

CHAPTER 1.0

INTRODUCTION

1.1 PURPOSE OF THE DOCUMENT

The California Environmental Quality Act (CEQA) requires State and local public agencies to prepare an Environmental Impact Report (EIR) prior to approving any project that may have a significant effect on the environment. According to CEQA, a “project” is defined as the whole of an action that has the potential to result in a direct physical change or a reasonably foreseeable indirect physical change in the environment (State CEQA Guidelines Section 15378[a]). The Seville 4 Solar Project is in Imperial County and meets the definition of a “project” as defined by CEQA.

The County of Imperial is the lead agency for the preparation of this EIR under CEQA and is responsible for conducting the environmental review and certifying the EIR. Likewise, consistent with the requirements of CEQA, the County will use the EIR 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 approve a General Plan Amendment (GPA 17-0002), a Rezone (ZC 17-0001) and issue a Conditional Use Permit (CUP 17-0006).

The Seville 4 Solar Project EIR (State Clearinghouse Number [SCH. No.] 2017061062) is a public document for a renewable energy project, specifically a solar generation facility. This Draft EIR describes the existing environment and evaluates the project-specific and cumulative impacts of the proposed Project and alternatives in accordance with the provisions set forth in CEQA and the CEQA Guidelines. This EIR 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 AND DEFINITIONS

1.2.1 PROJECT BACKGROUND

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. The Bill requires all California utilities, including independently owned utilities (IOUs), energy service providers, and community choice aggregators (CCAs), to generate electricity from renewable sources over a three-stage compliance period. In October 2015, Governor Brown signed Senate Bill 350 which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030 (refer to subsection 1.7.1, item “A. Renewables Portfolio Standard Program”).

One form of renewable energy is solar energy as harnessed through photovoltaic (PV) technology. PV power systems convert sunlight into electricity. For PV technology, the process begins with individual PV cells that combine to form PV modules. The modules are sealed and connected to each other with wires to form a PV array. The PV arrays convert solar radiation into direct current (DC) electricity. The direct current from the PV array is collected at an inverter and converted to alternating current (AC). AC electricity is consistent with the current flowing through the electrical grid.

The proposed Project is a solar generation facility put forth by Titan Solar II, LLC (hereafter referred to as “Applicant”). The facility would use either thin film or crystalline solar PV technology modules mounted either on fixed frames or horizontal single-axis tracker (HSAT) systems. All electricity generated by the Project is designated for use by the Imperial Irrigation District (IID).

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On April 13, 2017, the Applicant submitted the following permit applications to the Imperial County Planning and Development Services Department (ICPDSD):

- One General Plan Amendment (GPA) (17-0002) to add the Renewable Energy “RE” Overlay Zone designation to the existing Agriculture land use designation;
- One Zone Change (ZC 17-0001) to add the “RE” Renewable Energy Overlay Zone to the existing “A-2” General Agriculture zone. Pursuant to Section 9170101 (“RE” RENEWABLE ENERGY OVERLAY ZONE) of Title 9 of the Imperial County Code (Land Use Ordinance), land classified in some other (non-overlay) zone may also be classified in the “RE” Renewable Energy Overlay Zone by the County Board of Supervisors if a future renewable energy project would be located adjacent to the existing “RE” Overlay Zone and the project was not located in a sensitive area and it would not result in any significant environmental impacts.
- One CUP (17-0006) application package for the proposed Seville 4 Solar Project to be located on a portion of the 572.10 acres comprising Lot 8 of Tract Map 00988, Section 25, T12S, R9E. Pursuant to Section 91703.02 (CONDITIONAL USE PERMITS) of Title 9 of the Imperial County Code (Land Use Ordinance), Renewable Energy Projects must be located within the Renewable Energy Overlay Zone and may be permitted only through the issuance of a CUP as approved by the Approving Authority unless otherwise allowed by applicable law.

This EIR is being prepared to analyze the potential environmental impacts of the proposed Project and fulfill the requirements of CEQA.

A Notice of Preparation (NOP) for the Seville 4 Solar Project Draft EIR was issued by the ICPDSD on June 22, 2017. The NOP is included in **Appendix A** of this EIR.

1.3 PROJECT OVERVIEW

The proposed Project includes the construction, operation and reclamation of the following:

- A 20-megawatt (MW) solar photovoltaic (PV) energy project on approximately 146 or 174 acres of the 572.10 acres in Lot 8 of Tract Map 00988.
- A 34.5-kilovolt (kV) generator intertie line (Gen-Tie Line) connecting to the existing substation.
- A 34.5/92-kV substation and expansion of the adjacent Imperial Irrigation District (IID) Switching Station in common development interest Lot D of Tract Map No. 00988.
- Internal access roads and infrastructure (i.e. PV modules, inverters, internal transmission lines, security fence, etc.)
- Energy generated by the Seville 4 Solar Project would be conveyed to the IID transmission system via the Gen-Tie Line which starts in the northwest corner of Lot 8 and ends at the proposed Seville 4 Substation in Lot D. From the northwest corner of Lot 8 the Gen-Tie Line crosses the north end of Lot 3 to Lot A (“Utility Quarter”). The Gen-Tie Line continues in Lot A (adjacent to the north end of Lot 2) to the northeast corner of Lot 1 where Lot A turns north. At a point opposite Lots C and D, the Gen-Tie Line will cross east over the main access road (Lot B) and terminate at the proposed Seville 4 Substation in Lot D. After increasing the voltage to 92 kV, the Seville 4 Substation will deliver the generated power to an IID Switching Station which then delivers the power to the existing IID 92 kV transmission line connected to the IID Anza Substation. If feasible, the Gen-Tie Line may be constructed on existing power poles supporting power lines within the property. If not feasible, the Gen-Tie line will be constructed on new power poles.

