

## **5.0 – ALTERNATIVES**

### **5.1 INTRODUCTION**

CEQA Guidelines, Section 15126.6(a), states that an environmental impact report shall describe and analyze a range of reasonable alternatives to a project. These alternatives should feasibly attain most of the basic objectives of the project while avoiding or substantially lessening one or more of the significant environmental impacts of the project. An EIR need not consider every conceivable alternative to a project, nor is it required to consider alternatives that are infeasible. The discussion of alternatives shall focus on those capable of avoiding or substantially lessening any significant effects of the project, even if they impede the attainment of the project objectives to some degree or would be more costly (CEQA Guidelines, Section 15126.6(b)).

CEQA Guidelines, Section 15126.6(d) states that the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed but in less detail than the significant effects of the project as proposed.

### **5.2 NO PROJECT ALTERNATIVE**

CEQA Guidelines, Section 15126.6(e)(1) requires that a No Project Alternative be analyzed in order to allow the decision-makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. The No Project Alternative would not assist in developing the renewable energy overlay zone system or a revision to the County's Land Use Ordinance.

#### **5.2.1 Impact Analysis under No Project Alternative**

##### **Aesthetics**

Implementation of the No Project Alternative could potentially increase impacts associated with aesthetics beyond those identified for the proposed Project in Section 4.1. Construction and operation of future renewable energy facilities under this Alternative would change the visual character of the sites where construction of renewable energy facilities would take place. Future renewable energy facilities developed under this Alternative would also have the potential to be located on sites on BLM lands that are considered to have high visual resource value or have been determined to be a scenic vista. Depending on the type of renewable energy technology, future facilities developed under this Alternative may result in impacts related to light and glare.

Future renewable energy facilities developed under this Alternative would be subject to mitigation measures AESTH-1a through AESTH-3 described in Section 4.1.4 to reduce impacts associated with scenic vistas, scenic highways, existing visual character, and glare. Although implementation of mitigation measures AESTH-1a through AESTH-3 would minimize affects associated with scenic vistas, the visual character of the site, and glare, some impacts may remain. Additional mitigation may be developed for future specific projects, but it is anticipated that impacts may remain significant and unavoidable. Therefore, impacts associated with Aesthetics under this Alternative may be greater than those identified in Section 4.1 for the proposed Project and would remain significant and unavoidable.

## **Agricultural Resources**

The No Project Alternative would result in greater impacts to agricultural resources than the DRECP Alternative or the proposed Project. Because this Alternative would not identify specific locations for future development of renewable energy as the DRECP Alternative or proposed Project, a greater amount of agricultural resources could be converted to renewable energy uses. Additionally, unrestricted development of future renewable energy facilities under this Alternative may have a greater potential to result in indirect impacts on existing agricultural resources. The wider dispersal of renewable energy facilities throughout Imperial County under this Alternative may have greater potential to damage equipment, crops, or livestock on adjacent properties or inhibit crop growth by fugitive dust emissions. Similarly, erosion associated with future facilities could result in water and soil contamination. Although future renewable energy facilities would be subject to mitigation measures AG-1a through AG-3 described in Section 4.2.4, the unrestricted project development that may occur under this Alternative would have the potential to result in greater impacts to agricultural resources than under the DRECP Alternative or the proposed Project.

## **Air Quality**

The No Project Alternative would not increase the renewable energy goal of up to 7,000 MW for Imperial County identified for the proposed Project and, therefore, would not generate additional emissions of criteria pollutants during construction or operation of future renewable energy facilities beyond those anticipated under the proposed Project. Although this Alternative does not include the 0.5-mile buffer around all urban areas as was included in the proposed Project, implementation of mitigation measure NOI-1a would require all new renewable energy facilities to be located more than 0.5 mile from sensitive receptors, thereby allowing pollutant concentrations to dissipate between the construction site and boundary of the urban area. Furthermore, future renewable energy facilities developed under this Alternative would also be subject to mitigation measures AQ-1a through AQ-2b described in Section 4.3.4, which would reduce impacts to a level less than significant.

## **Biological Resources**

The No Project Alternative would result in greater impacts to biological resources than the DRECP Alternative or the proposed Project. As described in Section 2.3, the DRECP identified areas that should be preserved in order to contribute to the conservation (recovery) of Covered Species, habitats, and natural communities. Preservation of these areas would ensure that future renewable energy facilities would be developed either on land that has already been disturbed or in areas with lower biological value. Biological preservation areas identified in the DRECP were also excluded from the overlay zones developed for the proposed Project, which would in turn contribute to the conservation (recovery) of Covered Species, habitats, and natural communities. In contrast, the No Project Alternative would not restrict future development of renewable energy facilities from biological preserve areas excluded from the DRECP Alternative and proposed Project. Consequently, implementation of this Alternative could potentially allow future renewable energy facilities to be developed in biologically sensitive areas that could result in significant impacts to biological resources. Although future renewable energy facilities would be subject to mitigation measures BIO-1a through BIO-4 described in Section 4.4.4, the unrestricted project development that may occur under this Alternative may have the potential to result in greater impacts to biological resources than under the DRECP Alternative or the proposed Project.

## **Cultural Resources**

Future renewable energy facilities developed under the No Project Alternative would not have a greater likelihood to impact cultural resources than the proposed Project. Specific project sites have not been identified for future renewable energy facilities under this Alternative or the proposed Project, and each would have a similar potential to impact cultural resources that would depend on future project siting. Specific impacts to cultural resources, including historical, archaeological, and paleontological resources, would be addressed during project-specific environmental evaluation of future renewable energy projects approved by the County. Furthermore, future renewable energy facilities developed under this Alternative would also be subject to mitigation measures CUL-1 through CUL-4 identified in Section 4.5.4, which would reduce impacts to a level less than significant.

