1.1 PURPOSE OF THE DOCUMENT

In 2012, Campo Verde Solar, LLC applied to the Imperial County Planning & Development Services Department (ICPDSD or County) for a Conditional Use Permit (CUP) to construct and operate a solar photovoltaic (PV) project in unincorporated Imperial County. The County prepared a Final Environmental Impact Report (2012 Final Environmental Impact Report [EIR] State Clearinghouse Number [SCH. No.] 2011111049) that included a comprehensive analysis of the Campo Verde Solar Project's environmental impacts pursuant to the California Environmental Quality Act (CEQA). In August 2012, the County Board of Supervisors (Board) unanimously certified the 2012 Final EIR, approved the CUP (11-0007), and a Variance (V12-0008) to allow exceedance of height within the designated zoning. Rather than approving the project as originally proposed and analyzed in the 2012 Draft EIR, the County approved the Reduced Size Solar Generation Facility Alternative, a reduced acreage alternative that was described and analyzed in the 2012 Final EIR. The Reduced Size Solar Generation Facility Alternative is referred to as the "Approved Project" in this Supplemental EIR (SEIR).

In determining the level of environmental review needed for the proposed Campo Verde Battery Energy Storage System (i.e. the "proposed Project"), Imperial County as the Lead Agency reviewed CEQA Guidelines *Section 15162 Subsequent EIRs and Negative Declarations*, and *Section 15163 Supplement to an EIR*. These sections of the Guidelines provide direction with regard to when additional environmental review is appropriate.

The proposed Campo Verde Battery Energy Storage System represents a new component that will be added to the existing Approved Project that was examined in the 2012 Final EIR. The Battery Energy Storage System was not envisioned or included at the time the Approved Project was put forth. Per CEQA Guidelines Section 15163 (a)(2) "the Lead or Responsible Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation."

CEQA Guidelines Section 15163 provides a short-form method where only minor additions or changes to the previous EIR would be necessary to make that EIR apply in the changed situation (i.e. inclusion of the Battery Energy Storage System). Section 15163(b) thru (e) also provide essential interpretations of how to handle public notice, public review, and circulation of the supplement to the EIR as follows:

(b) The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.

(c) A supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15087.

(d) A supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR.

(e) When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.

Given that the Battery Energy Storage System would be located within the existing footprint of the project (specifically to the west of the existing Campo Verde Substation [Refer to Figure 2.0-2 in Chapter 2.0, Project Description), the County determined that a Supplemental EIR (SEIR) was the appropriate level of environmental review.

The County of Imperial is the lead agency for the preparation and certification of the SEIR. Likewise, consistent with the requirements of CEQA, the County will use the SEIR as a decision-making tool to assist with its determination whether to approve, modify, or deny the project. The County also has discretionary authority to amend CUP 11-0007 for the Campo Verde Solar Project to allow the Battery Energy Storage System.

The Campo Verde Battery Energy Storage System SEIR (SCH. No. 2011111049 [i.e. the same State Clearinghouse Number as the Campo Verde Solar Project) is a public document for a battery storage system to be constructed at the Campo Verde Solar Project. This SEIR describes the existing environment and evaluates the project-specific and cumulative impacts of the proposed Battery Energy Storage System and alternatives in accordance with the provisions set forth in CEQA and the CEQA Guidelines. This SEIR will be used to address potentially significant environmental issues and recommend adequate and feasible mitigation measures, where possible, that could reduce or eliminate potentially significant environmental impacts.

1.2 PROJECT BACKGROUND

The Campo Verde Solar Project began operation in October 2013. Currently, the Campo Verde Solar Project is capable of producing 147 mega-watts (MWs) of electricity using photovoltaic (PV) technology. This electricity is being sent directly to the electrical grid with no means of storing the electricity prior to being distributed. The proposed Battery Energy Storage System will be designed to store up to 105 mega-watt hours (MWHs) of energy.

A Notice of Preparation (NOP) for the Campo Verde Battery Energy Storage System SEIR was issued by the ICPDSD on June 27, 2016.

1.3 PROJECT OVERVIEW

The Campo Verde Battery Energy Storage System consists of two phases. Phase 1 of the proposed Project will be designed to store up to 5 MWH of energy. Phase 1 will consist of a 424 square foot (sq. ft.) metal modular battery system container placed on a concrete foundation. Other components will be located adjacent to the battery system container. These components include the power conversion system (PCS) cabinets and transformer; supervisory control and data acquisition (SCADA) cabinet; power distribution panel; and the station service transformer. Refer to **Figure 2.0-5A** and **2.0-5B** in Chapter 2.0. The components will be spaced to provide isolation as well as access and occupy a total of approximately 707 square feet (sq. ft.) (inclusive of the metal modular building system container). No offices or staffed control centers will be located within the container or other components. Phase 1 is proposed to begin construction in late 2016 with completion in early 2017.

Phase 2 of the proposed Project will be designed to store up to 100 MWH of energy. Phase 2 will consist of a 12,300 square foot (sq. ft.) metal building with battery racks on a concrete foundation. No offices or staffed control centers will be located within the building. Other components will be located adjacent to the battery system container. These components include the PCS cabinets and transformers; HVAC units; power distribution panel; and electrical switch gear. Refer to **Figure 2.0-6A** and **2.0-6B** in Chapter 2.0. The building and components will occupy approximately 16,068 sq. ft. of ground space (inclusive of the building). Phase 2 construction is expected to begin in 2018.

For both Phase 1 and 2, the wiring extending from the battery containers to connect the PCS to the transformers and ultimately to the substation will be placed underground in trenches. Alternatively, the wiring could be strung overhead. The wiring would extend a short distance and would not span any roads or canals.

1.3.1 PROJECT LOCATION

The Campo Verde Solar Project is approximately 7 miles southwest of the community of El Centro, California. The Solar Project is located generally south of Interstate I-8 (I-8), west of Drew Road, and north and east of the Westside Main Canal (refer to **Figure 2.0-2** and **Figure 2.0-3** in Section 2.0). The proposed Battery Energy Storage System is proposed within the existing fenced boundary of the Campo Verde Solar Project west of the Campo Verde Substation. The Substation is located west of Liebert Road, south of Wixom Road and north of Mandrapa Road (refer to **Figure 2.0-4A**).

1.4 PROJECT OBJECTIVES

Section 15124 of the CEQA Guidelines requires that the EIR include a statement of objectives sought by the proposed project. These objectives identify the underlying purpose of the project and provide a basis for identification of alternatives evaluated in the EIR. A clearly written statement of objectives allows the lead agency to develop a reasonable range of alternatives to evaluate in the EIR and aids the decision-makers in preparing findings or a statement of overriding considerations, if necessary.

