

SECTION 4.13

PUBLIC SERVICES AND UTILITIES

4.13 PUBLIC SERVICES AND UTILITIES

This section discusses public services and utilities that would serve the proposed Project. These include fire protection, law enforcement, solid waste, and electricity. Each service is described with regard to existing resources available and potential impacts the proposed Project would have on each service or utility providers' ability to adequately respond to and serve the Project. No water service is available in the Project area. Instead, water would be supplied from the Ranch Oasis Municipal Water District from wells located on the property.

4.13.1 FIRE PROTECTION

4.13.1.1 REGULATORY FRAMEWORK

A. STATE

Fire Codes and Guidelines

The 2016 California Fire Code (CFC) (Title 24, Part 9 of the California Code of Regulations) establishes regulations to safeguard against hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The CFC also establishes requirements intended to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout the State of California (CBCS 2016). The Fire Code includes regulations regarding fire service features, building services and systems, fire and smoke protection features, means of egress, and construction requirements.

The County has adopted the CFC with amendments specific to Imperial County.

B. LOCAL

Imperial County General Plan

The Seismic and Public Safety Element of the Imperial County General Plan includes goals, objectives, policies and programs for land use planning, public safety, emergency preparedness and the control of hazardous materials. In addition, the Circulation and Scenic Highways Element includes a goal and objective regarding emergency access. **Table 4.13-1** provides a consistency analysis of the applicable Imperial County General Plan goals and objectives as they relate to the proposed Project. While this EIR analyzes the Project's consistency with the General Plan pursuant to State CEQA Guidelines Section 15125(d), the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

**TABLE 4.13-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS – FIRE PROTECTION**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
SEISMIC/PUBLIC SAFETY ELEMENT		
Land Use Planning and Public Safety		
Goal 1 Include public health and safety considerations in land use planning.	Yes	The proposed Project is 20-MW solar project located in an area designated for agricultural use and zoned A-2 (Agricultural General). Solar Energy Electrical Generator uses are allowed in the A-2 zone with a conditional use

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**TABLE 4.13-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS – FIRE PROTECTION**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
		<p>permit (CUP). The Applicant has applied for a CUP to allow construction and operation of a solar generation facility. The Project would comply with all applicable health and safety considerations including provision of emergency access and fire water. Therefore, the proposed Project is consistent with this goal.</p>
<p>Objective 1.8 Reduce fire hazards by the design of new developments.</p>	<p align="center">Yes</p>	<p>The proposed Project would be designed to incorporate fire safety features including portable fire extinguishers during construction and 20,000 gallons of fire-fighting water stored in one or more tanks on site during operations. In addition, the ICFD will review all plans prior to Project approval for compliance with applicable CFC and local standards. Therefore, the proposed Project is consistent with this objective.</p>
<p>Emergency Preparedness</p>		
<p>Goal 2 Minimize potential hazards to public health, safety, and welfare and prevent the loss of life and damage to health and property resulting from both natural and human-related phenomena.</p>	<p align="center">Yes</p>	<p>The Project is located in an area of the County that is not prone to wildfire. The Project is boarder by Seville 2 Solar to the northwest and the proposed Seville 3 Solar project to the west and surrounded by open desert to the north, east and south. The ICFD has been contacted for input on the proposed Project to address any potential fire or emergency access hazards. The Project would be required to comply with all state and local fire codes and ordinances. Therefore, the Project is consistent with this goal.</p>
<p>Objective 2.8 Prevent and reduce death, injuries, property damage, and economic and social dislocation resulting from natural hazards including flooding, land subsidence, earthquakes, other geologic phenomena, levee or dam failure, urban and wildland fires and building collapse by</p>	<p align="center">Yes</p>	<p>The proposed Project area is not in a portion of the County subject to risk of forest fires nor is it within a fire hazard zone. The Project area consists of a solar farm complex (Seville Solar 1, 2 and 3) on land formerly used for agricultural activities surrounded by open desert. The project includes on-site retention</p>

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**TABLE 4.13-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS – FIRE PROTECTION**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
appropriate planning and emergency measures.		basin(s) to capture precipitation and will be designed in accordance with all applicable building codes. The Project is not in an area that is susceptible to wildfires. Therefore, the proposed Project is consistent with this objective.
Objective 2.5 Minimize injury, loss of life, and damage to property by implementing all state codes where applicable.	Yes	The proposed Project would be required to comply with all applicable state and local codes regarding the operation of a solar generation facility in accordance with all applicable standards and regulations. Therefore, the proposed Project would be consistent with this objective.
CIRCULATION AND SCENIC HIGHWAY ELEMENT		
Safe, Convenient, and Efficient Transportation System		
Goal 1 The County will provide and require an integrated transportation system for the safe and efficient movement of people and goods within and through the County of Imperial with minimum disruption to the environment.	Yes	The proposed Project would be regionally accessed from SR 78. The principal access to the Seville 4 Solar Project would be via the private access road off of SR 78. The Project would not disrupt the existing transportation system in the area. Therefore, the proposed Project is consistent with this Goal. Refer to Section 4.3, Transportation and Circulation, for a full discussion of Project access and traffic.
Objective 1.17 Assure that road systems are adequate to accommodate emergency situations and evacuation plans.	Yes	All access and internal roadways will be required to comply with 2017 CFC design specifications per Chapter 5, Appendix B. All facilities will be required to be accessible to fire apparatus by way of an approved fire apparatus access road. Gates for fire access will be designed per ICFD standards. The gated, private road from SR 78 would be used for secondary emergency access. Therefore, the proposed Project is consistent with this objective.

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4.13.1.2 EXISTING SETTING

Imperial County is comprised of approximately 4,597 square miles. The Imperial County Fire Department (ICFD) serves a large rural area including all unincorporated areas of Imperial County, Seeley, Heber, Palo Verde, Ocotillo, Niland, and the City of Imperial. ICFD serves these areas with stations staffed with County personnel or contract staff. In addition, the ICFD also provides emergency services such as Advanced Life Support (ALS) and Basic Life Support (BLS).

The Project would be served by the Salton City Fire District (SCFD), a contact agency with the ICFD. The Salton City Fire District would respond with an ICFD-owned and maintained 1,250 gpm Type-I fire engine staffed with a minimum of two Salton City Fire District personnel. Additional response would come from ICFD Station 1 located in the City of Imperial utilizing a 1,250 gpm Type-I fire engine staffed with a Captain, Firefighter/Engineer, and Reserve Firefighter. The Westmorland Fire Department would also respond with an Imperial County Fire Department owned and maintained 1,250 gpm Type-I fire engine staffed with a minimum of two Westmorland Fire Department personnel (Malek 2017).

Fiscal impacts of projects are determined in meetings with the ICFD. Agreements with project applicants over the terms and conditions of fiscal impacts or provisions will remain open until meeting with the department head and developer, which may include, but not be limited to: capital purchases which may be required to assist in servicing this project; costs for services during construction and life of the project; and training (Malek 2017).

4.13.1.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the CEQA Guidelines Appendix G thresholds of significance. The Project would have a significant impact to fire protection services if it would:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities, need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.

B. METHODOLOGY

The evaluation of potential impacts to fire protection services associated with construction, operation and reclamation of the proposed Seville 4 Solar Project was based on review of the Project site and surrounding land uses. ICFD Deputy Fire Marshal Robert Malek was consulted for input regarding the proposed Project. Impacts associated with provision of water pressure to support fire flow are addressed under the discussion of Water in subsection 4.13.3, below.

C. PROJECT IMPACTS AND MITIGATION MEASURES

Impacts to ICFD Services

Impact 4.13.1 The proposed Project would develop a solar generation facility on low gradient farmland and idle farmland in a remote area of Imperial County. The location of the facility and its size could result in increased demand on ICFD services. The lack of paved roads would inhibit the ICFD's ability to serve the Project. Therefore, impacts to ICFD service are considered **potentially significant**.

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Construction

The proposed Project would development of a 20-MW solar generation project on either 146 acres (Fixed-Frame Configuration) or 174 acres (HSAT Configuration) of desert land and approximately 60 acres of idle farmland. The Project site has mature tamarisk trees along a portion of its northern border.

Prior to starting construction, the internal roads would be cleared of all vegetation. The cleared areas would be maintained throughout construction and operations. Fire extinguishers would be available around the construction site. Fire water tank(s) capable of storing 20,000 gallons would be constructed on the Project site and kept filled during operations to fight potential fires. Water that is used for construction would also be available for firefighting. Personnel would be allowed to smoke only in designated areas.

During construction, the Project site would be accessible from both a primary and secondary access driveway. These driveways are each provided with 30-foot double swing gates with a "Knox Box" for keyed entry. Nominal 20-foot wide roads would be provided between the PV arrays as well as around the perimeter of the Project site inside the perimeter security fence to provide access for emergency vehicles. This width of the gates exceeds the 20-foot width minimum and the road width between arrays exceeds the minimum 9-feet required by ICFD.