## **Geology and Soils**

Future renewable energy facilities developed under the No Project Alternative would not have a greater likelihood to result in impacts related to geology and soils than the proposed Project. Specific project sites have not been identified for future renewable energy facilities under this Alternative or the proposed Project; and each would have a similar level of risk associated with seismic activity, geologic events such as landslides and subsidence, and soil erosion that would depend on future project siting. Specific impacts related to geology and soils would be addressed during project-specific environmental evaluations of future renewable energy projects approved by the County. Furthermore, future renewable energy facilities developed under this Alternative would also be subject to mitigation measures GEO-1 through GEO-5 identified in Section 4.6.4, which would reduce impacts to a level less than significant.

## **Greenhouse Gas Emissions**

The No Project Alternative would not increase the renewable energy goal of up to 7,000 MW for Imperial County identified for the proposed Project and, therefore, would not generate additional GHG emissions during construction or operation of future renewable energy facilities. Similarly, development of future renewable energy facilities under this Alternative would displace power currently produced by carbon-based fuels and reduce regional GHG emissions. This displacement of GHG emissions would be consistent with EO S-3-05, AB 32, and other legislation related to the reduction of GHG emissions in California described for the proposed Project in Section 4.7. Therefore, impacts associated with GHG under this Alternative would be similar to those identified in Section 4.7 for the proposed Project and would be less than significant.

## **Hazards and Hazardous Materials**

Implementation of the No Project Alternative would not increase impacts associated with hazards and hazardous materials beyond those identified for the proposed Project in Section 4.8. Construction and operation of future renewable energy facilities developed under this Alternative would require use, storage, and disposal of hazardous materials similar to those required under the proposed Project. Future renewable energy facilities developed under this Alternative would also have the potential to be located on sites that possess hazardous materials which could be exposed during construction. Implementation of mitigation measures HAZ-1a and HAZ-1b described in section 4.8.4 would reduce these impacts to a level less than significant. Although this Alternative does not include the 0.5-mile buffer around all urban areas as was included in the proposed Project, implementation of mitigation measure NOI-1a requiring all new renewable energy facilities be located more than 0.5 mile from noise-

sensitive receptors, including schools, would ensure that hazardous emissions or handling of hazardous materials, substances, or waste would not occur within 0.25 mile of an existing or proposed school. Implementation of mitigation measures TR-1a through TR-1d and TR-4a through TR-4c described in Section 4.16.4 would reduce impacts associated with interference with an adopted emergency response plan or emergency evacuation plan to a level less than significant. Furthermore, implementation of this Alternative would not increase the potential for impacts associated with proximity to public or private airports or risks associated with wildfires beyond those identified in Section 4.8. Therefore, impacts associated with hazards and hazardous materials under this Alternative would be similar to those identified in Section 4.8 for the proposed Project and would be less than significant.

### **Hydrology and Water Quality**

Future renewable energy facilities developed under the No Project Alternative would not have a greater likelihood to result in impacts related to hydrology and water quality than the proposed Project. Specific project sites have not been identified for future renewable energy facilities under this Alternative or the proposed Project, and each would have a similar potential to result in impacts related to hydrology and water quality that would depend on future project siting. Specific impacts related to the potential to violate water quality standards or waste discharge requirements, deplete groundwater supplies, or alter natural drainage patterns would be addressed during project-specific environmental evaluations of future renewable energy projects approved by the County. Furthermore, future renewable energy facilities developed under this Alternative would also be subject to mitigation measures HYDRO-1a through HYDRO-3 identified in Section 4.9.4, which would reduce impacts to a level less than significant.

### **Land Use and Planning**

Implementation of the No Project Alternative would not increase impacts associated with land use and planning beyond those identified for the proposed Project in Section 4.10. Renewable energy development tends to occur in rural areas, which could result in the conversion of rural land uses, including areas designated for agriculture, recreation, and open space. Renewable energy facilities constructed under this Alternative would not include the 0.5-mile buffer around all urban areas as was included in the proposed Project; however, proponents of future renewable energy facilities would likely seek sites that do not include residential properties and, therefore, would not divide established communities. Therefore, impacts associated with land use and planning under this Alternative would be similar to those identified in Section 4.10 for the proposed Project and would be less than significant.

### **Mineral Resources**

Future renewable energy facilities developed under the No Project Alternative would not have a greater likelihood to impact mineral resources than the proposed Project. Specific project sites have not been identified for future renewable energy facilities under this Alternative or the proposed Project, and each would have a similar potential to impact mineral resources that would depend on future project siting. Specific impacts to mineral resources would be addressed during project-specific environmental evaluations of future renewable energy projects approved by the County. Furthermore, future renewable energy facilities developed under this Alternative would also be subject to mitigation measures MR-1a and MR-1b identified in Section 4.11.4, which would reduce impacts to a level less than significant.

## **Noise**

Implementation of the No Project Alternative would not increase impacts associated with noise beyond those identified for the proposed Project in Section 4.12. Future renewable energy facilities developed under this Alternative would result in the same impacts associated with noise and vibration during construction and operation. These impacts would potentially affect sensitive receptors equally under this Alternative and the proposed Project depending on the receptors' distance from the future renewable energy facility site and the type of technology being constructed. Similar to the proposed Project, implementation of mitigation measures NOI-1a through NOI-1c described in Section 4.12.4 would reduce impacts associated with construction and operation of future renewable energy facilities to a level less than significant. Although this Alternative does not include the 0.5-mile buffer around all urban areas as was included in the proposed Project, implementation of mitigation measure NOI-1a requiring all new renewable energy facilities be located more than 0.5 mile from noise-sensitive receptors would ensure that additional impacts would not occur under this Alternative. Therefore, impacts associated with noise under this Alternative would be similar to those identified in Section 4.12 for the proposed Project and would be less than significant.

