description.

ES.2 PROJECT OBJECTIVES

The proposed Project has been developed to identify new opportunities for renewable energy and assures that the Imperial County General Plan can meet the needs for future development while remaining consistent with identified land use and environmental goals. The proposed Project would support the development of expanded renewable energy power production in the County and exportation to accommodate future growth in California and improve overall system reliability. The purpose of proposed Project is to provide a comprehensive document that contains the latest knowledge about the resources, feasible development technology, legal requirements, policies (County, State, and federal), and implementation measures. Additionally, the proposed Project provides a framework for the review and approval of renewable energy projects in the County. Development projections for the proposed Project are based on forecasts obtained from the renewable energy industry, regional utilities, and the Desert Renewable Energy Conservation Plan (DRECP).

ES.3 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The content of the Draft EIR was established based on the findings of the Initial Study (IS) and public and agency input. Based on the findings documented in the IS, the ICPDS determined that a Programmatic EIR would be required for the proposed Project. Due to the scale of the proposed Project, the Programmatic EIR analyzed potential impacts associated with all environmental categories listed on the CEQA Checklist, which include the following:

- Aesthetics
- Agricultural Resources/Forestry
- Air Quality
- Biological Resources
- Cultural Resources

- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities and Service Systems

Potential impacts for the above-mentioned environmental categories, including cumulative impacts, are presented in Chapter 4.0 – Environmental Analysis. The level of significance for each impact was determined using significance criteria (thresholds) developed for the issue area per Section 15064.7, Appendix G of the CEQA Guidelines. Table ES-1 summarizes the potential impacts, mitigation measures, and significance conclusions identified in Chapter 4.0 – Environmental Analysis.

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Aesthetics			
<p>Adverse Effect on a Scenic Vista or on Scenic Resources</p> <p>AESTH-1: Development of future renewable energy facilities under the proposed Project could have the potential to impact existing visual character and quality, including scenic vistas, natural environment and existing landscape, general built environment and historic buildings, and scenic highways.</p>	Potentially Significant	<p>AESTH-1a: Future renewable energy facilities would be required to assess conformance to VRM Class designations and identifying visual resource conflicts. Among the actions to be taken are consulting with BLM; factoring VRI Class values into project planning and design; including a qualified professional with VRM experience on the development team; consulting the local public to identify important visual resources in the area; consulting on viewshed protection with managers responsible for areas with special designations; evaluating impacts on historic trails; considering landscape setting observed from National Parks, National Historic Sites, and similar areas; using topographical data of engineering-design quality and digital terrain mapping for project planning and design; preparing simulations depicting project facilities as seen from key observation points and visual resource-sensitive locations; conducting public outreach to disseminate visual resource information; and performing visual mitigation planning and design based on field assessments and other means.</p> <p>AESTH-1b: Future solar facilities would be required to be sited and designed in a manner that would minimize night-sky effects. Identification of night-sky effects is to include assessing and quantifying potential lighting impacts and conducting assessments by using qualified individuals. Methods to minimize night-sky effects include using minimum intensity lighting of an appropriate color consistent with safety needs, prohibiting strobe lighting except where it is required for safety; shielding all permanent lighting unless otherwise required for safety; mounting lighting so that light is downward focused;</p>	Significant and Unavoidable

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		<p>controlling lighting with timers, sensors, and dimmers; and using vehicle-mounted lights for nighttime maintenance work rather than permanently mounted lighting.</p> <p>AESTH-1c: Future solar and related facilities would be required to be sited and designed in a manner that would explore and document means to reduce visual dominance in the viewshed and that the project comply with VRM Class objectives. Methods include conforming with VRM Class objectives (through use of BLM Handbook H-8431-1); determining the extent of the viewshed and selecting key observation points where people are expected to be observing the landscape; integrating visual design elements into plans, details, drawings, and specifications; and siting the facility to minimize the profile of all structures. Ways to minimize visual dominance include using existing topography and vegetation as screening; considering visual design elements when clearing vegetation and doing earthwork; siting projects outside of key observation point viewsheds; avoiding locating facilities near visually prominent landscape features; avoiding skylining of structures; designing linear features to follow natural land contours rather than straight lines; locating linear features at the edges of natural lines of transition between vegetation types and topography; using alternative means of access in visually sensitive areas to preserve landscape conditions; minimizing vegetation and ground disturbance; reducing cut and fill; shaping, staining, and vegetating excavations to conform with local conditions; creating natural-looking earthwork forms; repeating characteristics of naturally occurring openings in vegetation for roads, structures, and similar elements; burying linear utilities and lines along roads or paths; selecting appropriate materials</p>	

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		<p>and surface treatments for structures to reduce visual contrast; minimizing signage; delineating construction limits and minimizing area of surface disturbance; salvaging vegetation and topsoil for reuse; and removing stakes and flagging after construction.</p> <p>AESTH-1d: Future renewable energy facilities would be required to hold preconstruction meetings, if applicable, with affected agencies and designated specialists to coordinate the mitigation strategy. This includes a review of final design and construction documents with regard to visual impacts and mitigation.</p> <p>AESTH-1e: Project developers would be required to monitor compliance with mitigation requirements and consult with the affected agencies during operations and maintenance. Maintaining visual resource design elements would include maintaining revegetated surfaces until self-sustaining; keeping facilities in good repair and repainting as necessary; restoring lands as soon as possible after disturbance; controlling dust and noxious weeds; and operating so as to avoid high-intensity light (glare) being reflected off site.</p> <p>AESTH-1f: Immediate reclamation of the site, either on Federal, State or private land, would be required for renewable energy facilities after construction. These reclamation activities may include restoration of agricultural farmland to the prior condition. Methods for minimizing visual contrast during reclamation and decommission include undertaking treatments such as thinning and feathering vegetation at project edges, enhancing contouring, salvaging landscape materials, and revegetating; restoring the project area to predevelopment</p>	

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		<p>visual conditions and the inventoried visual quality rating; removing aboveground and near-ground-level structures; contouring soil borrow areas and other features to approximate natural slopes; using native vegetation to establish form, line, color, and texture consistent with the surrounding undisturbed landscape; distributing stockpiled topsoil to disturbed areas and replanting; and removing or burying gravel or other surface treatments.</p> <p>AESTH-1g: Each future renewable energy facility developed under the proposed Project would require preparation of a visual impact assessment that would evaluate potential impacts described in mitigation measures AESTH-1a through AESTH-1f. Based on the results of the analysis, the visual impact assessment would be required to develop mitigation measures to address potential impacts. Examples of mitigation measures for each renewable energy technology are presented below based on recommendations provided in the DRECP EIR/EIS:</p> <ul style="list-style-type: none"> • Examples of visual mitigation measures applicable to solar projects include development and implementation of a glint and glare mitigation and monitoring plan; screening of solar collectors from roads; retaining vegetation beneath solar collector arrays; prohibiting commercial signs, logos, or messages on towers and arrays; and using visually compatible color treatments and nonreflective materials for support structures and other components. In addition to direct reduction in visual quality, visual quality degradation can compromise the integrity of historical resources or traditional cultural places. In cases where such 	

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		<p>visual impacts occur, compensatory mitigation can include requiring research, field inventories, worker training, and other efforts specific to the resource and groups affected.</p> <ul style="list-style-type: none"> • Examples of visual mitigation measures for wind energy projects include siting to reduce visibility, clustering turbines, creating visual order and unity among groups of turbines, using radar-activated visual warning systems to reduce night-sky impacts, prohibiting signs and messages on towers, keeping turbines clean and in good repair, and promptly removing disused or abandoned equipment and parts. • Examples of visual mitigation measures specific to geothermal energy projects include using air-cooled systems (to avoid plumes that water-cooled systems may generate under some conditions), minimizing drill rig and well-test facility lighting, and screening of pipelines. 	
<p>Substantially Degrade Existing Visual Character or Quality of the Site</p> <p>AESTH-2: The development of future renewable energy facilities associated with the proposed Project could have the potential to affect existing visual character by introducing new structures onto sites that are currently undeveloped.</p>	<p>Potentially Significant</p>	<p>See Mitigation Measures AESTH-1a through AESTH-1g, above.</p>	<p>Significant and Unavoidable</p>

