CHAPTER 6.0
ALTERNATIVES

CEQA Guidelines Section 15126.6(a) states that an environmental impact report shall describe and analyze a range of reasonable alternatives to a project. These alternatives should feasibly attain most of the basic objectives of the project while avoiding or substantially lessening one or more of the significant environmental impacts of the project. An EIR need not consider every conceivable alternative to a project, nor is it required to consider alternatives that are infeasible. The discussion of alternatives shall focus on those which are capable of avoiding or substantially lessening any significant effects of the project, even if they impede the attainment of the project objectives to some degree or would be more costly (CEQA Guidelines Section 15126.6(b)).

CEQA Guidelines Section 15126.6(d) states that the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. The matrix appears as **Table 6.0-1** at the end of this section.

6.1 PROJECT OBJECTIVES

The proposed Seville 4 Solar Project has the following objectives:

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

6.2 ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR ANALYSIS

Identifying alternatives to the proposed Project was limited by the fact that the Project is a utility-scale solar project (i.e., a solar energy project that generates a large amount of electricity that is transmitted from a solar energy plant to many users through the electrical grid). Based on the nature of the Project, it required three key considerations in order to determine where it could be sited: 1) an area with access to high solar insolation (i.e., exposure to the sun's rays) rates; 2) a large area to accommodate solar

collectors; and 3) readily accessible interconnection to the IID transmission system and the California Independent System Operator (CAISO) transmission system to send electricity to consumers.

The proposed Project area is currently designated "Agriculture" in the Imperial County General Plan and zoned A-2 - General Agriculture. Solar energy electrical generators, electrical power generating plants, substations, and facilities for the transmission of electrical energy are allowed as uses in the A-2 designation with a Conditional Use Permit (CUP).

The Project area was chosen for the reasons identified above regarding utility-scale solar projects. West-central Imperial County has year-round, unobstructed access to sunlight during daytime hours. Likewise, sufficient land is available on the Property to accommodate a utility-scale solar project. The proposed Project site consists of low gradient desert and approximately 60 acres of idle farmland making it ideal for development of a solar generation facility. The site is also located near a transmission line corridor which will can be connected to in order to convey electricity to the IID Anza Substation. Accessibility to the transmission grid for distribution to consumers is a key factor in providing utility-scale solar power.

6.2.1 ALTERNATIVE SITE

Choosing an "Alternative Site" was considered but not selected for detailed analysis. The Applicant does not own or possess access to an alternative site in Imperial County to develop the proposed Project. A feasible alternative site would likely either be an area of actively farmed land in the irrigated central portion of the Imperial Valley, or vacant and undisturbed open desert. A project alternative located on actively farmed land would preclude the farming activities over the life of the project (i.e. approximately 30 to 40 years [if a 10-yer extension is requested and approved]). A project alternative located on vacant and undisturbed open desert could potentially have greater impacts on habitat for endangered and threatened species than a site that has been actively cultivated for agricultural purposes. Moreover, assembling sufficient land at an alternative location for the proposed Project in the vicinity of the Anza Substation would be difficult because all lands north of State Route (SR) 78 are owned or managed by the Ocotillo Well State Vehicular Recreation Area. South of SR 78 private land and public land managed by the BLM are generally found in alternating sections of 640 acres (see Figure 4.2-1 in Section 4.2, Land Use). Lands managed by the BLM are subject to significant environmental and development constraints. Development of the proposed Project at an alternative location is therefore infeasible because of the difficulties in assembling contiguous land as well as the additional and greater impacts associated with such a location.

6.2.2 DISTRIBUTED GENERATION ALTERNATIVE

A Distributed Generation Alternative to the proposed Project was also considered but not selected for detailed analysis. A distributed PV generation alternative would consist of small-scale PV installations on private or publicly-owned residential, commercial, or industrial building rooftops, parking lots or areas adjacent to existing structures such as substations. The location of such small-scale installations is not geographically constrained and, as relevant for CEQA purposes, could be located anywhere in the State. As of June 20, 2017, almost 10,400 MW of distributed generation capacity was operating or installed in California with an additional 500 MW pending. This data includes approximately 5,800 MW of solar self-generation capacity which far exceeds the state's goal established through the California Solar Initiative of installing 3,000 MW of solar energy on residential and commercial sites by the end of 2016 (CEC 2017).