## **Population and Housing**

The No Project Alternative would not construct any new housing or business that would induce population growth nor would this Alternative extend roads that would indirectly induce population growth. Renewable energy facilities constructed under this Alternative would meet future local and regional demand for power and would not generate excessive energy capacity that would induce population growth. This Alternative would not increase the renewable energy goal of up to 7,000 MW for Imperial County identified for the proposed Project and, therefore, would not generate additional population growth associated with temporary and permanent jobs required for future renewable energy facilities. Although this Alternative does not include the 0.5-mile buffer around all urban areas as was included in the proposed Project, proponents of future renewable energy facilities would likely seek sites that do not include residential properties. Renewable energy facilities typically require large tracts of vacant land with few or no structures on them, thereby minimizing the potential for displacement of housing and people. Therefore, impacts associated with population and housing under this Alternative would be similar to those identified in Section 4.13 for the proposed Project and would be less than significant.

## **Public Services**

Implementation of the No Project Alternative would not increase impacts associated with public services beyond those identified for the proposed Project in Section 4.14. Renewable energy facilities developed under this Alternative would meet future local and regional demand for power and would not generate excessive energy capacity that would induce population growth that would create demand for additional public service facilities. Although this Alternative does not include the 0.5-mile buffer around all urban areas as was included in the proposed Project, proponents of future renewable energy facilities would likely seek sites that do not include current fire stations, police stations, libraries, schools, and other public facilities. Renewable energy facilities typically require large tracts of vacant land with few or no structures on them, thereby minimizing the potential for displacement of public services facilities.

Future renewable energy facilities developed under this Alternative would be required to comply with all existing regulations and requirements of the Imperial County Fire/OES Department and would be

reviewed for adherence to prevention measures for fires. Future renewable energy facilities developed under this Alternative would be required to pay their proportional share of local infrastructure improvement costs per the 2006 Development Impact Fees Ordinance. Similar to the proposed Project, the number of new workers required for construction and operation of future renewable energy facilities developed under this Alternative would be relatively low and would not require construction of new public services facilities. Therefore, impacts associated with public services under this Alternative would be similar to those identified in Section 4.14 for the proposed Project and would be less than significant.

### **Recreation**

Implementation of the No Project Alternative would not increase impacts associated with recreation beyond those identified for the proposed Project in Section 4.15. This Alternative would not construct new housing that would result in an increase in population and would not generate excessive energy capacity that would induce population growth. Thus, implementation of this Alternative would not increase use of existing park or recreation facilities and would not result in the need to construct or expand recreational facilities that might have an adverse effect on the environment. Therefore, impacts associated with recreation under this Alternative would be similar to those identified in Section 4.15 for the proposed Project and would be less than significant.

### **Transportation/Traffic**

Implementation of the No Project Alternative would not increase impacts associated with transportation and traffic beyond those identified for the proposed Project in Section 4.16. This Alternative would not increase the renewable energy goal of up to 7,000 MW for Imperial County identified for the proposed Project and, therefore, would develop a similar number of future renewable facilities. Consequently, this alternative would generate similar levels of traffic during construction and operation of future renewable energy facilities. Furthermore, future renewable energy facilities developed under this Alternative would also be subject to mitigation measures TRA-1a through TRA-4c identified in Section 4.16.4, which would reduce potential impacts to a level less than significant.

### **Utilities and Service Systems**

Implementation of the No Project Alternative would not increase impacts associated with utilities and service systems beyond those identified for the proposed Project in Section 4.17. This Alternative would not increase the renewable energy goal of up to 7,000 MW for Imperial County identified for the proposed Project and, therefore, would develop a similar number of future renewable facilities. Consequently, implementation of this Alternative would require similar amounts of water supply and generate similar levels of stormwater. Implementation of mitigation measure HYDRO-3 would reduce impacts associated with stormwater to a level less than significant. Wastewater generated under this Alternative would be treated via onsite septic systems as under the proposed Project. Future renewable energy facilities developed under this Alternative would also be subject to mitigation measure UTIL-6, which would reduce impacts associated with solid waste to a level less than significant. Therefore, impacts associated with utilities and service systems under this Alternative would be similar to those identified in Section 4.17 for the proposed Project and would be less than significant.

### **5.2.2      Conclusion**

The No Project Alternative would have the potential to result in the greatest level of environmental impacts of all three alternatives. The unrestricted development that may occur under this Alternative would have the potential to result in the greatest level of impacts related to aesthetics, agricultural resources, and biological resources. Potential impacts would be similar for the remaining environmental categories.