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<p>Create a New Source of Substantial Light or Glare</p> <p>AESTH-3: Future renewable energy facilities may create new sources of substantial light or glare which could adversely affect day or nighttime views in the area.</p>	Potentially Significant	<p>AESTH-3: Future renewable energy facilities would be required to consider siting and design features that would minimize glint and glare and take appropriate actions. These actions include identifying glint and glare effects, assessing and quantifying these effects to determine potential safety and visual impacts, and having qualified people conduct such assessments. Methods to minimize glint and glare include limiting use of signs; using reflective or luminescent markers instead of permanent lighting; minimizing offsite visibility of signs and lighting; using nonglare materials and appropriate colors; mitigating or offsetting visual impact by reclaiming unnecessary roads, removing abandoned buildings, using underground utility lines, and rehabilitating and revegetating disturbed areas; and other actions determined in consultation with BLM.</p>	Significant and Unavoidable
Agricultural Resources			
<p>Convert Important Farmland to Non-agricultural Use</p> <p>AG-1: Future solar and geothermal renewable energy facilities would likely convert all Important Farmland within the project areas to nonagricultural uses, while impacts associated with future wind facilities would be limited to the footprints of turbines, poles, and associated infrastructure.</p>	Potentially Significant	<p>AG-1a: Payment of Agricultural and Other Benefit Fees. Prior to the issuance of a grading permit or building permit (whichever is issued first) for a future renewable energy project, one of the following options included below must be implemented:</p> <ul style="list-style-type: none"> • For Non-Prime Farmland: <ul style="list-style-type: none"> ○ Option 1: The project proponent of a future renewable energy facility shall procure Agricultural Conservation Easements on a “one-to-one” basis on land of equal size, of equal quality of farmland, outside the development footprint. The 	Less than Significant

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		<p>Conservation Easement shall meet the State Department of Conservation’s regulations and shall be recorded prior to issuance of any grading or building permits.</p> <ul style="list-style-type: none"> ○ Option 2: The project proponent of a future renewable energy facility shall pay an “Agricultural In-Lieu Mitigation Fee” in the amount of 20 percent of the fair market value per acre for the total acres of proposed site based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee will be placed in a trust account administered by the Imperial County Agricultural Commissioner’s office and will be used for such purposes as the acquisition, stewardship, preservation, and enhancement of agricultural lands within Imperial County; or ○ Option 3: The project proponent of a future renewable energy facility and County voluntarily enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that is: (1) consistent with Board Resolution 2012-005; (2) the Agricultural Benefit Fee must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation, and enhancement of agricultural lands within Imperial County and to implement the goals and objectives of the Agricultural Benefit program, as specified in the Development 	

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		<p>Agreement, including addressing the mitigation of agricultural job loss on the local economy.</p> <ul style="list-style-type: none"> • For Prime Farmland: <ul style="list-style-type: none"> ○ Option 1: The project proponent of a future renewable energy facility shall procure Agricultural Conservation Easements on a “two-to-one” basis on land of equal size, of equal quality farmland, outside of the development footprint. The Conservation Easement shall meet the State Department of Conservation's regulations and shall be recorded prior to issuance of any grading or building permits; or ○ Option 2: The project proponent of a future renewable energy facility shall pay an “Agricultural In-Lieu Mitigation Fee” in the amount of 30 percent of the fair market value per acre for the total acres of the proposed site based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee, will be placed in a trust account administered by the Imperial County Agricultural Commissioner's office and will be used for such purposes as the acquisition, stewardship, preservation, and enhancement of agricultural lands within Imperial County. ○ Option 3: The project proponent of a future renewable energy facility and County enter into an enforceable Public Benefit Agreement or 	

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		<p>Development Agreement that includes an Agricultural Benefit Fee payment that is (1) consistent with Board Resolution 2012-005; (2) the Agricultural Benefit Fee must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation, and enhancement of agricultural lands within Imperial County and to implement the goals and objectives of the Agricultural Benefit program, as specified in the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy; the future renewable energy project and other recipients of the future renewable energy project's Agricultural Benefit Fee funds; or emphasis on creation of jobs in the agricultural sector of local economy for the purpose of off-setting jobs displaced by the future renewable energy project.</p> <ul style="list-style-type: none"> ○ Option 4: The project proponent of a future renewable energy facility must revise their Renewable Energy Conditional Use Permit Application/Site Plan to avoid Prime Farmland. <p>Additional details regarding fee amounts and use of mitigation fees for mitigation measure AG-1a are presented in Section 4.2.4.</p> <p>AG-1b: Reclamation/Decommissioning Plan and Security. For solar energy facilities, the DOC and County have clarified the goal of a reclamation and decommissioning plan: the land must be restored to land which can be farmed. In addition to AQ-1a for Prime Farmland and Non-Prime</p>	

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		<p>Farmland, the project proponent of future renewable energy facilities shall submit to Imperial County a Reclamation Plan prior to issuance of a grading permit. The Reclamation Plan shall document the procedures by which each future Renewable Energy Conditional Use Permit will be returned to its current agricultural condition. The project proponent also shall provide financial assurance/bonding in an amount equal to a cost estimate prepared by a California-licensed general contractor or civil engineer for implementation of the Reclamation Plan in the event project proponent fails to perform the Reclamation Plan.</p> <p>AG-1c: Prepare Economic Impact Analysis, Employment (Jobs) Impact Analysis, and Fiscal Impact Analysis. Project proponents of future renewable energy facilities would be required to prepare an Economic Impact Analysis (EIA), Employment (Jobs) Impact Analysis (JIA), Fiscal Impact Analysis (FIA) pursuant to County of Imperial requirements. These analyses would document potential socioeconomic impacts associated with future renewable energy facilities and identify strategies to mitigate any potential impacts to a level less than significant.</p>	
<p>Conflict with Existing Zoning for Agricultural Use</p> <p>AG-2: Construction of renewable energy facilities associated with the proposed Project would have the potential to be developed on properties zoned for agricultural uses and protected under Williamson Act contracts that are located within the</p>	Potentially Significant	See Mitigation Measures AG-1a through AG-1c.	Less than Significant

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proposed renewable energy overlay zones.			
Involve Other Change that Could Result in Conversion of Farmland AG-3: Construction and operation of future facilities could damage equipment, crops, water delivery or water drainage systems, or livestock on adjacent properties or inhibit crop growth through dispersal of fugitive dust.	Potentially Significant	See Mitigation Measures AG-1a through AG-1c. AG-3: Pest Management Plan. A Pest Management Plan to monitor for and control insect, weed, vertebrates, and pathogens that could be injurious to the surrounding farmland must be in place for the duration of the project (until reclamation is complete and approved by the Planning and Development Services Department and the Agricultural Commissioner).	Less than Significant
Air Quality			
Conflict with or Obstruct Applicable Air Quality Plan AQ-1: Construction and operation of renewable energy facilities associated with the proposed Project would generate emissions that could exacerbate existing nonattainment designations and or change the attainment status of other criteria pollutants in Imperial County.	Potentially Significant	AQ-1a: Prior to commencing construction, each project proponent shall submit a Dust Control Plan to the ICAPCD for approval identifying all sources of PM ₁₀ emissions and associated mitigation measures during the construction and operational phases of their future renewable energy project. The project proponent shall submit a “Construction Notification Form” to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The Dust Control Plan submitted to the ICAPCD shall meet all applicable requirements for control of fugitive dust emissions, including the following measures designed to achieve the no greater than 20-percent opacity performance standard for dust control: <ul style="list-style-type: none"> • All disturbed areas, including bulk material storage that is not being actively used, shall be effectively stabilized; and visible emissions shall be limited to no greater than 20-percent opacity for dust 	Less than Significant

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		<p>emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material, such as vegetative groundcover. Bulk material is defined as earth, rock, silt, sediment, and other organic and/or inorganic material consisting of or containing PM with 5 percent or greater silt content.</p> <ul style="list-style-type: none"> • All onsite and offsite unpaved roads shall be effectively stabilized; and visible emissions shall be limited to no greater than 20-percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering. • All unpaved traffic areas 1.0 acre or more in size with 75 or more average vehicle trips per day shall be effectively stabilized; and visible emissions shall be limited to no greater than 20-percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering. • The transport of bulk materials shall be completely covered, unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of bulk material. • All track-out or carry-out, which includes bulk materials that adhere to the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto the pavement, shall be cleaned at the end of each workday or immediately 	

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		<p>when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.</p> <ul style="list-style-type: none"> • Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line. • The construction of new unpaved roads is prohibited within any area with a population of 500 or more, unless the road meets ICAPCD's definition of a "temporary unpaved road." Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering. <p>AQ-1b: Each project proponent shall implement all applicable standard mitigation measures for construction combustion equipment for the reduction of excess NO_x emissions as contained in the Imperial County CEQA Air Quality Handbook and associated regulations. These measures include:</p> <ul style="list-style-type: none"> • Use alternative-fueled or catalyst-equipped diesel construction equipment, including all off-road and portable diesel powered equipment. • Minimize idling time, either by shutting equipment off when not in use or reducing the time of idling to five minutes at a maximum. 	