Southern Power Company, majority owner of Campo Verde Solar, LLC, proposes to install a utility-scale Battery Energy Storage System on the existing site of the Campo Verde Solar Project and contract with a load-serving entity to buy electricity generated by the solar facility and stored in the batteries. The following objectives have been identified for the proposed Project:

- To allow for the storage and sale of renewable power that the Campo Verde Solar Project is capable of generating to help meet energy needs.
- To be able to receive solar-generated electricity during times of excess generation or times of less desirable generation and store that power for release when the customer (load-serving entity) deems it to be more valuable.
- To be a valuable tool in allowing the customer and system operators to manage and convert intermittent renewable generation and into reliable, dispatchable generation.
- To build on available land previously disturbed during construction of the Campo Verde Solar Project, thus minimizing environmental and land impacts.

1.4.1 REVIEW AND CERTIFICATION PROCESS

A. NOTICE OF PREPARATION

Due to the potential for significant impacts to result from the proposed Campo Verde Battery Energy Storage System, the County determined than a SEIR would be necessary. The County prepared a CEQA Appendix G Environmental Checklist Form and issued a Notice of Preparation (NOP) for the preparation of a SEIR (SCH. No. 2011111049) for the Campo Verde Battery Energy Storage System on June 27, 2016. The NOP was distributed to county, state/federal agencies, and other public agencies to define the scope of the SEIR. The NOP was also published in the Imperial Valley Press on Sunday, June 25, 2016. The purpose of the NOP was to identify public agency and public concerns regarding the potential impacts of the proposed Project (discussed further in subsection 1.7, below), and the scope and content of environmental issues to be addressed in the SEIR. Circulation of the NOP ended on July 26, 2016.

B. DRAFT SEIR

The Draft SEIR includes a detailed description of the proposed Project, description of the environmental setting, identification of project impacts, cumulative impacts, and mitigation measures for impacts found to be significant. An analysis of project alternatives is also provided as well as a discussion of cumulative impacts, other CEQA required considerations and impacts found not to be significant. Upon completion of the Draft SEIR, a Notice of Completion (NOC) will be filed with the State Office of Planning and Research (OPR) by the County. The NOC signals the start of the public review period for the Draft SEIR (CCR §15085).

C. PUBLIC NOTICE/PUBLIC REVIEW

The Draft SEIR public review and comment period should be no less than 30 days and no longer than 60 days. In the case of the proposed Project, the review period will be the 45-day minimum per CEQA rather than 50 days (45-day minimum plus five days) typically required per County of Imperial Guidelines.

On October 23, 2016 a NOC was filed with the State Clearinghouse for the Draft SEIR, initiating the 45-day public review period of the Draft SEIR document and associated technical appendices. The public review period on the Draft SEIR ends on November 28, 2016 after which time all comments received will be responded to (refer to item D, "Response to Comments/Final EIR," below).

Concurrent with filing the NOC, the County is also required to provide notice to the public, agencies, organization and other interested parties of the availability of the Draft SEIR for review and comment. A Notice of Availability (NOA) was published on October 13, 2016 in the Imperial Valley Press newspaper as well as posted at the County's website and libraries. Public comment on the Draft SEIR will be accepted in written form. Details on where to send questions or comments on the documents are provided in subsection 1.7, below.

D. RESPONSE TO COMMENTS/FINAL EIR

A Final SEIR (FSEIR) will be prepared following the public review and comment period for the Draft SEIR. The FSEIR will respond to written comments received during the public review and comment period and to oral comments made at any public hearings.

E. CERTIFICATION OF THE EIR

The FSEIR will be independently reviewed and considered by the County. If the FSEIR is deemed "adequate and complete," the County may certify the FSEIR at a public hearing. In general, the rule of adequacy holds that the EIR can be certified if it demonstrates a good faith effort at full disclosure of environmental information and provides sufficient analysis to allow decisions to be made regarding the project in terms of its environmental consequences.

Following review and consideration of the FSEIR, the County may take action to approve, conditionally approve, revise, or reject the project. Written findings would accompany a decision to approve or conditionally approve the project (CCR §15091). Likewise, a statement of overriding considerations would be prepared if necessary (CCR §15093). A Mitigation Monitoring and Reporting Program, as described below, would also be adopted for mitigation measures that have been incorporated into or imposed upon the project to reduce or avoid significant effects on the environment.

F. MITIGATION MONITORING AND REPORTING PROGRAM

The County must adopt a Mitigation Monitoring and Reporting Program (MMRP) for mitigation measures that have been incorporated into or imposed upon the project to reduce or avoid significant effects on the environment (CCR §15097). This program will be designed to ensure that these measures are carried out during project implementation.

The specific reporting or monitoring program required by CEQA is not required to be included in the EIR. However, any mitigation measures adopted by the County as part of the certified FSEIR will be considered as conditions of approval for the project and will be included in the MMRP to ensure and verify compliance.

1.5 AGENCY ROLES AND RESPONSIBILITIES

1.5.1 IMPERIAL COUNTY

The Battery Energy Storage System is proposed on land that is zoned A-3 - Heavy Agriculture. The application for the proposed Project requests that the County amend CUP 11-0007 to allow the construction and operation of the proposed Battery Energy Storage System on a single parcel Assessor's Parcel Number (APN) 051-350-018 (previously APN 051-350-014) that was included as part of the Campo Verde Solar Project. The Campo Verde Substation is currently sited on this APN. The proposed Battery Energy Storage System would be sited to the west of the Substation.

The Imperial County Code of Ordinances Title 9, Division 5 (Zoning Areas Established), identifies permitted uses within various zones as well as uses requiring a CUP. Imperial County Code Section 90509.01 identifies the following permitted uses in the A-3 zone: "Transmission lines, including supporting towers, poles, microwave towers, utility substations."

No land use changes would be required to implement the proposed Battery Energy Storage System.

Pursuant to CEQA, the proposed Project will require the following County authorizations:

- Certification of the Final SEIR;
- Approval of a project MMRP;
- Approval of CEQA Findings pursuant to CEQA Guidelines Section 15091;
- Approval of Project Site Plan
- Amendment to Conditional Use Permit (CUP 11-0007)
- Grading Permits
- Construction Traffic Control Plan
- Building Permits
- Occupancy Permits

1.5.2 OTHER AGENCY REVIEWS AND/OR CONSULTATIONS

The Project would require permits and approvals from various federal, state and local regulatory agencies. The agencies and potential permits and approvals are identified below.