Even assuming that there are enough additional sites throughout California for installation of sufficient distributed PV to accomplish the Project's objective of generating 20 MW, this alternative cannot feasibly accomplish most of the Project's objectives. Such an alternative would not comply with the terms and requirements of the Project's long-term power purchase agreements. Likewise, a distributed generation

alternative could not locate the solar power facilities as near as possible to the IID's electrical transmission facilities with anticipated capacity availability and a reserved queue position. Because distributed generation is not geographically constrained, there is no guarantee that any portion of the solar installation would occur in Imperial County. Furthermore, the County has no authority or influence over the installation of distributed PV generation systems outside of its jurisdiction. As such, there is no guarantee that action by the County to approve a distributed generation alternative would 1) result in the installation of 20 MW of generating capacity; 2) support the objective of assisting the State of California to meet to its RPS goals; or 3) create additional construction employment and Project-related expenditures in local businesses. For these reasons, a distributed solar alternative was not considered for further analysis.

6.2.3 REDUCED SIZE PROJECT ALTERNATIVE

A Reduced Size Project Alternative would result in a reduction in power output and would not meet the Project objectives. Therefore, a Reduced Size Project Alternative was not analyzed in detail. However, as a part of refining the Project design plans toward final design, the Applicant is working to increase Project efficiency and further reduce impacts to the environment and natural resources. Therefore, the proposed Project layout and associated impacts as identified and analyzed in this Draft EIR are considered a conservative (worst-case) scenario, and may be further revised and reduced in the Final EIR.

6.3 SUMMARY OF ALTERNATIVES ANALYZED

In accordance with the provisions of CEQA Guidelines Section 15126.6, the following alternatives to the proposed Project are evaluated:

6.3.1 ALTERNATIVE 1 – ENVIRONMENTALLY SENSITIVE AVOIDANCE ALTERNATIVE

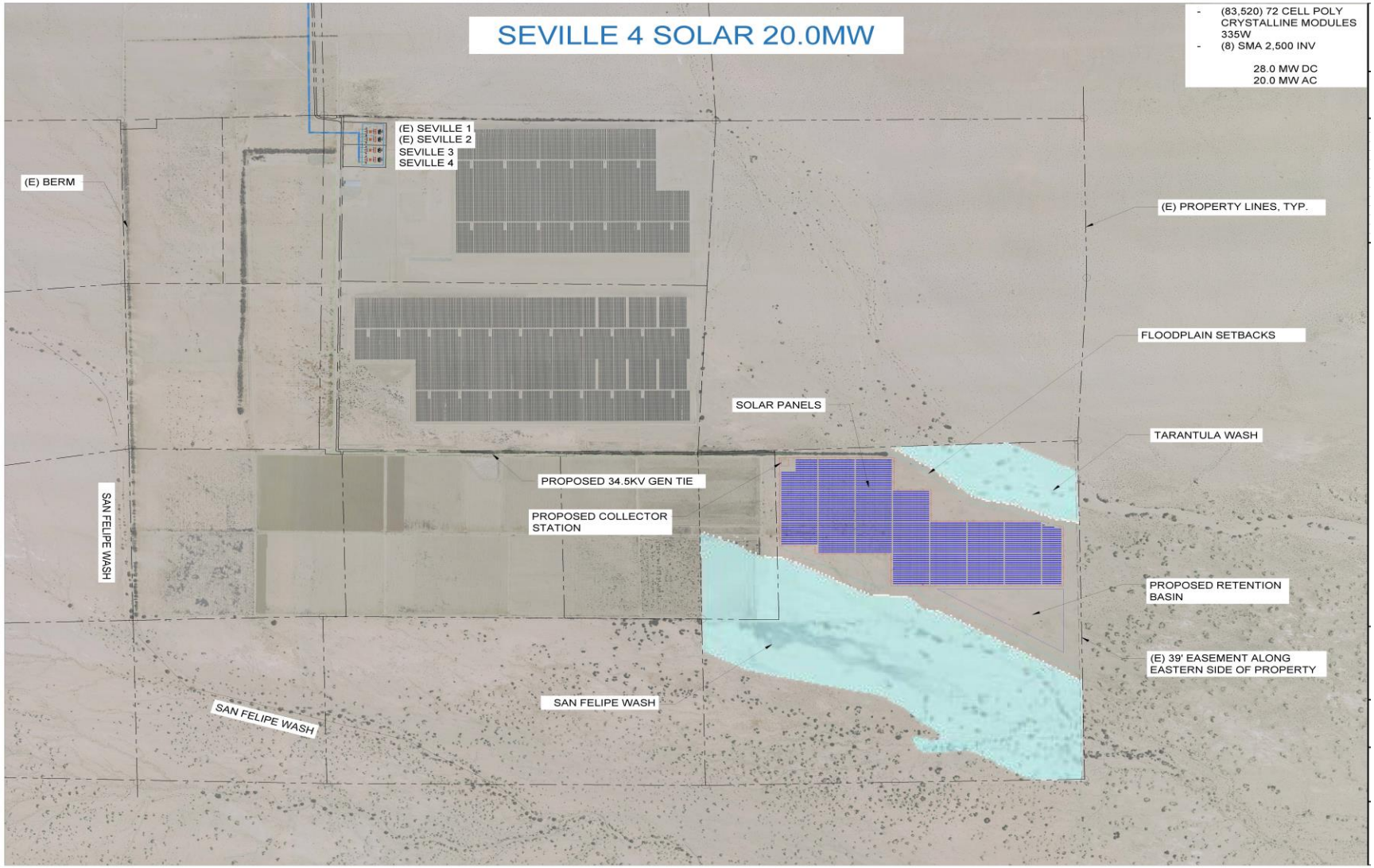
The Environmentally Sensitive Avoidance Alternative would shift the eastern boundary of the Fixed-Frame Configuration (**Figure 6.0-1**) and HSAT Configuration (**Figure 6.0-2**) approximately 200 feet to the west. Both configurations would be adjusted to fit into the same overall footprints in Lot 8 and designed to produce 20 MW of electricity. The purpose of the Environmentally Sensitive Avoidance Alternative is to avoid the Environmentally Sensitive Area containing cultural resources identified in the 200-foot wide eastern strip. This alternative would avoid potential impacts to cultural resources that have not yet been evaluated for eligibility for listing in the California Register of Historic Resources (CRHR). This alternative would also substantially reduce glare from the Fixed-Frame Configuration.