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		<ul style="list-style-type: none"> • Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use. • Replace fossil-fueled equipment with electrically driven equivalents (assuming powered by a portable generator set and are available, cost effective, and capable of performing the task in an effective, timely manner). • Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak hour of vehicular traffic on adjacent roadways. • Implement activity management (e.g., rescheduling activities to avoid overlap of construction phases, which would reduce short-term impacts). <p>AQ-1c: Each project proponent shall use all available USEPA Tier 3 or better construction equipment.</p> <p>AQ-1d: Consistent with the requirements of ICAPCD Policy 5, each project proponent shall pay an emission mitigation fee sufficient to offset the amount by which the project’s NO_x emissions exceed the 100 pounds per day threshold. ICAPCD allows a project to pay in-lieu impact fees using the most current Carl Moyer Cost Effective methodology to reduce excess NO_x emissions. Under the ICAPCD program, the exact amount of the fee cannot be calculated until the time of construction when more precise data regarding the construction equipment types and hours of operation are known, allowing ICAPCD to calculate the fee. Prior to any earthmoving activity, each project proponent shall submit to the ICAPCD a complete list of all construction equipment</p>	

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		<p>to be utilized during the construction phase identifying make, model, year, horsepower, and estimated hours of usage.</p> <p>AQ-1e: Future renewable energy facilities that utilize combustion sources during operation would be required to obtain a “Permit to Operate” from ICAPCD. Future project proponents would be required to demonstrate consistency with ICAPCD regulations regarding combustion activities prior to permit approval.</p>	
<p>Expose Sensitive Receptors to Substantial Pollutant Concentrations</p> <p>AQ-2: Construction and operation of renewable energy facilities associated with the proposed Project would generate emissions that could expose sensitive receptors to substantial pollutants concentrations.</p>	Potentially Significant	<p>See Mitigation Measures AQ-1a through AQ-1e.</p> <p>AQ-2a: New stationary air pollution point sources such as, but not limited to, combustion sources, emergency-use engines, geothermal wells or steam vents, and cooling towers shall be located away from residential areas and other air quality-sensitive land uses.</p> <p>AQ-2b: Depending on the size of individual future renewable energy facilities developed under the proposed Project, a health risk assessment may be required to identify potential impacts and mitigation measures to reduce impacts to a level less than significant.</p>	Less than Significant

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<p>Create Objectionable Odors</p> <p>AQ-3: Construction of renewable energy facilities would result in diesel exhaust and/or application of asphalt pavement that may be considered offensive to some people. It is not anticipated that operation of solar or wind energy facilities would emit objectionable odors; however, operation of geothermal energy facilities associated with the proposed Project would generate odors that may be considered objectionable to people living within a mile of a geothermal project.</p>	Potentially Significant	See Mitigation Measures AQ-1b, AQ-1c, and AQ-2.	Less than Significant
Biological Resources			
<p>Have a substantial adverse effect on a listed species</p> <p>BIO-1: Future renewable energy facilities developed under the proposed Project would result in direct and indirect impacts to special status plant and animal species.</p>	Potentially Significant	<p>BIO-1a: Conduct Surveys for Special Status Plant Species. As a requirement of an application for a renewable energy facility, surveys for special status plant species shall be conducted by qualified and agency-approved botanists to determine the presence or absence of sensitive plant species within the project footprint. Surveys shall be conducted following CDFW or BLM survey guidelines and be appropriately timed to coincide with the blooming periods for these species. Special status plants identified within the construction disturbance area shall be avoided to the extent feasible. A qualified botanist shall supervise the installation of orange construction fencing or other visible material to establish buffer zones between special status plants and construction disturbance.</p>	Less than Significant

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		<p>BIO-1b: Conduct Surveys for Special Status Animal Species. As a requirement of an application for a future renewable energy facility, surveys for special status animal species shall be conducted by qualified and agency-approved biologists to determine the presence or absence of sensitive animal species within the footprint of a future renewable energy project. Any special status mammal, reptile, and amphibian species detected during surveys shall be passively relocated to areas outside the construction zone and prevented from reentering the future project area with the installation of silt fencing or other exclusion fencing. All fencing shall be periodically monitored and maintained for the duration of construction. Passive relocation shall only be done in the nonbreeding season in accordance with guidelines and consultations with resource agencies. This includes covering or excavating all burrows or dens and installing one-way doors into occupied burrows. This would allow any animals inside to leave the burrow but would exclude any animals from reentering the burrow. The burrows shall then be excavated and filled in to prevent their reuse.</p> <p>If direct impacts to special status species cannot be avoided, an agency-approved biologist shall prepare a species-specific Mitigation and Monitoring Plan that would detail the approved, site-specific methodology proposed to minimize and mitigate impacts to each species. Passive relocation, destruction of burrows, construction of artificial burrows, etc. shall be completed only upon prior approval by and in cooperation with CDFW and/or USFWS.</p> <p>BIO-1c: Mark Areas of Construction Boundaries. All areas to be disturbed during construction of future renewable energy facilities developed under the proposed Project</p>	

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		<p>would be required to flag disturbance boundaries prior to construction. All disturbances would be confined to these flagged areas, and all employees would be instructed that their activities must be confined to locations within the flagged areas. Project proponents of future renewable energy facilities developed under the proposed Project would be required to have environmental monitors on site during construction activities.</p> <p>BIO-1d: Power Wash Equipment Prior to Arrival On Site. All construction equipment used during construction of future renewable energy facilities developed under the proposed Project would be required to be power washed prior to arrival at the future project site to prevent the transportation and establishment of noxious weeds in the project area.</p> <p>BIO-1e: Implement a Worker Environmental Awareness Program. A brief Worker Environmental Awareness Program (WEAP) would be implemented for construction crews prior to the commencement of project activities for future renewable energy facilities developed under the proposed Project. Training materials and briefings would include, but would not be limited to, discussion of the federal and State ESAs, the consequences of noncompliance with these acts, identification and values of wildlife and natural plant communities, hazardous substance spill prevention and containment measures, and review of all required and recommended mitigation measures.</p> <p>BIO-1f: Additional Project Mitigation: Additional biological mitigation may be required based on the renewable energy technology to be developed at specific project locations.</p>	

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		<p>Project proponents for future renewable energy facilities would be required to evaluate how specific renewable energy facilities may impact sensitive species and how to mitigate impacts through site design and/or mitigation and monitoring activities. Project-specific mitigation and monitoring for future renewable energy facilities may include, but would not be limited to, a Bird and Bat Conservation Strategy based on the type of renewable energy technology to be utilized for a future renewable project.</p>	
<p>Have a Substantial Adverse Effect on Riparian Habitat or Sensitive Natural Community</p> <p>BIO-2: Future renewable energy facilities developed under the proposed Project that would be located within or adjacent to sensitive natural communities could cause an incremental loss of these community types.</p>	Potentially Significant	<p>BIO-2: Develop a Habitat Restoration Plan and Provide for Offsite Mitigation for Temporary or Permanent Impacts. As a requirement of an application for a future renewable energy facility, project proponents shall make an effort to minimize impacts on sensitive natural communities, especially riparian habitats, when designing and permitting projects in order to preserve both the habitat and the overall ecological functions of these areas. These efforts to minimize impacts on riparian habitats and other sensitive natural communities shall be done consistent with CDFW guidelines. Future project proponents shall minimize ground disturbance and construction footprints within and near such areas to the extent practicable. Where avoidance of these areas is not feasible, future project proponents shall arrange for offsite replacement of removed habitats in accordance with consultation with CDFW.</p> <p>Prior to construction, future project proponents shall develop a Habitat Restoration Plan (HRP) for review and approval by CDFW and the County of Imperial. The HRP shall be prepared by a qualified biologist and/or botanist and shall detail the methods for restoring or enhancing any</p>	Less than Significant

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Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		riparian habitats or other sensitive natural communities impacted within the project area. The goal of the HRP shall be to mitigate any temporary or permanent impacts to riparian habitats or other sensitive natural communities. Mitigation ratios would be developed through consultation with CDFW and the County of Imperial.	
<p>Have a substantially adverse effect on federally protected wetlands</p> <p>BIO-3: Future renewable energy facilities developed under the proposed Project may result in direct and/or indirect impacts to jurisdictional Waters of the United States including wetlands (i.e., areas regulated by the USACE, State and Regional Water Boards, and RWQCB and/or CDFW).</p>	Potentially Significant	<p>See Mitigation Measure HYDRO-3.</p> <p>BIO-3: Provide restoration/compensation for affected jurisdictional areas. Impacts to areas under the jurisdiction of the USACE, RWQCB Regional Water Boards, State Water Board, and CDFW shall be avoided to the extent feasible. Where avoidance of jurisdictional areas is not feasible, each applicant shall provide the necessary mitigation required as part of wetland permitting by creation/restoration/preservation of suitable jurisdictional or equivalent habitat along with adequate buffers to protect the function and values of jurisdictional area mitigation. The location(s) of the mitigation would be determined in consultation with USACE, CDFW, RWQCB, and BLM as part of the wetland permitting process. A jurisdictional delineation and impact assessment shall be prepared for each site based on the final alignment and final engineering plans when they are complete. Mitigation ratios would be developed through consultation with the wetland permitting agencies. The width of wetland buffers would also depend on the sensitivity of the jurisdictional habitat and on the requirements of the wetland permitting agencies.</p>	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Interfere with the Movement of Fish and Wildlife Species</p> <p>BIO-4: Future renewable energy facilities developed under the proposed Project would have the potential to indirectly interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.</p>	<p>Potentially Significant</p>	<p>BIO-4: Minimize Impacts to Designated Linkage Networks. Impacts to identified linkage networks shall be avoided to the extent feasible. Where direct avoidance of these areas is not feasible, the applicant shall modify the proposed Project footprint to the extent practicable to allow broad (i.e., 2-km wide) swaths between project facilities for animal movement. Where such modifications are not feasible, the applicant shall consult with CDFW, BLM, and other land management agencies as appropriate to discuss other options such as wildlife crossing structures to facilitate wildlife movement in areas crossed by newly constructed roads. One or more crossing structures should be constructed at a crossing point to provide connectivity for species that are likely to use the area. Different species prefer different types of structures (Clevenger et al. 2001; Malta et al. 2005). For bighorn sheep or other ungulates, an open structure such as a bridge is crucial. For medium-sized mammals, large box culverts with natural earthen substrate flooring are optimal (Evink 2002). For small mammals and reptiles, pipe culverts are preferable (Clevenger et al. 2001). Additional mitigation may be required to offset impacts and would depend on the sensitivity of the area and on the individual requirements of land management agency.</p>	<p>Less than Significant</p>