A. FEDERAL

UNITED STATES FISH AND WILDLIFE SERVICE

The United States Fish and Wildlife Service (USFWS) is responsible for oversight of the Federal Endangered Species Act (ESA) and the Migratory Bird Treaty Act (MBTA). USFWS was previously

consulted during environmental review for the Campo Verde Solar Project regarding the project's potential to impact federally-listed endangered/threatened or proposed species or their habitat. The Battery Energy Storage Facility site is located within the boundaries of the Campo Verde Substation on lands that have been disturbed and developed.

B. STATE

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

The California Department of Fish and Wildlife (CDFW) is responsible for overseeing the California Endangered Species Act (CESA), approving Streambed Alteration Agreements (Section 1602 of the California Fish and Game Code), and enforcing the California Native Plant Protection Act. The CDFW would take action associated with any activity where a listed candidate, threatened or endangered species under CESA may be present in the project area and a state agency is acting as lead agency for CEQA compliance. CDFW would also consider issuance of a Section 2081 incidental take permit for state-only listed species and a Section 2081.1 consistency determination for the effects on species that are both state and federally listed.

CDFW will review the Project for potential effects on State listed species and consider issuance of Section 1602 Streambed Alteration Agreement for impacts on drainages from construction if applicable.

CDFW will review the mitigation agreement and mitigation plan for plants listed as rare, if applicable, as part of California Native Plant Protection Act requirements.

CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL (DTSC)

The California Department of Toxic Substances Control (DTSC) oversees toxic substances procedures and remediation. DTSC review will the chemical composition of the lithium ion batteries proposed to be installed as part of the Battery Energy Storage System. The composition of the proposed system is cobalt oxide; manganese dioxide; nickel oxide; carbon; electrolyte; polyvinylidene fluoride; aluminum foil; copper foil; aluminum and inert materials.

CALIFORNIA NATIVE AMERICAN HERITAGE COMMISSION

The California Native American Heritage Commission (NAHC) strives for the preservation and protection of Native American human remains and associated grave goods. The NAHC was consulted in to conduct a Sacred Lands file search in 2011 as part of the due diligence on the Campo Verde Solar Project. The Battery Energy Storage System is within the boundaries of the Campo Verde Solar Project and would not disturb any new areas that were not previously analyzed. The NAHC was contacted to determine if additional consultation was needed. The NAHC concluded that a new round of consultation was not necessary for the SEIR (Totton pers. comm. 2016).

CALIFORNIA OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

The California Occupational Safety and Health Administration (CalOSHA) is responsible for protecting workers and the public from safety hazards. The existing Hazardous Material Business Plan (HMBP) prepared for the Campo Verde Solar Project will be updated to include the Battery Energy Storage System. CalOSHA will review the updated HMBP.

C. LOCAL

IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT

Imperial County Air Pollution Control District (ICAPCD) is responsible for enforcing air emission requirements in the County. The ICAPCD will review the proposed Project for consistency with the

ICAPCD CEQA Air Quality Handbook, the 1991 Air Quality Attainment Plan, and the State Implementation Plan for PM_{10} in the Imperial Valley. The Project will submit a Construction Dust Control Permit as well as a Specialty Dust Control plan which will amend the current Operation Dust Control Plan for Campo Verde Solar Project to comply with Rule 801 of Imperial County's Rules and Regulations for Construction and Earthmoving Activities.

IMPERIAL COUNTY FIRE DEPARTMENT

The Imperial County Fire Department (ICFD) would provide fire protection service to the Battery Energy Storage System. The Department received a copy of the NOP and has reviewed the Project, including the proposed flammable components of the battery storage system. The Applicant has also been in discussions with the ICFD regarding the design of the Project. The ICFD has indicated that the Project will be constructed in accordance with the 2013 California Fire Code (Loper 2016). A fire suppression system will also be required to be installed to extinguish possible ignition of the lithium ion cells.

IMPERIAL COUNTY SHERIFF'S OFFICE

The Imperial County Sheriff's Office currently provides law enforcement service to the Campo Verde Solar Project, as necessary. Access to the area is currently provided off of Liebert Road. The existing paved access road that terminates at the Campo Verde Operations and Maintenance (O&M) building would be extended using gravel to the Battery Energy Storage System.

1.6 RELATIONSHIP TO STATUTES, REGULATIONS AND OTHER PLANS

1.6.1 STATE

D. A. RENEWABLES PORTFOLIO STANDARD PROGRAM & ENERGY STORAGE MANDATE

This Renewables Portfolio Standard Program requires California electric utilities to procure 50 percent of their annual retail sales from renewable sources by the year 2030. In 2002, California established a Renewable Portfolio Standard (RPS) requiring electric utilities in the State to increase procurement of eligible renewable energy resources to achieve a target of 20 percent of their annual retail sales by the year 2010. In 2008, by Executive Order (S-14-08), then Governor Arnold Schwarzenegger increased that target to 33 percent by the year 2020. In 2011, Governor Jerry Brown signed Senate Bill (SB) X1-2 into law. This statute requires all California electric utilities, including investor-owned utilities (IOUs), energy service providers, and community choice aggregators (CCAs), to procure 33 percent of their annual retail sales from renewable sources over a three-stage compliance period. In 2015, Governor Brown signed SB 350, which increased the RPS goal to 50 percent by 2030.

The Campo Verde Solar Project, which is capable of generating 147 MWs of electricity, is helping California meet its statutory and regulatory goals for renewable electricity generation.

In conjunction with the generation of solar energy, utilities have been mandated to develop energy storage. In 2013, the California Public Utilities Commission (CPUC) issued an order requiring the three large electric IOUs to procure 1,325 megawatts of energy storage by 2020, with installation completed by 2024.

E. CALIFORNIA GLOBAL WARMING SOLUTIONS ACT OF 2006, ASSEMBLY BILL (AB) 32

This California Global Warming Solutions Act, AB 32 (Statutes 2006; Chapter 488; Health and Safety Code Sections 38500 et. seq) requires the California Air Resources Board (CARB) to enact

standards that will reduce GHG emissions to 1990 levels by 2020. GHG emissions of electricity production facilities are regulated by the CARB.

F. TITLE 17 CALIFORNIA CODE OF REGULATIONS (CCR)

Title 17 CCR, Subchapter 10, Article 2, Sections 95100 et seq. are CARB regulations that implement mandatory GHG emissions reporting as part of the California Global Warming Solutions Act of 2006.

G. CALIFORNIA ENDANGERED SPECIES ACT

The California Endangered Species Act (CESA) is codified at Fish and Game Code Section 2050. That section prohibits "take" of any species that the commission determines to be an endangered species or a threatened species. Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

The Battery Energy Storage System is proposed on vacant, previously disturbed land within the boundaries of the Campo Verde Solar Project. The potential for take of endangered or threatened species is low given existing conditions.