6.3.2 ALTERNATIVE 2 – NO PROJECT ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(1) requires that a No Project Alternative be analyzed in order to allow the decision-makers to compare the impacts of approving a proposed Project with the impacts of not approving the proposed Project. Under the No Project Alternative, the proposed Seville 4 Solar Project would not be developed. No CUP application, GPA or Zone Change would be approved. The Project site could remain in its existing condition as low gradient desert lands and approximately 60 acres of idle farmland reverting to open desert.

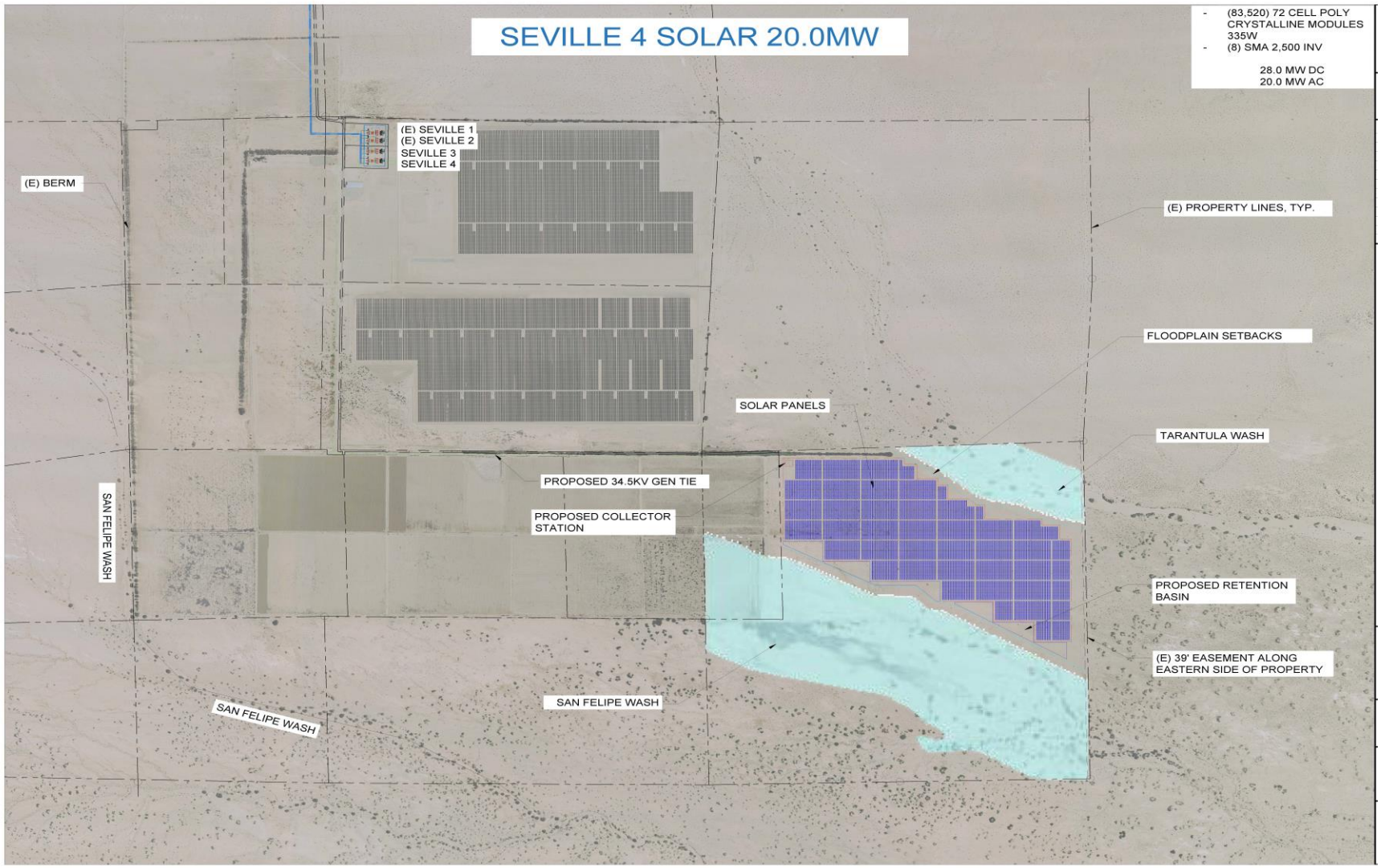
6.4 ANALYSIS OF ALTERNATIVES

This section identifies the environmental effects of the alternatives and compares the environmental effects with those resulting from the proposed Project. **Table 6.0-1** at the end of this section provides a summary of the comparisons. An "environmentally superior" alternative is also identified.



Source: ZGlobal 2017.

FIGURE 6.0-1
ENVIRONMENTALLY SENSITIVE AVOIDANCE ALTERNATIVE - FIXED FRAME CONFIGURATION



Source: ZGlobal 2017.

FIGURE 6.0-2
ENVIRONMENTALLY SENSITIVE AVOIDANCE ALTERNATIVE - HSAT CONFIGURATION

6.4.1 ALTERNATIVE 1 - ENVIRONMENTALLY SENSITIVE AVOIDANCE ALTERNATIVE

Alternative 1 is the Environmentally Sensitive Avoidance Alternative. This alternative avoids a 200-foot wide strip along the eastern boundary of both the Fixed-Frame Configuration (**Figure 6.0-1**) and the HSAT Configuration (**Figure 6.0-2**). This area contains cultural resources that have not been evaluated for eligibility for listing in the CRHR. Each configuration would be shifted approximately 200 feet to the west and designed to occupy the same overall footprints in Lot 8 and produce 20 MW of electricity.

This discussion analyzes the impacts of this alternative by projecting what can reasonably be expected to occur in the foreseeable future if the Project were implemented with the Environmentally Sensitive Avoidance Alternative as compared to the Fixed-Frame Configuration or the HSAT Configuration.