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Conflict with Local Policies or Ordinances Protecting Biological Resources</p> <p>BIO-5: The proposed Project has developed goals and objectives that would preserve biological resources consistent with the goals of the Conservation and Open Space Element:</p>	Less than Significant	Mitigation Measures BIO-1a through BIO-4 would provide further consistency.	Less than Significant
<p>Conflict with the Provisions of a Habitat Conservation Plan</p> <p>BIO-6: Future renewable energy facilities developed under the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.</p>	Less than Significant	Mitigation Measures BIO-1a through BIO-4 would provide further consistency.	Less than Significant
Cultural Resources			
<p>Cause a substantial adverse change in the significance of a historical or archaeological resource</p> <p>CUL-1: Future renewable energy facilities developed under the proposed project may impact historical and archaeological resources.</p>	Potentially Significant	CUL-1a: Agency Coordination. Project proponents of future renewable energy facilities developed under the proposed Project would be required to coordinate with appropriate agencies early in the planning process. Depending on the nature and intended location of a future renewable energy facility, coordination may be required with federal, tribal, State, and local agencies. Consultation efforts should be made with the Native American Heritage Commission	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>(NAHC), the State Historic Preservation Office (SHPO), and stakeholders identified that may potentially be impacted by development of the future renewable energy facilities. Such coordination would elicit input and help define the parameters of future renewable energy facilities to better reduce or avoid impacts to cultural resources, including historic properties, archaeological resources, sacred sites, and cultural landscapes.</p> <p>CUL-1b: Cultural Resources Records Searches. Project proponents of future renewable energy facilities developed under the proposed Project would be required to conduct cultural resources records searches for future project sites. This should include a Sacred Lands File records search with the NAHC and a cultural resources records search with the CHRIS location that covers the project footprint. For Imperial County, the CHRIS records search will be conducted at the South Coastal Information Center (SCIC) located on the campus of San Diego State University.</p> <p>CUL-1c: Cultural Resources Record Searches. Project proponents of future renewable energy facilities developed under the proposed Project would be required to conduct cultural resource pedestrian surveys for future project sites. The cultural resource pedestrian survey would be conducted to identify resources that have not been previously discovered through past survey efforts and, therefore, would not be noted in the records search results. The survey should be conducted in accordance with Secretary of the Interior’s Standards and Guidelines for Archaeological and Historic Preservation (48 FR 44716, Sept. 29, 1983). All cultural resources encountered during pedestrian surveys for future renewable energy facilities</p>	

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>developed under the proposed Project would be mapped and recorded in detail in order to document cultural resources and potential impacts. Efforts should be made to relocate previously recorded resources and update information for the sites surveyed for future renewable energy facilities.</p> <p>CUL-1d: Site Characterization, Siting and Design, and Construction. The results of the coordination efforts, records searches, and pedestrian surveys conducted under mitigation measures CUL-1a through CUL-1c should be utilized to minimize or avoid impacts to cultural resources through project design of future renewable energy facilities. Preconstruction activities for the minimization or avoidance of impacts on cultural resources based on the results of mitigation measures CUL-1a through CUL-1c may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Avoid impacts to cultural resources by prohibiting subsurface activities in certain areas. • Areas of higher sensitivity should be tested for cultural content. The extent of the testing should be determined in concert with the design of the future renewable energy facility. • If testing is deemed necessary, all testing should be conducted by a qualified archaeological consultant and should include involvement by one or more of the local Native American representatives. • Areas of lower sensitivity should be targeted for improvements and areas of higher sensitivity (i.e., 	

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>more dense cultural materials) should be protected, as deemed feasible.</p> <ul style="list-style-type: none"> • Consultation should be maintained between the lead agency and the local Native American representatives and their respective concerns should be considered when formulating decisions. • Whenever possible, future renewable energy facilities should be developed on fill soil or in areas of previous ground disturbance. • Archaeological Monitoring: Prior to any ground-disturbing activities for future renewable energy facilities, project proponents should retain a qualified archaeologist to be present at all preconstruction meetings to advise construction contractors about the sensitive nature of cultural resources located on and/or in the vicinity of the future project site, as well as monitoring requirements. A qualified monitor should observe all onsite and offsite future construction activities that would result ground disturbance (including project-related offsite utility and roadway improvements). • Native American Monitor: During construction of future renewable energy facilities, a Native American monitor should observe all ground-disturbing activities (including project-related offsite utility and roadway improvements). The Native American monitor should consult with the archaeological monitor regarding objects and 	

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>remains encountered during grading or excavation that may be considered sacred or important.</p> <p>CUL-1e: Reclamation and Decommissioning. Project proponents of future renewable energy facilities should develop measures to confine reclamation and decommissioning activities to those areas previously disturbed by construction-related activities. Along with ensuring that the removal of structures would not result in further subsurface intrusion, measures should be developed to ensure that reclamation and decommissioning activities would utilize established access routes.</p>	
<p>CUL-2: Future renewable energy facilities developed under the proposed project may impact paleontological resources.</p>	<p>Potentially Significant</p>	<p>CUL-2: Paleontological Resource Assessment Report. Project proponents of future renewable energy facilities developed under the proposed Project shall document whether paleontological resources exist in a future project area in a paleontological resources assessment report based on the following: the geologic context of the region and future project site and its potential to contain paleontological resources (including the PFYCs on site), a records search of institutions holding paleontological collections from California desert regions, a review of published and unpublished literature for past paleontological finds in the area, and coordination with paleontological researchers working locally in potentially affected geographic areas (or studying similar geologic strata).</p> <p>If the PFYC (or PFYCs) of the geologic units to be encountered during construction of the future renewable energy facility has not been determined, the project proponent shall use the best available data and field</p>	<p>Less than Significant</p>

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>surveys, as applicable, to develop a site-specific map of the PFYC ratings. The PFYC map shall be at a scale equal to or more detailed than 1:100,000. Depending on the extent of existing information available and the sensitivity of the site, development of the resource assessment and PFYC map could require the completion of a paleontological survey.</p> <p>If paleontological resources are present at the future project site or if the geologic units to be encountered by the future renewable energy project (at the surface or the subsurface) have a PFYC Class of 3, 4, or 5, a Paleontological Resources Management Plan shall be developed. The elements of the plan shall be consistent with BLM IM 2009-11 and shall be prepared and implemented by a professional paleontologist as defined under Secretary of the Department of the Interior Standards. The plan shall include the following:</p> <ul style="list-style-type: none"> • The qualifications of the principal investigator and monitoring personnel • Construction crew awareness training content, procedures, and requirements • Any measures to prevent potential looting, vandalism, or erosion impacts • The location, frequency, and schedule for onsite monitoring activities • Criteria for identifying and evaluating potential fossil specimens or localities 	

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • A plan for the use of protective barriers and signs or implementation of other physical or administrative protection measures • Collection and salvage procedures • Identification of an institution or museum willing and able to accept any fossils discovered • Compliance monitoring and reporting procedures • If the Paleontological Resources Management Plan determines that all geologic units that would be affected by the future renewable energy project are within an area with a PFYC Class of 1 or 2, the lead agency shall include paleontological resources as an element in construction worker awareness training and shall include measures to be followed in the event of unanticipated discoveries, including suspension of construction activities in the vicinity. The measure shall stipulate that the future project site must be protected from further earth-moving or damage until a qualified paleontologist can assess the significance and importance of the find and until the fossil specimen or locality can be recorded and salvaged, if necessary. • The Paleontological Resources Management Plan shall evaluate all of the construction methodologies proposed on the future site, including destructive excavation techniques. Where applicable, the principal investigator shall 	