1.6.2 LOCAL

A. IMPERIAL COUNTY GENERAL PLAN AND LAND USE ORDINANCE

The Imperial County General Plan provides guidance on future growth in the County. Any development within the jurisdiction of the County must be consistent with the General Plan and the Land Use Ordinance (Title 9, Division 10). The proposed Battery Energy Storage System is located within the boundaries of the previously approved Campo Verde Solar Project and represents an expansion of current uses. CUP 11-0007 for the Campo Verde Solar Project will accordingly require amendment to allow construction and operation of the Battery Energy Storage System.

B. IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT

The Imperial County Air Pollution Control District (ICAPCD) is responsible for enforcing rules and regulations regarding air emissions to protect public health. These regulations apply to various activities including construction, farming, and operational activities associated with various land uses. The ICAPCD has commented on the proposed Project and indicated the need for an amendment to the existing Operational Dust Control Plan for the Campo Verde Solar Project, submittal of a Construction Dust Control Plan; notification two weeks prior to earthmoving activity; and compliance with other applicable regulations and rules.

1.7 PUBLIC AND AGENCY COMMENTS

The opportunity for agency input and NOP comments have occurred as part of the environmental review process. A Notice of Preparation was prepared and published in the Imperial Valley Press on Sunday, June 25, 2016 informing the public of the forthcoming SEIR for the Campo Verde Battery Energy Storage System. The NOP was also circulated to applicable State agencies including the California Air Resources Control Board, California Energy Commission, California Department of Fish and Game (Region #6), California Public Utilities Commission and the California Department of Toxic Substances Control. In addition, the County also sent an NOP to responsible agencies (e.g. the Imperial County Air Pollution Control District and Imperial County Fire Department) to provide input on the Project during the 30-day comment period (June 27 to July 26, 2016).

Table 1.0-1 includes a summary of the letters received from various agencies and the associated comments. A copy of the NOP, the Appendix G Environmental Checklist Form and comment letters are included in **Appendix A** of this SEIR.

TABLE 1.0-1
SUMMARY OF NOP COMMENTS

Agency	Issued Noted
Scott Morgan, Director Governor's Office of Planning and Research State Clearinghouse and Planning Unit	Responsible agencies requested to comment on NOP.
Gayle Totton, M.A. PhD. Associate Governmental Program Analyst Native American Heritage Commission	• AB 52 – Tribal Cultural Resources • SB 18 – Tribal Consultation • NAHC Recommendations for Cultural Resources Assessments *Addressed in sub-section 1.11, Cultural Resources, below.*
Andrew Loper, Lieutenant/Fire Prevention Specialist Imperial County Fire Department Fire Prevention Bureau	• Requirements of 2013 California Fire Code pertaining to the proposed Battery Energy Storage System. *Addressed in Section 4.5, Hazards and Hazardous Materials.*
Belen Leon, Administrative Analyst II Imperial County Air Pollution Control District	• The Operational Dust Control Plan (ODCP) submitted by Campo Verde in October 2013, must be amended to include the proposed Project as it will be part of the operation for the existing Campo Verde Solar Project. • Submittal of a Construction Dust Control Plan (CDCP) and construction notification form to the ICAPCD two weeks prior any earthmoving activity. • The project must adhere to Regulation VIII - Fugitive Dust. In particular • Rule 801 - Construction and Earthmoving Activities requirements: E.I.B. • All persons who perform Earthmoving Activities shall comply with requirements of Section F.1 so as to limit Visible Dust Emissions to 20% opacity. • Construction emissions, while traditionally temporary in nature, have been known to cause adverse air impacts. Therefore, the applicant must adhere to Section 7.1 of the Imperial County CEQA Handbook, which lists

TABLE 1.0-1
SUMMARY OF NOP COMMENTS

Agency	Issued Noted
Belen Leon, Administrative Analyst II Imperial County Air Pollution Control District	standard mitigation measures for construction activities. • Any engine(s) or generator(s) greater than 50 brake horse power either as prime or emergency standby must be permitted with the ICAPCD. • Rule 310 - Operational Development Fee will be applicable to the proposed Phase 1 and Phase 2 structures including any temporary structures. The fee must be paid prior to obtaining the building permit. • Discrepancy in square footage of Phase 2 building. *These items are addressed in Section 4.1, Air Quality and Greenhouse Gas Emissions.*
Connie Valenzuela, Imperial County Agricultural Commissioner Agricultural Commissioner Sealer of Weights and Measures	• A Pest Management Plan (PMP) and Restoration Plan (RP) both need to be completed and maintained the length of the entire project by the responsible party. • A new PMP and a new RP may be submitted, or Campo Verde's current PMP and RP may be updated to include the new solar battery energy storage system. • The Imperial County Pest Management Plan Guidelines for Solar Projects are attached to the letter for reference. *The PMP is Addressed in Chapter 2.0, Project Description, sub-section 2.1.3 Battery Energy Storage System Characteristics, item E.*
Jacob M. Armstrong, Chief Development Review Branch California Department of Transportation	• Applicant needs Transportation Permit/ Transportation Management Plan (TMP) *Addressed in Section 4.7, Transportation and Circulation.* • Glint Glare Analysis • Visual aspects of the project including glint and glare should be documented not to have any potential impacts to motorists driving on 1-8. *These items are addressed in in sub-section 1.11, Aesthetics, below.* • Utilities

TABLE 1.0-1
SUMMARY OF NOP COMMENTS

Agency	Issued Noted
Jacob M. Armstrong, Chief Development Review Branch California Department of Transportation	*Addressed in in sub-section 1.11, Public Services and Utilities, below.* • No new utility crossing on state facilities will occur as a result of this project. *Addressed in Chapter 2.0, Project Description.*

1.8 AVAILABILITY OF REPORTS

This Draft SEIR, appendices, and documents incorporated by reference are available for public review at the Imperial County Planning and Development Services Department, 801 Main Street, El Centro, California, 92243. Copies are also available for review at the City of El Centro Public Library, 539 State Street, El Centro, California. Documents at these locations may be reviewed during regular business hours. This document is available for review online at the Imperial County Planning and Development Services website: http://www.icpds.com. All comments on the Draft SEIR should be directed to:

David Black, Planner IV
Imperial County Planning and Development Services Department
801 Main Street
El Centro, California 92243

Comments received in response to the NOP were reviewed and addressed in this Draft SEIR as applicable. The Draft SEIR will be reviewed by the Imperial County Planning Commission and Board of Supervisors as a part of the procedure to adopt the SEIR. Additional information on this process may be obtained by contacting the Imperial County Planning and Development Services Department at (442) 265-1736.