- Water tank(s) capable of storing 20,000 gallons for fire protection.

1.3.1 PROJECT LOCATION

The Project is located at 2085 “H” West Highway 78, Borrego Springs, CA 92004 in west-central Imperial County, California, approximately eight miles west of the junction of SR 78 and SR 86, and approximately five miles east of the San Diego County line. The Project site is also 12 miles west of the southern tip of the Salton Sea and bordered by the east by the unpaved section of Pole Line Road south of SR 78. Specifically, the Project site is located in Section 25, Township 12 South (T12S), Range 9 East (R9E), San Bernardino Baseline and Meridian (SBB&M).

1.4 UNDERLYING PURPOSE AND OBJECTIVES OF THE PROPOSED PROJECT

Pursuant to CEQA the following objectives have been identified for the proposed Project. 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.

1.4.1 UNDERLYING PURPOSE

Construct and operate a solar generation facility that will help meet the increasing demand for clean, renewable electrical power and provide economic investment and diversification of the economic base in Imperial County.

1.4.2 STATEMENT OF OBJECTIVES

The proposed Seville 4 Solar Project has the following objectives:

- Produce a minimum of 20 MWAC, on-peak, renewable power to the electrical grid in California.
- Assist California in meeting its current and future Renewable Portfolio Standard goals.
- Support the greenhouse gas reduction goals of Assembly Bill 32 (California Global Warming Solutions Act of 2006).
- Site the Project in an area with excellent solar energy resources in order to maximize productivity from the PV panels.
- Use a proven and available solar PV technology to reliably and economically produce electricity during daylight hours.
- Locate the solar power facility as near as possible to the Imperial Irrigation District’s (IID) existing electrical transmission facilities with anticipated capacity.
- Minimize environmental impacts by constructing and operating the solar power facility adjacent to existing and approved solar facilities and existing supporting infrastructure (transmission lines and roads).
- Construct and operate a solar power facility that would reduce the historic groundwater use on the Project site.
- Create additional employment and project-related expenditures for local businesses.

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1.5 REVIEW & CERTIFICATION PROCESS

1.5.1 NOTICE OF PREPARATION

Due to the potential for significant impacts to result from the proposed Seville 4 Solar Project, the County determined that an EIR would be necessary. The County prepared an Initial Study (Code of California Regulations [CCR] §15063b (1)(A)) and subsequently issued a Notice of Preparation (NOP) for the preparation of an EIR (SCH. No. 2017061062) on June 22, 2017 (discussed further in subsection 1.8.1). The NOP was distributed to city, county, state and federal agencies, other public agencies, and various interested private organizations and individuals to define the scope of the EIR. The NOP was also published in the Imperial Valley Press on Sunday, July 2, 2017. The purpose of the NOP was to identify public agency and public concerns regarding the potential impacts of the proposed Project, and the scope and content of environmental issues to be addressed in the EIR. Circulation of the NOP ended on July 21, 2017. A public scoping meeting was held on July 13, 2017, at the Board of Supervisors meeting room. No members of the public were in attendance and no public comments were received.

A. DRAFT EIR

The Draft EIR includes a detailed description of the proposed Project, description of the environmental setting, identification of project impacts and mitigation measures for impacts found to be significant. An analysis of Project alternatives as well as a discussion of cumulative impacts and other CEQA required considerations are also provided. Upon completion of the Draft EIR, a Notice of Completion (NOC) will be filed with the California State Office of Planning and Research (OPR) by the County of Imperial. The NOC signals the start of the public review period for the Draft EIR (CCR §15085).

B. PUBLIC NOTICE/PUBLIC REVIEW

The Draft EIR 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 50 days (45-day minimum per CEQA, plus five days per County of Imperial Guidelines).

On July 18, 2018 a NOC was filed with the State Clearinghouse for the Draft EIR, initiating the 50-day public review period of the Draft EIR document and associated technical appendices. 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 EIR for review and comment. A Notice of Availability (NOA) was published on July 15, 2018 in the Imperial Valley Press newspaper. In addition, the NOA was posted on the County’s website and at local libraries. Public comment on the Draft EIR will be accepted in written form. Details on where to send questions or comments are provided in subsection 1.9, below. The public review and comment period ends on September 6, 2018 after which time all comments received will be responded to (refer to item C, “Response to Comments/Final EIR,” below).

C. RESPONSE TO COMMENTS/FINAL EIR

A Final EIR (FEIR) will be prepared following the public review and comment period for the Draft EIR. The Final EIR will respond to: written comments received during the public review and comment period; and oral comments made at any public hearing held to receive comments on the Draft EIR.

D. CERTIFICATION OF THE EIR

The Final EIR will be independently reviewed and considered by the County. If the Final EIR is deemed “adequate and complete,” the County may certify the EIR 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 Final EIR, 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 (MMRP), 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.

E. 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 construction and operation.

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 Final EIR will be considered as conditions of approval for the project and will be included in the MMRP to ensure and verify compliance.

1.6 AGENCY ROLES AND RESPONSIBILITIES

1.6.1 IMPERIAL COUNTY

Lands on which Project is proposed are zoned A-2 - General Agriculture. The application for the proposed Project requests approval of a General Plan Amendment (GPA), a Zone Change and a Conditional Use Permit (CUP) in association with the proposed solar use. 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 90508.0 addresses uses in the A-2 zone. The following uses are permitted subject to approval of a CUP from Imperial County: solar energy electrical generator, electrical power generating plant, major facilities relating to the generation and transmission of electrical energy, and resource extraction and energy development.