Characteristics

Under the Environmentally Sensitive Avoidance Alternative, the Seville 4 Solar Project would be constructed. The Project site would be developed with either Fixed-Frame or HSAT PV module arrays and the same supporting on-site structures/infrastructure as would occur under the proposed Project. Approval of a CUP application for the Seville 4 Solar Project; approval of one GPA to add the Renewable Energy "RE" Overlay Zone designation to the existing Agriculture land use designation; and approval of one zone change to add the "RE" Renewable Energy Overlay Zone to the existing "A-2" General Agriculture zone.

Under this Alternative, at the end of the Project's operational life, the solar facility would be removed and reclaimed to approximate the existing low gradient desert lands or idle farmland zoned General Agricultural (A-2) in the County's Land Use Ordinance and designated Agriculture in the County's General Plan.

Relationship to Project Objectives

Implementation of the Environmentally Sensitive Avoidance Alternative would result in a shift of the eastern boundary of the Fixed-Frame Configuration and HSAT Configuration approximately 200 feet to the west. Implementation of the Environmentally Sensitive Avoidance Alternative would fulfill the Project's objectives to construct and operate solar power facilities with minimal impacts to the environment by locating the facilities on previously disturbed land (i.e. approximately 60 acres of idle farmland) and low gradient desert free of encumbrances. Further, this alternative would fulfill the Project's objective to locate facilities as close as possible to IID's electrical transmission facilities (i.e. existing 92-kV transmission line and the Anza Substation). Therefore, the Environmentally Sensitive Avoidance Alternative would achieve all of the objectives identified for the proposed Project.