All elements of roadway access, turnaround areas and adequate fire suppression water supply and systems must meet the requirements of the ICFD, National, State and local codes and ordinances (Malek 2017). The final site plan for the Project, as well as all on-site fire-fighting facilities (i.e. water tank[s] for storage and fire water pressure) will be reviewed by the ICFD to ensure compliance with all applicable codes and standards. The Project would have to be inspected periodically by the Imperial County Prevention Bureau. Because the access road(s) and internal roads are not paved, the ICFD would require specialized equipment and dedicated personnel to respond to the area during emergencies (Malek 2017). Therefore, impacts associated with increased demand for ICFD services are considered **potentially significant** during Project construction.

Operation

The proposed Project has been designed to incorporate fire prevention and emergency preparedness features to minimize risk and accommodate ICFD services. Fire safety precautions available during operation include 20,000 gallons of fire-fighting water stored in an on-site tank. Solar equipment is non-flammable and panels typically have a Class-C Fire rating. Invasive/weedy species would be controlled and any non-invasive vegetation that re-establishes within the Project site would be controlled. Vegetation growing within the boundaries of the Project area (including the solar field, Gen-Tie Line corridor and Lot D) would be periodically removed manually and/or treated with herbicides. All elements of roadway access, turnaround areas and adequate fire suppression water supply and systems must meet the requirements of the Imperial County Fire Department and National, State and local codes and ordinances (Malek 2017). The access points, swing-gates with a "Knox Box" and private internal roads described under construction would also be in place during operation. Because these private roads are unpaved, the ICFD has indicated that specialized equipment and dedicated personnel would be required to respond to the area during emergencies (Malek 2017). Therefore, impacts associated with increased demand for ICFD services are considered **potentially significant** during Project operation.

Reclamation

At the end of the Project's useful life, approximately 30 to 40 years (if a 10-year extension is requested and approved) in the future, the Project's equipment and on-site facilities will be removed and the site would be cleared, contoured and reclaimed to its end state to approximate the existing low gradient

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desert or idle farmland. On-site materials and equipment are non-flammable and fire water tank(s) would be on-site until demolished. Vegetation will have been maintained throughout operation of the Project and mitigation measure 4.13.1 would have been implemented which would off-set impacts to the ICFD. Therefore, impacts to ICFD services are anticipated to be **less than significant** during Project reclamation.

Mitigation Measure

MM 4.13.1 The Project Applicant shall pay a fair share contribution towards capital purchases (e.g. specialized equipment) which may be required to assist in servicing the Project; costs for services during construction and the life of the Project; and/or training as negotiated with the ICFD.

Timing/Implementation: As a Condition of Approval/Prior to issuance of a Building Permit.

Enforcement/Monitoring: Imperial County Planning and Development Services Department/Imperial County Fire Department.

Significance After Mitigation

Mitigation measure MM 4.13.1 would address potential impacts to ICFD services through the payment of the Project Applicant's fair share contribution towards capital purchases, costs to serve the Project and/or training. Following implementation of mitigation measure MM 4.13.1, impacts to ICFD services would be reduced to **less than significant**.

4.13.1.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The cumulative setting for fire protection service is the service area of the ICFD. For emergency fire response, the proposed Project would be served by the SCFD.

A cumulative list of large-scale proposed, approved and reasonably foreseeable renewable energy projects within Imperial County, as well as one nearby project in San Diego County, is shown in Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used. None of the cumulative projects identified within Imperial County are in the immediate vicinity of the proposed Project. (Note: one proposed project in Table 3.0-1 is in proximity to the Project but is in San Diego County. As such, it would not be served by the ICFD).

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Impacts to ICFD Services

Impact 4.13.2 Development of the proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the ICFD service area, would increase demand for fire protection. However, each individual project would be required to incorporate fire safety features and worker safety protocols in compliance with all applicable fire and occupational safety standards and codes. Therefore, cumulative impacts to ICFD services are considered **less than cumulatively considerable**.

Construction, Operation and Reclamation

The proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the ICFD service area identified in Table 3.0-1 Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used, would increase demand on existing fire facilities, equipment, and staffing during Project construction, operation and reclamation. None of

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the other large-scale proposed, approved and reasonably foreseeable renewable energy projects identified as part of cumulative conditions would increase residential or commercial development which would increase both the number of structures and population requiring ICFD fire protection. In addition, the Ocotillo Wells Solar Project which is approximately three miles to the west, is in San Diego County. Thus, conditions in this portion of the County remain unchanged with regard to demand for fire protection from the ICFD.

All new development in Imperial County is subject to fire safety standards, including state and local regulations. Furthermore, impacts to fire protection are mitigated on a project-by-project basis through review of individual projects by the ICFD to ensure that all fire safety requirements are satisfied. In the case of the proposed Project, mitigation measure MM 4.13.1 would be implemented to offset impacts to the ICFD through payment of a fair share contribution negotiated with the Project Applicant. Thus, the Project's contribution to cumulative impacts to fire protection would be **less than cumulatively considerable** during Project construction, operation and reclamation. Likewise, because individual projects are required to meet all applicable federal, state and local requirements, as applicable, cumulative impacts to ICFD services would be considered **less than cumulatively considerable** during Project construction, operation and reclamation.

Mitigation Measures

Implement mitigation measure MM 4.13.1.

Significance After Mitigation

Mitigation measure MM 4.13.1 would address potential impacts to ICFD services through payment of the Project Applicant's fair share contribution towards capital purchases, costs to serve the Project and/or training. Following implementation of mitigation measure MM 4.13.1, the Project's contribution to cumulative impacts to ICFD services would be **less than cumulatively considerable**.

4.13.2 LAW ENFORCEMENT

4.13.2.1 REGULATORY FRAMEWORK

A. LOCAL

Imperial County General Plan

The Imperial County General Plan provides goals, objectives, policies and programs regarding public safety and provision of emergency access. The Circulation and Scenic Highway Element of the General Plan includes a goal and objective regarding emergency access applicable to the proposed Project. **Table 4.13-2** provides a consistency analysis of the applicable Imperial County General Plan goals and objectives as they relate to the proposed Project. While this EIR analyzes the Project's consistency with the General Plan pursuant to State CEQA Guidelines Section 15125(d), the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

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**TABLE 4.13-2
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS – LAW ENFORCEMENT**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
CIRCULATION AND SCENIC HIGHWAY ELEMENT		
Safe, Convenient, and Efficient Transportation System		
Goal 1 The County will provide and require an integrated transportation system for the safe and efficient movement of people and goods within and through the County of Imperial with minimum disruption to the environment.	Yes	The proposed Project would be regionally accessed from SR 78. The Project would not disrupt the existing transportation system in the area. Therefore, the proposed Project is consistent with this Goal. Refer to Section 4.3, Transportation and Circulation, for a full discussion of transportation.
Objective 1.17 Assure that road systems are adequate to accommodate emergency situations and evacuation plans.	Yes	All access and internal roadways will be required to comply with 2017 CFC design specifications per Chapter 5, Appendix B. All facilities and buildings will be required to be accessible to fire apparatus by way of an approved fire apparatus access road. The existing access gates have been designed per ICFD standards and include 30-foot wide swing gates and a Knox Box. Therefore, the proposed Project is consistent with this objective.

4.13.2.2 EXISTING SETTING

The Imperial County Sheriff’s Office (ICSO) covers a 4,597-square mile service area bordered by Mexico to the south, Riverside county to the north, San Diego County to the west and the State of Arizona to the East. It provides general law enforcement, detention and court services for the residents, business owners and visitors of Imperial County. Sheriff substations are located in the communities of Brawley, Palo Verde, Niland, Salton City and Winterhaven (Sheppard pers. comm., 2017).

The Salton City Substation at 2101 South Marina Drive, Suite 1, in Thermal, is the closest substation to the Project site. This facility is approximately 25 miles away. The Salton City Substation is staffed by ten deputies and one sergeant. This staffing allows the Salton City Substation to provide a minimum of two deputy sheriffs on duty 24-hours per day, 7 days per week (Sheppard pers. comm., 2017).

The U.S. customs and Border Patrol has five offices in Imperial County. The Border Patrol provided comments on the Notice of Preparation (NOP) indicating that the Project would have no significant impact on current or future operations. A Border Patrol Community Liason would contact the Project owner to coordinate access after the Project is constructed (Saar 2017).

4.13.2.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the CEQA Guidelines Appendix G thresholds of significance. The project would have a significant impact on law enforcement services if it would:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered law enforcement facilities, or the need for new or physically altered law enforcement, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for law enforcement.

B. METHODOLOGY

The evaluation of potential impacts to law enforcement associated with construction, operation and reclamation of the proposed Project was based on review of the Project area, surrounding lands and consultation with Chief Deputy Scott Sheppard of the ICSO.

C. PROJECT IMPACTS AND MITIGATION MEASURES

Impacts to ICSO Services

Impact 4.13.3 Implementation of the proposed Project may result in increased demands for service for the ICSO's Salton City Substation during construction and operation. The ICSO does not have proper vehicles to access the site's unpaved roads. Therefore, impacts to ICSO services are considered a **potentially significant**.