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

- Certification of the EIR
- Adoption of a project MMRP
- Approval of CEQA Findings pursuant to CEQA Guidelines Section 15091
- Approval of Project Site Plan
- General Plan Amendment
- Zone Change
- Conditional Use Permit
- Public Benefit Agreement
- Grading Permits
- Construction Traffic Control Plan
- Building Permits
- Occupancy Permits

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1.6.2 OTHER AGENCY REVIEWS AND/OR CONSULTATIONS

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

A. FEDERAL

UNITED STATES ARMY CORPS OF ENGINEERS

The United States Army Corps of Engineers (USACE) possesses jurisdiction over waters of the United States and jurisdictional wetlands pursuant to the federal Clean Water Act. The USACE regulates the discharge of dredge/fill material into such waters, including ditches and drains that could be jurisdictional. A Jurisdictional Delineation Report was conducted for the Project site in July 2017 (included in **Appendix L** of this EIR).

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). Biological surveys of the area were conducted to determine if critical habitat and federally listed species are present or are expected to occur in the Project area (**Appendix L**).

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, 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 California Endangered Species Act (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.

A Biological Technical Report (ECORP 2017a) and a Burrowing Owl Survey Report (Primrose 2017) were prepared for the proposed Project (Both reports are included in **Appendix L** of this EIR). The Applicant will consult with CDFW prior to the start of Project construction. CDFW will review the Project for potential effects on State listed species and determine the extent of its jurisdiction under Section 1602 Streambed Alteration Agreement for impacts on drainages from construction, if applicable.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD (RWQCB), COLORADO RIVER BASIN REGION 7

The California Regional Water Quality Control Board (RWQCB), Colorado River Basin Region 7 is responsible for regulating water quality. Construction of the Project would be covered under General Permit for Discharges of Storm Water Associated with Construction Activity (NPDES No. CAS000002) (Construction General Permit Order 2010-2014-DWQ, effective February 14, 2011). The permit requires the Applicant to file a public Notice of Intent (NOI) to discharge stormwater and to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP).

CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL (DTSC)

The California Department of Toxic Substances Control (DTSC) oversees toxic substances procedures and remediation. If the Project is required to submit a Hazardous Materials Management Plan, a Spill

Containment, Countermeasure, and Control (SPCC) Plan and/or Hazardous Materials Transportation Plans, DTSC would be responsible for review of these documents.

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

The California Environmental Protection Agency (CalEPA) oversees various aspects of environmental protection throughout the State. CalEPA will be among the agencies that will be noticed during the public review period and have the opportunity to comment on the Project.

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 has been consulted and conducted a Sacred Lands file search for the Project.

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. CalOSHA will review the Hazardous Materials Management Plan or Program, as applicable.

C. LOCAL

IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT

The Imperial County Air Pollution Control District (ICAPCD) is responsible for enforcing air emission requirements to protect public health in the County. These requirements apply to various activities including construction, and operational activities associated with various land uses. The Project will prepare a Dust Control Plan to comply with Rule 801 of Imperial County's Rules and Regulations for Construction and Earthmoving Activities. The Project would also be subject to the ICAPCD's Rule 310 Operational and Development Fees.

IMPERIAL COUNTY FIRE DEPARTMENT

The Imperial County Fire Department would provide fire protection service to the Project. The Department received a copy of the NOP, and was consulted during preparation of this EIR. The Department will review the Project including the final design of the proposed fire safety system.

IMPERIAL COUNTY SHERIFF'S OFFICE

The Imperial County Sheriff's Office would provide law enforcement service to the Project, as necessary. The Office received a copy of the NOP and will review the Project, including the final design, for adequate emergency access. The Office was also consulted for input during preparation of this EIR.

1.7 RELATIONSHIP TO STATUTES, REGULATIONS AND OTHER PLANS

1.7.1 STATE

A. RENEWABLES PORTFOLIO STANDARD PROGRAM

This Renewables Portfolio Standard Program requires investor-owned utilities to obtain 33 percent of the power supplied to their customers to be generated from renewable sources by the year 2010. Senate Bill (SB) X1 2 established a three-stage compliance period: 20 percent by December 31, 2013; 25 percent by December 31, 2016; 33 percent by December 31, 2020; and 50 percent by December 31, 2030.

B. 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

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reduce greenhouse gas (GHG) emissions to 1990 levels by 2020. Electricity production facilities are regulated by CARB. The requirement for reduction of GHGs was increased in October 2015 with the signing of SB 350 which requires 50 percent of electricity to be generated by eligible renewable energy sources by December 31, 2030.

C. 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.

D. CALIFORNIA ENDANGERED SPECIES ACT

The California Endangered Species Act (CESA) is codified at Fish and Game Code Section 2050. This Section prohibits "take" of any species listed as an endangered or 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."

CESA allows for take incidental to otherwise lawful activity through take authorization issued by CDFW. CESA emphasizes early consultation to avoid potential impacts to rare, endangered, and threatened species. Early consultation is also helpful in developing appropriate mitigation to offset losses of listed species populations and their essential habitats. The Applicant will consult with the CDFW regarding any issues arising under CESA.

E. CALIFORNIA LAKE AND STREAMBED PROGRAM

The CDFW is responsible for conserving, protecting, and managing California's fish, wildlife, and native plant resources. The California Lake and Streambed Program (Fish and Game Code Sections 1601 to 1603) requires an entity to notify CDFW prior to constructing any project that would divert, obstruct or change the natural flow, bed, channel, or bank of any river, stream, or lake. CDFW is required to propose reasonable project changes and/or mitigation to protect the resource in cases where an existing fish or wildlife resource may be substantially adversely affected. Changes or mitigations are formalized in a Streambed Alteration Agreement that becomes part of the plans, specifications, and bid documents for the project.