1.9 STRUCTURE OF THIS SEIR

1.9.1 DRAFT SEIR

The structure of this Draft SEIR is identified in the Table of Contents. The Draft SEIR is organized into the chapters and sections described below:

Executive Summary. This section provides a summary of the proposed Project, including a summary of Project impacts, mitigation measures, and alternatives.

Chapter 1.0 - Introduction. This section provides a brief introduction of the proposed Project; objectives and purpose and need; relationship to statutes, regulations and other plans; availability of reports; comments received on the Draft SEIR; and a summary of items from the CEQA Appendix G Environmental Checklist Form that were scoped out of the analysis in the SEIR.

Chapter 2.0 - Project Description. This section provides a detailed explanation of the proposed Project including location; Project characteristics; a description of construction activities; operation and maintenance activities; and decommissioning plan. It also identifies alternatives under consideration; the intended uses of the SEIR; authorizing actions and subsequent/concurrent entitlements to implement the proposed Project; and Discretionary Actions and Approvals by Other Agencies.

Chapter 3.0 - **Introduction to the Environmental Analysis and Assumptions Used.** This section provides an introduction to the environmental impact analyses and general assumptions used in the project-specific and cumulative analyses contained in the ensuing sections.

Chapter 4.0 – Environmental Analysis. This section provides a brief overview of the seven resource areas discussed in each section and orients the reader to the order and format of the analysis.

Section 4.1 – Air Quality/Greenhouse Gases. This section describes existing air quality in the region as well as federal, state and local emissions standards. It also addresses the requirements of the Imperial County Air Pollution Control District and impacts associated with dust and equipment exhaust resulting from project construction as well as operational and decommissioning air quality impacts. This section also evaluates applicable greenhouse gas (GHG) emissions associated with heavy-duty construction equipment combustion and evaluates net increase in applicable GHG emissions associated with mobile source activity during construction and decommissioning.

Section 4.2 – Biological Resources. This section describes the existing biological resources in the vicinity of the Project site. Potential impacts to wildlife that may occur during project construction are discussed.

Section 4.3 – Cultural Resources. This section describes the setting of the Project site with regard to potential for cultural and paleontological resources. The analysis examines the potential presence of cultural resources and paleontological resources, and the potential for damage as a result of the proposed Project.

Section 4.4 – Geology and Soils. This section describes the current setting of the Project site both seismically and geologically. Engineering constraints and general soil suitability for the proposed Battery Energy Storage System are examined.

Section 4.5 – Noise. This section describes the existing noise setting of the Project site. Potential noise impacts resulting from construction, operations and decommissioning of the facility are analyzed.

Section 4.6 – Hazardous and Hazardous Materials. This section examines the potential hazards associated with flammable and explosive materials contained in the lithium ion batteries. Project design features to address these hazards are discussed.

Section 4.7 – Transportation/Traffic. This section identifies existing intersection and roadway segment traffic volumes and levels of service. The analysis examines potential impacts on the area roadway network as a result on traffic generated by Project construction, operation and decommissioning.

Chapter 5.0 – Cumulative Impacts Summary. This section summarizes the cumulative impacts for each resource area identified in Section 4.1 through 4.7.

Chapter 6.0 – Project Alternatives. This section qualitatively analyzes impacts associated with alternatives to the proposed Project relative to impacts resulting from the proposed Project. A summary matrix of impacts for each issue area is included to facilitate comparison of each alternative relative to the proposed Project (better, similar, worse).

Chapter 7.0 – Other CEQA Required Considerations. This section provides an analysis of any significant irreversible environmental changes, growth inducing impacts, and unavoidable significant environmental impacts. It also identifies effects found not to be significant (i.e. all issues determined to be less than significant under CEQA).

Chapter 8.0 – EIR Preparers. This section lists all the individuals involved in the preparation of the SEIR.

Chapter 9.0 – References. This section lists the data references used in preparing the SEIR as well as the individuals and agencies consulted and cited in the text.

1.9.2 TECHNICAL APPENDICES

The technical reports for air quality/greenhouse gas emissions; biological resource; cultural resources; geology/soils; noise; and, transportation/traffic are provided in the appendices to this SEIR. These reports are referenced within the relevant environmental analysis sections of this document. Incorporation by reference is permitted by Section 15150 of the CEQA Guidelines. Other documents, reference sources, and individuals cited in the preparation of this Draft SEIR are identified in Chapter 9.0, References. The baseline physical conditions as analyzed in these reports are the conditions that existed at the time of the issuance of the NOP for the SEIR (CEQA Guideline Section 15125 (a)).

1.10 ISSUES TO BE ADDRESSED

The issues evaluated in this SEIR include the physical, biological, and other resources that have the potential to be affected by activities related to the proposed Project. The issues were initial identified through the preparation of the CEQA Appendix G Environmental Checklist Form and refined based on further consideration.

- Air Quality/Greenhouse Gases
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials (Fire Safety)
- Noise
- Transportation and Circulation

1.11 ISSUES SCOPED OUT FROM FURTHER ENVIRONMENTAL REVIEW

The CEQA Appendix G Environmental Checklist Form for the proposed Campo Verde Battery Energy Storage System prepared by the County of Imperial concluded that the Project would not cause significant impacts related to various topics addressed in the CEQA Appendix G Environmental Checklist Form (included in **Appendix A** of this SEIR). The reasons for concluding that no significant impacts would occur related to specific items in the Checklist are explained in the discussion below and may differ from the Checklist based on further consideration of the Project and the existing environment. CEQA Environmental Checklist topics not addressed in this SEIR, and the rationale for their exclusion, are identified below:

AESTHETICS

- **Have a substantial adverse effect on a scenic vista?**

The proposed Battery Energy Storage System is located within the boundaries of the Campo Verde Solar Project in a rural portion of the County. The area is characterized by agricultural fields. It is surrounded by solar fields on the north and west, the Campo Verde Substation on the east and vacant land to the south. As a component added to the Campo Verde Solar Project, the proposed Project would not degrade the existing visual character or quality of the site and its surroundings. Further, based on the remote, rural location of the Project, views from neighboring lands and roadways would not be impacted as there are no residents in the area and traffic volumes on surrounding roads are low. Therefore, the Project would not substantially degrade the existing

visual character or quality of the site and its surroundings and this issue will not be discussed in the SEIR.

- **Substantially damage scenic resources, including, but limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

The Battery Energy Storage System shares the same parcel as the Campo Verde Substation. As such, the parcel has been developed with the substation including structures, transformers, towers and wires. The Project represents an expansion of the existing solar facility by adding an energy storage component. As a result, the addition of a battery energy storage system will have no impact with regard to substantially damaging scenic resources, including, but limited to, trees, rock outcroppings, and historic buildings. Moreover, the Project site is not located adjacent to a scenic highway. Therefore, no impacts to resources within a state scenic highway will occur and this issue will not be discussed in the SEIR.