## **5.3          DRECP ALTERNATIVE**

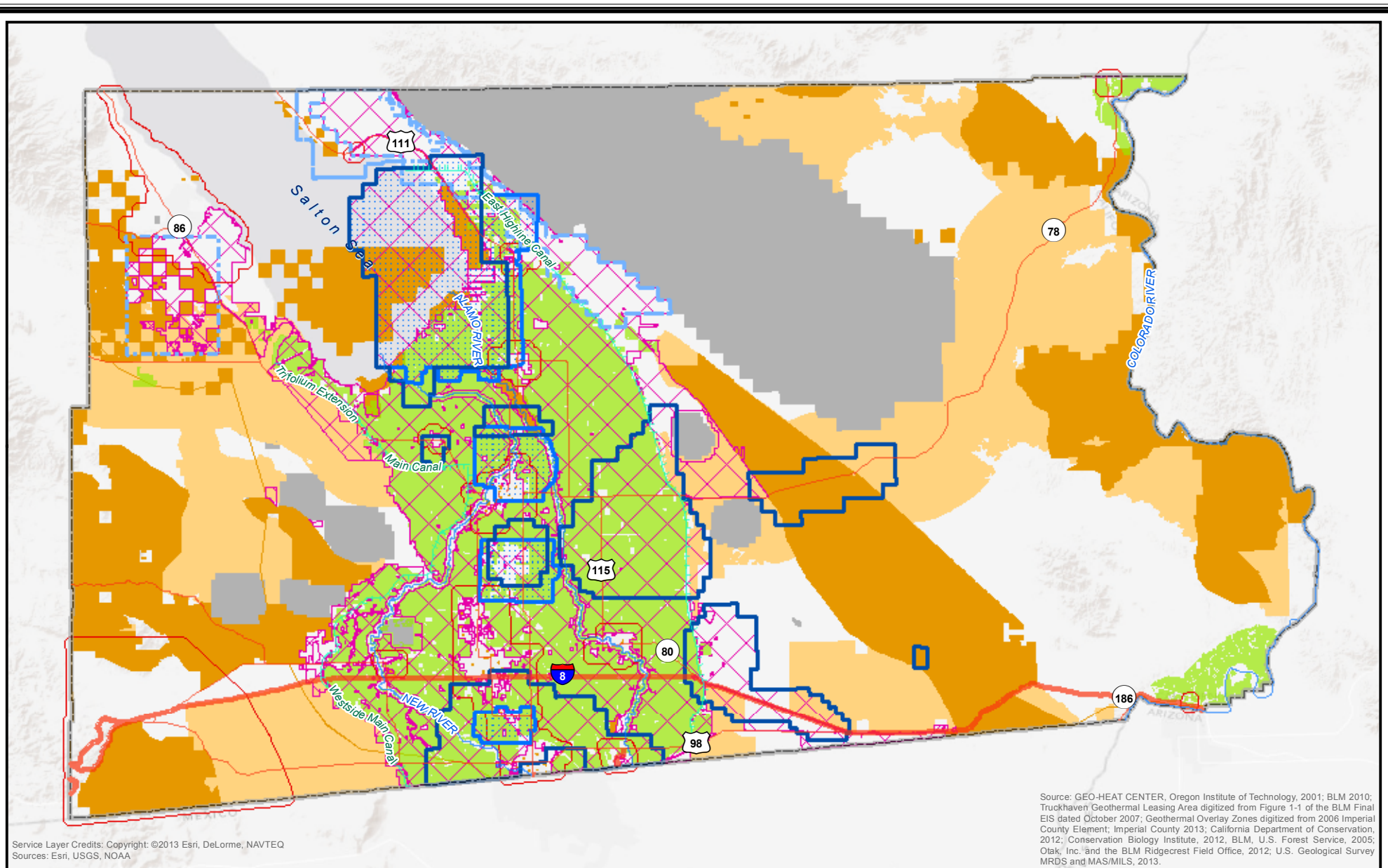
The DRECP Alternative represents the proposed Project that was developed for the Desert Renewable Energy Conservation Plan (DRECP). This alternative encompasses a far larger project area that would substantially increase the amount of County land that could be developed with renewable energy facilities (Figure 5.3-1). Under this Alternative, a total of 733,859.60 acres would be available for development of future renewable energy facilities, compared to 339,206.15 acres under the proposed Project evaluated in Chapter 4.0. Additionally, this Alternative does not include a 0.5-mile buffer around all urban areas as was included in the proposed Project evaluated in Chapter 4.0.

### **5.3.1      Impact Analysis under the DRECP Alternative**

#### **Aesthetics**

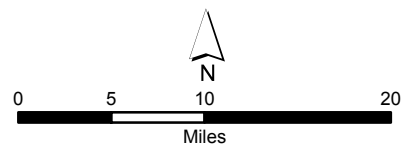
The DRECP Alternative would result in greater impacts related to aesthetics than the proposed Project but lesser impacts than the No Project Alternative. This Alternative has identified locations for future renewable energy facilities that would restrict development from some areas within Imperial County considered to have high visual resource value that otherwise may be developed under the No Project Alternative; however, the development footprint for this Alternative is far larger than the overlay zones developed for the proposed Project and would have a greater potential to have impacts related to aesthetics. Construction and operation of future renewable energy facilities developed under this Alternative would change the visual character of the sites where construction of renewable energy facilities would take place. Future renewable energy facilities developed under this Alternative would also have the potential to be located on sites on BLM lands that are considered to have high visual resource value. Depending on the type of renewable energy technology, future facilities developed under this Alternative may result in impacts related to light and glare.

Future renewable energy facilities developed under this Alternative would be subject to mitigation measures AESTH-1a through AESTH-3 described in Section 4.1.4 to reduce impacts associated with scenic vistas, scenic highways, existing visual character, and glare. Although implementation of mitigation measures AESTH-1a through AESTH-3 would minimize effects associated with scenic vistas, the visual character of the site, and glare, some impacts could remain. Additional mitigation may be developed for future specific projects, but it is anticipated that impacts would remain significant and unavoidable. Therefore, impacts associated with aesthetics under the DRECP Alternative would be greater than those identified in Section 4.1 for the proposed Project and would remain significant and unavoidable.



### Legend

- |                                 |  |                   |
|---------------------------------|--|-------------------|
| KGRA                            | Urban Areas (plus 1/2-mile buffer)           | DRECP Alternative |
| Geothermal Overlay Zones (2006) | Prime and Statewide Significant Farmland     |                   |
| BLM/NEPA-Designated Zones       | Park Lands & Recreational Areas              |                   |
|                                 | Maintenance of Visual Quality has High Value |                   |
|                                 | Military Land Ownership                      |                   |
|                                 | Sensitive and Designated Habitat             |                   |



**Figure 5.3-1**  
Imperial County Renewable Energy and  
Transmission Element Update PEIR  
DRECP Alternative



## Agricultural Resources

The DRECP Alternative would result in greater impacts to agricultural resources than the proposed Project but lesser impacts than the No Project Alternative. This Alternative has identified locations for future renewable energy facilities that would restrict development from some agricultural lands within Imperial County that otherwise may be developed under the No Project Alternative; however, the development footprint for this Alternative is far larger than the overlay zones developed for the proposed Project and possess a far greater amount of agricultural resources. As shown in Table 5.3-1, this Alternative encompasses a total of 483,847.83 acres of important farmland compared to 92,113.80 acres for the proposed Project. The locations of important farmlands within the development footprint of this Alternative are shown on Figure 5.3-2. Although this Alternative would not increase the renewable energy goal of up to 7,000 MW for Imperial County identified for the proposed Project, the larger development footprint would potentially allow for a greater level of conversion of more valuable agricultural resources such as Prime Farmland and Farmland of Statewide Importance.