1.7.2 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 2).

B. IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT

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 PM₁₀ in the Imperial Valley.

1.8 PUBLIC PARTICIPATION OPPORTUNITIES/ COMMENTS AND COORDINATION

Imperial County conducted a scoping process to fulfill the intent and requirements of CEQA Guidelines Section 15082 (described in detail under subsection 1.8.2, below), including a scoping meeting held on July 13, 2017 at the Board of Supervisors meeting room to gather input from the public. No members of the public attended the meeting and no public comments were received.

1.8.1 NOTICE OF PREPARATION

The Notice of Preparation (NOP) for the Seville 4 Solar Project EIR was issued by the Imperial County Department of Planning and Development Services on June 22, 2017. Seven letters were received in response to the NOP from various agencies and individuals. A list of the letter writers and summary of the areas of concern or issue raised in these letters is summarized in **Table 1.0-1**. The NOP and written comments received during the public review period for the NOP are included on the attached CD of Technical Appendices as **Appendix A** of this EIR.

**TABLE 1.0-1
SUMMARY OF NOP COMMENTS**

Agency/Individual	Issue Noted or Area of Controversy
<p>Scott Morgan Director, State Clearinghouse</p>	<p>NOP routed to responsible agencies for comment. 30-day response period.</p>
<p>Gayle Totton, M.A. Ph.D. Associate Governmental Analyst Native American Heritage Commission</p>	<ul style="list-style-type: none"> • Lead agency will need to determine if there are historical resources with the area of potential effect. • Both SB 18 and AB 52 have tribal consultation requirements. • NAHC recommends that lead agencies consult with all California Native American tribes that are affiliated with the geographic area of the Project. • Lead agencies should include provisions to address the following in their mitigation monitoring and reporting program plans: inadvertently discovered archaeological resources; disposition of recovered cultural items; and treatment and disposition of inadvertently discovered Native American human remains. <p><i>The above issues are addressed in Section 4.7, Cultural Resources.</i></p>
<p>Johnson P. Abraham, Project Manager Brownfield Restoration and School Evaluation Branch Department of Toxic Substances Control</p>	<ol style="list-style-type: none"> 1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. 2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to commencing new development or any construction. 3. If the proposed project involves the demolition of existing structures, lead-based-paints or products, mercury, and asbestos containing materials (ACMs) should be addressed in accordance with all applicable and relevant laws and regulations if buildings are modified/demolished.

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**TABLE 1.0-1
SUMMARY OF NOP COMMENTS**

Agency/Individual	Issue Noted or Area of Controversy
<p>Johnson P. Abraham, Project Manager Brownfield Restoration and School Evaluation Branch Department of Toxic Substances Control</p>	<p>4. If the site was used for agricultural or related activities, residual pesticides may be present in onsite soil. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from residual pesticides.</p> <p>5. DTSC recommends evaluation, proper investigation and mitigation, if necessary, of on-site areas with current or historic polychlorinated biphenyls (PCB)-containing transformers.</p> <p>6. If the project plans include discharging wastewater to a storm drain, an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB) may be required.</p> <p>7. If the project development involves soil export/import, proper evaluation is required.</p> <p>8. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/ demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted and the appropriate government agency to provide regulatory oversight.</p> <p><i>The above issues are addressed as appropriate throughout the EIR in Sections 4.2 Land Use, 4.10 Hazards and Hazardous Materials, 4.11 Hydrology and Water Quality and Section 4.13, Public Services and Utilities.</i></p>
<p>Dirk Saar, Logistics Director U.S. Border Patrol, El Centro Sector</p>	<ul style="list-style-type: none"> • No significant impact to current or future operations. • Community Liaison Agents to contact Seville 4 to coordinate access after project is constructed. <p>Border Patrol is mentioned in <i>Section 4.13, Public Services and Utilities.</i></p>
<p>Donald Vargas, Compliance Administrator II Imperial Irrigation District (IID)</p>	<ol style="list-style-type: none"> 1. Applicant should contact the IID Customer Project Development Office to initiate the customer service application process and submit a formal application for electrical service. 2. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface

**TABLE 1.0-1
SUMMARY OF NOP COMMENTS**

Agency/Individual	Issue Noted or Area of Controversy
<p>Donald Vargas, Compliance Administrator II Imperial Irrigation District (IID)</p>	<p>improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement. The IID Real Estate Section should be contacted for additional information regarding encroachment permits or agreements.</p> <p>3. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but are not limited to: electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent (e.g., the gen-tie should be considered a part of the project and as such assessed and mitigated).</p> <p><i>The above issues are addressed as appropriate throughout the document including Section 4.13, Public Services and Utilities.</i></p>
<p>Maurice Eaton, Acting Chief Local Development and Intergovernmental Review Branch Department of Transportation, District 11 Division of Planning and Local Assistance</p>	<p>A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities- existing and proposed – and to propose appropriate mitigation measures.</p> <p>The TIS should include an analysis of the multi-modal travel demand expected from the proposed project. This analysis should also identify potentially significant adverse impacts from such demands and avoidance, minimization, and mitigation measures needed to address them.</p> <p>The data used in the TIS should not be more than 2 years old.</p> <p>Mitigation measures to State facilities should be included in the TIS. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation.</p> <ul style="list-style-type: none"> • Glint/Glare:

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**TABLE 1.0-1
SUMMARY OF NOP COMMENTS**

