

CHAPTER 3.0

INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

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The following is an introduction to the environmental impacts analysis and general assumptions used in the project specific and cumulative analyses. Individual sections of the Supplement Environmental Impact Report (SEIR) include assumptions, methodology and standards of significance relevant to each applicable environmental factor identified through preparation of the CEQA Appendix G Environmental Checklist Form (The Checklist Form is included on the attached CD of Technical Appendices as **Appendix A** of this SEIR).

3.1 ANALYSIS ASSUMPTIONS GENERALLY USED TO EVALUATE THE IMPACTS OF THE PROJECT

3.1.1 BASELINE ENVIRONMENTAL CONDITIONS ASSUMED IN THE DRAFT SEIR

Section 15125(a) of the CEQA Guidelines requires that an EIR include a description of the physical environmental conditions in the vicinity of the project as they exist at the time the Notice of Preparation (NOP) is published. The CEQA Guidelines also specify that the description of the physical environmental conditions is to serve as the baseline physical conditions by which a lead agency determines whether impacts of a project are considered significant.

The environmental setting conditions of the Battery Energy Storage System site and the surrounding area are described in detail in sections 4.1 through 4.7 of this SEIR. In general, these discussions describe the conditions of the Project site and the surrounding area as they existed at the time the NOP for the Project was released in June 2016 (SCH No. 2011111049) (see subsection 3.2, “Approach to the Cumulative Impact Analysis” below).

3.1.2 GENERAL PLAN CONSISTENCY ANALYSIS

As required by CEQA Guidelines 15125(d), each relevant environmental factor analyzed in sections 4.1 through 4.7 has been evaluated for consistency with policies contained in the Imperial County General Plan (January 18, 1993, with updates and amendments through November 2008). The general plan consistency analysis is presented in tabular form. Applicable policies appear in the left column; the middle column identifies whether the project is consistent (yes or no) with the policy; and the right column includes an analysis of the consistency or inconsistency.

3.1.3 PROJECT CONSTRUCTION EFFECTS

The proposed Project is a battery energy storage system using lithium ion battery technology. In order for the Project to be approved by the Imperial County Board of Supervisors, the Project must be consistent with the General Plan and Land Use Ordinance Policies and Standards. During construction, impacts such as dust, equipment noise, and increased traffic volumes are anticipated to occur. Construction phase impacts would be reduced to a level which is less than significant through the implementation of mitigation measures for the following environmental factors: biological resources; cultural resources; geology and soils; and hazards and hazardous materials. Project construction impacts specific to each environmental factors are evaluated in sections 4.1 through 4.7 (refer to subsections 4.1.3, 4.2.3, 4.3.3, etc., “Impacts and Mitigation Measures”).

3.1.4 PROJECT BUILDOUT ASSUMPTIONS

For the environmental analysis, it is assumed that buildout of the battery energy storage system would occur in two phases. Phase 1 construction is expected to begin in late 2017 and will take between six to eight weeks to install the foundations and connect the components to the existing

3.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

controls system and Campo Verde Substation. An additional three to six weeks will be required to commission and debug Phase 1 system integration. Phase 2 construction is expected to occur in 2018 and will take up to eight months. Commissioning is anticipated to take an additional three to six weeks.

Total construction time for both phases is between nine-and-a-half to ten months; commissioning and debugging would add another one-and-a-half to two months. Project operational impacts, such as air quality/greenhouse gas emissions, noise, and transportation and circulation are evaluated in sections 4.1 through 4.7 of the EIR (refer to subsections 4.1.3, 4.2.3, 4.3.3, etc., “Impacts and Mitigation Measures”). Buildout of the project is assumed to occur in the context of other cumulative projects which are currently approved, proposed or reasonably foreseeable.

3.2 APPROACH TO THE CUMULATIVE IMPACT ANALYSIS

3.2.1 DEFINITION OF CUMULATIVE SETTING

CEQA Guidelines Section 15130 requires that EIRs include an analysis of the cumulative impacts of a project to determine if the project’s effect is considered cumulatively considerable. As defined by CEQA Guidelines Section 15065(a)(3), “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

Section 15130(b)(1) goes on to identify two approaches for performing a cumulative analysis: Either 1) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or 2) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

For the purposes of this cumulative analysis, a list approach is used. According to Section 15130(b)(2), when using a list it is important to consider the nature of each environmental resource being examined, the location of the project and its type. In keeping with these provisions, the cumulative project list was compiled in consultation with the ICPDSD. The projects identified were chosen because they represent past, present or probable large-scale solar projects located in the vicinity of the proposed project (southern Imperial County).