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		include in the plan an evaluation of the potential for such techniques to disturb or destroy paleontological resources, an evaluation of whether loss of such fossils would represent a significant impact, and discussion of mitigation or compensatory measures (such as recordation/recovery of similar resources elsewhere on the site) that are necessary to avoid or substantially reduce the impact.	
<p>Disturb Human Remains</p> <p>CUL-3: Future renewable energy facilities developed under the proposed project may impact human remains.</p>	Potentially Significant	<p>CUL-3: Human Remains. If, at any time, evidence of human remains are identified during construction of future renewable energy facilities associated with the proposed Project, the County Coroner must be notified immediately and permitted to examine the remains. The discovery of human remains is always a possibility during ground disturbances. Human remains and associated cultural items refer to objects that fit into one of four types of items expressly protected under Native American Graves Protection and Repatriation Act (NAGPRA) (43 CFR 10), to include: (a) human remains, (b) funerary objects; (c) sacred objects; and (d) objects of cultural patrimony. Any significant confirmed find should be evaluated to determine if an adverse effect to the resource has occurred. Such a discovery would require a recommencement of consultation between the lead agency, the Imperial County Coroner’s office, the NAHC, and the Most-Likely Descendant (MLD) identified by the NAHC, in order to address adverse effects. Any potential human remains identified by a cultural resources monitor during construction of future renewable energy facilities should initially be treated according to California Health and Safety Code, Section 7050.5(b) and Public Resource Code, Section 5097.98(a-h); however, the</p>	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		archaeological monitor should be responsible for determining whether cultural items are associated.	
Geology and Soils			
<p>Expose people or structures to adverse effects from seismic activity</p> <p>GEO-1: Development of future renewable energy facilities under the proposed Project may be subject to fault rupture, strong seismic ground shaking, or seismic-related ground failure during an earthquake.</p>	Potentially Significant	<p>GEO-1: Prepare Geotechnical Report(s) for the Projects and Implement Required Measures. Facility design for all project components of future renewable energy facilities developed under the proposed Project shall comply with the site-specific design recommendations as provided by a licensed geotechnical or civil engineer to be retained by the project applicant. The final geotechnical and/or civil engineering report shall address and make recommendations on the following:</p> <ul style="list-style-type: none"> • Site preparation • Soil bearing capacity • Appropriate sources and types of fill • Potential need for soil amendments • Road, pavement, and parking areas • Structural foundations, including retaining-wall design • Grading practices • Soil corrosion of concrete and steel • Erosion/winterization • Seismic ground shaking • Liquefaction • Expansive/unstable soils <p>In addition to the recommendations for the conditions listed above, the geotechnical investigation shall include subsurface testing of soil and groundwater conditions and</p>	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		shall determine appropriate foundation designs that are consistent with the version of the CBC that is applicable at the time building and grading permits are applied for. All recommendations contained in the final geotechnical engineering report shall be implemented by each project applicant. Design of future renewable energy facilities would need to be consistent with applicable CBC Seismic Design Categories based on site-specific soil characteristics and proximity to potential seismic hazards.	
<p>Result in substantial soil loss or erosion of topsoil</p> <p>GEO-2: Impacts would result from the clearing of vegetation, excavation, salvage, stockpiling, and redistribution of soils during construction and reclamation activities associated with solar arrays, wind turbine and well pad sites, access roads, and other proposed Project facilities.</p>	Potentially Significant	<p>GEO-2: Develop and Implement a Storm Water Pollution Prevention Plan (SWPPP). Future renewable energy facilities developed under the proposed Project would require a detailed SWPPP to be developed and implemented to minimize erosion during construction in compliance with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The SWPPP would be required to include the following:</p> <ul style="list-style-type: none"> • A detailed description of all Best Management Practices (BMPs) that will be employed • An outline of the areas on site that will be disturbed during construction of the project • An outline of all areas that will be stabilized by temporary or long-term erosion control measures • A proposed schedule for the implementation of erosion control measures <p>In addition, all surface water and drainage features within 1,000 feet of construction activities shall be identified. Construction activities within 100 feet of these resources</p>	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		shall implement the BMPs detailed in the SWPPP prepared for each project.	
<p>Be located on an unstable geologic unit or soil that is unstable</p> <p>GEO-3: According to the Soil Survey of Imperial County, the proposed Project overlay zones contain some soils that are prone to liquefaction under certain conditions.</p>	Potentially Significant	See Mitigation Measure GEO-1.	Less than Significant
<p>Be located on expansive soil</p> <p>GEO-4: Many soil types within the County generally contain a high proportion of clay, which may exhibit a moderate to high potential for shrink-swell. Unless properly mitigated, shrink-swell soils could exert additional pressure on buried structures and electrical connections to produce shrinkage cracks that could allow water infiltration and compromise the integrity of backfill material.</p>	Potentially Significant	<p>See Mitigation Measures GEO-1 and GEO-2.</p> <p>GEO-4: Implement Corrosion Protection Measures. As determined appropriate by a licensed geotechnical or civil engineer, each project proponent shall ensure that all underground metallic fittings, appurtenances, and piping located in corrosive soils include a cathodic protection system to protect these facilities from corrosion for future renewable energy facilities developed under the proposed Project.</p>	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Have soils incapable of supporting the use of septic tanks or alternative wastewater disposal systems</p> <p>GEO-5: Septic systems for future renewable energy facilities would be engineered based on onsite soil characteristics and designed and installed in compliance with County Environmental Health Department standards. Notwithstanding these design requirements, potential equipment failures or wastewater loading rates in excess of the design capacity of the treatment and disposal system could lead to water quality degradation. Additionally, areas where a shallow groundwater table is present could render infiltration of wastewater into the soil column temporarily infeasible at certain times of the year.</p>	Potentially Significant	<p>GEO-5: Demonstrate Compliance with Onsite Wastewater Treatment and Disposal Requirements. Wastewater treatment and disposal system(s) associated with future renewable energy facilities shall demonstrate compliance with the Imperial County performance standards as outlined in Title 9, Division 10, Chapters 4 and 12 of the Imperial County <i>Land Use Ordinance</i>. Prior to construction, and again prior to operation, each future project proponent would be required to obtain all necessary permits and/or approvals from Imperial County. Each future project proponent would be required to demonstrate that the system adequately meets County requirements, which have been designed to protect beneficial uses and ensure that applicable water quality standards are not violated. This shall include documentation that the system would not conflict with the Regional Water Quality Control Board’s (RWQCB) Anti-Degradation Policy.</p>	Less than Significant
Greenhouse Gases			
<p>Generate Greenhouse Gas Emissions that Could Have a Significant Effect on the Environment</p> <p>GHG-1: Site preparation activities, site grading, exhaust from vehicles transporting construction materials and personnel, and emissions from heavy-duty construction equipment could generate GHG emissions.</p>	Less than Significant	None required.	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Conflict with Applicable Plan or Policy Regulating Greenhouse Gas Emissions</p> <p>GHG-2: The proposed Project would not conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs.</p>	Less than Significant	None required.	Less than Significant
Hazards and Hazardous Materials			
<p>Create a significant hazard involving release of hazardous materials into the environment</p> <p>HAZ-1: Construction and decommissioning of future renewable energy facilities developed under the proposed Project would require the use of hazardous materials.</p>	Potentially Significant	<p>HAZ-1a: Implement hazardous materials and waste minimization measures including conducting a Phase I Environmental Site Assessment to determine the presence of hazardous materials from past site activities.</p> <p>HAZ-1b: Future renewable energy facilities developed under the proposed Project that would handle hazardous materials that exceed regulatory thresholds would need to prepare and submit a Business Emergency Response Plan for approval to the State Department of Toxic Substance Control.</p>	Less than Significant
<p>Emit hazardous emissions or handle hazardous materials within 0.25-mile of a school</p> <p>HAZ-2: All future renewable energy facilities developed under the proposed Project would be located at least 0.5 mile from any urban area within Imperial County which, in turn, would prevent impacts to existing schools.</p>	Less than Significant	None required.	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Be located on a site that is included on a list of hazardous materials sites</p> <p>HAZ-3: Future renewable energy facilities developed under the proposed Project would have the potential to be located on sites that possess hazardous materials which could be exposed during construction.</p>	Potentially Significant	See Mitigation Measure HAZ-1a.	Less than Significant
<p>Result in a Safety Hazard for People Working or Living in the Area of a Public or Private Airport</p> <p>HAZ-4: The proposed Renewable Energy Overlay Zones do not include areas within an airport land use plan or within 2.0 miles of public or private airport.</p>	Less than Significant	None required.	Less than Significant
<p>Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan.</p> <p>HAZ-5: Construction and decommissioning of future renewable energy facilities associated with the proposed Project could generate large numbers of vehicle trips that could interfere with an adopted emergency response or emergency evacuation plan by degrading traffic levels of service (LOS).</p>	Potentially Significant	See Mitigation Measures TR-1a through TR-1d and TR-4a through TR-4c.	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Expose people to significant risk of loss, injury, or death involving wildland fires</p> <p>HAZ-6: Land in Imperial County consists primarily of urban areas, active farmlands, recreation areas, and undeveloped land; the County does not possess wildlands with the potential for fires.</p>	Less than Significant	None required.	Less than Significant
Hydrology and Water Quality			
<p>Violate any water quality standards or waste discharge requirements</p> <p>HYDRO-1: Hazardous materials associated with construction and operation of future renewable energy facilities would have the potential to impact water quality.</p>	Potentially Significant	<p>HYDRO-1a: Acquire Appropriate CWA Regulatory Permits, Prepare SWPPP, and Implement BMPs Prior to Construction and Site Restoration. Project proponents or project construction contractors for future renewable energy facilities would be required to prepare a project-specific SWPPP and be responsible for securing coverage under SWRCB's NPDES stormwater permit for general construction activity (Order 2009-0009-DWQ). The SWPPP shall identify specific actions and BMPs relating to the prevention of stormwater pollution from project-related construction sources by identifying a practical sequence for site restoration, BMP implementation, contingency measures, responsible parties, and agency contacts. The SWPPP shall reflect localized surface hydrological conditions and shall be reviewed and approved by each project applicant prior to commencement of work and shall be made conditions of the contract with each contractor selected to build and decommission future renewable energy facilities developed under the proposed Project. The SWPPP(s) shall, at a minimum, incorporate control measures in the following categories:</p>	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • Soil stabilization and erosion control practices (e.g., hydroseeding, erosion control blankets, mulching) • Dewatering and/or flow diversion practices, if required (see Mitigation Measure HYDRO-1b) • Sediment control practices (temporary sediment basins, fiber rolls) • Temporary and postconstruction onsite and offsite runoff controls • Special considerations and BMPs for water crossings, wetlands, and drainages • Monitoring protocols for discharge(s) and receiving waters, with emphasis placed on the following water quality objectives: dissolved oxygen, floating material, oil and grease, pH, and turbidity • Waste management, handling, and disposal control practices • Corrective action and spill contingency measures • Agency and responsible party contact information • Training procedures that shall be used to ensure that workers are aware of permit requirements and proper installation methods for BMPs specified in the SWPPP <p>Each SWPPP shall be prepared by a qualified SWPPP practitioner with BMPs selected to achieve maximum pollutant removal and that represent the best available technology that is economically achievable. Emphasis for BMPs shall be placed on controlling discharges of oxygen-</p>	