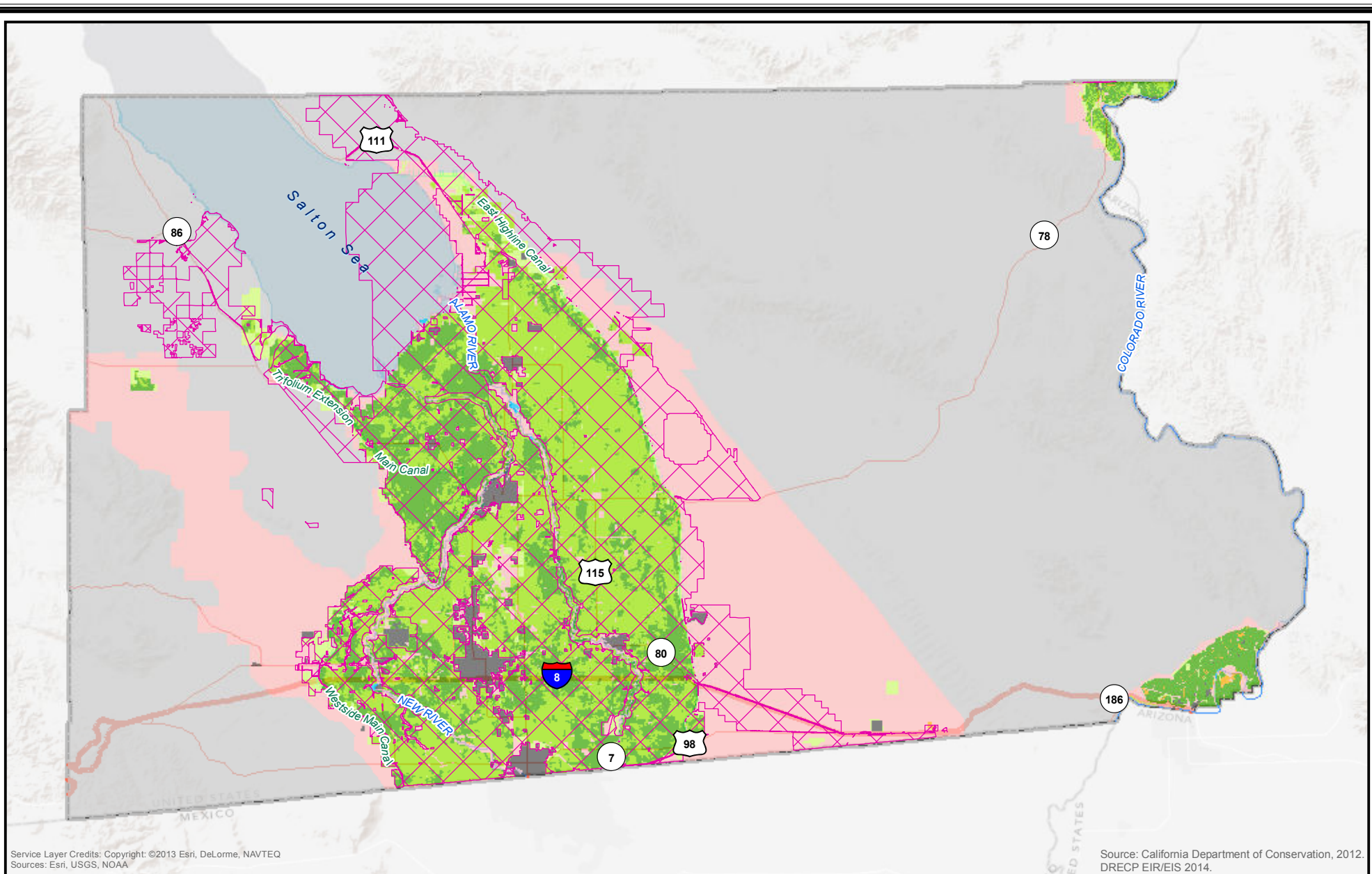
**Table 5.3-1: Comparison of Important Farmland Between  
Proposed Project and DRECP Alternative**

<b>Farmland Classification</b>	<b>Proposed Project</b>	<b>DRECP Alternative</b>	<b>Larger Amount Present Under DRECP Alternative</b>
Prime Farmland	26,145.71	160,504.78	134,359.07
Farmland of Statewide Importance	46,006.41	293,522.53	247,516.12
Unique Farmland	379.75	734.37	354.62
Farmland of Local Importance	19,581.93	29,086.15	9,504.22
Total	92,113.80	483,847.83	391,734.03

Furthermore, the larger development footprint for this Alternative would have a greater potential to result in indirect impacts on existing agricultural resources. The wider dispersal of renewable energy facilities throughout Imperial County under this Alternative would have greater potential to damage equipment, crops, or livestock on adjacent properties or inhibit crop growth through dispersal of fugitive dust. Similarly, erosion associated with future facilities could result in water and soil contamination. Although future renewable energy facilities would be subject to mitigation measures AG-1a through AG-3 described in Section 4.2.4, the larger development footprint for this Alternative would have the potential to result in greater impacts to agricultural resources than under the proposed Project. Impacts to agricultural resources under this Alternative, however, would be less than under the No Project Alternative.