Agency/Individual	Issue Noted or Area of Controversy
<p>Maurice Eaton, Acting Chief Local Development and Intergovernmental Review Branch Department of Transportation, District 11 Division of Planning and Local Assistance</p>	<p>Requests that a copy of the Glint and Glare analysis be made available to Caltrans.</p> <ul style="list-style-type: none"> • Access: <p>An encroachment permit was obtained by Seville Solar Holding Company, LLC to construct a commercial driveway to the existing access road of the Seville 3 Solar Plant under Permit No. 11-14-6RC-0715. The work was completed on October 28, 2015, in accordance with all permit requirements and conditions.</p> <p><i>The above issues are addressed in Sections 4.1 Aesthetics and 4.3, Transportation and Circulation.</i></p>
<p>Axel Salas, APC Environmental Coordinator Imperial County Air Pollution Control District</p>	<ul style="list-style-type: none"> • Requests preparation of a comprehensive Air Quality Analysis of construction and operational impacts for Project and alternatives. • Suggests that a Health Risk Assessment be conducted • Suggests “Hot Spot Modeling” if heavy volumes of traffic are expected. • Include cumulative impact analysis for existing and proposed projects. • Directs that all mitigation measures be formulated consisted with CEQA Air Quality Handbook and consult Clean Air Plans, District Rules and Regulations and other Air District approved programs. • Requires discussion of the impacts from Green House Gas emissions (AB-32) reported in EIR. • Directs that the EIR include a discussion of combined cumulative impacts of the Project 15065(c)(a)(3) of CEQA. • Requires that construction sites follow Fugitive Dust Control, Regulation VII requirements. • Requires that the Project prepare a dust control plan and appropriate notification of the APCD prior to commencement of construction. • Requires that the Project submit a list of equipment that will be used in construction and operation of project. • Notes that the Project is subject to the Air District’s Rule 310, “Operational Development Fees.” <p><i>The above issues are addressed in Section 4.4, Air Quality.</i></p>

**TABLE 1.0-1
SUMMARY OF NOP COMMENTS**

Agency/Individual	Issue Noted or Area of Controversy
<p>Garratt Aitchison, District Superintendent State of California, Department of Parks and Recreation - Colorado Desert District</p>	<p>Concerned that the proposed Project may result in significant and unavoidable impacts to the Ocotillo Wells State Vehicular Recreation Area (OWSVRA) with regard to the following:</p> <ul style="list-style-type: none"> • Aesthetics <p>The project site is within the view shed of OWSVRA. Water tanks, fencing and security lighting may affect views.</p> <ul style="list-style-type: none"> • Air Quality <p>Methods and treatment of soils in and around the project site both during and after construction (water, binders, etc.) should be identified. Long-term restoration of the bladed area should be discussed.</p> <ul style="list-style-type: none"> • Biological <p>The potential cumulative impacts of further expansion of the Seville Solar Farm on sensitive species such as burrowing owl, kit fox, flat-tailed horned lizard, and fringe-toed lizard should be considered. Mitigation for these species should be identified in the immediate area and within or adjacent to the project.</p> <p>Fencing could provide predator perching opportunities which could impact flat-tailed horned lizards.</p> <p>Focused surveys should be completed to inform the EIR, as needed.</p> <p>Identify how much undisturbed desert habitat corridors and linkages would be affected.</p> <p>Concerned that loss of connectivity and foraging habitat will significantly impact the park.</p> <p>The EIR should discuss the potential for the solar panels to cause a "lake effect" in which birds may perceive the solar field as a water body.</p> <p>Project proponent should pre-plan for the early reintroduction of native vegetation to expedite in their growth, and increase the visual quality of operational structures.</p> <ul style="list-style-type: none"> • Geology and Soils <p>Provide specific information about the potential application of chemical stabilization agents to be discussed in the EIR.</p>

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**TABLE 1.0-1
SUMMARY OF NOP COMMENTS**

Agency/Individual	Issue Noted or Area of Controversy
<p>Garratt Aitchison, District Superintendent State of California, Department of Parks and Recreation - Colorado Desert District</p>	<ul style="list-style-type: none"> • Hydrology and Water Quality The EIR should address the water use by the project and cumulative effects in the area. • Recreation Recreational impacts range from potential interruption of wildlife and OHV travel corridors between OWSVRA and the BLM Areas of Critical Environmental Concern (ACEC's) and Superstition BLM OHV area, to potential night sky impacts to our Interpretive Program's stargazing events. Potential aesthetic impacts from glare as well as public safety impacts need to be analyzed in the EIR. Request that the Project proponents work with State Parks staff during the development of the EIR to appropriately mitigate any impacts to recreation, visitor services, and associated public safety at OWSVRA. • Transportation/Traffic Inquires if identified truck trips to export or import material to the jobsite, as well as other associated construction traffic, will create the need for traffic control signs/devices for the park visitors as they ingress and egress on State Highway 78. Inquires if the Project restrict or eliminate, either temporarily or permanently, access between OWSVRA and the Superstition OHV area. Inquires how the construction schedule for numerous projects will affect traffic along the 78 corridor over time. Inquires how often will there be periodic maintenance events and the volume of traffic associated with those events. • Tribal Cultural Resources Due to the Project's proximity to the Ancient Lake Cahuilla shoreline, there is a high potential for impacts to cultural resources and possibly human remains. The project should be designed to avoid these impacts. • Noise Address why the noise impacts are potentially significant and why they would continue past the short-term construction periods in the EIR. Provide analysis of desert wind hitting the solar panels and creating noise.