- **Substantially degrade the existing visual character or quality of the site and its surroundings?**

The proposed Battery Energy Storage System is located within the boundaries of the Campo Verde Solar Project. It is surrounded by solar fields on the north and west, the Campo Verde Substation on the east and vacant land to the south. As a component added to the Campo Verde Solar Project, the proposed Project would not degrade the existing visual character or quality of the site and its surroundings. Further, based on the remote, rural location of the Project, views from neighboring lands and roadways would not be impacted as there are no residents in the area and traffic volumes on surrounding roads are low. Therefore, the Project would have no impact with regard to substantially degrading the existing visual character or quality of the site and its surroundings and this issue will not be discussed in the SEIR.

- **Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

This proposed Battery Energy Storage System will be located on the west side of the Substation. The Substation has area lighting. No external lighting additions are proposed as part of the Battery Energy Storage System. Lighting will be installed inside the container for Phase 1 and the building for Phase 2. This light will not increase lighting levels outside. The container proposed to house Phase 1 and the building proposed as part of Phase 2 will be metal. These structures will be neutral in color and non-reflective. Therefore, no impact would occur with regard to light and glare as a result of the proposed Battery Energy Storage System and this issue will not be discussed in the SEIR.

AGRICULTURE AND FORESTRY RESOURCES

- **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?**

The proposed Battery Energy Storage System is located within the boundaries of the Campo Verde Solar Project. The Campo Verde Solar Project site has been converted from agricultural land to a solar facility and no further impacts on farmland would occur in association with development of the Battery Energy Storage System. Therefore, no impacts would occur with regard to converting Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) and this issue will not be discussed in the SEIR.

- **Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

The project site is zoned A-3 (Heavy Agriculture) and designated by the General Plan as "Agriculture." Solar energy facilities are allowed uses within these zones subject to a CUP. The Applicant is not proposing a change in the land use designation or zoning of the APN. Furthermore, the A-3 zone allows for the development of solar energy farms and the Board of Supervisors has determined that solar projects are consistent with agriculture related zones. The Board of Supervisors has taken public comments on, and approved, the Campo Verde Solar Project as a temporary use. Thus, the Battery Energy Storage System, as a component of the larger Campo Verde Solar Project does not conflict with existing zoning for agriculture and is a conditionally allowed use with an amendment to the CUP 11-0007. Therefore, contract conversion of land under Williamson Act Contract is not an issue and is not discussed in the SEIR.

- **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 511 04(g))?**

Based on the Imperial County General Plan, Conservation and Open Space Element, mixed chaparral, pinyon-juniper habitats, and the montane hardwood-conifer forest are located in restricted areas of the County. Mixed chaparral and pinyon-juniper habitats are located in the extreme southwestern corner of Imperial County; montane hardwood-conifer forest is in the extreme northwestern corner of Imperial County. Thus, there are no existing forest lands, timberlands, or timberland zoned Timberland Production either on the Battery Energy Storage System site or in the immediate vicinity that would conflict with existing zoning or require a rezoning to accommodate the proposed Project. Therefore, no impact is identified for this issue and it is not discussed in the SEIR.

- **Result in the loss of forest land or conversion of forest land to non-forest use?**

There are no existing forest lands either on site or in the immediate vicinity of the Project site. The proposed Battery Energy Storage System would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue and it is not discussed in the SEIR.

- **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

The proposed Battery Energy Storage System is located within the boundaries of the Campo Verde Solar Project. The proposed Project would not result in the conversion of any farmland or forest land to non-agricultural or non-forest uses. Therefore, no impact is identified for this issue and it is not discussed in the SEIR.

AIR QUALITY

- **Expose sensitive receptors to substantial pollutant concentrations?**
- **Create objectionable odors affecting a substantial number of people?**

The proposed Battery Energy Storage System is located within the boundaries of the Campo Verde Solar Project without any sensitive receptors in close proximity. Construction equipment may create mildly objectionable odors associated with vehicle exhausts. However, this would occur on a temporary basis with no sensitive receptors being affected. Thus no odor impact would occur and this issue is not discussed further in the SEIR.

BIOLOGICAL RESOURCES

- **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

The County of Imperial does not have an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). Thus, no conflict with an HCP or NCCP would occur in association with implementation of the Battery Energy Storage System. This issue is not discussed further in the SEIR.

CULTURAL RESOURCES

- **Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

A Cultural Resources Inventory Report was prepared for the Campo Verde Solar Project which included the Battery Energy Storage Site. A records search and field survey were conducted as part of the Cultural Resources Inventory. No historical resources were identified within the boundaries of the proposed Project. In addition, the area of the proposed Battery Energy Storage System site has been disturbed and leveled as part of the Campo Verde Solar Project. Thus, no historical resources as defined in §15064.5 are present on the Project site and no impact would occur. This issue will not be discussed further in the SEIR.

GEOLOGY AND SOILS

- **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?**

The Battery Energy Storage System is not located within a State of California, Alquist-Priolo Earthquake Fault Zone. A Geotechnical Evaluation Report was prepared for the Project to ensure the Battery Energy Storage System's structural design is based upon the 2012 International Building Code (IBC). Thus, no impact is identified for this issue and it is not discussed in the SEIR.

- **Seismic-related ground failure, including liquefaction and seiche/tsunami?**

The proposed Battery Energy Storage System site is not located near a large body of water and is not along the coast. The Project site is approximately 100 miles inland from the Gulf of California most likely precluding damage due to seismically induced waves. Therefore, no impact would occur with respect to a tsunami. No retention basins that could be susceptible to seiche are located in the vicinity of the Battery Energy Storage System site. Therefore, no impact would occur with regard to seiche and tsunami and these issues will not be discussed in the SEIR.

- **Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

The proposed Battery Energy Storage System does not propose a septic or wastewater system as part of the Project. The Campo Verde Solar Project includes a sanitary wastewater system to collect wastewater from sinks and toilets located in the O&M building and convey the waste stream to an on-site sanitary waste septic system. Thus, no impact would occur with regard to the adequacy of soils to support septic tanks. This issue is not discussed further in the SEIR.

HAZARDS AND HAZARDOUS MATERIALS

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The Project site is not located within one-quarter mile of an existing school. Furthermore, the Battery Energy Storage System would not create any hazardous emissions. Therefore, this issue will not be discussed in the SEIR.