## Air Quality

The DRECP Alternative would not increase the renewable energy goal of up to 7,000 MW for Imperial County identified for the proposed Project and, therefore, would not generate additional emissions of criteria pollutants during construction or operation of future renewable energy facilities beyond those anticipated under the proposed Project. Although the DRECP Alternative does not include the 0.5-mile buffer around all urban areas as was included in the proposed Project, implementation of mitigation measure NOI-1a requiring all new renewable energy facilities to be located more than 0.5 mile from sensitive receptors, thereby allowing pollutant concentrations to dissipate between the construction

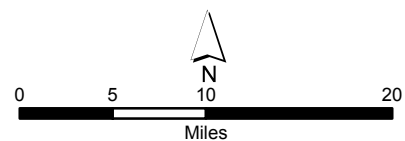


## Legend

### Farmland Mapping and Monitoring Program

- Prime Farmland (P)
- Farmland of Statewide Importance (S)
- Unique Farmland (U)
- Farmland of Local Importance (L)

- Urban and Built-Up Land (D)
- Other Land (X)
- Water (W)
- Area not mapped (Z)
- DRECP Alternative



**Figure 5.3-2**  
Imperial County Renewable Energy and  
Transmission Element Update PEIR  
DRECP Alternative and  
State of California Farmlands of Significance

Name: 20674 EIR Fig 5.3-2 DRECP Alt State Farms of Sig.Mxd  
Date Saved: 11/20/2014, Author: msimmons



site and boundary of the urban area. Furthermore, future renewable energy facilities developed under this Alternative would also be subject to mitigation measures. Implementation of mitigation measures AQ-1a through AQ-2b described in Section 4.3.4 would reduce impacts to a level less than significant.

### **Biological Resources**

The DRECP Alternative would result in greater impacts to biological resources than the proposed Project but lesser impacts than the No Project Alternative. As described in Section 2.3, the DRECP identified areas that should be preserved in order to contribute to the conservation (recovery) of Covered Species, habitats, and natural communities. Preservation of these areas would ensure that future renewable energy facilities would be developed either on land that has already been disturbed or in areas with lower biological value. Consequently, the DRECP Alternative would restrict development from sensitive biological areas that may otherwise be allowed under the No Project Alternative and thereby reduce impacts to biological resources.

This Alternative may result in greater impacts than the proposed Project, however, because it has a larger project footprint that would potentially allow for greater conversion of agricultural resources. As described in Section 2.3, the County executed an additional constraints analysis on the Development Focus Areas (DFAs) of the DRECP to identify additional valuable resources within Imperial County. The results of this constraints analysis dramatically reduced the acreage of land available for future renewable energy development and thereby reduced the potential to impact agricultural resources that may serve as habitat for sensitive species. Although future renewable energy facilities would be subject to mitigation measures BIO-1a through BIO-4 described in Section 4.4.4, the larger footprint that includes a greater amount of agricultural resources under the DRECP Alternative could have the potential to result in greater impacts to biological resources than under the proposed Project.

### **Cultural Resources**

Future renewable energy facilities developed under the DRECP Alternative would not have a greater likelihood to impact cultural resources than the proposed Project. Specific project sites have not been identified for future renewable energy facilities under this Alternative or the proposed Project, and each would have a similar potential to impact cultural resources that would depend on future project siting. Specific impacts to cultural resources, including historical, archaeological, and paleontological resources, would be addressed during project-specific environmental evaluations of future renewable energy projects approved by the County. Furthermore, future renewable energy facilities developed under this Alternative would also be subject to mitigation measures CUL-1 through CUL-4 identified in Section 4.5.4, which would reduce impacts to a level less than significant.

### **Geology and Soils**

Future renewable energy facilities developed under the DRECP Alternative would not have a greater likelihood to result in impacts related to geology and soils than the proposed Project. Specific project sites have not been identified for future renewable energy facilities under this Alternative or the proposed Project; and each would have a similar level of risk associated with seismic activity, geologic events such as landslides and subsidence, and soil erosion that would depend on future project siting. Specific impacts related to geology and soils would be addressed during project-specific environmental evaluations of future renewable energy projects approved by the County. Furthermore, future renewable energy facilities developed under this Alternative would also be subject to mitigation

measures GEO-1 through GEO-5 identified in Section 4.6.4, which would reduce impacts to a level less than significant.

### **Greenhouse Gas Emissions**

The DRECP Alternative would not increase the renewable energy goal of up to 7,000 MW for Imperial County identified for the proposed Project and, therefore, would not generate additional GHG emissions during construction or operation of future renewable energy facilities. Similarly, development of future renewable energy facilities under this Alternative would displace power currently produced by carbon-based fuels and reduce regional GHG emissions. This displacement of GHG emissions would be consistent with EO S-3-05, AB 32, and other legislation related to the reduction of GHG emissions in California described for the proposed Project in Section 4.7. Therefore, impacts associated with GHG under this Alternative would be similar to those identified in Section 4.7 for the proposed Project and would be less than significant.

