

CHAPTER 7.0

**OTHER CEQA REQUIRED
CONSIDERATIONS**

7.0 OTHER CEQA REQUIRED CONSIDERATIONS

This section discusses the additional topics statutorily required by the California Environmental Quality Act (CEQA). The topics discuss whether the Battery Energy Storage System causes significant irreversible environmental changes, growth inducing impacts, or 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).

7.1 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. In addition, Section 15093(a) of the CEQA Guidelines requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. The County of Imperial can approve a project with unavoidable adverse impacts if it adopts a “Statement of Overriding Considerations” setting forth the specific reasons for its decision. Based on the analysis provided in Sections 4.1 through 4.7, the proposed project would not result in any significant and unavoidable adverse impacts.

7.2 GROWTH-INDUCING IMPACTS

A. INTRODUCTION

CEQA Guidelines Section 15126.2[d] requires that an EIR evaluate the growth-inducing impacts of a proposed action. A “growth-inducing impact” is defined by the CEQA Guidelines as:

“...the way in which a 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... It is not assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.”

Growth inducement potential can result from a project either directly or indirectly. Direct growth inducement results from a project which can accommodate population growth such as a residential subdivision or apartment complex. Indirect growth inducement potential can result from new permanent employment opportunities associated with commercial or industrial development. Likewise, indirect growth can occur if a project removes an obstacle to additional growth and development, such as removing a constraint on a required public service. Growth inducing projects provide resources (such as water) or infrastructure capacity (such as wastewater conveyance and treatment) that has previously been missing or inadequate to allow growth.

Environmental effects of growth inducement are considered indirect impacts. These indirect impacts or secondary effects of growth have the potential to result in significant, adverse environmental impacts. Potential secondary effects of growth include: increased traffic and noise; increased demand on other community and public services and infrastructure; adverse environmental impacts such as degradation of air and water quality; degradation or loss of plant and animal habitat; and conversion of agricultural and open space land to developed uses.

Growth inducement may constitute an adverse impact if the growth is inconsistent with the land use plans, growth management plans, and growth policies for the area affected. Local land use plans provide for land use development patterns and growth policies that allow for the orderly

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expansion of urban development supported by public utilities and services. A project that would induce unplanned growth or growth that conflicts with the local land use plans could indirectly cause additional adverse environmental and public services and utilities impacts. To determine if a growth-inducing project will result in adverse secondary effects, it is important to assess the degree to which the growth occurring as part of a project would or would not be consistent with applicable land use plans.

B. COMPONENTS OF GROWTH

The timing, location and extent of development and population growth in a community or region are based on multiple factors. Key variables include regional economic trends, market demand for residential and nonresidential uses, land availability and cost, the availability and quality of transportation facilities and public services, proximity to employment centers, the supply and cost of housing, and regulatory policies or conditions. The general plan is the primary mechanism used to regulate development and growth in California as it is used to define location, type, and intensity of growth.

C. PROJECT-SPECIFIC GROWTH-INDUCING IMPACTS

Growth Inducement Potential

As described in Chapter 2.0, Project Description, the Campo Verde Battery Energy Storage System Project proposes to build, operate, and maintain a lithium ion battery energy storage system capable of storing up to 105 MWH of energy. The proposed Project would be built in two phases with Phase 1 capable of storing 5 MWH and Phase 2 capable of storing 100 MWH of energy.

As described in Chapter 2.0, subsection 2.1.2 Site Location, the Campo Verde Solar Project is approximately 7 miles southwest of the community of El Centro, California, south of Interstate 8 (I-8), west of Drew Road, and north and east of the Westside Main Canal. The Battery Energy Storage System is proposed within the existing fenced Campo Verde Solar Project, adjacent to the Campo Verde Substation. The Substation is located west of Liebert Road, south of Wixom Road and north of Mandrapa Road. The proposed Battery Energy Storage System site is immediately to the west of the Substation.

The Project requires Imperial County to amend CUP 11-0007 to allow construction and operation of a battery energy storage system on the proposed site.

Approval of the amended CUP by the Imperial County Board of Supervisors would allow the Project to attain consistency with the General Plan and Land Use Ordinance allowable land uses. By its nature as a battery energy storage system for renewable energy within the Campo Verde Solar Project, the Project would not directly induce growth. Instead, the Project would allow the storage and sale of renewable power that the Campo Verde Solar Project is capable of generating to help meet energy needs.

Growth Effects of the Project

Existing and Proposed Land Uses

The Project is a conditionally allowed use that is complementary to the existing Campo Verde Solar Project. Implementation of the proposed Project would not result in the conversion of additional agricultural land, and it is not anticipated to result in growth-related land use impacts as it does not propose residential development or other uses that would attract a population

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base. At the end of the useful life of the Project, the Applicant plans to remove the battery energy storage system and associated equipment and restore the site, as part of the Campo Verde Solar Project, back to agricultural production.

