CHAPTER 3.0

INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

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 Draft Environmental Impact Report (DEIR) 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 EIR

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 Drew Solar Project site and the surrounding area are described in detail in sections 4.1 through 4.13 of this DEIR. 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 May 2018 (SCH NO. 2018051036) (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 4.13 has been evaluated for consistency with policies contained in the Imperial County General Plan (January 18, 1993, with updates and amendments through March 8, 2016). 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 100-mega-watt solar energy generating system that will use photovoltaic (PV) technology. The Project also proposes a battery storage component provided it is at a 2 to 1 ratio. 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 resource areas: agricultural resources; biological resources; cultural resources; geology and soils; hazards and hazardous materials; and transportation and circulation. Project construction impacts specific to each environmental factor are evaluated in sections 4.3, Transportation; 4.6 Geology & Soils; 4.7 Cultural Resources & Tribal Cultural Resources; 4.9 Agricultural Resources; and 4.12 Biological Resources; and 4.14 Energy (refer to subsections 4.3.3, 4.6.3, 4.7.3, 4.9.3 4.12.3 and 4.14.3, "Impacts and Mitigation Measures").

3.1.4 PROJECT BUILDOUT ASSUMPTIONS

For the purpose of this EIR analysis, two buildout scenarios are considered for the Solar Energy Generation Facility Component of the Project:

Full Build-out Scenario

A worst-case scenario (Full Build-out Scenario) assumes that the full buildout of the Solar Energy Generation Facility Scenario is implemented at one time, resulting in all six of the site parcels undergoing temporary conversion from agricultural land to a solar energy generation facility simultaneously over an 18-month build-out period.

Phased CUP Scenario

The incremental construction of the Project proposes build-out of the six parcels in five phases over a ten-year period as market conditions demand (Phased Build-out Scenario). The ten-year period was established because the CUPs require construction to begin within 10 years pursuant to the provisions of the Development Agreement.

Project operational impacts, such as air quality/greenhouse gas emissions, noise, glare, biological, and transportation and circulation are evaluated in sections 4.1 through 4.13 of the EIR (refer to subsections 4.1.3, 4.2.3, 4.3.3, etc., "Impacts and Mitigation Measures"). Build-out 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."

CEQA Guidelines 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 CEQA Guidelines 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 and reasonably foreseeable projects having similar effects to the proposed Project 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.

TABLE 3.0-1
PROPOSED, APPROVED AND REASONABLY FORESEEABLE PROJECTS IN THE REGION

Project Number	Name of Project	Use	Project Description	Status
1	Big Rock Solar and Laurel Solar	Solar Facility	A PV solar facility capable of producing approximately 345 MWs of electricity generally located west of Drew Road and south of I-8.	Approved.
2	Calexico 1-A	Solar Facility	A PV solar facility capable of producing approximately 100 MWs of electricity generally located 6 miles west of the City of Calexico.	Approved April 2012.
3	Calexico 1-B	Solar Facility	A PV solar facility capable of producing approximately 100 MWs of electricity generally located 6 miles west of the City of Calexico.	Approved April 2012.
4	Calexico II-A	Solar Facility	A PV solar facility capable of producing approximately 100 MWs of electricity generally located 6 miles west of the City of Calexico.	Approved April 2012.
5	Campo Verde Battery Energy Storage System	Battery Storage	A 100 MW battery storage system for the Campo Verde Solar facility generally located west of Drew Road and south of I-8.	Approved January 2017.
6	Centinela Solar Phase 2	Photovoltaic Solar Facility	A PV solar facility capable of producing approximately 100 MWs of electricity generally located east of Drew Road and south of I-8.	EIR Approved, Pending Construction
7	Coyne Ranch Specific Plan	Specific Plan	A residential project with up to 546 residential units located at 1642 Ross Road.	In process.
8	County Center II Expansion	Mixed-Use	A mixed-use project of a commercial center, expansion of the Imperial County Office of Education, a Joint-Use Teacher Training and Conference Center, Judicial Center, County Park, Jail expansion, County Administrative Complex,	Completed Certificate of Occupancy

TABLE 3.0-1
PROPOSED, APPROVED AND REASONABLY FORESEEABLE PROJECTS IN THE REGION

Project Number	Name of Project	Use	Project Description	Status
			Public Works Administration, and a County Administrative Complex located on the southwest corner of McCabe Road and Clark Road.	
9	IV Substation and SDG&E Ocotillo Solar	Transmission Line	A project connecting the Imperial Irrigation District's "S" line from the Imperial Irrigation District substation to the Imperial Valley substation and a PV solar facility capable of producing approximately 14 MWs of electricity generally located adjacent to the SDG&E Imperial Valley Substation.	IV Substation Completed. Ocotillo Solar not is not an active application but is reflected here to be conservative.
10	IRIS Solar Farm Cluster (Ferrell, Rockwood, Iris, and Lyons)	Photovoltaic Solar Facility	PV solar facilities capable of producing approximately 360 MWs of electricity generally located north of SR-98 between Brockman Road and Weed Road.	Approved February 2015.
11	Wistaria Ranch Solar Energy Center	Photovoltaic Solar Facility	A PV solar facility capable of producing approximately 250 MWs of electricity generally located 8 miles west of the City of Calexico.	Approved December 2014.
12	Vega Solar	Photovoltaic Solar Facility	A PV solar facility capable of producing approximately 100 MWs of electricity generally located west of Drew Road and south of I-8.	Planning Commission, March 2019.
13	Le Conte Battery Storage System	Battery Storage	Battery storage system proposed on 2.0 acres within the Centinela Solar Facility capable of strong 125 MWs.	CUP Application, July 2018. Board of Supervisors Approval Anticipated Spring 2019.