### **Hazards and Hazardous Materials**

Implementation of the DRECP Alternative would not increase impacts associated with hazards and hazardous materials beyond those identified for the proposed Project in Section 4.8. Construction and operation of future renewable energy facilities developed under this Alternative would require use, storage, and disposal of hazardous materials similar to those required under the proposed Project. Future renewable energy facilities developed under this Alternative would also have the potential to be located on sites that possess hazardous materials which could be exposed during construction; however, implementation of mitigation measures HAZ-1a and HAZ-1b described in Section 4.8.4 would reduce these impacts to a level less than significant. Although this Alternative does not include the 0.5-mile buffer around all urban areas as was included in the proposed Project, implementation of mitigation measure NOI-1a requiring all new renewable energy facilities be located more than 0.5 mile from noise-sensitive receptors, including schools, would ensure that hazardous emissions or handling of hazardous materials, substances, or waste would not occur within 0.25 mile of an existing or proposed school. Implementation of mitigation measures TR-1a through TR-1d and TR-4a through TR-4c described in Section 4.16 would reduce impacts associated with interference with an adopted emergency response plan or emergency evacuation plan to a level less than significant. Furthermore, implementation of this Alternative would not increase the potential for impacts associated with proximity to public or private airports or risks associated with wildfires beyond those identified in Section 4.8. Therefore, impacts associated with hazards and hazardous materials under this Alternative would be similar to those identified in Section 4.8 and would be less than significant.

### **Hydrology and Water Quality**

Future renewable energy facilities developed under the DRECP Alternative would not have a greater likelihood to result in impacts related to hydrology and water quality than the proposed Project. Specific project sites have not been identified for future renewable energy facilities under this Alternative or the proposed Project, and each would have a similar potential to result in impacts related to hydrology and water quality that would depend on future project siting. Specific impacts related to the potential to violate water quality standards or waste discharge requirements, deplete groundwater supplies, or alter natural drainage patterns would be addressed during project-specific environmental evaluations of future renewable energy projects approved by the County. Furthermore, future renewable energy

facilities developed under this Alternative would also be subject to mitigation measures HYDRO-1a through HYDRO-3 identified in Section 4.9.4, which would reduce impacts to a level less than significant.

### **Land Use and Planning**

Implementation of the DRECP Alternative would not increase impacts associated with land use and planning beyond those identified for the proposed Project in Section 4.10. Similar to the proposed Project evaluated in Section 4.10, this Alternative has been developed to identify new opportunities for renewable energy and assures that the future development associated with the Alternative will remain consistent with the Imperial County General Plan and meet land use and environmental goals. Renewable energy development tends to occur in rural areas, which could result in the conversion of rural land uses, including areas designated for agriculture, recreation, and open space. Renewable energy facilities constructed under this Alternative would not include the 0.5-mile buffer around all urban areas as was included in the proposed Project; however, proponents of future renewable energy facilities would likely seek sites that do not include residential properties and, therefore, would not divide established communities. Therefore, impacts associated with land use and planning under this Alternative would be similar to those identified in Section 4.10 for the proposed Project and would be less than significant.

### **Mineral Resources**

Future renewable energy facilities developed under the DRECP Alternative would not have a greater likelihood to impact mineral resources than the proposed Project. Specific project sites have not been identified for future renewable energy facilities under this Alternative or the proposed Project, and each would have a similar potential to impact mineral resources that would depend on future project siting. Specific impacts to mineral resources would be addressed during project-specific environmental evaluations of future renewable energy projects approved by the County. Furthermore, future renewable energy facilities developed under this Alternative would also be subject to mitigation measures MR-1a and MR-1b identified in Section 4.11.4, which would reduce impacts to a level less than significant.

### **Noise**

Implementation of the DRECP Alternative would not increase impacts associated with noise beyond those identified for the proposed Project in Section 4.12. Future renewable energy facilities developed under this Alternative would result in the same impacts associated with noise and vibration during construction and operation. These impacts would potentially affect sensitive receptors equally under this Alternative and the proposed Project depending on the receptors' distance from the future renewable site and type of technology being constructed. Similar to the proposed Project, implementation of mitigation measures NOI-1a through NOI-1c described in Section 4.12.4 would reduce impacts associated with construction and operation of future renewable energy facilities to a level less than significant. Although this Alternative does not include the 0.5-mile buffer around all urban areas as was included in the proposed Project, implementation of mitigation measure NOI-1a requiring all new renewable energy facilities to be located more than 0.5 mile from noise-sensitive receptors would ensure that additional impacts would not occur under this Alternative. Therefore, impacts associated with noise under this Alternative would be similar to those identified in Section 4.12 for the proposed Project and would be less than significant.

## **Population and Housing**

Similar to the proposed Project evaluated in Section 4.13, the DRECP Alternative 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. Consequently, future development of this Alternative would be limited to construction of future renewable energy facilities and would not construct any new housing or business that would induce population growth nor would this Alternative extend roads that would indirectly induce population growth. Renewable energy facilities constructed under this Alternative would meet future local and regional demand for power and would not generate excessive energy capacity that would induce population growth. This Alternative would not increase the renewable energy goal of up to 7,000 MW for Imperial County identified for the proposed Project and, therefore, would not generate additional population growth associated with temporary and permanent jobs required for future renewable energy facilities. Although this Alternative does not include the 0.5-mile buffer around all urban areas as was included in the proposed Project, proponents of future renewable energy facilities would likely seek sites that do not include residential properties. Renewable energy facilities typically require large tracts of vacant land with few or no structures on them, thereby minimizing the potential for displacement of housing and people. Therefore, impacts associated with population and housing under this Alternative would be similar to those identified in Section 4.13 for the proposed Project and would be less than significant.

## **Public Services**

Similar to the proposed Project evaluated in Section 4.14, the DRECP Alternative has been developed to identify new opportunities for renewable energy and assures that the future development associated with this Alternative would remain consistent with the Imperial County General Plan and meet land use and environmental goals. Renewable energy facilities developed under this Alternative would meet future local and regional demand for power and would not generate excessive energy capacity that would induce population growth that would create demand for additional public service facilities. Although this Alternative does not include the 0.5-mile buffer around all urban areas as was included in the proposed Project, proponents of future renewable energy facilities would likely seek sites that do not include current fire stations, police stations, libraries, schools, and other public facilities. Renewable energy facilities typically require large tracts of vacant land with few or no structures on them, thereby minimizing the potential for displacement of existing public services facilities.