Infrastructure

Development of the Project site would not result in the development and extension of infrastructure facilities. Likewise, the Project is not expected to have an impact on infrastructure availability to adjacent parcels. The Project will not require new utility lines or extension of existing utility and service lines. Instead, it would construct connections to the Campo Verde Substation. Thus, there is no potential for the project to result in growth inducement.

As a general rule, extension of utilities or increased capacity of infrastructure has the potential to result in growth inducement. Any such improvements not only accommodate a project for which they are built but also for any other projects in the surrounding area that would be proposed or become feasible as a result of the availability of new infrastructure. The proposed Project site is located in a rural area of Imperial County with limited infrastructure; no new infrastructure or utilities are included as part of the proposed Project. Thus, implementation of the proposed Project would not contribute to growth in this area of the County.

Housing

The Regional Housing Needs Assessment has determined that the unincorporated area of the county will need 13,427 housing units for the period 2006–2014. No housing is proposed as part of the Battery Energy Storage System nor is the Project anticipated to induce growth in other regions. Instead, the Project would allow the customer and system operators to manage and convert intermittent renewable generation and into reliable, dispatchable generation.

Roadways

Vehicular access to and throughout the Project area would be provided via existing roadways as well as internal roads. The existing paved road internal to the Campo Verde Solar Project would be extended using gravel. The road would extend past the Substation to serve the Battery Energy Storage System. No improvements to area roadways would be necessary to accommodate the proposed Project.

D. SECONDARY EFFECTS OF GROWTH

The Campo Verde Solar Project would not result in the introduction of people and activities to an area that is currently in agricultural use. Secondary effects of the proposed Battery Energy Storage System would include the creation of increased short-term traffic, noise, and air emissions during construction. However, during operation and maintenance of the project, traffic, noise and air emissions would not increase over existing levels given that current Campo Verde Solar Project staff would also operate the Battery Energy Storage System. Thus, no long-term increase in traffic, noise or air emissions would occur as a result of the proposed Project.

7.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

A. INTRODUCTION

CEQA Guidelines Section 15126.2(c) describes irreversible environmental changes as follows:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes

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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. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Development of the Project site would irretrievably commit building materials and energy to the construction and maintenance of the Battery Energy Storage System. Renewable, nonrenewable, and limited resources that would likely be consumed as part of the development of the proposed Project would include, but are not limited to, oil, gasoline, lumber, sand and gravel, asphalt, water, steel, and similar materials. Energy would also be irreversibly consumed, both as part of the construction and during operation (HVAC to cool the batteries) of the Battery Energy Storage System.

7.4 MANDATORY FINDINGS OF SIGNIFICANCE

State CEQA Guidelines Section 15065 identifies four mandatory findings of significance that must be considered as part of the environmental review process of a project. These findings are identified below with an analysis of the project's relationship to these findings.

- 1) The project has the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory.

The project's impacts on biological resources and cultural resources are evaluated in Section 4. 2, Biological Resources, and Section 4.3, Cultural Resources, of this SEIR, respectively. A pre-construction Burrowing Owl survey and avian survey would be required to address biological impacts and mitigation measures have been identified to reduce impacts to cultural resources. Upon implementation of these measures, impacts to biological and cultural resources will be less than significant.

- 2) The project has potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.

The Project would create short-term traffic and air emissions during construction. However, the Campo Verde Battery Energy Storage System would expand the renewable energy sector in Imperial County and reduce the emission of GHGs from the generation of electricity by allowing for storage of 105 MWH of renewable energy. In doing so, the Project would assist the State of California in achieving the RPS and energy storage mandate. The Applicant plans to remove the battery energy storage system and associated equipment and restore the site, as part of the Campo Verde Solar Project, back to agricultural production at the end of the life of the Project as directed by the CUP. Given the benefits of the Project, impacts to long-term environmental goals will be less than significant.

- 3) The project has possible environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the

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effects of past projects, the effects of other current projects, and the effects of probable future projects.

The Project's potential cumulative impacts are summarized in Chapter 5.0 of this SEIR. Sections 4.1 through 4.7 evaluate cumulative impacts related to each technical discussion area and identify mitigation measures addressing each cumulatively considerable impact, if applicable. If not already less than cumulatively considerable, upon implementation of these measures, cumulative impacts will be less than considerable.

- 4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

Potential adverse impacts on humans are discussed and evaluated in Section 4.1, Air Quality/Greenhouse Gas Emissions, Section 4.5, Hazards and Human Health, and Section 4.6, Noise. As appropriate, each section identifies mitigation measures to reduce significant impacts associated with these resource areas. In addition, the proposed project would remain subject to applicable local, state, and federal regulations intended to avoid adverse effects on humans. The Battery Energy Storage System would comply with all required regulatory/legal requirements (including the California Fire Code) as well as project-specific conditions of approval, and would therefore result in less than significant impacts on humans.

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