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>depleting substances, floating material, oil and grease, acidic or caustic substances or compounds, and turbidity. Given that Imperial Valley Drains would accept runoff from areas within the Salton Trough and are listed as impaired for sediment, the SWPPP shall include BMPs sufficient for Risk Level 2 projects. BMPs for soil stabilization and erosion control practices and sediment control practices would also be required. Performance and effectiveness of these BMPs shall be determined either by visual means where applicable (i.e., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination, (inadvertent petroleum release) is required to determine adequacy of the measure.</p> <p>HYDRO-1b: Properly Dispose of Construction Dewatering in Accordance with the Colorado River Basin Regional Water Quality Control Board. If required, all construction dewatering for future renewable energy facilities developed under the proposed Project shall be discharged to an approved land disposal area or drainage facility in accordance with Colorado River Basin RWCQB requirements. Each future project proponent or project construction contractor shall provide the Colorado River Basin RWQCB with the location, type of discharge, and methods of treatment and monitoring for all groundwater dewatering discharges. Emphasis shall be placed on those discharges that would occur directly or in proximity to surface water bodies and drainage facilities.</p>	
Substantially deplete groundwater supplies or interfere with groundwater recharge	Potentially Significant	<p>HYDRO-2a: Groundwater Monitoring and Mitigation Plan. A Groundwater Monitoring and Mitigation Plan (Plan) shall be prepared, reviewed, and approved by the County of</p>	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>HYDRO-2: Withdrawal of groundwater could lower water levels of the source aquifer. Creation of new impervious surfaces associated with future renewable energy facilities developed under the proposed Project, and in particular those associated with future solar facilities, could interfere with groundwater recharge by reducing the amount of surface area through which precipitation and surface water percolates to underlying aquifers.</p>		<p>Imperial prior to project approval and implementation. The County must approve the Plan prior to issuance of any groundwater well permits. The Plan shall be prepared by a qualified professional geologist, hydrogeologist, or civil engineer registered in the State of California and submitted by the applicant to the County for approval.</p> <p>The Plan shall provide detailed methodology for monitoring and reporting procedures; locate monitoring, extraction, and survey points; define significance criteria; and identify mitigation measures in the event that adverse impacts occur that can be attributed to the proposed Project. The Plan shall include summarization of all monitoring data and would require submission of annual reports to the County. A comprehensive summary and analysis of data shall be included in a five-year report. Monitoring shall be performed during preconstruction, construction, and operation, with the intent to establish preconstruction and specific project-related groundwater level trends that can be quantitatively compared against observed and simulated trends near the pumping wells and near potentially affected existing private wells and sensitive water resources. Additionally, at each stage of reporting, the applicant would be required to reevaluate of the adequacy of the monitoring network and Plan.</p> <p>HYDRO-2b: Implement Water Conservation Measures. Project developers shall plan to implement water conservation measures related to renewable energy technology water needs in order to reduce project water requirements. Developers shall minimize the consumptive use of fresh water for power plant cooling by, for example, using dry cooling, using recycled or impaired water, or</p>	