Construction

Although the Project area is located approximately 25 miles from the Salton City Substation, ICSO deputies are responsible for providing public safety services. The potential for theft and vandalism is greatest during the construction period when there is a high volume of activity on the site including workers coming and going for multiple shifts, deliveries of equipment and storage of construction materials and equipment on site. All of these factors contribute to attracting thieves and vandals to the site.

A log spanning a three-year period from May 31, 2015 through May 5, 2018 from the ICSO documenting calls to the Ocotillo Wells State Vehicular Recreation Area (OWSVRA) (immediately to the north of the Seville Solar Farm Complex) indicates that one call for theft was received from First Solar on December 4, 2015 (ISCO 2018). First Solar owns the Seville Solar Farm Complex which was under construction in 2015. This call occurred during the time the Seville Solar Farm Complex was nearing completion of construction. However, based on historical calls for similar projects throughout the County, the ICSO has experienced an increase in calls for service, especially during the construction phase (Sheppard, pers. comm., 2017 and 2018).

The Project site would be secured with an 8-foot security fence to assist in reducing demands for law enforcement service. On-site private security may also be hired to patrol the site when employees are not present. These actions would help to reduce the potential for theft and vandalism. However, should the Sheriff be called to respond to calls during construction, the ICSO does not have a four-wheel drive vehicle to access the site. The Seville Solar Farm Complex was developed as a major subdivision/tract map and is considered a "gated" subdivision with "private streets." The Complex was developed with a primary access road extending south from SR 78 and internal access roads across portions of the Property to each lot. The primary access has *30-foot double swing gates with a coded entry and "Knox Box" over-ride*. The unpaved private common roads will be constructed to meet County minimum standards. Without a four-wheel drive vehicle to access the Project site, the ICSO's ability to provide service would be inhibited. This is considered a **potentially significant impact**.

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Operation

Once operational, the Project site would be outfitted with on-site security equipment to deter theft and vandalism. In addition to the 8-foot security fence, a motion detection system and closed-circuit camera system would also be installed to assist in reducing demands for law enforcement service. However, based on ICSO historic call logs from May 31, 2015 through May 5, 2018, only one call out of a total of 84 was received at the Seville Solar Farm Complex. No calls have been received during the operational period of the Seville 1 and Seville 2. Nevertheless, without a four-wheel drive vehicle, the ICSO would not be properly equipped to serve the Project in the event of a call to the site during operation. Therefore, impacts to ICSO services are considered **potentially significant impact** during Project operation.

Reclamation

At the end of the Project's useful life, approximately 30 or 40 years (if a 10-year extension is requested and approved) in the future, the Project's equipment and on-site facilities will be removed and the site would be cleared, contoured and reclaimed to its end state to approximate the existing low gradient desert or idle farmland. No additional impacts to ICSO services would be anticipated during reclamation activities because the Project's requirement for increased law enforcement services would have already occurred and been mitigated with implementation of mitigation measure MM 4.13.3. Therefore, impacts to ICSO services are considered **less than significant** during Project reclamation.

Mitigation Measure

MM 4.13.3 The Project Applicant shall pay a fair share contribution towards the purchase of a marked and equipped four-wheel drive patrol vehicle for the ICSO.

Timing/Implementation: As a Condition of Approval/Prior to issuance of a Building Permit.

Enforcement/Monitoring: Imperial County Planning and Development Services Department/Imperial County Sheriff's Office.

Significance After Mitigation

Mitigation measure MM 4.13.3 would address potential impacts to law enforcement services through the payment of the Project Applicant's fair share towards the purchase of a four-wheel drive patrol vehicle for the ICSO. Following implementation of mitigation measure MM 4.13.3, impacts to law enforcement services would be reduced to **less than significant**.

4.13.2.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The cumulative setting for law enforcement is the service area of the ICSO which includes unincorporated Imperial County in its entirety. Under cumulative conditions, the ICSO would continue to provide law enforcement services to Imperial County, as well as the other large-scale proposed, approved and reasonably foreseeable renewable energy projects identified in Table 3.0-1, in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used (Note: one project in Table 3.0-1 in proximity to the Project is within San Diego County and would not be served by the ICSO). This development would increase the number and acreage of renewable energy projects requiring law enforcement.

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B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Impacts to ICSO Services

Impact 4.13.4 Development of the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects in Imperial County would result in an increased cumulative demand for law enforcement. However, cumulative projects would not cause the ICSO the need to expand its facilities. Therefore, impacts to law enforcement services are **less than cumulatively considerable**.

Construction, Operation and Reclamation

Increased development in the County, including cumulative projects identified in Table 3.0-1 within Imperial County, would increase demand for law enforcement services under cumulative conditions. The ICSO has indicated that law enforcement will experience a cumulatively considerable impact due to the potential for the Project to increase service calls in its 4,597 square-mile service area (Sheppard pers. comm., 2017 and 2018). Historical call logs to the ICSO for the OWSVRA revealed only one call associated with the existing Seville Solar Farm Complex over a 3-year period which represented only .01 percent of the total calls over this same period (ICSO 2018). However, the ICSO has indicated that an increase in calls for service have occurred during construction of similar projects throughout the County (Sheppard, pers. comm., 2018). Thus, payment of fair-share fees towards the purchase of a four-wheel drive patrol vehicle for the ICSO is identified as project-specific mitigation to address impacts during construction (refer to mitigation measure MM 4.13.3). The four-wheel drive patrol vehicle would also be used as necessary to respond to any calls received during Project operation. However, the proposed Project includes features to deter crime during operations including fencing, cameras and private security. These features would greatly diminish the demand for law enforcement services during operations. Therefore, the proposed Project' contribution to cumulative impacts to law enforcement services is **less than cumulatively considerable**. Individual projects are required to mitigate impacts to law enforcement services on a project-by-project basis. Therefore, the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects, in Imperial County, would result in a **less than cumulatively considerable impact** during construction, operation and reclamation.

Mitigation Measures

Implement mitigation measure MM 4.13.3.

Significance After Mitigation

Mitigation measure MM 4.13.3 would address potential impacts to law enforcement services through the payment of the Project Applicant's fair share towards the purchase of a four-wheel drive patrol vehicle for the ICSO. Following implementation of mitigation measure MM 4.13.3, the Project's contribution to cumulative impacts to law enforcement services would be **less than cumulatively considerable**.

4.13.3 WATER SERVICE

4.13.3.1 REGULATORY FRAMEWORK

A. STATE

Urban Water Management Planning Act - Assembly Bill (AB) 797

The Urban Water Management Planning Act was established by Assembly Bill 797 (AB 797) on September 21, 1983. This law evidences recognition by state legislators of water as a limited resource. AB 797 is also a declaration that efficient water use and conservation should be actively pursued throughout the state. AB 797 requires water suppliers providing water for municipal purposes either directly or indirectly to

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more than 3,000 customers or supplying more than 3,000 acre-feet per year (AF/Y) of water, to prepare and adopt a specific plan every five years. The purpose of the plan is to define the supplier's current and future water use, sources of supply and supply reliability, and existing conservation measures.

Senate Bill (SB) 610 and SB 221

Effective January 1, 2002, SB 610 (Chapter 643, Statutes of 2001) and SB 221 (Chapter 642, Statutes of 2001) amended state law to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 works in conjunction with SB 221 to promote more collaborative planning between local water suppliers and cities and counties. These statutes require submission of detailed water availability information to be provided to the city and county decision-makers prior to approval of specified large development projects. Both statutes also require this detailed information to be included as part of the administrative record to substantiate an approval action by the city or county on such projects. Both SB 610 and SB 221 recognize local control and decision-making regarding the availability of water for projects and the approval of projects.

California Water Code

California Water Code (CWC) Section 10910 describes the water supply assessment (WSA) that must be undertaken for projects referred under Public Resources Code (PRC) Section 21151.9, including an analysis of groundwater supplies. CWC Section 10910 also specifies the circumstances under which a subsequent WSA would be required for a project which previously had a WSA prepared. CWC Section 10631 directs that contents of the urban water management plans include further information on future water supply projects, programs, and groundwater supplies.

Water Code Sections 10910-10915 (also termed Senate Bill 610 or SB610) requires lead agencies to identify if there is a public water system that may supply water for a proposed development project. If a public water system would supply water to the project, then the water supply agency is given 90 days from the start of consultation in which to provide a WSA to the CEQA lead agency. If no public water system would provide water to the project, the CEQA Lead Agency must prepare the WSA.

In accordance with SB 610, because no public water system would provide water to the Project, a WSA was prepared for the County of Imperial as the CEQA Lead Agency for the proposed Seville Solar Farm Complex in 2013 by Todd Engineers. The WSA included Lot 8 and assumed that five solar projects would be completed on the Property by year 2025. The projections assume that construction would occur in stages with three solar projects completed by 2020 and five completed by 2025. Each solar project was projected to need 30 to 50 AFY for a total combined usage of 190 AFY at build out. Each solar project was estimated to need 100 to 175 AF for construction. Construction is assumed to occur in stages between 2015 and 2020 with a combined water use total of 650 AF for all five solar projects (Todd 2013, p. 5).