Table 3.0-1 lists the cumulative projects. **Figure 3.0-1** provides a graphical representation of each project’s location.

3.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

**TABLE 3.0-1
PAST, PRESENT AND PROBABLE LARGE-SCALE SOLAR PROJECTS
IN THE VICINITY OF THE CAMPO VERDE BATTERY ENERGY STORAGE SYSTEM PROJECT**

Project Number	Name of Project	Use	Project Description	Status
1	Campo Verde Solar Project	Photovoltaic Solar Facility	Approximately 1,379 acres PV solar facility located 7 miles southwest of the community of El Centro, California.	Completed. In operation as of October 2013.
2	Acorn Greenworks	Solar Facility	Entitled 125-mega-watt (MW) facility on approximately 699 acres located 10 miles southwest of the City of El Centro.	Entitlements in process September 2016.
3	Imperial Solar Energy Center West	Photovoltaic Solar Facility	A photovoltaic solar facility capable of producing approximately 250 MW of electricity on approximately 1,130 acres generally located east of Dunaway Road and located both north and south of I-8.	Notice of Determination Filed November 8, 2011. Project completed and operational.
4	Mount Signal Solar Farm (includes Calexico I-A at 700 acres; I-B at 600 acres; and II-A at 940 acres)	Photovoltaic Solar Facility	A photovoltaic solar facility capable of producing approximately 300 MWs of electricity generally located south of SR-98 from Rockwood Road to Hammer Road. Includes Calexico 1-A (720 acres); Calexico 1-B (600 acres); Calexico II-A (940 acres)	Projected to start construction in late 2017.
5	Centinela Solar Energy	Photovoltaic Solar Facility	A 1,645-acre photovoltaic solar facility capable of producing approximately 175 MW of electricity generally located in the vicinity of SR-98 and Drew Road.	Completed, operational as of July 2014.
6	Iris Solar	Photovoltaic Solar Facility	Multi-site 360-MW solar facility north of SR 98 between Hammer and Rockwood occupying approximately 1,420 acres.	Projected to start construction late 2017.

3.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

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PAST, PRESENT AND PROBABLE LARGE-SCALE SOLAR PROJECTS
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Project Number	Name of Project	Use	Project Description	Status
7	Wistaria Ranch Solar Energy Center	Photovoltaic Solar Facility	A 250 MW solar facility consisting of 16 CUPs (13-0036 thru 13-0046 and 13-0048 thru 13-0052), 16 Variances (V13-002 thru V13-0011 and V13-0013 thru V13-0018) on 29 parcels totaling approximately 2,660 acres. The solar field site parcels are located in three clusters (northern, central and southern) and are generally bounded by Wahl Road on the north, Brockman and Rockwood Roads on the west, the U.S./Mexico border on the south, and Ferrell and Corda Roads on the east.	Estimated start of construction is December 2016 – January 2017 for CUP's 13-0050, 51, 52 & CUP's 13-0036 & 13-0037

Source: ICPDSD 2016.

While Imperial County as a whole has many more solar projects, only projects in the vicinity of the proposed Battery Energy Storage System were included based on their proximity to the Project site (approximately 10 miles or less to the southeast).

3.2.2 CONSIDERATION OF CUMULATIVE IMPACTS

While the cumulative projects list establishes past, present and probable large-scale solar projects to consider in combination with the proposed Project, the cumulative setting varies for each environmental factor. The cumulative setting is established specific to each environmental factor based on the nature and extent of the resource or issue. Some environmental factors such as hazards and hazardous materials may be highly localized. In contrast, environmental factors such as air quality and seismicity may be regional in nature. Still, some environmental factors demonstrate both aspects as in the case of geology and soils (site specific soils but more regional geology). In most cases, a geographic scope (in miles from the Project site, or as determined based on a natural or jurisdictional boundary) is identified.

When considering cumulative impacts, the analysis examines whether the overall long-term impacts of all such projects would be cumulatively significant and whether the projects would cause a “cumulatively considerable” (and thus significant) incremental contribution to any such cumulatively significant impacts (CEQA Guidelines Sections 15064(h), 15065(c), 15130(a), 15130(b), and 15355(b)). To fulfill these two levels of analysis, the project is assessed with

3.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

regard to its incremental contribution to anticipated cumulative impacts within a geographic scope that extends beyond the project site. The geographic scope is determined for each individual issue area. The next level of analysis determines if the project's incremental contribution to any significant cumulative impacts from all projects is itself significant (i.e., "cumulatively considerable).