**TABLE 1.0-1
SUMMARY OF NOP COMMENTS**

Agency/Individual	Issue Noted or Area of Controversy
<p>Garratt Aitchison, District Superintendent State of California, Department of Parks and Recreation - Colorado Desert District</p>	<p>Address proximity effects from this project on the camping, visual, interpretive and public safety operations at the OWSVRA.</p> <ul style="list-style-type: none"> • Utilities and Service Systems <p>If the Project includes the construction of new stormwater drainage facilities, the potential change in the Ocotillo-Clark Groundwater Basin should be addressed in the EIR.</p> <p>Requests that the Lead Agency and Project proponent work with State Parks, where appropriate, to address the above questions and concerns prior to release of the EIR.</p> <p><i>The above issues are addressed as appropriate throughout the document including Sections 4.1 Aesthetics, 4.3 Transportation and Circulation, 4.4 Air Quality, 4.5 Climate Change, 4.7 Cultural Resources, 4.8 Noise, 4.11 Hydrology and Water Quality, and Section 4.12 Biological Resources.</i></p>

1.8.2 SCOPING MEETING

In keeping with the provisions of CEQA Guidelines Section 15083 Early Public Consultation, a public scoping meeting was held for the proposed Project to solicit input on the scope and content of the EIR. The scoping meeting conducted by Imperial County as the lead agency and took place on July 13, 2017 at 6 p.m. at the Board of Supervisors meeting room. No members of the public attended the meeting and no comments were received.

The County also sent the NOP to responsible agencies (e.g., Imperial County Sheriff’s Office) to provide input on the Project during the 30-day comment period (June 22 - July 21, 2017). The County also sent a consultation letter to the Torres Martinez Desert Cahuilla Indians in June 2017. No response was received after 30-days.

1.9 AVAILABILITY OF REPORTS

This Draft EIR, 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 ICPDSD website: <http://www.icpds.com>.

All comments on the Draft EIR should be directed to:

Patricia Valenzuela, Planner IV - PatriciaValenzuela@co.imperial.ca.us
Imperial County Planning and Development Services Department
801 Main Street, El Centro, California 92243

Comments received during the public scoping meeting were reviewed and addressed in this Draft EIR. The Draft EIR will be reviewed by the Imperial County Planning Commission and Board of Supervisors as part

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of the procedure to adopt the EIR. Additional information on this process may be obtained by contacting the ICPDSD at (442) 265-1749.

1.10 STRUCTURE OF THIS EIR

1.10.1 DRAFT EIR

The structure of this Draft EIR is identified in the Table of Contents and further explained in the beginning of Chapter 4.0, Environmental Analysis. The Draft EIR is organized into nine Chapters and the Executive Summary.

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

Chapter 1.0 - Introduction. This chapter explains the purpose of the document; provides a summary of the background, terminology and overview of the proposed Project; identifies the purpose and objectives of the Project; explains the review and certification process; identifies agencies responsible for review and/or consultation regarding the Project; explains the Project's relationship to statutes, regulations and other plans; identifies public participation opportunities and summarizes comments received on the NOP; provides information regarding the availability of reports; and, outlines the structure of the document.

Chapter 2.0 - Project Description. This chapter provides a detailed description of the proposed Project and its various components; identifies the Project's location and land ownership; specifies the General Plan and zoning designations; provides details regarding the Project's construction, operation, and reclamation; identifies alternatives under consideration; and, explains the intended uses of the EIR and authorizing actions.

Chapter 3.0 - Introduction to the Environmental Analysis and Assumptions Used. This chapter introduces the environmental impacts analyses and general assumptions used in the Project-specific and cumulative analyses contained in Sections 4.1 thru 4.13. It also describes the approach used in the General Plan consistency analysis.

Chapter 4.0 – Environmental Analysis. This chapter provides a brief overview of the thirteen resource areas determined for inclusion in the EIR by the Initial Study. This chapter also orients the reader to the order of the sections and format of the analysis.

Section 4.1 - Aesthetics. This section examines the potential change in aesthetic character measured against the existing setting and visual conditions of the Project site and surrounding area. Project visibility, scale, and potential glare are considered relative to the existing aesthetic context. This section includes findings of the Glint and Glare analysis prepared for the Project.

Section 4.2 - Land Use. This section focuses on the potential impacts on, and conflicts with, land use that may result from development of the proposed Project. This section also evaluates the consistency of the Project with the County of Imperial General Plan, zoning, and other applicable plans or documents. It also analyzes the proposed GPA, Zone Change and CUP.

Section 4.3 - Transportation and Circulation. This section identifies existing traffic volumes and roadway segment levels of service along SR 78. The analysis examines potential impacts on the segment of SR 78 north of the Project and impacts to intersection LOS at the SR 78/Project driveway during construction and operation. This section is based on a Traffic Letter prepared for the proposed Project.

Section 4.4 - Air Quality. This section describes existing air quality in the region. It also addresses the requirements of the ICAPCD and analyzes local and regional air quality impacts associated with Project implementation including short-term construction impact (grading, etc.), as well as long-term operational

emissions. This section is based on construction and operational air pollutant emissions assessments prepared for the proposed Project.

Section 4.5 - Climate Change and Greenhouse Gases. This section describes the existing setting and regulatory conditions of the County of Imperial and surrounding area in terms of Greenhouse Gases (GHGs) and climate change. Potential increases in GHG emissions or factors that would affect climate change as a result of implementation of the proposed Project are discussed. This section is based on CO2 emissions modeled for construction and operation of the proposed Project.

Section 4.6 - Geology and Soils. This section describes the current setting of the Project seismically and geologically. Engineering constraints and general soil suitability for the proposed Project are discussed. This section is based on a Preliminary Geotechnical Report and the Phase I Environmental Assessment prepared for the Project.