The WSA documented the existing and future water supplies available to serve the entire Seville Solar Farm Complex (including the proposed Project as one of the five solar projects) and compared existing and future water supplies to the area's future water demand. This comparison, conducted for both normal and drought conditions during a 20-year projection, is the basis for an assessment of water supply sufficiency in accordance with the requirements of California Water Code section 10910 (Todd 2013). The WSA prepared for the Seville Solar Farm Complex is included as **Appendix M** of this EIR.

B. LOCAL

Groundwater Management Ordinance

In 1998, the County adopted a comprehensive Groundwater Management Ordinance for the express purpose of preserving and managing groundwater resources within the County. The Groundwater

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Ordinance, codified as Chapter 1 of Title 9 of the Imperial County Code (Imperial County 1998), is implemented by the Planning Commission acting upon the direction of the Board of Supervisors.

The Planning Commission, charged by the Board of Supervisors with the regulation of groundwater, can request preparation of an annual report on groundwater supplies and conditions, determine the need for and recommend groundwater management activities (see Section 92202.00), recommend groundwater extraction standards and charges, and establish standards for artificial recharge, among other things.

The Groundwater Ordinance provides the County with various regulatory tools that are designed to avoid or minimize the impact of existing and proposed groundwater extraction activities on groundwater resources and other users. For example, Section 92201.13 provides a remedy for water users who are aggrieved by well interference (defined as a substantial water level decline in a short time period in a localized area caused by extraction) or other impairment or infringement of groundwater use caused by the extraction activities of another party. In such cases, the Planning Commission may issue any order that it determines necessary to provide the petitioning water user with an adequate remedy. The Groundwater Ordinance also requires that existing extraction facilities be registered with the County.

Imperial County General Plan

The Imperial County General Plan provides goals, objectives, policies and programs regarding the preservation and use of water. **Table 4.13-3** provides a consistency analysis of the applicable Imperial County General Plan goals and objectives from the Conservation and Open Space Element and Geothermal/Alternative Energy and Transmission Element as they relate to the proposed Project. While this EIR analyzes the Project’s consistency with the General Plan pursuant to State CEQA Guidelines Section 15125(d), the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

**TABLE 4.13-3
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS – WATER SERVICE**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
CONSERVATION AND OPEN SPACE ELEMENT		
Preservation of Water Resources		
<p>Goal 8: The County will conserve, protect, and enhance the water resources in the planning area.</p>	<p>Yes</p>	<p>The proposed Project is within the Colorado River Basin and the Salton Sea Transboundary Watershed. The Project intends to use groundwater from private wells provided by the Ranch Oasis Mutual Water Company. The Project is subject to Regional Water Quality Control Board (RWQCB) regulations and would prepare and implement a stormwater pollution prevention plan (SWPPP) to avoid impacts to San Felipe Creek and Tarantula Wash. Therefore, the proposed Project is consistent with this goal. Impacts to water quality are</p>

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**TABLE 4.13-3
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS – WATER SERVICE**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
		discussed further in Section 4.11, Hydrology and Water Quality.
Objective 8.6 Eliminate potential surface and groundwater pollution through regulations as well as educational programs.	Yes	Potential impacts to surface and groundwater quality would be addressed through the National Pollutant Discharge Elimination System, SWPPP and Best Management Practices. Therefore, the proposed Project is consistent with this objective.
GEOTHERMAL/ALTERNATIVE ENERGY AND TRANSMISSION ELEMENT		
Efficient Water Use		
Goal 3 Geothermal/alternative energy operations will be required to efficiently utilize water.	Yes	The proposed Project, as a 20-MWAC solar development, is an alternative energy operation. The Project would use groundwater during construction and for maintenance over the operational life of the Project. The WSA prepared for the Seville Solar Farm Complex indicates that sufficient groundwater is available (Todd 2013) (Appendix M). The Project does not propose wasteful or inefficient use of water during construction or operations. Therefore, the proposed Project is consistent with this Goal.
Objective 3.3 Encourage the efficient utilization of water in geothermal/alternative energy operations, and foster the use of non-irrigation water by these industries.	Yes	Refer to analysis under Goal 3.

4.13.3.2 EXISTING SETTING

A. REGIONAL SETTING

River Basin, Watershed and Groundwater Basin

The Property is within the Colorado River Basin and the Salton Sea Transboundary Watershed. The Project is within the Ocotillo-Clark Valley Groundwater Basin. The Basin is bounded by the Santa Rosa Mountains to the north and northeast, Coyote Creek and Superstition Mountain faults to the west and south, and

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the Salton Sea and surface drainage divides to the east. Clark Valley (to the northwest) drains toward Clark Lake (which is dry) while the rest of the area drains toward the Salton Sea. The Ocotillo-Clark Valley Groundwater Basin is comprised of valley with a combination of stream, alluvial fan, lake and aeolian deposits (Todd 2013). The Ocotillo-Clark Valley Groundwater Basin receives water from mountain runoff in the north and east at the rate of approximately 1,200 Acre-Feet/Year (AFY) for the Clark Valley portion and 1,100 AFY for the Ocotillo Valley portion. Groundwater in this area generally flows to the southeast (Todd 2013).

Subbasin

The Project Area within the Allegretti Subbasin of the Ocotillo-Clark Valley Ground Water Basin. The Allegretti Subbasin is bounded by the Salton Sea to the east; the Ocotillo Badlands and Coyote Creek fault to the southwest; the Superstition Hills and the topographic divide between Coyote Creek fault and Superstition Hills faults to the south; and the San Felipe Hills fault and the topographic divide between Tule Wash and San Felipe Creek to the north.

B. PROJECT VICINITY

Aquifer

Both a shallow and a deep aquifer are in the vicinity of the Project. Water levels in the shallow aquifer are approximately 100 feet higher than the deep aquifer. The shallow aquifer is unconfined and appears to feed both the San Felipe Creek and Fish Creek springs located southeast of the Property (Todd 2013). The deep aquifer is at least partially confined. Irrigation return flows do not infiltrate to the deep aquifer because of the presence of a perched shallow aquifer in the vicinity of the Property (Todd 2013).

Groundwater

The groundwater basin has been in a state of overdraft as indicated by the water levels in the United States Geological Survey (USGS) (San Felipe) well, which is located on the Property. Water levels declined approximately 163 feet between 1953 and 2001. Along with water decline, there is also evidence of land subsidence on the Property due to groundwater withdrawals (Todd 2013). However, recovery in groundwater levels is apparent since about 2002, corresponding to a reduction in farming and irrigation on the Property. Due to an obstruction in the monitoring well, the USGS was not able to measure water levels in 2012 and 2013 (Todd 2013).

Water levels in the vicinity of the Property are generally characterized by little or no short-term variation. Although rainfall in the region is flashy both seasonally and annually, water levels exhibit little fluctuation over time. In comparison, the annual precipitation at the Borrego Desert Park station is highly variable. The lack of groundwater level response to precipitation may reflect a significant lag time between rainfall events and recharge. This lag time probably reflects the distance from the washes to the Property and in some areas, the significant thickness of the unsaturated (vadose) zone or the presence of a clay layer separating the shallow aquifer from the deep aquifer. Because groundwater levels in the vicinity do not respond to short-term drought events, the supply of groundwater is effectively the same through normal and drought periods (Todd 2013).

Groundwater from private wells is the sole source of water provided to the Property. A total of ten wells are located in the vicinity of the Property. The Payne, Gann, Scholl, Steinruck, and Blu-In Park wells are to the west of the Property. Two United States Geological Survey (USGS) test wells, Harpers well, and two Three Flags Ranch wells are to the east of the Property. The wells on the Property wells pump the most groundwater while other nearby wells such as Payne, Gann, and Blu-In Park pump small quantities for dust control and landscape irrigation. The Three Flags Ranch wells were pumped briefly in the mid-1980s

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to irrigate 1,000 to 1,200 acres of citrus. Pumping was soon replaced with Colorado River water from IID (Todd 2013).

Water Quality

The deep aquifer has better water quality than the shallow aquifer. TDS concentrations in the wells on the Property have been in the range of 1,200 to 1,800 milligrams per liter (mg/L) between 1962 and 2002. Allegretti Well 7 had slightly better quality (TDS of 880 and 930 mg/L) when sampled in 1982 and 1995, indicative of the superior water quality in the upper part of the deep aquifer. The secondary maximum contaminant level (MCL) derived from human welfare considerations such as taste, odor, and laundry staining for TDS is 500 mg/L (Todd 2013).

C. SEVILLE 4 SOLAR PROJECT

Water System

A public water system does not serve the Property and an Urban Water Management Plan (UWMP) does not exist for the Property or proposed Project. Under Water Code section 10910(b), if there is no public water system (or associated UWMP) available to serve the project, the CEQA lead agency must prepare the WSA. In this case, the Applicant prepared a WSA for the lead agency (Imperial County) to approve and adopt. The WSA included Lot 8 and assumed development of five solar projects, one of which is the Seville 4 Solar Project. The WSA assumed: 1) that a residence could be developed on Lot 8; 2) a new well (Well #9) would be drilled on Lot 8; and 5 acre-feet of water per year would be pumped from the well for the residence. The proposed Project would develop a solar generation facility instead of a residence on Lot 8 and well #9 is no longer proposed.