CEQA Guidelines Section 15355 defines a cumulative impact as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." A cumulative impact occurs from "the change in the environment which results from the incremental impact of the projects when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (CEQA Guidelines Section 15355[b]).

This SEIR evaluates the cumulative impacts of the project for each environmental factor with respect to geographic scope, in combination with past and present (existing) and reasonably foreseeable future projects in the area, and incremental contribution to the cumulative effects.

Chapter 5.0, Cumulative Impacts Summary, provides a summary of the cumulative impacts identified in sections 4.1 through 4.7 (refer to subsections 4.1.4, 4.2.4, 4.3.4, etc., "Cumulative Setting, Impacts and Mitigation Measures").

3.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

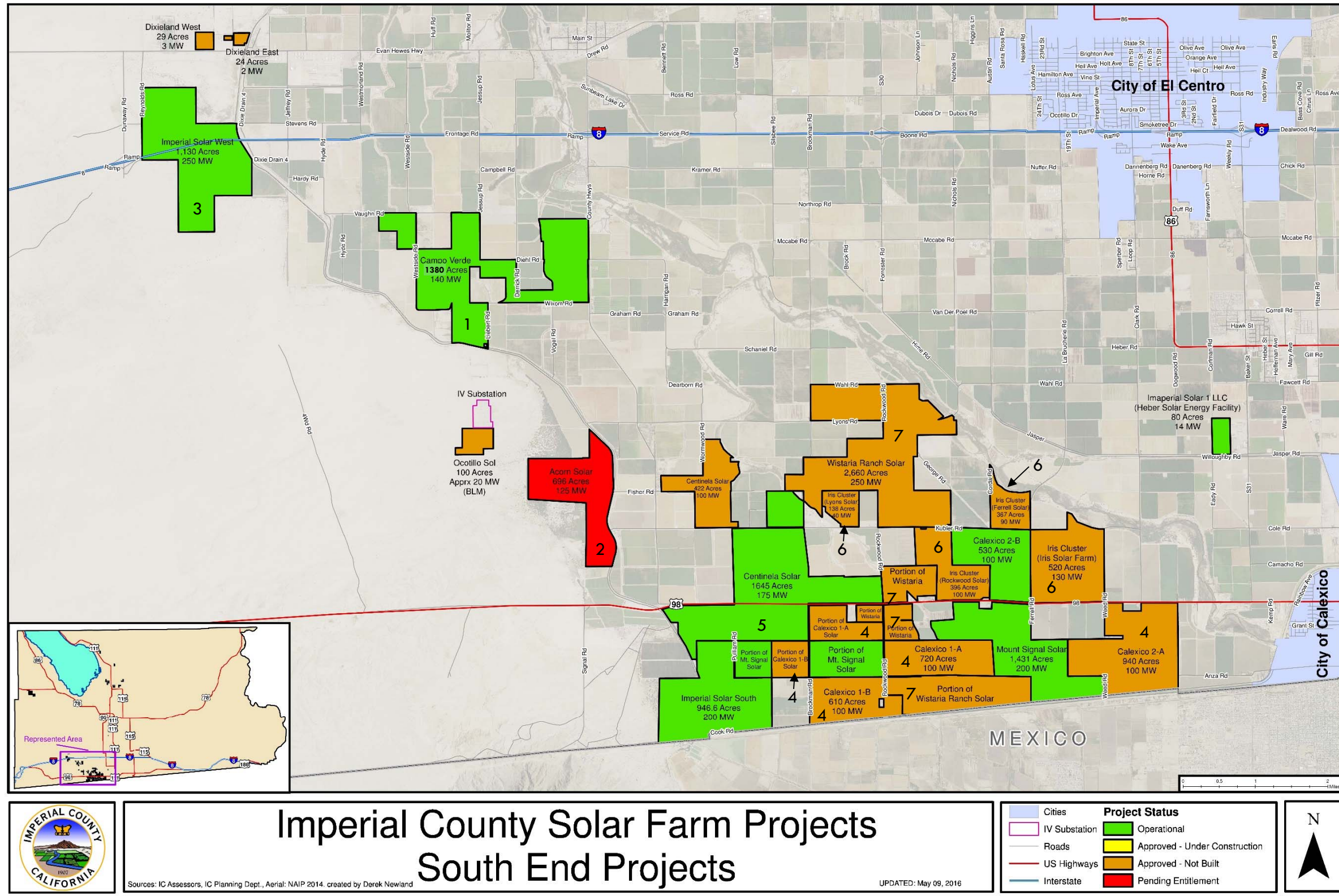


FIGURE 3.0-1 - IMPERIAL COUNTY CUMULATIVE PROJECTS LOCATION MAP