- **Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

The Battery Energy Storage System site is not listed as a hazardous materials site pursuant to Government Code, Section 65962.5. The storage system is proposed on the same parcel as the Campo Verde Substation which is in operation. No impact is identified with regard to a hazardous materials site and this issue is not discussed in the SEIR.

- **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**
- **For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

The Battery Energy Storage System site is not located within two miles of a public airport or a private airstrip. Thus, no impact is identified with regard to hazards associated with airstrips and these issues are not discussed in the SEIR.

- **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

As identified in the Seismic and Public Safety Element of the County of Imperial General Plan, the "Imperial County Emergency Plan" addressed Imperial County's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and nuclear defense operations. The proposed circulation plan for the Battery Energy Storage System site will be required to provide emergency access points and safe vehicular travel. In addition, local and state building codes would be followed to minimize flood, seismic, and fire hazard. Thus, the proposed Project would not impair the implementation or physically interfere with any adopted emergency response plans or emergency evacuation plans. No impact is identified for this issue and it is not discussed in the SEIR.

- **Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

The Battery Energy Storage System site is not characterized as an area of urban/wildland interface. According to the Imperial County Natural Hazard Disclosure (Fire) Map prepared by the California Department of Forestry and Fire Protection (2000) the Battery Energy Storage System site does not fall into an area characterized as either: (1) a wildland area that may contain substantial forest fire risk and hazard; or (2) very high fire hazard severity zone. Thus, the Battery Energy Storage System site would not expose people or structures to significant risk of loss injury or death involving wildland fire. No impact is identified for this issue area and it is not discussed in the SEIR.

HYDROLOGY AND WATER QUALITY

- **Violate any water quality standards or waste discharge requirements?**

The Project site is relatively flat and requires minimal grading to accommodate construction of the Battery Energy Storage System. Some excavation and trenching would occur in association with construction of foundations and installation of wiring. The Project would comply with the requirements of the Regional Water Quality Control Board (RWQCB) concerning coverage under the General Construction Permit. Therefore, no impact with regard to water quality standards or waste discharge requirements is anticipated. This issue will not be discussed in the SEIR.

- **Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

The proposed Battery Energy Storage System does not propose the use of groundwater. Water will continue to percolate through the ground as a majority of the surfaces surrounding the Battery Energy Storage System and Campo Verde Substation will remain pervious. No impact is identified for this issue and it is not discussed in the SEIR.

- **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**

The Battery Energy Storage System site has been previously leveled in association with construction of the Campo Verde Solar Project. As a result, the Battery Energy Storage System site would require minimal earthwork limiting the potential for erosion and sediment. Due to the proposed Project site being 2 to 5 acres, soil erosion, sedimentation and pollutants in runoff (e.g. grease, oils, sediment, and heavy metals) would be controlled during construction in accordance with the Construction General Stormwater Waiver. A Stormwater Pollution Prevention Plan (SWPPP) will be required for Phase 2 to protect water quality during construction. However, the SWPPP will be exempt for Phase 1 because it is under one acre. Phase 2 is larger than one acre and is located in a zone that previously had a SWPPP when the Campo Verde Solar Project was constructed, therefore it requires a SWPPP. With these mandatory permits, soil erosion and sedimentation during construction would be controlled. Therefore, impacts with regard to substantial erosion or siltation on- or off-site are considered less than significant. This issue will not be discussed in the SEIR.

- **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

Based on the Battery Energy Storage System site's topography, minimal grading would be necessary during construction to support the gravel road and foundations for equipment and buildings. Excavation would be required to install underground wiring and foundations. The existing topography would generally be maintained and the site would remain largely pervious (e.g. no major paved surfaces or structures. Therefore, impacts with regard to on- and off-site drainage and flooding in association with the Battery Energy Storage System are considered less than significant. This issue will not be discussed in the SEIR.

- **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

The Project site is comprised of disturbed, leveled land to the west of the Campo Verde Substation. Because the site has been previously leveled, minimal grading would be necessary during construction to support the gravel road and foundations for equipment and buildings. Excavation and trenching would be required to install underground foundations and wiring. The existing topography would generally be maintained and the site would remain largely pervious (e.g. no major paved surfaces or structures). The existing basin to the north of the Project site in Block 1 of the Campo Verde Solar Project, directly north of the Battery Energy Storage System site, has been sized to account for the proposed Project. As noted in the *Campo Verde Solar Conceptual Drainage Study and Storm Water Quality Analysis* (Fuscoe 2012) prepared for the Campo Verde Solar Project, the basins were sized to meet the County of Imperial Standards for water storage (i.e. basins were designed to have a total volume capacity for a100-year, 3-inch storm covering the entire site with no "C" reduction factor). Detention requirements over the Campo Verde Solar Project site were satisfied by a combination of detention basins (typically less than 3.5 feet deep) located outside the solar arrays and detention runoff in shallow ponded areas (less than 12 inches deep) under the arrays such that the County of Imperial standard of 3-inches of detention over the Campo Verde Solar Project site is satisfied (Corales 2016). Therefore, impacts with regard to exceeding the capacity of planned stormwater drainage systems or providing substantial additional sources of polluted runoff are considered less than significant. This issue will not be discussed in the SEIR.

- **Otherwise substantially degrade water quality?**

The Battery Energy Storage System does not propose any features that would degrade water quality once operational. During construction, a National Pollution Discharge Elimination Permit (NPDES) permit will not be required for Phase 1 because less than one acre would be disturbed. However, a NPDES Small Construction Waiver will need to be submitted for Phase 2 of the Project because more than 1 acre, but less than 5 acres would be disturbed. A Stormwater Pollution Prevention Plan (SWPPP) will be required for Phase 2 to protect water quality during construction. However, the SWPPP will be exempt for Phase 1 because it is under one acre. Phase 2 is larger than one acre and is located in a zone that previously had a SWPPP when the Campo Verde Solar Project was constructed, therefore it requires a SWPPP. No impact is identified for this issue area will not be discussed in the SEIR.

- **Place housing within a 100-year flood hazard area as mapped on a Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**
- **Place within a 100-year flood hazard area structures which would impede or redirect the flood flows?**

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, the Battery Energy Storage System site is located in Zone X, which is an area determined to be outside of the 0.2 percent annual chance of a flood. The Battery Energy Storage System does not propose the placement of housing or structures within a 100-year flood hazard area. Thus, no impact is identified for these issues and they are not discussed in the SEIR.

- **Expose people or structures to a significant risk of loss injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

No dams or levees are located in the vicinity of the Project site. Thus, no impact is identified relative to the failure of a levee or dam.