Water Supply

The Property was initially developed in the early 1950s by the construction of two wells (Jacobs and San Felipe). These wells supplied water to the Property referred to as Ranch Oasis or Jacobs Ranch. The Jacobs well has long been abandoned and the San Felipe well was converted to a USGS monitoring well in the 1960s. Wells 1 through 7 were drilled between 1961 and 1982. **Table 4.13-4** summarizes the existing wells on the Property.

**TABLE 4.13-4
EXISTING WELLS**

Well	Jacobs Domestic Well	San Felipe/ USGS	1	2	3	4	5	6	7
Lot	Lot 7	Lot 5	Lot 5	Lot 7	Lot 6	Lot 1	Lot 4	Lot 3	Lot 5
Status	Abandoned	USGS Monitoring well since 1960s	Inactive	Inactive	Out of service since 1983	Active, Commercial	Inactive	Active	Active, Domestic
Constructed	1953	1953	1965	1961	1967	1976	1976	1976	1982
Boring Depth (feet)	>1,200	580	675	729	1,250	970	1,100	950	400
Casing Diameter (depth)	NA	14" (0-580)	14" (0-260')	14" (0-287')	16" (0-190)	16"	16"	NA	NA
			12.75" (260-674')	12" (287-380')	14" (190-1,200')				
Perforated Intervals	900-1,200	250-565	260-674	287-667	270-680, 900-1,200	382-400, 405-955	345-390, 401-765, 917-1,050	380-1,000	340-400

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**TABLE 4.13-4
EXISTING WELLS**

Well	Jacobs Domestic Well	San Felipe/ USGS	1	2	3	4	5	6	7
Lot	Lot 7	Lot 5	Lot 5	Lot 7	Lot 6	Lot 1	Lot 4	Lot 3	Lot 5
Pump Discharge	NA	NA	1,500	1,800	3,000	2,800	1,800	3,100	NA
Specific Capacity gpm/ft	NA	NA	63	134	177	90	40	50	NA

Source: Todd 2013, Table 3. TBD – To be determined. N/A – not available. gpm = gallons per minute gpm/ft = gallons per minute per foot

On February 18, 2015, the Project Owner entered into an Agreement for Conditional Use Permit #13-0021 which allowed development of a commercial well on Lot 5.

On March 21, 2017, the Project Owner (Solano Energy Farms I, LLC) entered into an Agreement for Conditional Use Permit #16-0001 which allowed three commercial water wells to be developed.

Based on information from the Applicant, an approved Well #4 on Lot 1 is currently operational. The two wells on Lot 5 have been abandoned. Well #9 was proposed on Lot 8 as part of the Seville Solar Farm Complex. However, the Applicant for the proposed Project does not plan to drill, activate and use such a well (Gonzalez, pers. comm., 2017)

Table 4.13-5 provides a summary of historical water demand by Allegretti Farms. The trend for water pumping on the Property has declined substantially since 1970 when it possibly exceeded 10,000 acre-feet per year (AFY). With development of Seville 1 Solar and Seville 2 Solar, the pumping has declined below the rates shown in the table as there are no longer any irrigated areas, residences or water fowl hunting requiring water.

**TABLE 4.13-5
PAST WATER DEMAND**

	Historic			Pre-Seville 1 & Seville 2	
	1978	1983-1996	1996-2009	2010	2011
Estimated Irrigated Area ¹ (acres)	1,700	3,250-6,050 AFY ³ (0 in 1990)	500	80	80
Application Rate ² (acre-feet/acre per year)	6		5.6	2.4	2.6
Residential ⁴ (acre-feet/year)	1	1	1	1	1
Reservoir Filling for Water Fowl Hunting ⁵	Unknown			Estimated to be at least 15 AF	
Total (Pumped) ⁶ (acre-feet)	10,201	3,251-6,051	2,801	208	224

Source: Todd 2013. Notes to Table 4.13-5

¹ From Table 2.

² 6 AFY/A crop demand from Koebig & Koebig (1970), 5.6 AFY per acre Imperial County average from Imperial County Farm Bureau (2013), 1.77 AFY/A average historical onion use and 1.95 AF/acre average historic wheat use in Imperial Irrigation District (Dynamic, 2011). Assumed 75% irrigation efficiency for onions and wheat (2.4 and 2.6 AF/acre application rate).

1993-2009: first used flood irrigation but it used too much water at high electricity costs so switched to drip and sprinkler systems. Also constructed systems to reuse agricultural tail water.

³ From Borrego Water District, 2012.

⁴ Estimated usage of one existing home with lawn, fruit trees and swimming pool.

⁵ Assumes a 5-acre area with water 3 feet deep filled once per year.

⁶ Irrigation return flows were assumed to not return to the deep aquifer because of the presence of a perched shallow aquifer.

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Between 1983 and 1996, pumping levels were reported at 3,250 AFY to 6,050 AFY with the exception of 1990 when no pumping occurred. Between 1993 and 1996 pumping averaged 4,400 AFY; and from 1996 to 2009 pumping averaged 2,800 AFY assuming an average of 500 acres were planted and a water application rate of 5.6 acre-feet per year per acre (AFY/A) (**Table 4.13-5**). The Property was leased to another tenant in 2010 and 2011 and the planted acreage and crops changed. Pumping decreased to an estimated 200 AFY to 225 AFY during these two years. This estimate is based on planted acreages and application rates of 2.4 AFY/A for onions and 2.6 AFY/A for wheat. Information on water use in 2012 is not available but most likely less than 2010 and 2011 use (Todd 2013).

4.13.3.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the following CEQA Guidelines Appendix G thresholds of significance. The project would have a significant impact with regard to water if it would:

- a) Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects;
- b) Not have sufficient water supplies available to serve the project from existing entitlements and resources, or if new or expanded entitlements are needed; or
- c) Substantially degrade groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

B. METHODOLOGY

Evaluation of potential water supply and service impacts of the proposed Project were based on correspondence with the Applicant, and the SB 610 - Water Supply Assessment (WSA) previously prepared for the Seville Solar Farm Complex. The WSA is included as **Appendix M** of this EIR. The purpose of the WSA is to document the Property's existing and future water supplies and compare these supplies to the water demand of the Seville Solar Farm Complex, including that of the proposed Project. This comparison, conducted for both normal and drought conditions during a 20-year projection, is the basis for an assessment of water supply sufficiency in accordance with the requirements of California Water Code section 10910. The WSA remains applicable to the proposed Project as it was accounted for in the calculation of water supply needed for five solar projects.

C. PROJECT IMPACTS AND MITIGATION MEASURES

Impacts to Groundwater Supply

Impact 4.13.5 The proposed Project will require groundwater in association with both construction and operation activities. The groundwater resources were found to be adequate to meet Project water demands. Therefore, impacts to groundwater supply are considered **less than significant**.

Groundwater from private wells is the sole source of water provided to the Property. There are no plans to use recycled water, desalinated water or imported water. A total of 190 AFY of water was requested for operation of the five solar projects to be developed as part of the Seville Solar Farm Complex. An

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additional 25 AFY of water was requested for existing and potential future non-solar development (residential/ancillary uses).

Construction and Operation

Table 4.13-6 provides a list of lot use, approximate acreage and associated supply well.

**TABLE 4.13-6
LOT USES AND ASSOCIATED WELLS**

Solar Farm Lots & Wells	Non-Solar Farm Lots & Wells	Common Development Interest Lots
<ul style="list-style-type: none"> • Lot 1 (185 acres): Well #4 • Lot 2 (185 acres): Proposed Well # 8 Lot 3 (185 acres) Proposed Well # 6 • Lot 4 (319 acres): Well #5 • Lot 5 (307 acres): Well #1 (and Well #7 [domestic]) 	<ul style="list-style-type: none"> • Lot 6 (266 acres): Well #3 • Lot 7 (339 acres): Well #2 • Lot 8 (599 acres): Proposed Well #9 (Note this well is no longer proposed) 	<ul style="list-style-type: none"> • Lot A (34 acres): Solar projects transmission line corridors • Lot B (11 acres): Common access road corridors • Lot C (5 acres): Site for Imperial Irrigation District switch station • Lot D (5 acres): Site for solar project substations.

Source: Todd 2013, p. 6.

Table 4.13-7 summarizes the water use per well for the Seville Solar Farm Complex (which includes Lot 8) and domestic wells by lot. Well #9 which was proposed as a domestic well on Lot 8 is no longer being proposed but is shown in the table to demonstrate the water that is available/accounted for as part of the WSA.

**TABLE 4.13-7
WATER USE BY WELL AND LOT**

Solar Farm Wells		
Lot	Well	AFY
1	5	30
2	8 (proposed)	30
3	6	30
4	5	50
5	7	50
Subtotal		190
Domestic Wells		
Lot	Well	AFY
5	7	10
6	3	5
7	2	5
8	9 (proposed)	5
Subtotal		25
Total		215

Source: Todd 2013, p. 6.