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		selecting solar energy technologies that do not require cooling water.	
<p>Substantially alter the existing drainage pattern of the site that would result in flooding or erosion</p> <p>HYDRO-3: Construction and operation of future renewable energy facilities developed under the proposed Project could affect natural surface water and groundwater flow systems by diverting and/or channelizing onsite and nearby streams to accommodate access road and facility construction.</p>	Potentially Significant	<p>HYDRO-3: Comprehensive Drainage and Sedimentation Control Plan. Project proponents for future renewable energy facilities would be required to prepare a Comprehensive Drainage and Sedimentation Plan (Plan) prior to the initiation of construction (or decommissioning as relevant). Detailed hydrologic analysis shall be performed prior to final design of the specific future renewable energy project. Results of these analyses will be submitted to the County for review. All proposed grading and impervious surfaces on site shall be reviewed and approved by the County with respect to its potential to cause or result in additional erosion and sedimentation, increased stormwater flows, or altered drainage patterns that could lead to unintentional ponding or flooding on site or downstream, and/or additional erosion and sedimentation. The Plan shall include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> • Construction of access corridors and temporary and permanent access roads shall not block existing drainage channels and shall not significantly alter the existing topography. • The project proponent shall delineate the active drainage channels within each drainage avoidance area and avoid placement of proposed flood protection berms within active drainage channels. The drainage avoidance areas shall protect no less than 90 percent of the area of the active drainage channels from construction impacts. 	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> The project proponent shall prepare hydraulic analyses that estimate the pre- and post-development peak discharges, water depths, and velocities for both smaller, more frequent events (2-, 5-, and 10-year events), as well as larger design storm events (100-year event) that would flow through each future project site, drainage avoidance area, and/or on either side of each proposed flood protection berm. <p>The project proponent shall provide the County design details for the flood protection berms including subgrade preparation, construction methods, and armoring or scour protection.</p>	
<p>Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems</p> <p>HYDRO-4: Construction activities including land disturbance-related soil erosion and sedimentation; fuel and chemical spills; storage and potential treatment of wastewater; and the potential application of pesticides, herbicides, and dust suppressant chemicals could result in polluted runoff, resulting in a significant impact.</p>	Potentially Significant	See Mitigation Measures HYDRO-1a and HYDRO-1b.	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Otherwise substantially degrade water quality</p> <p>HYDRO-5: Construction and operation of future renewable energy facilities associated with the proposed Project could impact both groundwater and surface water quality.</p>	Potentially Significant	See Mitigation Measures HYDRO-1a and HYDRO-1b.	Less than Significant
<p>Place housing or structures within a 100-year flood hazard area</p> <p>HYDRO-6: Portions of the proposed overlay zones are located within areas delineated as 100-year flood zones, and development of future renewable energy facilities within these locations could impede or redirect the flood flows.</p>	Potentially Significant	See Mitigation Measure HYDRO-3	Less than Significant
<p>Expose people or structures to risk of loss, injury, or death involving flooding</p> <p>HYDRO-7: Unless construction practices and procedures are managed carefully, construction period flooding could result in damages to onsite facilities, interference with the construction process, and potential exposure of employees to flood conditions.</p>	Potentially Significant	See Mitigation Measures HYDRO-1a and HYDRO-3.	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Result in inundation by seiche, tsunami, or mudflow</p> <p>HYDRO-8: Substantial amounts of the topography of Imperial County is relatively flat and does not pose the risk of exposure to landslides. The proposed Renewable Energy Overlay Zones do not include areas with steep topography and avoid impacts associated with mudflow.</p>	Less than Significant	None required.	Less than Significant
Land Use and Planning			
<p>Physically divide an established community</p> <p>LU-1: The proposed Project has established overlay zones based on a review of the existing County of Imperial Land Use Policy Map to identify areas suitable for development of future renewable energy facilities. Development of these overlay zones included defining a 0.5-mile buffer around all urban areas to avoid land use conflicts with existing development.</p>	Less than Significant	None required.	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Conflict with an applicable land use plan, policy, or regulation</p> <p>LU-2: The <i>Renewable Energy and Transmission Element</i> update has been developed with the intent of maintaining consistency with the other elements of the Imperial County General Plan and includes goals and policies to ensure this consistency.</p>	Less than Significant	None required.	Less than Significant
<p>Conflict with any applicable habitat conservation plan or natural community conservation plan</p> <p>LU-3: Development of future renewable energy facilities under the proposed Project would not conflict with the provisions of a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.</p>	Less than Significant	Mitigation Measures BIO-1a through BIO-4 would provide further consistency.	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Mineral Resources			
<p>Result in the loss of availability of a known mineral resource that would be of value to the region</p> <p>MR-1: Development of future renewable energy facilities under the proposed Project would have the potential to restrict existing mineral resources from being extracted. Similarly, future renewable energy facilities could also conflict with delineated locally important mineral resource recovery sites.</p>	Potentially Significant	<p>MR-1a: Project proponents of future renewable energy facilities shall identify potential impacts on mineral development activities and ways to minimize any potentially significant impacts during early phases of project planning. Impact assessments on mineral resources shall include, but are not limited to, the following actions:</p> <ul style="list-style-type: none"> • Identify active mining claims or mineral development activities and potential for mineral development in proximity to a proposed renewable energy facility. In coordination with County staff, developers shall consult existing land use plans and updated inventories. • Evaluate impacts on mineral development as part of the environmental impact analysis for the proposed renewable energy facility and consider options to avoid, minimize, and mitigate significant impacts. <p>MR-1b: Where valid mining claims or leases already exist, proponents of future renewable energy facilities shall engage in early coordination with claim or lease holders to determine the possibility of locating new facilities in or near these areas to avoid adverse effects on mineral development.</p>	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Noise			
<p>Exposure of persons to or generation of noise levels in excess of established standards or existing levels</p> <p>NOI-1: Construction and operation of future renewable energy facilities associated with the proposed Project would have the potential to generate noise levels in excess of the standards established in the <i>Noise Element</i> of the Imperial County General Plan.</p>	Potentially Significant	<p>NOI-1a: Protect sensitive receptors from noise. Project proponents developing future renewable energy facilities shall demonstrate that the following requirements are implemented:</p> <ol style="list-style-type: none"> 1. Future renewable energy facilities developed under the proposed Project should be located more than 0.5 mile from noise-sensitive receptors, including residences, churches, medical care facilities, schools, child care facilities, public parks, public recreation areas, quiet recreation areas, and wildlife or wilderness areas. 2. Project proponents should take measurements to assess the existing background noise levels at sites and compare them with the anticipated noise levels associated with the project. 3. Project proponents should prepare a noise monitoring and mitigation plan including designs to (a) minimize noise impacts to noise-sensitive receptors, limit increases to less than a 5 to 10 dBA increase above ambient levels, and not exceed local noise standards; (b) address project-generated noise impacts; and (c) acquire lands to serve as buffers around the proposed facilities. <p>NOI-1b: Implement noise reduction techniques. Project proponents developing future renewable energy facilities shall implement the following requirements:</p>	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ol style="list-style-type: none"> 1. Limit noisy construction activities (including truck and rail deliveries, pile driving, and blasting) to the least noise-sensitive times of day consistent with the requirements of the County of Imperial Noise Ordinance. 2. Consider use of noise barriers such as berms and vegetation to limit ambient noise at plant property lines, especially where noise-sensitive receptors may be present. 3. Ensure all project equipment has the appropriate sound-control devices and shield-impact tools. Use battery-powered forklifts and other facility vehicles and flashing lights instead of audible backup alarms on mobile equipment. 4. Locate stationary construction equipment (such as compressors and generators) as far as practical from nearby residences. 5. If blasting or other noisy activities are required during the construction period, notify nearby residents and the permitting agencies 24 hours in advance. 6. Properly maintain mufflers, brakes, and all loose items on construction and operation-related vehicles to minimize noise and ensure safe operations. Operate trucks as quietly as possible, while considering local conditions. Advise about downshifting and vehicle operations in residential communities to keep truck noise to a minimum. 7. Install mufflers on diesel and gas-driven engine air coolers and exhaust stacks. Equip emergency 	

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>pressure relief valves and steam blow-down lines with silencers to limit noise levels.</p> <p>8. Contain project facilities within buildings or other types of effective noise enclosures, when necessary and feasible.</p> <p>9. Employ engineering controls, including sound-insulated equipment and control rooms, to reduce the average noise level to appropriate levels in normal work areas.</p> <p>NOI-1c: Protect residences from wind turbine noise. Project proponents developing future wind energy facilities shall demonstrate that the proposed wind energy conversion system complies with setbacks defined by the lead agency. Minimum setbacks are generally 1,800 feet from each generator to the nearest receptor. For future wind energy systems that would occur nearer than 3,000 feet from receptors (including habitable dwellings), acoustical studies shall be prepared to demonstrate compliance with local standards.</p>	
<p>Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels</p> <p>NOI-2: Construction of future renewable energy facilities under the proposed Project would generate groundborne vibrations associated with the movement of heavy equipment, earth movement, drilling, pile driving, rock breaking, and explosives blasting.</p>	Potentially Significant	<p>NOI-2: Evaluate Potential for Vibration Impacts. Project proponents of future renewable energy facilities would be required to evaluate the potential for vibration to impact sensitive receptors during construction and operation and develop appropriate mitigation measures if necessary.</p>	Less than Significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Operation of wind, geothermal, and solar renewable energy facilities utilize high-speed rotating mechanical equipment, including turbines and generators, that may generate groundborne vibrations.			
Expose people residing or working in the project area to excessive noise levels within 2.0 miles of a public or private airport NOI-3: The proposed Project would not construct any new housing that could expose residents to excessive noise levels associated with nearby airports. Similarly, employees operating and maintaining future renewable energy facilities would not be exposed to excessive noise levels associated with nearby airports.	Less than Significant	None required.	Less than Significant
Population and Housing			
Induce substantial population growth in an area directly or indirectly POP-1: The proposed Project may increase the population on a temporary basis during construction. The Project would not construct any new housing or businesses and would not extend roads that will induce population growth. It is unlikely that a substantial number of employees would relocate	Less than significant	None required.	Less than significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
and affect housing ability			
Displace substantial numbers of existing housing or people. POP-2: Construction and operation of the proposed Project would be located at least 0.5 mile from any urban area thereby avoiding displacement of housing.	Less than significant	None required	Less than significant
Public Services			
Result in physical impacts associated with the provision of new or physically altered fire protection facilities or new facilities. PS-1: Future renewable energy facilities under the proposed Project may require specialized workers from outside the region during construction and operation. It is, however, unlikely that a substantial number of construction personnel would relocate to Imperial County at one time and thereby increase demand for fire protection services.	Less than significant	None required	Less than significant
Physical impacts associated with the provision of new or physically altered police facilities PS-2: As discussed in PS-1 above, it is unlikely that a substantial number of	Less than significant	None required.	Less than significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
construction personnel would relocate to Imperial County at one time and thereby increase demand for police protection.			
Physical impacts associated with the provision of new or physically altered school facilities PS-3: As described in PS-1, it is unlikely that a substantial number of construction personnel would relocate and require the construction of new schools.	Less than significant	None required.	Less than significant
Impacts associated with the provision of new or physically altered recreation facilities or new facilities. PS-4: Construction and operation of future renewable energy facilities developed would have low requirements in needing new workers and would not require construction of new recreation areas.	Less than significant	None required.	Less than significant
Physical impacts associated with the provision of new or physically altered public facilities, or new facilities. PS-5: The proposed Project will avoid impacts to libraries, post offices, and other public facilities. There will be minimal potential for displacement of libraries, post offices, or other existing public facilities. Minimal new workers	Less than significant	None required.	Less than significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
required would be low and not require construction of new public facilities.			
Recreation			
<p>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.</p> <p>REC-1: The proposed project would not construct any new housing that would result in an increase in population that could increase use of existing park or recreation facilities.</p>	Less than significant.	None required.	Less than significant
<p>Include recreational facilities or require the construction or expansion of recreational facilities.</p> <p>REC-2: The proposed project would not construct any recreation facilities. New workers required for construction and future operations would not require the construction or expansion of recreational facilities.</p>	Less than significant	None required.	
Transportation/Traffic			
Conflict with an applicable plan, policy, or ordinance establishing measures of effectiveness for the performance of a circulation system, or conflict with an applicable congestion management program.	Potentially significant	TRA-1a: Implement a transportation plan. Project proponents shall prepare a transportation plan for implementation during all phases of future renewable energy facilities developed under the proposed Project. The transportation plan shall address methods for reducing construction worker traffic volumes and project-related	Less than significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>TRA-1: The proposed Project could result in an increase in traffic due to vehicles transporting construction materials and personnel which could decrease the level of service on roadways and highways.</p> <p>Operations associated with the proposed Project would generate traffic due to operations and maintenance activities. Impacts would be less than traffic generated during construction.</p>		<p>equipment and materials transport by implementing the following strategies: (1) provide a construction worker rideshare program; (2) schedule shift changes and deliveries to avoid conflict with peak-hour traffic patterns; (3) establish traffic controls for transport of facility hazardous and nonhazardous materials, components, main assembly cranes, and other large pieces of equipment; and (4) evaluate alternative transportation approaches depending on specific object sizes, weights, origin, destination, peak-hour traffic, and unique handling requirements.</p> <p>TRA-1b: Coordinate road improvements with local authorities. Project proponents shall consult with local planning authorities regarding increased traffic during the construction phase of future renewable energy facilities developed under the proposed Project. Each project proponent shall conduct a project-specific traffic impact assessment of the vehicle numbers per day, their size, and type to determine design for implementing local road improvements and multiple-site access locations for future renewable energy facilities developed under the proposed Project.</p> <p>TRA-1c: Implement traffic control measures. Project proponents shall prepare and implement traffic control measures, such as intersection realignment coupled with speed limit reduction; installation of traffic lights and/or other signage; and addition of acceleration, deceleration, and turn lanes on routes with site entrances for future renewable energy facilities developed under the proposed Project.</p>	