Future renewable energy facilities developed under this Alternative would be required to comply with all existing regulations and requirements of the Imperial County Fire/OES Department and would be reviewed for adherence to prevention measures for fires. Future renewable energy facilities developed under this Alternative would be required to pay their proportional share of local infrastructure improvement costs per the 2006 Development Impact Fees Ordinance. Similar to the proposed Project, the number of new workers required for construction and operation of future renewable energy facilities developed under this Alternative would be relatively low and would not require construction of new public services facilities. Therefore, impacts associated with public services under this Alternative would be similar to those identified in Section 4.14 for the proposed Project and would be less than significant.

## **Recreation**

Similar to the proposed Project evaluated in Section 4.15, the DRECP Alternative has been developed to identify new opportunities for renewable energy and assures that the future development associated with the Alternative would remain consistent with the Imperial County General Plan and meet land use and environmental goals. Implementation of this Alternative would not increase impacts associated with recreation beyond those identified for the proposed Project in Section 4.15. This Alternative would not construct new housing that would result in an increase in population and would not generate excessive energy capacity that would induce population growth. Thus, implementation of this Alternative would not increase use of existing park or recreation facilities and would not result in the need to construct or expand recreational facilities that might have an adverse effect on the environment. Therefore, impacts associated with recreation under this Alternative would be similar to those identified in Section 4.15 for the proposed Project and would be less than significant.

## **Transportation/Traffic**

Implementation of the DRECP Alternative would not increase impacts associated with transportation and traffic beyond those identified for the proposed Project in Section 4.16. This Alternative would not increase the renewable energy goal of up to 7,000 MW for Imperial County identified for the proposed Project and, therefore, would develop a similar number of future renewable facilities. Consequently, this alternative would generate similar levels of traffic during construction and operation of future renewable energy facilities. Furthermore, future renewable energy facilities developed under this Alternative would also be subject to mitigation measures TRA-1a through TRA-4c identified in Section 4.16.4, which would reduce potential traffic impacts to a level less than significant.

## **Utilities and Service Systems**

Implementation of the DRECP Alternative would not increase impacts associated with utilities and service systems beyond those identified for the proposed Project in Section 4.17. This Alternative would not increase the renewable energy goal of up to 7,000 MW for Imperial County identified for the proposed Project and, therefore, would develop a similar number of future renewable facilities. Consequently, implementation of this Alternative would require similar amounts of water supply and generate similar levels of stormwater. Implementation of mitigation measure HYDRO-3 would reduce impacts associated with stormwater to a level less than significant. Wastewater generated under this Alternative would be treated via onsite septic systems as under the proposed Project. Future renewable energy facilities developed under this Alternative would be subject to mitigation measure UTIL-6, which would reduce impacts associated with solid waste to a level less than significant. Therefore, impacts associated with utilities and service systems under this Alternative would be similar to those identified in Section 4.17 for the proposed Project and would be less than significant.

### **5.3.2 Conclusion**

The DRECP Alternative would result in greater impacts than the proposed Project but lesser impacts than the No Project Alternative. The development footprint of the DRECP Alternative would reduce impacts to aesthetics, agricultural resources, and biological resources in comparison to the unrestricted development of future renewable energy facilities that would occur under the No Project Alternative; however, the larger development footprint of this Alternative may result in greater impacts related to aesthetics, agricultural resources, and biological resources than under the proposed Project. Potential impacts would be similar for the remaining environmental categories.

## 5.4 COMPARISON OF ALTERNATIVES

Table 5.4-1 below presents a comparative analysis of the proposed Project and the Alternatives.

**Table 5.4-1: Comparative Analysis between the Proposed Project and Alternatives**

<b>Environmental Issue Area</b>	<b>Proposed Project</b>	<b>No Project Alternative</b>	<b>DRECP Alternative</b>
Aesthetics	Significant and Unavoidable	Significant and Unavoidable (impacts greater than proposed Project and DRECP Alternative)	Significant and Unavoidable (impacts greater than proposed Project but less than No Project Alternative)
Agricultural Resources	Mitigated to a Level Less Than Significant	Mitigated to a Level Less Than Significant (impacts greater than proposed Project and DRECP Alternative)	Mitigated to a Level Less Than Significant (impacts greater than proposed Project but less than No Project Alternative)
Air Quality	Mitigated to a Level Less Than Significant	Similar to proposed Project	Similar to proposed Project
Biological Resources	Mitigated to a Level Less Than Significant	Similar to proposed Project	Similar to proposed Project
Cultural Resources	Mitigated to a Level Less Than Significant	Similar to proposed Project	Similar to proposed Project
Geology and Soils	Mitigated to a Level Less Than Significant	Similar to proposed Project	Similar to proposed Project
Greenhouse Gases	Less Than Significant	Similar to proposed Project	Similar to proposed Project
Hazards and Hazardous Materials	Mitigated to a Level Less Than Significant	Similar to proposed Project	Similar to proposed Project
Hydrology and Water	Mitigated to a Level Less Than Significant	Similar to proposed Project	Similar to proposed Project
Land Use	Mitigated to a Level Less Than Significant	Similar to proposed Project	Similar to proposed Project
Mineral Resources	Mitigated to a Level Less Than Significant	Similar to proposed Project	Similar to proposed Project
Noise	Mitigated to a Level Less Than Significant	Similar to proposed Project	Similar to proposed Project
Population and Housing	Less Than Significant	Similar to proposed Project	Similar to proposed Project
Public Services	Less Than Significant	Similar to proposed Project	Similar to proposed Project
Recreation	Less Than Significant	Similar to proposed Project	Similar to proposed Project
Traffic/Transportation	Mitigated to a Level Less Than Significant	Similar to proposed Project	Similar to proposed Project
Utilities and Services System	Mitigated to a Level Less Than Significant	Similar to proposed Project	Similar to proposed Project