

6.0 – OTHER CEQA CONSIDERATIONS

This section discusses the additional topics statutorily required by CEQA Guidelines Section 15126. The topics include whether the proposed Project would: cause significant irreversible environmental changes, result in growth-inducing impacts, or create unavoidable significant environmental impacts.

6.1 IRREVERSIBLE ENVIRONMENTAL CHANGES

According to the *CEQA Guidelines*, “[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified...” Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects associated with implementation of the proposed Project that cannot be avoided.

Both construction and operation of the future renewable energy facilities developed under the proposed Project would lead to the consumption of limited, slowly renewable, and nonrenewable resources, committing such resources to uses that future generations would be unable to reverse. The new development would require commitment of resources that include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of materials and people to and from future renewable energy facility sites.

During construction of future renewable energy facilities developed under the proposed Project, fossil fuels for construction vehicles and equipment would be consumed. In terms of project operations, the following slowly renewable or nonrenewable resources would be required: electricity, petroleum-based fuels, fossil fuels, and water. Title 24 of the California Administrative Code regulates the amount of energy consumed by new development. Nevertheless, the consumption of such resources would represent a long-term commitment of those resources.

The commitment of resources required for the construction and operation of future renewable energy facilities would limit the availability of such resources for future generations or for other uses. However, impacts on energy supply would be less than significant given that the Proposed Project would develop renewable energy in support of the CEC’s requirement of providing 33 percent of electricity retail sales by renewable energy resources. As described in Section 4.7.4, introduction of renewable energy facilities developed under the proposed Project would displace power currently produced by carbon-based fuels that would otherwise be used to meet regional demand for electricity. As documented in the Draft EIR/EIS prepared for the DRECP, estimates prepared by the California Public Utilities Commission (CPUC) project that by 2020, the marginal power plant would consist of a new combined-cycle combustion turbine 95 percent of the time or a new combustion turbine 5 percent of the time. Based on this ratio, GHG emissions associated with marginal power production are 830 pounds CO₂E per MWh. Additionally, the Environmental Protection Agency (USEPA) estimates presented in the DRECP EIR/EIS project that estimates baseline GHG emissions for marginal power in California would be more than 990 pounds CO₂E per MWh (DRECP 2014).

Electricity generated by future renewable energy facilities developed under the proposed Project would displace GHG emissions currently produced by carbon-based fuels. Using the conservative estimate of

GHG emissions for marginal power plants developed by the CPUC, future solar and wind facilities would eliminate a minimum of 830 pounds CO₂E per MWh. Similarly, future geothermal energy facilities developed under the proposed Project would displace approximately 520 pounds CO₂E per MWh. The displacement of CO₂E for geothermal production would be reduced by 310 pounds CO₂E per MWh due to the CO₂ that occurs naturally in geothermal steam released by operations at a geothermal plant (DRECP 2014). Consequently, displacement of power currently produced by carbon-based fuels by development of future renewable energy facilities would offset energy resources consumed during construction, operation, and decommissioning of future renewable energy facilities.

6.2 GROWTH INDUCING IMPACTS

Pursuant to the *CEQA Guidelines*: an EIR must address whether a project will directly or indirectly foster growth as follows:

[An EIR shall] "...discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of wastewater treatment plant, might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also, discuss the characteristic of some projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment..."

As described in Section 4.14.4, 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. Consequently, implementation of the proposed Project would be limited to construction of future renewable energy facilities within the proposed overlay zones. The proposed Project would not construct any new housing or business that would induce population growth, nor would the proposed Project extend roads that would indirectly induce population growth. Renewable energy facilities constructed under the proposed Project would meet future local and regional demand for power and would not generate excessive energy capacity that would induce population growth.

Development of future renewable energy facilities under the proposed Project would generate new jobs and may increase population during construction on a temporary basis. Although it is anticipated that a substantial portion of the construction workforce for each future renewable energy facility would come from communities within Imperial County, it is also anticipated that some specialized workers would be required that may come from outside the region. Future renewable energy facilities developed under the proposed Project would occur over a long period of time, however, and it is unlikely that a large number of future facilities would be developed concurrently. Consequently, it is unlikely that a substantial number of construction personnel would relocate to Imperial County at one time and thereby affect housing availability within Imperial County. Based on the existing homeowner vacancy rate of 3.5 percent and rental vacancy rate of 7.5 percent described in Section 4.13.2 above, adequate housing supply exists to accommodate the limited number of construction personnel that may come from outside the region to work on future renewable energy facilities.

Operation of future renewable energy facilities would not require large numbers of onsite operations and maintenance employees. Although some in-migration of permanent workers with specialized skills would be required for operation of future facilities, the number of new workers would be relatively low and is not expected to exceed existing population growth projections for Imperial County. Based on the existing homeowner vacancy rate of 3.5 percent and rental vacancy rate of 7.5 percent described in Section 4.13.2 above, adequate housing supply exists to accommodate the limited number of permanent workers that may come from outside the region to operate future renewable energy facilities. Therefore, the proposed Project would not result in temporary or long-term population growth, and impacts would be less than significant. No mitigation measures would be required.

6.3 SIGNIFICANT UNAVOIDABLE IMPACTS

As described in Section 4.1, future renewable energy facilities developed under the proposed Project would result in significant and unavoidable impacts related to aesthetics. Although implementation of mitigation measures AESTH-1a through AESTH-3 would minimize impacts related to scenic vistas, scenic resources, visual character, and light and glare, some impacts would remain at both the project and cumulative level. Impacts related to all other environmental issues analyzed under the proposed Project would be mitigated to a level less than significant.

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