Comparative Impacts

Aesthetics

Under the Environmentally Sensitive Avoidance Alternative, the aesthetic condition of the Project site would be altered in association with development of Fixed-Frame or HSAT PV Arrays and supporting common areas identical to the proposed Project, with the exception of shifting the configurations 200 feet to the west. The Project site would include PV panels, inverters, transformers, and a Gen-Tie Line. The Seville 4 Substation and IID Switching Station would also be developed on Lot D. Likewise, the existing access road would be extended. Under this alternative, impacts to a scenic vista and visual character and quality of the site would be less than significant similar to the proposed Project. Because the eastern boundary would be shifted 200 feet to the west, greater distance would be placed between the Fixed-Frame array at KOP #3 and along IID's "R" Transmission Line, substantially reducing glare from the Fixed-

Frame Configuration. Therefore, potential impacts resulting from light and glare, and cumulative impacts would be less for the Environmentally Sensitive Avoidance Alternative compared to the proposed Project.

Land Use

The Project area has an existing General Plan land use designation of "Agriculture" and a zoning designation of A-2, General Agriculture. Solar energy electrical generators, electrical power generating plants, substations, and facilities for the transmission of electrical energy are allowed as conditional uses in the A-2 designation. The proposed Project would require: approval of one CUP (CUP 17-000) by Imperial County to allow construction and operation of a 20-MW solar energy project; approval of one General Plan Amendment (GPA) (17-0002) to add the Renewable Energy "RE" Overlay Zone designation to the existing "Agriculture" designation; and one Zone Change (ZC 17-0001) to add the "RE" Renewable Energy Overlay Zone to the existing A-2 General Agriculture zone.

Under the Environmentally Sensitive Avoidance Alternative, the eastern boundary of both the Fixed-Frame Configuration and the HSAT Configuration would be sifted approximately 200 feet to the west. However, the same CUP application, GPA and Zone Change would still be required. No changes to the General Plan land use designation of "Agriculture" and a zoning designation of A-2, General Agriculture would be required under the Environmentally Sensitive Avoidance Alternative. Under both the proposed Project and Environmentally Sensitive Avoidance Alternative, at the end of the Project's operational life, the Project site would be reclaimed to approximate the existing low gradient desert or idle farmland consistent with the site's existing A-2 designation.

Overall, conflicts with applicable land use plans, policies and regulations would be less than significant and similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Transportation and Circulation

Under the Environmentally Sensitive Avoidance Alternative, short-term construction-related traffic would increase similar to the proposed Project. Long-term increases in vehicle traffic related to operation and maintenance of the proposed Seville 4 Solar Project would be similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project under all traffic scenarios modeled (Near-Term Year 2018, Near-Term year 2018 Plus Cumulative Plus Project, Long-Term Year 2050). Similar to the proposed Project, the Environmentally Sensitive Avoidance Alternative includes extension of the existing access road and development of internal roadways. Under both this alternative and the proposed Project, no hazards due to a design feature would occur.

Overall, potential impacts related to roadway Level of Service standards, hazardous design features and cumulative impacts to roadway segment would be less than significant and similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Air Quality

Under the Environmentally Sensitive Avoidance Alternative, short-term construction-related air quality impacts would be less than those of the proposed Project because of the shift in the eastern boundary 200 feet to the west. A slight reduction in combustion emissions and dust (including NO_X and PM_{10}) would be anticipated because less acreage would be disturbed but mitigation measures MM 4.4.1a and MM 4.4.1b would still apply to the Environmentally Sensitive Avoidance Alternative to reduce fugitive dust. As with the proposed Project the nearest sensitive receptors are located 2.5 or more miles from the Project site. Diesel equipment could create temporary adverse odors during construction for both the Environmentally Sensitive Avoidance Alternative and the proposed Project. However, the odors would be temporary and no sensitive receptors would be impacted.

Overall, potential impacts related to air quality plans and standards, sensitive receptors and objectionable odors, would be less than significant and similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project. Potential impacts related to violating an air quality standard and cumulative violations of an air quality standard would be less for the Environmentally Sensitive Avoidance Alternative compared to the proposed Project based on slightly less acreage being disturbed as a result of shifting the eastern boundary 200 feet to the west.