Section 4.7 - Cultural Resources. This section describes the setting of the Project site with regard to cultural and historic resources. The analysis is based on the findings of a cultural resource survey conducted for the Project. Potential resources are assessed for significance and potential for damage as a result of implementing the proposed Project. The Torres Martinez Desert Cahuilla Indians were also consulted consistent with the requirements of AB 52. Correspondence with the tribe is discussed in this section of the EIR.

Section 4.8 – Noise. This section explains noise terminology and describes the existing noise setting of the Project site and surrounding area. The discussion includes an analysis and potential Project noise impacts resulting from construction, operation, and reclamation. This section is based on roadway construction noise modeling prepared for the proposed Project.

Section 4.9 - Agricultural Resources. This section describes the agricultural setting of the County, Project area, and past agricultural activities on a portion of the Project site. The analysis focuses on potential impacts of the conversion of land that has been historically farmed.

Section 4.10 - Hazardous and Hazardous Materials. This section examines the potential presence of hazardous materials based on and historical agricultural operations conducted on the Project site in association with the Allegretti Farms operation. Potential impacts and mitigation measures are identified. This section is based on the Phase I Environmental Assessment prepared for the Project site.

Section 4.11 - Hydrology and Water Quality. This section describes the current drainage of the Project site and assesses potential impacts of the proposed Project on hydrology, storm drainage, and water quality. The analysis discusses drainage patterns, storm drainage runoff, potential flooding impacts and proposed stormwater retention.

Section 4.12 - Biological Resources. This section describes the existing and potential biological resources on and in the vicinity of the Project site. Potential impacts to plants and wildlife including listed, proposed, candidate threatened and endangered species are examined. This section is based on a Biological Resources Assessment, Burrowing Owl Surveys and Jurisdictional Wetland Delineation.

Section 4.13 – Public Services and Utilities. This section discusses public services and utilities that would serve the Project site. These include fire protection, law enforcement (including Border Patrol), solid waste, and electricity. The use of groundwater for water supply is also discussed based on the Water Supply Assessment prepared for the Seville Solar Farm Complex. This section is based on consultation with appropriate service providers and information provided by the Applicant.

Chapter 5.0 – Cumulative Impacts Summary. This chapter summarizes the cumulative impacts for each resource area identified in Sections 4.1 through 4.13.

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Chapter 6.0 – Alternatives. This chapter 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 chapter provides a discussion of energy conservation, significant and unavoidable environmental effects, growth-inducing impacts, significant irreversible environmental changes, and mandatory findings of significance.

Chapter 8.0 - EIR Preparers. This chapter lists all the individuals involved in the preparation of the EIR.

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

1.10.2 APPENDICES

The supporting documentation (NOP, Initial Study and Comment Letters, AB 52 Letter) and technical reports for aesthetics (Glint and Glare Analysis); agricultural resources (LESA Model); air quality (Air Pollutant Emissions Assessment); biological resources (Biological Resources Assessment, Burrowing Owl Surveys and Jurisdictional Wetland Delineation); cultural resources (Cultural Resource Survey); geology/soils (Geotechnical Report); greenhouse gas emissions (CalEEMod Results); hazards and hazardous materials (Phase I Environmental Site Assessment); hydrology and water quality (Hydrology Report); noise (noise models); and, transportation/circulation (Traffic Analysis Letter) are provided on the CD attached to this Draft EIR. These documents and reports are referenced as throughout this EIR. 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 EIR 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 EIR (CEQA Guideline Section 15125 (a)).

1.11 ISSUES TO BE ADDRESSED

The issues evaluated in this EIR include the physical, biological, cultural, and other resources that have the potential to be affected by activities related to the proposed Project. The issues were identified through the preparation of an Initial Study:

- Aesthetics
- Land Use
- Transportation and Circulation
- Air Quality
- Climate Change and Greenhouse Gases
- Geology and Soils
- Cultural Resources
- Noise
- Agricultural Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Biological Resources
- Public Services and Utilities

1.12 ISSUES SCOPED OUT FROM FURTHER ENVIRONMENTAL REVIEW

The Initial Study for the proposed Seville 4 Solar Project prepared by the County of Imperial concluded that the Project would not cause significant impacts related to various topics addressed in the CEQA Environmental Checklist (included in **Appendix A** of this EIR). Therefore, these topics are not addressed in this EIR. The reasons for concluding that no significant impacts would occur related to these topics are disclosed in the Initial Study, which was distributed with the NOP from June 21 through July 22, 2017.

CEQA Environmental Checklist topics not addressed in this EIR, and the rationale for exclusion, are identified below:

Aesthetics

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

The Project site consists of Assessor Parcel 018-170-057-000, Lot 8 of Tract Map No. 00988. The site is vacant, undeveloped land. The northern boundary of Lot 8 extends approximately 4,425 feet east from its boundary with Lot 3. A tamarisk windbreak extends approximately 1,775 feet east from the boundary of the adjacent Lot 3 providing screening of a portion of Lot 8. There are no rock outcroppings on Lot 8. SR 78 is approximately one-half mile north of the northern property boundary of the Project site. According to the Imperial County General Plan Circulation and Scenic Highways Element, "The portion of SR 78 from the junction with SR 86 to the San Diego County line is eligible for future Scenic Highway Designation. The area is considered scenic because of its desert characteristics and view of the Salton Sea" (Imperial County 1998, p. 30). However, SR 78 is not officially designated as a Scenic Highway. Therefore, no impact is anticipated and impacts to resources within a state scenic highway are not discussed in the EIR.