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>TRA-1d: Ensure proper signage and travel management. Project proponents shall ensure signs are placed along future construction roads to identify speed limits, travel restrictions, and other standard traffic control information. Consideration should be given to limiting construction vehicles traveling on public roadways during the morning and late afternoon commute times to minimize impacts on local commuters.</p>	
<p>Result in a change in air traffic patterns</p> <p>TRA-2: Development of future renewable energy facilities under the proposed Project may include uses such as windmills and concentrated solar voltaic structures, which may affect air traffic patterns due to their substantial height. Existing regulations would require future project proponents to coordinate with the Federal Aviation Administration, branches with the United States Military and other agencies to ensure facilities would not affect air traffic patterns.</p>	Less than significant.	None required	Less than significant.
<p>Substantially increase hazards due to a design feature or incompatible uses</p> <p>TRA-3: The proposed Project may have the potential to introduce incompatible uses or result in an increase in hazards. Impacts may result due to temporary hazards with construction or</p>	Potentially significant	<p>TRA-3a: Project proponents of future renewable energy facilities would be required to retain a professional civil engineer to survey and evaluate the conditions of roads along proposed haul routes prior to commencing construction. Preconstruction conditions shall be documented for each roadway with photo and text description. Video of haul routes may also be used to document preconstruction conditions. The photographs</p>	Less than significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>permanent changes to existing roadways with facility design. Traffic increases during construction could damage existing roadways. Heavy truck loads with construction equipment may accelerate the deterioration of roadway surfaces. Roadways with pavement design and existing conditions that are unable to withstand future construction traffic could develop cracks, ruts, and pot-holes.</p>		<p>and/or videos are to include documentation of bridges and other appurtenances such as signs, striping, drainage, and other utilities as determined in consultation with the County. The report shall make a determination of the minimum road design criteria needed to support anticipated project traffic and whether the existing roadways comply. Each project proponent shall submit the completed report to Imperial County Department of Public Works for review and comment.</p> <p>TRA-3b: Project proponents of future renewable energy facilities shall enter into a Roadway Maintenance Agreement with the County of Imperial prior to issuance of a grading permit. Each project proponent shall pay its fair share of the responsibility to maintain future haul routes during construction and, if necessary, bring the roadways up to an appropriate minimum standard to handle the anticipated traffic.</p> <p>TRA-3c: Project proponents of future renewable energy facilities shall be responsible for roadway preparation work, pavement construction, and repairs to County-maintained roads, including County-maintained bridges and other roadway appurtenances for any other route that is subsequently used but not identified in the Programmatic EIR. This may include, but is not limited to, bridges, signs, striping, drainage improvements and roadway shoulders. Consideration shall also be given to improvements to other infrastructure, such as IID canal and drain crossings.</p>	

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Result in inadequate emergency access.</p> <p>TRA-4: Traffic increases during construction of future renewable energy facilities could generate large numbers of vehicle trips that could temporarily reduce LOS on roadways within Imperial County, which could in turn affect emergency access.</p>	<p>Potentially Significant</p>	<p>See Mitigation Measures TRA-1a through TRA-1d</p> <p>TRA-4a: Provide onsite laydown and staging. Project proponents shall ensure that their future renewable energy facility site contains adequate area for construction laydown and staging, parking for construction and operation worker vehicles, and site traffic circulation aisles.</p> <p>TRA-4b: Control site access. Project proponents shall restrict traffic to the roads specified for the future renewable energy facility. Use of other unimproved roads should be restricted to emergency situations involving potential injury or loss of life.</p> <p>TRA-4c: Repair project-related damage. Project proponents shall be responsible for repairing or reconstructing project-related access roads that are damaged during construction of future renewable energy facilities to return them to pre-project conditions.</p>	<p>Less than Significant</p>
<p>Conflict with plans, policies, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the safety or performance of such facilities.</p> <p>TRA-5: The proposed Project is not anticipated to conflict with adopted policies, plans, and programs regarding alternative transportation.</p>	<p>Less than significant</p>	<p>None required.</p>	<p>Less than significant.</p>

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Utilities and Service Systems			
<p>Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board</p> <p>UTIL-1: The proposed Project would generate a minimal amount of wastewater during construction. Implementation of the proposed Project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board.</p>	Less than significant	None required.	Less than significant.
<p>Require/result in construction of new water or wastewater treatment facilities, or expansion of existing facilities</p> <p>UTIL-2: The proposed Project would not construct residential, commercial, or other uses that would require substantial amounts of water supply or generate substantial amounts of wastewater. Permanent resources would be limited to domestic use. It is not anticipated that these permanent water service needs would impact water supply within Imperial County.</p>	Less than significant	None required	Less than significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Require/result in the construction of new stormwater drainage facilities</p> <p>UTIL-3: As described in the impact analysis for HYDRO-3, the proposed Project could affect natural surface water and groundwater flow systems by diverting and/or channelizing onsite and nearby streams.</p>	Potentially Significant	Mitigation Measure HYDRO-3 would be implemented to reduce impacts associated with stormwater drainage facilities.	Less than significant.
<p>Have sufficient water supplies available to serve the project from existing entitlements and resources, or new or expanded entitlements are needed</p> <p>UTIL-4: The proposed Project would not construct residential, commercial, or other uses that would require substantial amounts of water supply. Permanent resources would be limited to domestic use. It is not anticipated that these permanent water service needs would impact water supply within the County.</p>	Less than significant	None required	Less than significant
<p>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</p> <p>UTIL-5: Development of future renewable energy facilities under the proposed Project would generate</p>	Less than significant	None required	Less than significant

Table ES-1: Summary of Potential Impacts and Mitigation Measures

Potential Impacts	Level of Impact/ Significance before Mitigation	Mitigation Measures	Level of Significance After Mitigation
minimal amount of wastewater during construction but would not increase the demands of a wastewater treatment provider.			
<p>Be served by a landfill without sufficient permitted capacity to accommodate the project's solid waste disposal needs</p> <p>UTIL-6: Development of future renewable energy facilities under the proposed Project would generate solid waste during construction and operation. Generated solid waste may exceed the permitted capacity of existing landfills within Imperial County.</p>	Potentially significant	UTIL-6: Complete a Waste Management Plan for construction and decommissioning. Future renewable energy facilities developed under the proposed Project would be required to develop a Waste Management Plan that shall identify the projected waste generated by the activity and feasible methods to divert a minimum of 75 percent of waste from landfills, such as sorting and recycling of materials, reuse of materials, and waste reduction measures.	Less than significant
<p>Comply with federal, State, and local statutes and regulations related to solid waste</p> <p>UTIL-7: Development of future renewable energy facilities under the proposed Project would generate solid waste and would be required to comply with the 1989 California Integrated Waste Management Act and AB-341.</p>	Potentially Significant	Mitigation measure UTIL-6 would also be implemented to reduce impacts associated with solid waste regulations.	Less than significant

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