Table 4.13-8 provides an overview of water demand projections associated with the proposed Project for construction, operation and future residential uses that were assumed on Lots 5, 6, 7 and 8. The

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projections assume that construction will occur in stages with one solar project built by 2015, three solar projects completed by 2020, and all five completed by 2025. No additional future water demand aside from the proposed Seville Solar Farm Complex was identified in the Allegretti Subbasin. Further, Lot 8 is now proposed for development with the Seville 4 Solar Project rather than a residence with Well #9.

TABLE 4.13-8*
PROPOSED FUTURE WATER DEMAND

	Future (AFY)				
	2015	2020	2025	2030	2035
General Operations ¹	30	110	190	190	190
Construction ²	100	175	0	0	0
Residential ³	10	15	20	25	25
Total	140	300	210	215	215

Source: Todd 2013, Table 5.

* Dry year demands are anticipated to be the same as normal year demands

¹ Assumes that construction will be staged with one project built by 2015, three projects built by 2020 and five projects built by 2025. Solar project water would be from Wells #1, #4, #5, #6, and proposed well #8).

² The amount of water needed during project construction is estimated at 650 AF for all five solar projects (100 to 175 AF per project). This was apportioned as 175 AF of water for construction of each of the two larger projects (Lots 4 & 5) and 100 AF of water for construction of each of the three smaller projects (Lots 1, 2 and 3). Table assumes that construction will occur in stages between 2015 and 2020.

³ Assumes that the existing residential well (Well #7) will produce no more than 10 AFY, and each of the three additional water wells (Wells #3, and proposed well #9) not associated with a solar project would each produce no more than 5 AFY (for residential water use).

Construction Water Demand

Each solar project will need 100 to 175 AF of water during construction. The combined water use over all five solar projects would total of 650 AF (refer to row 2 and footnote 2 for **Table 4.13-8**, below). The proposed Project is estimated to need up to 145 acre-feet of water during construction.

The Project Manager for construction of the Seville 1 Solar and Seville 2 Solar projects stated that “a total of 158 acre-feet of well water” was used during construction (Janigan 2017). Both Seville 1 & 2 were constructed on the two larger lots (4 & 5) which had been estimated to require 350 AF of water during construction. In contrast both projects used only 158 AF of the estimated 350 AF that was anticipated to be used. This results in 192 AF (350 AF – 158 AF = 192 AF) of water still in the aquifer. Water demand for construction of the Seville 4 Project is estimated at 145 AF, leaving 47 AF (192 AF – 145 AF = 47 AF) of construction water still left unused in the aquifer.

Operations Water Demand

Each solar project will need 30 to 50 AFY for a total combined usage of 190 AFY at build out (refer to row 1 and footnote 1 for **Table 4.13-8**). An additional 25 AFY of water was requested for existing and potential future non-solar development (residential/ancillary uses) (see **Table 4.13-8** row 3 and footnote 3).

As shown in **Table 4.13-7**, the WSA for the Seville Solar Farm Complex assumed that a residence and new well (Well #9) would be built on Lot #8. The water demand for the residence was assumed to be 5 AFY. Because the Seville 4 Solar project is now being proposed for Lot 8, no residence or well would be constructed on Lot 8. As a result, the 5 AFY intended for operation of the residence may instead be used for operation of the proposed Project. The volume of water to be used for PV module washing and dust control, if needed, is estimated at up to 5 acre-feet per year.

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Groundwater Availability

The WSA indicates that sufficient groundwater for the proposed Project and adjacent undeveloped land within the Property is available from the Ocotillo-Clark Valley Groundwater Basin. **Table 4.13-9** identifies the water supplies needed to meet future demands in both normal and drought conditions.

**TABLE 4.13-9
WATER SUPPLIES NEEDED TO MEET DEMANDS**

Pumping in AFY	Past and Current				Future			
	1996-2009	2010	2011	2015	2020	2025	2030	2035
Pumping Groundwater	2,801	208	224	140	300	210	215	215

Source: Todd, 2013, Tables 4 and 5.

A detailed water balance of the Ocotillo-Clark Valley Groundwater Basin was not conducted; however, the recovering water levels indicate that the pumping between 2002 and 2011 was within sustainable rates (refer to Figure 3 in the WSA included in **Appendix M** of this EIR). The lowest level of pumping occurred in 2010 and 2011, which was estimated to be on the order of 200 AFY to 225 AFY. Water levels increased at a greater rate during this period than during 2002 and 2009, indicating that the 215 AFY of pumping for the proposed Project and Project area is sustainable (Todd 2013, p. 9).

Table 4.13-10 presents the supply needed to meet Project demands under normal climatic conditions and in single-year and multiple-year droughts.

**TABLE 4.13-10
COMPARISON OF WATER SUPPLY AND DEMAND**

	Most Recent Available (2011)			Future (2035) [build out occur by 2030]		
	Normal Year (AFY)	Single Dry Year (AFY)	Multiple Dry Years (AFY)	Normal Year (AFY)	Single Dry Year (AFY)	Multiple Dry Years (AFY)
Supply Needed¹	224	224	224	215	215	215
Demand	224	224	224	215	215	215
Difference	0	0	0	0	0	0

Source: Todd, 2013, Table 8.

¹Note that the "Supply Needed" represents the groundwater pumped to meet demands. Additional groundwater supply may be available.

The use of water in drought years was assumed to be the same as normal years because operations at the solar energy projects will be similar during droughts. In addition, the ongoing monitoring of groundwater levels in the USGS well and the staged implementation of the Project would provide progress checks on the impacts of Project water use on groundwater levels (Todd 2013, p. 11). Therefore, impacts to groundwater supply associated with Project construct and operation are considered **less than significant**.

Reclamation

At the end of the Project's useful life, approximately 30 years to 40 years (if a 10-year extension is requested and approved) in the future, the Project's solar equipment and on-site facilities will be removed, and the site would be cleared, contoured and reclaimed to its end state to approximate existing desert lands or idle farmland. Water demand associated with reclamation activities would be anticipated to be similar to the amount used during construction. Based on future projections (**Table 4.13-10**), impacts to groundwater supply during reclamation are anticipated to be **less than significant**. Likewise, no groundwater use is anticipated in association with the end reclaimed state of the Project site.

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Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

Water Distribution and Storage Impacts

Impact 4.13.6 The proposed Project would require water distribution and storage infrastructure. Any required improvements would occur within the Project site and would not disrupt any off-site areas. Therefore, impacts associated with water conveyance infrastructure are considered **less than significant**.

Construction

During construction, water for dust control would be obtained from the Ranch Oasis Mutual Water Company. Potable drinking water will be supplied by a local provider. Therefore, impacts associated with water conveyance infrastructure are considered **less than significant** during Project construction.

Operation

The Project would require water for fire protection and potentially panel washing. The volume of water to be used for PV module washing and dust control, if needed, is estimated at up to 5-acre-feet per year. Water for these uses would be provided by the Ranch Oasis Water Company.

The proposed Project's operational fire water needs would be stored in on-site water tank(s) capable of storing approximately 20,000 gallons. All water distribution and storage would be located within the limits of disturbance of the Project site, and all improvements would be sized in consultation with the appropriate County agencies. Therefore, impacts to water distribution and storage are considered **less than significant** during Project operation.

Reclamation

At the end of the Project's useful life, approximately 30 to 40 years (if a 10-year extension is requested and approved) in the future, the Project site would be cleared, contoured and reclaimed to its end state to approximate existing desert land or idle farmland. As part of decommissioning, all solar equipment and other on-site facilities (chain link fence, gates, posts and concrete footings, solar generation facilities, electrical switchyard and substation facilities, transmission lines, water tanks, etc.) would be removed. However, all of the water wells on the Property would not be decommissioned or reclaimed unless the owner of the requested that these features be removed. No water distribution and storage infrastructure would be necessary to serve the Project site during reclamation activities or as part of its end state as low gradient desert or idle farmland. Therefore, **no impacts** to water distribution and storage infrastructure are anticipated in association with Project reclamation.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

4.13.3.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The cumulative setting and geographic scope for water supply is the Ocotillo-Clark Valley Groundwater Basin. A detailed water balance of the Ocotillo-Clark Valley Groundwater Basin has not been conducted. However, the recovering water levels from the most recent available data indicate that the pumping between 2002 and 2011 were within sustainable rates. A wet winter in the years 2016-2017 is also likely a factor in improving groundwater recharge.