Agriculture and Forestry Resources

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

There are no Williamson Act lands within or adjacent to the Project area. Therefore, conversion of land under Williamson Act Contract is not an issue.

- *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 the County and 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 or near the Project site that would conflict with existing zoning.

- *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 Project 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 area.

Air Quality

- *Create objectionable odors affecting a substantial number of people?*

The proposed Project is the development of a PV solar facility. No malodorous chemicals or substances would be used or generated during Project construction or operations. No impact is identified for this issue area.

Biological Resources

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

Imperial County does not have a Habitat Conservation Plan (HCP). Thus, no conflicts or impacts would occur between the proposed Project and an adopted HCP. Some lands in the County under the jurisdiction of the Bureau of Land Management (BLM) are covered by the California Desert Conservation Area (CDCA) Plan which includes Areas of Critical Environmental Concern (ACEC). The Project site is not within or immediately adjacent to an ACEC of the CDCA. Therefore, no impact would occur.

Geology and Soils

Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- *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 Project site is not within a designated State of California Alquist-Priolo Earthquake Fault Zone. In addition, no known active faults have been identified on the site. While Fault rupture would most likely occur along established fault traces, fault rupture could occur at other locations. However, the potential for active fault rupture at the site is considered to be very low. Therefore, no impact is anticipated.

- *Landslides?*

The site exhibits a generally flat topography and no landslides exist within or near the site. Based on the topography across the site, the potential for landsliding is considered negligible. Thus, no impact is identified for this issue area.

- *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 Project does not include an Operations and Maintenance Building or septic system. Therefore, no impact would occur with regard to soil capability to support a septic system and this issue will not be discussed in the EIR.

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. No impact would occur.

- *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?*

As part of the environmental review process for the Seville 4 Solar Project, an Agency Database Record Search was undertaken of available compiled agency database records. Based on the information available, the Project site was not found on a hazardous materials list pursuant to California Government Code Section 65962.5. No impact is identified for this issue area.

- *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 Project site is not located within two miles of a public airport or a private airstrip. The Salton Sea Airport is approximately 9 miles northeast of the Project site and the Ocotillo Airport is approximately 6.75 miles to the northwest. Thus, no impact is identified for these issue areas.

- *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 the County's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and nuclear defense operations. The proposed circulation plan for the Project site will be required to provide emergency access points and safe vehicular travel. In addition, local building codes would be followed to minimize flood, seismic, and fire hazard. Thus, the proposed Project would not impair the implementation of, or physically interfere with, any adopted emergency response plans or emergency evacuation plans. No impact is identified for this issue area.

- *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 Project site is not characterized as an 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 Project 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) a very high fire hazard severity zone. Thus, the Project 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.

Hydrology and Water Quality

- *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?*

The Project does not include a residential component. Therefore, no homes would be constructed within a 100-year flood zone. No impact would occur.

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

No bays or lakes are located within a two-mile radius of the Project. Furthermore, the Project site and Imperial Valley are over 75-miles inland from the Pacific Ocean. In addition, the Project site and agricultural fields are relatively flat and level. Therefore, there is no potential for the Project site to be inundated by seiches, tsunamis, or mudflows. Thus, no impact is identified for these issues.

Land Use

- *Physically divide an established community?*

The Project is located on portions of the approximately 2,440-acre Allegretti Farms property in west-central Imperial County. The project represents an expansion of existing solar uses currently developed as part of Seville 1 Solar and Seville 2 Solar. Thus, no impact is identified with regard to dividing an established community.

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

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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 and this issue will not be examined in the EIR.

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?*

A portion of the Project site was historically used for agriculture and is currently vacant. According to the Conservation and Open Space Element of the County of Imperial General Plan, no known mineral resources occur within the Allegretti Farms property nor does the Project site contain any mapped mineral resources. Thus, no impact is identified with regard to mineral resources.

Noise

- *Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

Construction and operation of the proposed Project is not anticipated to create groundborne vibration. As no blasting is anticipated based on the site's characteristics, site preparation activity is not likely to generate groundborne vibration. Therefore, no impacts are identified with regard to groundborne vibration.

- *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 Project 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. The proposed Project is industrial in nature and therefore is not a noise sensitive land use. No impacts are identified with regard to airport noise.

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 Project does not propose the development of new housing on the Project site nor does it propose construction or extension of new roads (aside from internal access roads). The Project, by its nature as solar generation facility, would not induce growth. Rather it would produce renewable energy to meet existing demands. No impact would occur for this issue.

- *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 Project site is currently vacant. As a result, development of the proposed Project would not displace substantial numbers of existing housing or people requiring construction of replacement housing elsewhere. No impact would occur for these issues.

Public Services

- *Schools, Parks and Other Public Facilities*

The proposed Project 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 Project as a solar generation facility, no increase in schools, parks, or other public facilities are anticipated. As such, the proposed Project would not have an adverse physical effect on the environment resulting from construction of a new school, park or other public facility. Therefore, no impact is identified for public services.

Recreation

- *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 Project is a solar generation facility and does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact to recreational facilities would occur and this issue will not be discussed in the EIR.

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 Project 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 area.

- *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 Project is located in a rural, sparsely populated portion of the County void of public transit, bike lanes and pedestrian facilities. Thus, development a 20-MW solar generation facility 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. No impact is identified for this issue area.

Utilities and Service Systems

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

The proposed Project does not include an Operations and Maintenance Building. No wastewater flows would be generated by the Project. Therefore, no impact on wastewater treatment requirements would occur.

- *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 Project does not propose any feature that would generate wastewater O&M buildings on Seville 1 Solar and Seville 2 Solar are served by on-site septic system. Thus, no impact to a wastewater provider would occur.

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