- **Inundation by seiche, tsunami, or mudflow?**

No bays or lakes are located within a two-mile radius of the Battery Energy Storage System site. Furthermore, the Project site is over 100-miles inland from the Pacific Ocean. In addition, the area where the Battery Energy Storage System is sited has been graded as part of the Campo Verde Solar Project. Based on the site's location and topography, there is no potential for the Project site to be inundated by seiches, tsunamis, or mudflows. Thus, no impact is identified for these issues and they are not discussed in the SEIR.

LAND USE

- **Physically divide an established community?**

The proposed Battery Energy Storage System is located in a rural portion of the County dominated by solar facilities and agricultural land. As such, the proposed Battery Energy Storage System does not physically divide any established community. Thus, no impact is identified for this issue and it is not discussed in the SEIR.

- **Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

The Project site is located within the boundaries of the Campo Verde Solar Project. Per section 90508.1 of the Imperial County Land Use Code, an electrical power generating plant is a conditionally allowed use within the existing A-2 agricultural zone. An amendment to CUP 11-0007 is proposed as part of the Project to allow development of the Battery Energy Storage System. The Project represents a new component added to the existing Campo Verde Solar Project and would not conflict with existing land use plans, policies and regulations. No impact would occur with regard to this issue and it will not be discussed further in the SEIR.

- **Conflict with any applicable habitat conservation plan or natural community conservation plan?**

Imperial County is not within the jurisdiction of any adopted habitat conservation plan (HCP) or natural community conservation plan (NCCP), or other approved local, regional or state habitat conservation plan. Therefore, no impact to an HCP or NCCP would occur in association with the proposed Project and this issue will not be discussed further in the SEIR.

MINERAL RESOURCES

- **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

The Battery Energy Storage System site is immediately west of, and shares the same parcel as the Campo Verde Substation. According to the Conservation and Open Space Element of the County of Imperial General Plan, no known mineral resources occur within the Project site nor does the Project site contain mapped mineral resources. As such, the proposed Battery Energy Storage System would not adversely affect the availability of any known mineral resources within the Project site. Thus, no impact is identified for these issues and they are not discussed in the SEIR.

NOISE

- **For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**
- **For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

The Battery Energy Storage System site is not located within two miles of a public airport or a private airstrip. Thus, the project site would not be exposed to excessive aircraft noise. No impacts have been identified for these issues and they are not discussed in the SEIR.

POPULATION AND HOUSING

- **Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example through extension of roads or other infrastructure)?**

The proposed Project, as a battery energy storage system, does not include the development of housing on the project site. The Battery Energy Storage System would be operated and maintained by the six operators currently working at the Campo Verde Solar Project. Thus, the proposed Battery Energy Storage System would not result in substantial population growth as the number of employees required to operate and maintain the Campo Verde Solar Project, including the Battery Energy Storage System, would remain unchanged. No impact would occur for this issue and it is not discussed in the SEIR.

- **Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**
- **Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

The proposed Battery Energy Storage System site is currently on vacant land within the fenced area of the Campo Verde Solar Project immediately to the west of the Campo Verde Substation. As a result, development of the proposed Battery Energy Storage System would not displace substantial numbers of existing housing or people requiring construction of replacement housing elsewhere. No impact would occur for these issues and they are not discussed in the SEIR.

PUBLIC SERVICES

- **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire, police, schools, parks, or other public facilities?**

The proposed Battery Energy Storage System would not result in a substantial increase in population because it neither includes a residential component nor would it generate the need for new housing to accommodate workforce population. Based on the nature of the proposed Project as a battery energy storage system, no increase in schools, parks, or other public facilities are anticipated. However, lithium ion batteries are considered a potential fire hazard and as such could impact fire protection services. However, no new fire facilities would be needed and the proposed Project would not have an adverse physical effect on the environment because the project does not require

new police, schools, parks or other public facilities to be altered or constructed. Therefore, no impact is identified with regard to impacts to police, schools, parks, or other public facilities in the SEIR.

Fire Protection

This issue will be discussed with regard to fire risk and fire safety as part of Hazards and Hazardous Materials.

Police Protection

Police protection to the Project site would be under the jurisdiction of the Imperial County Sheriff's Office. The Campo Verde Solar Project site including the Substation is currently surrounded by a chain-link security fence topped with three strands of barbed wire reaching a total height of approximately 8 feet. Roaming security guards in trucks patrol the site 24-hours a day, seven days per week. Lights are installed at the substation and O&M building. Thus, impacts to police protection are considered less than significant and are not discussed further in the SEIR. Thus, impacts to police protection are considered less than significant and are not discussed further in the SEIR.

RECREATION

- **Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?**

The proposed Battery Energy Storage System represents an additional component to the Campo Verde Solar Project and would not create a demand for recreation or parks in the County nor would it result in the expansion of any existing recreational facilities. The Project would have no impact on recreation and these issues are not discussed in the SEIR.

TRANSPORTATION/TRAFFIC

- **Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

The proposed Battery Energy Storage System would not result in changes to existing air traffic patterns through an increase in traffic levels or change in location. Thus, no impact is identified for this issue and it not discussed further in the SEIR.

- **Conflicts with adopted policies, plans, programs, regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

The proposed Battery Energy Storage System would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Thus, no impact is identified for this issue and it is not discussed further in the SEIR.

UTILITIES AND SERVICE SYSTEMS

Wastewater Treatment

- **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

- **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?**

The Battery Energy Storage System would not generate an increase in wastewater. An on-site sanitary sewer system has been developed as part of the Campo Verde Solar Project. Toilets are available in the O&M buildings and wastewater flows would not be impacted as the staff currently operating the Campo Verde Solar Project would also operate the Battery Energy Storage System. During construction, portable toilets will be used to provide sanitary facilities. Thus, no impact would occur with regard to wastewater treatment requirements or a wastewater treatment provider. This issue is not discussed further in the SEIR.

Water Treatment

- **Require or result in the construction of new water or water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**
- **Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

The proposed Battery Energy Storage System is anticipated to result in a minimal increase in water demand/use during construction. Water will be used to control fugitive dust on exposed soils while grading and excavating activities occur. This water will be supplied by IID and trucked in to the site as needed. Thus, no impact would occur with regard to construction of new water facilities or water supplies. These issues are not discussed further in the SEIR.

Stormwater Facilities

- **Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

The Battery Energy Storage System site is relatively flat and will be drained by sheet flow to on- and off-site drainages as it is currently configured. No new drainage facilities are proposed or required. Thus, no impact would occur with regard to stormwater facilities and this issue is not discussed further in the SEIR.

Solid Waste

- **Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**
- **Comply with federal, state, and local statutes and regulations related to solid waste?**

During operations of the proposed Battery Energy Storage System, waste generation will be minor. Solid wastes are currently disposed of using a locally-licensed waste hauling service. Thus, a less than significant impact is identified for this issue.

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