None of the other large-scale proposed, approved and reasonably foreseeable renewable energy projects identified in Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used, are located within the Ocotillo-Clark Valley Groundwater Basin. The closest project in Table 3.0-1 to the Project, the Ocotillo Wells Solar Project in San Diego County, is located in the Borrego Valley Groundwater Basin and would receive water from the Borrego Valley Aquifer (RBF 2013, pp. 37-38). The Ocotillo Wells State Recreational Vehicle area (OWSRVA) located to the north and west of the Project, lies within the West Salton Sea Subbasin, the Clark Ocotillo Valley Subbasin, and the Borrego Valley Subbasin, all part of the Colorado River Basin (OWSRVA Working Paper #2 2013, p 87). The OWSRVA does not draw water from the Ocotillo-Clark Valley Groundwater Basin. The nearby Anza Borrego State Park is also located in the Borrego Valley Groundwater Basin.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Groundwater Supply Impacts

Impact 4.13.7 Development of the proposed Project would result in a reduced demand for groundwater from the Ocotillo-Clark Valley Groundwater Basin compared to historical demand. The WSA prepared for Seville Solar Farm Complex, which includes the proposed Project, demonstrated that there is adequate groundwater to serve Project development over the next 20 years. No other projects were identified within the cumulative setting to affect groundwater supply. Therefore, cumulative groundwater supply impacts are considered **less than cumulatively considerable**.

Construction, Operation and Reclamation

As discussed under Impact 4.13.5, the Property, inclusive of the proposed Project, will need 215 AFY of groundwater at buildout. The WSA identified that groundwater pumping in the Ocotillo-Clark Valley Groundwater Basin has been much greater in the past, leading to groundwater level declines. Higher volumes of groundwater were pumped to support former agricultural activities on the Allegretti Farms property. Since approximately 2002, groundwater levels have been recovering due to a reduction in groundwater use associated with a decline in farming on the Property as well as a wet winter in 2016-2017. Pumping estimates in the range of 200 AFY to 250 AFY, coupled with the groundwater level increases, indicate that the proposed pumping of up to 215 AFY for all of the Property, including the proposed Project, is within sustainable levels during normal and drought conditions. Thus, the Project would result in a **less than cumulatively considerable contribution** to cumulative groundwater supply impacts. Moreover, based on the lack of cumulative development with the Ocotillo-Clark Valley Groundwater Basin, cumulative impacts to groundwater supply are considered **less than cumulatively considerable** during Project construction, operation and reclamation.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

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Cumulative Water Distribution and Storage Impacts

Impact 4.13.8 The proposed Project would result in an increased demand for on-site water distribution and storage. No municipal water infrastructure is available on or in the vicinity of the Project area. The Project includes construction of the needed water distribution and storage facilities. Therefore, cumulative impacts to water distribution and storage are considered **less than cumulatively considerable**.

Construction, Operation and Reclamation

As discussed under Impact 4.13.5, the proposed Project would require water distribution and storage infrastructure to serve the proposed solar lots within the Property. All necessary water distribution and storage (tank[s] capable of storing 20,000 gallons of water for fire protection) would be located within the Project site. As no municipal service provider serves the area, the Project would result in a **less than cumulatively considerable contribution** to water distribution and storage impacts. Likewise, because no other cumulative projects would be affected by the Project's provision of on-site infrastructure, cumulative impacts to water distribution and storage would be **less than cumulatively considerable** during Project construction, operation and reclamation.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

4.13.4 SOLID WASTE

4.13.4.1 REGULATORY FRAMEWORK

A. STATE

California Integrated Waste Management Act

The California Integrated Waste Management Act of 1989 (AB 939) was signed into law by the Governor of California on September 29, 1989. AB 939 requires each California city and county to divert 25 percent of its waste stream by 1995 and 50 percent by 2000 [Public Resources Code (PRC), Section 41780] and to manage waste disposal through the implementation of the Source Reduction and Recycling Element (SRRE). The SRRE was approved by CalRecycle (formerly the California Integrated Waste Management Board [CIWMB]) on November 17, 1993 and adopted in December 1993. Under the SRRE, counties are required to demonstrate how they intend to achieve the mandated diversion goals through the implementation of various programs. The County of Imperial agreed to implement the following programs to meet the required diversion goals:

- | | |
|-----------------------------|------------------------------------|
| 1. Agriculture Plastic | 5. Commercial Source and Recycling |
| 2. Compost Operation | 6. Construction and Demolition |
| 3. Procurement Policy | 7. School Recycling |
| 4. Christmas Tree Diversion | 8. County Waste Reduction Policy |

Countywide Integrated Waste Management Plan for Imperial County

All California counties are required to prepare and submit to CalRecycle a Countywide Integrated Waste Management Plan (CIWMP). The CIWMP is to include all SRREs, all Household Hazardous Waste Elements, a Countywide Siting Element, all Non-Disposal Facility Elements, all applicable regional SRREs, Household Hazardous Waste Elements, and an applicable Regional Siting Element (if regional agencies have been formed).

CalRecycle summarizes waste management problems specific to each county and provides an overview of actions that would be taken to achieve the SRRE implementation schedule (PRC Section 41780). Imperial County's CIWMP was approved by CalRecycle (formerly CIWMB) in May of 2000. The Executive Director of the CIWMB approved by Resolution 2008-91 the Five-Year Review Report of the Countywide Integrated Waste Management Plan for the County of Imperial on June 17, 2008.

B. LOCAL

Imperial County General Plan

The Imperial County General Plan does not contain any goals, objectives, policies or programs pertaining to solid waste that are applicable to the proposed Project.

4.13.4.2 EXISTING SETTING

Allied Waste Services is the waste and landfill service provider for the Project area. Allied Imperial Landfill is located at 104 East Robinson Road in Imperial California. The landfill is sited on 337 acres with 162-acres designated for disposal. This facility accepts the following types of waste: agricultural, asbestos, ash, construction/demotion, green materials, industrial, inert, mixed municipal, sludge, tires and wood waste. As of December 31, 2010, the Allied Imperial Landfill had a remaining capacity of 15,485,200 cubic yards and a permitted capacity of 19,514,700 cubic yards (CalRecycle 2017).

The proposed Project site is located on vacant land. Approximately 60 acres were previously farmed and is currently idle farmland. The remainder is low gradient desert that will require grubbing. The Project area in its existing condition does not generate any solid waste or require solid waste pick-up and disposal.

4.13.4.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the CEQA Guidelines Appendix G thresholds of significance for Utilities and Service Systems criteria "f" and "g." The Project would have a significant impact to solid waste if it would:

- f) Not be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; or
- g) Fail to comply with federal, state, and local statutes and regulations related to solid waste.

In addition, the following County standards were analyzed to determine significant impacts. Based on these standards, the Project would have a significant impact if it would:

- Result in the need for new systems or supplies, or a substantial expansion or alteration to solid waste materials recovery or disposal; or
- Substantially affect the County's ability to comply with solid waste source reduction programs.

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B. METHODOLOGY

Evaluation of potential solid waste impacts is based on information provided by the Applicant as well as information regarding Allied Waste Services from the Seville Solar Farm Complex EIR (Imperial County 2014).

C. IMPACTS AND MITIGATION MEASURES

Impacts to Solid Waste Service and Landfill Capacity

Impact 4.13.9 Solid waste would be generated during demolition, construction and reclamation of the proposed Project. Such materials would be picked up by a locally-licensed waste hauling service and disposed of at a local landfill with sufficient capacity to accept this waste. Thus, a **less than significant impact** is identified with regard to solid waste service and landfill capacity.

Construction

The Project site would require clearing and grubbing as part of site preparation for construction. Waste from grubbing activities (chipped and spread as a base on the site to assist with drivability) is anticipated to be handled on site. Alternatively, the grubbed material would be taken to the Allied Imperial Landfill.

In addition to debris from site preparation, trash and recycling materials (cardboard, plastic) would be generated during construction from packaging materials used to ship panels and other components. All construction waste is anticipated to be removed by Allied Waste Services, a contracted commercial garbage collection agency. Allied Waste would haul construction debris and trash to the Allied Imperial Landfill. Pick-up service can be made available on a contract basis and the landfill has remaining capacity. Therefore, impacts to solid waste service and landfill capacity during construction are considered **less than significant**.

Operation

Once the Project begins operations, no on-going waste would be generated as there are no on-site employees are proposed. Small quantities of waste may be generated in association with maintenance worker trips or replacement of equipment. As with construction waste, all trash, litter, garbage, and other solid waste generated during Project operation is anticipated to be removed by Allied Waste Services and disposed of at the Allied Imperial Landfill.

Solid waste disposal services are provided on a contract basis. Allied Waste Services has not indicated any problems associated with providing pick-up/removal service to the proposed Project. In addition, the Allied Imperial Landfill has a remaining capacity of approximately 15 million cubic yards (CalRecycle 2017). Therefore, impacts to solid waste service and landfill capacity during Project operation would be considered **less than significant**.