Source: ICPDSD 2018a.

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 our 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 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 DEIR 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 4.13 (refer to subsections 4.1.4, 4.2.4, 4.3.4, etc., "Cumulative Setting, Impacts and Mitigation Measures").

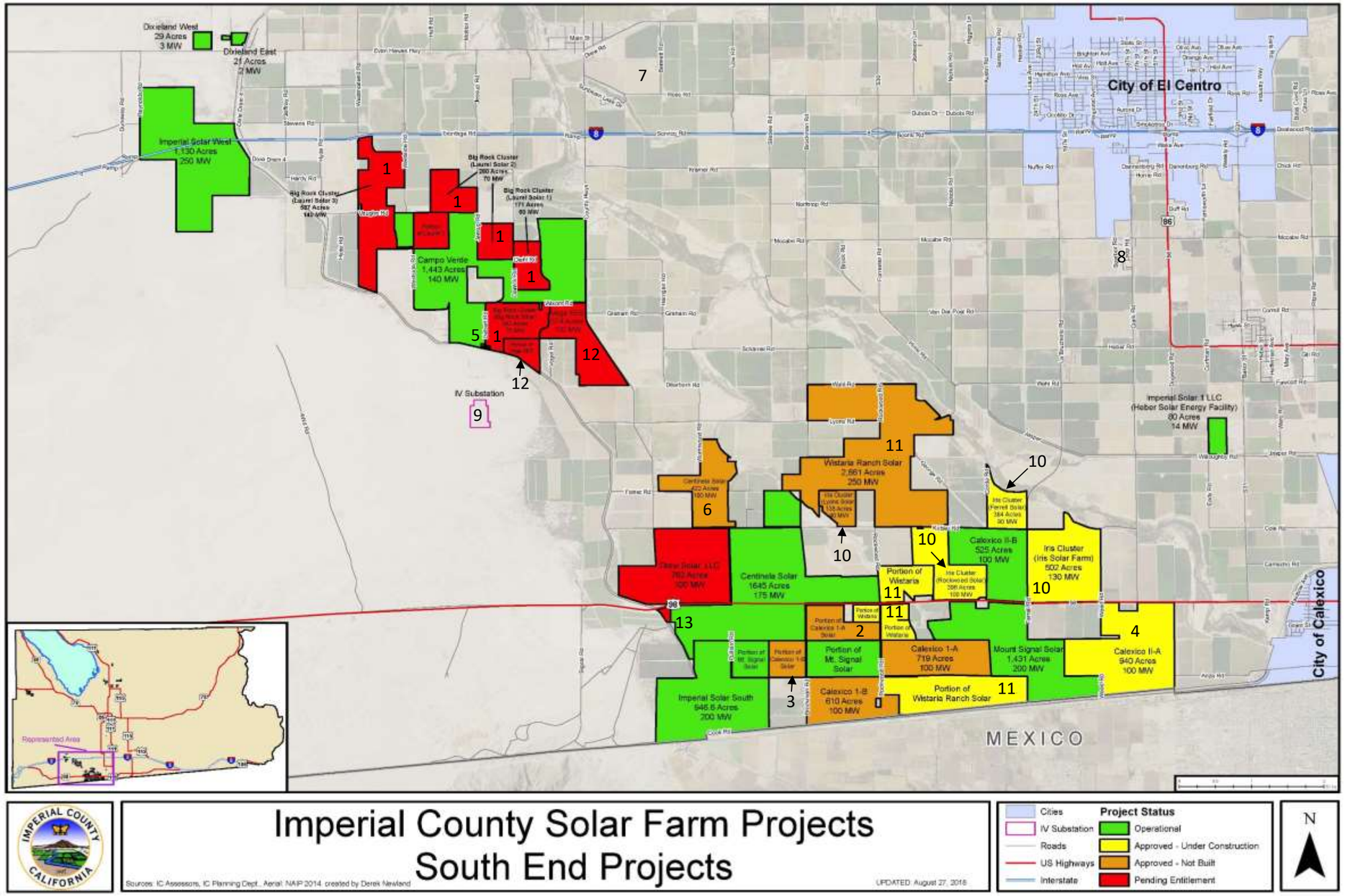

FIGURE 3.0-1
IMPERIAL COUNTY CUMULATIVE PROJECTS LOCATION MAP