Reclamation

At the end of the Project's useful life, approximately 30 to 40 years (if a 10-year extension is requested and approved) in the future, some waste would be generated. Reclamation activities would include dismantling and demolition of above-ground structures; concrete removal; removal and dismantling of underground utilities; excavation and removal of soil; and final site contour. As part of decommissioning, all solar equipment and other on-site facilities (chain-link fence, gates, posts and concrete footings, solar generation facilities, electrical switchyard and substation facilities, transmission lines, water tanks, etc.) would be removed and salvaged if economically feasible. Any materials used for surfacing the access roads would either be plowed under (if the origin of the road surfacing is on-site material) or taken off site for

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re-use or disposal (if the origin of the road surfacing is off-site material). As a good portion of the dismantled materials would likely be salvaged, impacts to solid waste service and landfill capacity are anticipated to be less than significant during Project reclamation. Once the site is reclaimed to its end state to approximate the existing idle farmland, no solid waste is anticipated to be generated.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

4.13.4.4 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The geographic scope for the cumulative setting for solid waste pick-up and disposal is the service area of Allied Waste Services, the County of Imperial. As previously described in the Existing Setting, the County has permitted nine landfills and contracts with private collection companies for solid waste pick-up. Other large-scale proposed, approved and reasonably foreseeable renewable energy projects in County of Imperial are identified in Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used. All of these projects (with the exception of the Ocotillo Wells Solar Project which is in San Diego County) are located within the cumulative setting for solid waste.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Impacts to Solid Waste Service and Landfill Capacity

Impact 4.13.10 Implementation of the proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial, would result in cumulative demand for solid waste service and landfill capacity. However, the proposed Project would not generate a substantial quantity of waste, pick-up service is available to serve the Project and sufficient landfill capacity is available. Therefore, cumulative impacts to solid waste service and landfill capacity are considered **less than cumulatively considerable**.

Construction, Operation and Reclamation

Cumulative renewable energy development in Imperial County identified in Table 3.0-1 would generate an additional demand for solid waste pick-up and disposal services, primarily during construction. These services are provided under contract with private waste hauling companies. Accordingly, each operator may have to add additional staff, trucks and refuse and recycling bins to accommodate the increase in demand. As discussed under Impact 4.13.11, local landfills have remaining capacity to serve cumulative development identified in Table 3.0-1. In addition, the landfill that would receive refuse from the Project (i.e. the Allied Imperial Landfill), has a remaining capacity of approximately 15 million cubic yards (CalRecycle 2017).

As previously discussed, the proposed Project would generate some waste and recycling materials during construction. However, once in operation, trash and would not be generated on an on-going basis as no on-site employees are proposed. Therefore, the proposed Project would have a **less than cumulatively considerable contribution** to cumulative solid waste impacts. In addition, solar generation facility projects are not considered waste generators and would not substantially increase demand for solid waste services or disposal. Therefore, cumulative impacts to solid waste service and landfill capacity are considered **less than cumulatively considerable** during Project construction, operation and reclamation.

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Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

4.13.5 ELECTRICITY

4.13.5.1 REGULATORY FRAMEWORK

A. LOCAL

Imperial County General Plan

The Imperial County General Plan Land Use Element contains one goal and one objective that relate to electricity associated with the proposed Project. **Table 4.13-11** provides a consistency analysis of the applicable Imperial County General Plan goal and objective as they relate to the proposed Project. While this EIR analyzes the Project's consistency with the General Plan pursuant to State CEQA Guidelines Section 15125(d), the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

**TABLE 4.13-11
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS - ELECTRICITY**

General Plan Goal and Objective	Consistent with General Plan?	Analysis
LAND USE ELEMENT		
Public Facilities		
Goal 8 Coordinate local land use planning activities among all local jurisdictions and state and federal agencies.	Yes	The proposed Project is being coordinated with various state and local agencies (i.e. California Energy Commission, Imperial County Air Pollution Control District, and the California Department of Fish and Wildlife, among others) as necessary. Therefore, the proposed Project is consistent with this goal.
Objective 8.8 Ensure that the siting of future facilities for the transmission of electricity, gas, and telecommunications is compatible with the environment and County regulation.	Yes	The proposed Project is compatible with the environment as evidenced by the presence of existing electrical infrastructure (i.e. IID's 92-kV transmission line and the Anza Substation). The proposed Project is an allowed use within the A-2 zone with a CUP. The Applicant has applied for a CUP for the Project site to be used as a solar generation facility. Therefore, the proposed Project is consistent with this objective.

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4.13.5.2 EXISTING SETTING

IID provides electricity to more than 150,000 customers in Imperial County as well as parts of Riverside and San Diego counties. The service area covers approximately 6,471 square miles (IID 2017).

IID's generating facilities and sources of power are varied and dispersed across the County. Renewable sources of energy generation include solar, hydroelectric, geothermal and wind. More diverse sources include biomass and biowaste (IID 2017).

IID's transmission system consists primarily of 161-kilovolt (kV) and 92-kV transmission lines and lower voltage distribution lines. IID also has two 230-kV transmission lines that allow for import/export of electrical power to its system in the County. SDG&E/IID operate a 500-kV transmission line that traverses the southern part of Imperial County and interconnects with the transmission system in Arizona. This 500-kV transmission line is the primary import line for electrical power to be wheeled into SDG&E's system to supply power to San Diego County and the City of San Diego. This line also provides import/export capacity to IID's service area (EDAW 2006, p. 21).

The IID currently provides electrical power to the Property through the 12.5-kV power lines which originate from the Anza Substation and extend east-west along the south side of SR 78, connecting to the Property at the existing access road off SR 78. The electrical power is used by the seven water wells on the Property.



4.13.5.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the CEQA Guidelines Appendix G thresholds of significance. The Project would have a significant impact to electrical service if it would:

- a) Result in the need for new systems or supplies of electricity, or a substantial expansion or alteration to electrical infrastructure that results in a physical impact on the environment.

B. METHODOLOGY

The analysis of impacts to electricity and electrical infrastructure was based on information provided by the Applicant and correspondence with the IID.

C. IMPACTS AND MITIGATION MEASURES

Impacts to Electrical Service and Infrastructure

Impact 4.13.11 The proposed Project would not increase the demand for electrical services from IID in association with construction or operation of the Fixed-Frame and HSAT Configurations. No new improvements are required to the IID infrastructure to serve the Project. Therefore, impacts to electrical service and infrastructure are considered **less than significant**.

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Construction

The Project includes construction of an IID Switching Station on Lot D which would expand IID infrastructure. The Project does not require temporary power during construction. Thus, the Project construction impacts to electrical service and infrastructure are considered **less than significant**.

Operation

The proposed Project may consume an estimated 250 kW-hours (Fixed-Frame) or 300 kWh (HSAT) of electrical energy daily from the IID power system. This energy would be used to operate the solar panel trackers, the on-site security system and the solar facility monitoring and control system when the solar panels are not generating power.

Once operational, the Project would generate approximately 20-MWAC. The Project substation would increase the voltage to 92-kV, then deliver the generated power to the IID Switch Yard and IID 92-kV transmission line. The Project would be interconnected with the Anza Substation to transmit the electricity to the IID electrical grid. No other improvements to IID's electrical service or infrastructure are required in association with operation of the proposed Project. Therefore, operational impacts to electrical service and infrastructure are considered **less than significant**.

Reclamation

At the end of the Project's operational life approximately 30 to 40 years (if a 10-year extension is requested and approved) in the future, the Project site's complex's solar equipment and on-site facilities will be removed and the site would be cleared, contoured and reclaimed to its end state. However, the IID-owned facilities (e.g. IID Switching Station) would not be decommissioned until IID determined that these improvements were no longer needed and could be retired and removed. Reclamation of the site to its end state to approximate the existing low gradient desert or idle farmland is anticipated to result in a **less than significant** impact to electrical service and infrastructure.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

4.13.5.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The cumulative setting for electrical service is IID's service area, which encompasses almost all of Imperial County. Only a small portion of the northeast corner of the County receives service from Southern California Edison. The proposed Project and all other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial identified in Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Use, are within IID's service area. All would result in a net benefit with regard to electricity generation.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Impacts to Electric Service

Impact 4.13.12 Implementation of the proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial, would result in a minimal increase in the current use of IID electricity and a substantial increase in solar energy generation. Therefore, cumulative impacts to electrical service are considered **less than cumulatively considerable**.

Construction, Operation and Reclamation

The proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial in Table 3.0-1, as well as cumulative buildout of Imperial County, would contribute to the demand for electricity in IID's service area. The proposed Project, as well as the large-scale proposed, approved and reasonably foreseeable renewable energy projects identified in Table 3.0-1, may contribute to some demands in IID's service area for electricity, but would also generate a substantial amount of electricity for sale to the electrical grid. The proposed Project alone would contribute approximately 20 MW. Likewise, the amount of electricity required by the proposed Project (i.e. approximately 250-kWh of electrical energy daily from the IID power system for the Fixed-Frame Configuration or 300 kWh for the HSAT Configuration). would be more than offset by the 20 MW the Project would generate. Therefore, the proposed Project would result in a beneficial contribution to electrical service through the addition of electricity to the IID grid.

Overall, the proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial would generate electricity, providing additional power to the IID electrical grid. Each project would also construct the necessary infrastructure to convey or distribute the electricity either individually or collaboratively with other projects in the vicinity. Therefore, the Project would result in a **less than cumulatively considerable contribution** to cumulative impacts to electrical service and infrastructure. Likewise, cumulative impacts to electric service and infrastructure are considered **less than cumulatively considerable** during Project construction, operation and reclamation.

Mitigation Measures

Not required.

Significance After Mitigation

Not required.

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