Climate Change and Greenhouse Gases

Under the Environmentally Sensitive Avoidance Alternative, short-term construction-related greenhouse gas/climate impacts are anticipated to be similar to, though slightly less than, the proposed Project. Because the eastern boundary of both the Fixed-Frame Configuration and HSAT Configuration would be shifted approximately 200 feet to the east, construction equipment would be operating/emitting GHGs for a shorter period of time in association with less acreage disturbed. GHG emissions during operation and maintenance of the Environmentally Sensitive Avoidance Alternative are expected to be the similar to as those generated by the proposed Project. GHG's generated during construction and reclamation activities would be less than significant and no impact would occur with regard to conflicting with an applicable plan, policy or regulation adopted to reduce GHG emissions for both the proposed Project and the Environmentally Sensitive Avoidance Alternative.

Geology and Soils

Under the Environmentally Sensitive Avoidance Alternative, the geographic area of the Project area would be identical to the proposed Project, and would result in exposure to similar geologic and seismic hazards as the proposed Project (seismic exposure, liquefaction, unstable soils, erosion, expansive soils, and soil corrosivity). Implementation of the Environmentally Sensitive Avoidance Alternative would result in shifting the eastern boundary of both the Fixed-Frame Configuration and the HSAT Configuration approximately 200 feet to the west.

Potential impacts related to seismic exposure, liquefaction, unstable soils, erosion, expansive soils, soil corrosivity, and cumulative impacts, would be similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project. All mitigation measures identified for the proposed Project with regard to seismic ground shaking (MM 4.6.1); erosion (MM 4.6.4a, MM 4.6.4b and MM 4.6.4c); and soil corrosivity (MM 4.6.6) would also apply to the Environmentally Sensitive Avoidance Alternative.

Cultural Resources, Tribal Cultural Resources and Paleontological Resources

Under the Environmentally Sensitive Avoidance Alternative, potential to disturb historical resources, archaeological resources (prehistoric isolates) would be less than would occur under the proposed Project due to shifting the eastern boundary of both the Fixed-Frame Configuration and HSAT Configuration 200 feet to the west. Under both Environmentally Sensitive Avoidance Alternative and the proposed Project, implementation of the same mitigation measures (MM 4.7.3a and MM 4.7.3b) requiring a formal evaluation for eligibility for the CRHR under CEQA Guidelines and the presence of a qualified archaeologist and local Native American monitor would apply. Likewise, mitigation measures MM 4.7.4 (unrecorded subsurface archaeological resources), MM 4.7.5 (subsurface human remains), MM 4.7.6a and MM 4.7.6b (unknown fossil remains) would also apply for both the proposed Project and the Environmentally Sensitive Avoidance Alternative.

Overall, cultural resource impacts are anticipated to be less under the Environmentally Sensitive Avoidance Alternative as compared to the proposed Project because this alternative was designed to avoid resources that may potentially be CRHR-Eligible.

Noise

Shifting the eastern boundary of the Fixed-Frame Configuration and the HSAT Configuration 200 feet to the west would not result in any substantial change in noise levels associated with Project construction, operation or reclamation activities. Under the Environmentally Sensitive Avoidance Alternative, short-term construction-related noise impacts, groundborne vibration, increases in traffic noise, stationary source noise and cumulative noise levels are anticipated to be less than significant and similar to the proposed Project.

Agricultural Resources

Under both the Environmentally Sensitive Avoidance Alternative and the proposed Project, Farmland of Local Importance and Other Land would be temporarily converted to non-agricultural uses. However, under the Environmentally Sensitive Avoidance Alternative, the eastern boundary of the Fixed-Frame Configuration and the HSAT Configuration 200 feet to the west. This shift would have no impact on the amount of Farmland of Local Importance that would be converted to a non-agricultural use because the Farmland of Local Importance is located on the western portion of the Project site. However, slightly less Other land would be converted to non-agricultural uses under the Environmentally Sensitive Avoidance Alternative compared to the proposed Project. Under both the Environmentally Sensitive Avoidance Alternative and the proposed Project, the temporary conversion of approximately 60 acres of idle farmland would not preclude Farmland of Local Importance and Other Land within Fixed-Frame Configuration and the HSAT Configuration from being reclaimed to approximate the existing low gradient desert and idle farmland at the end of the Project's operational life. Overall, impacts to agricultural resources would be similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Hazards and Hazardous Materials

Risks associated with site hazards, including construction activities and conditions (e.g., soil disturbance, use of hazardous materials associated with construction activities), and operational activities (e.g., transport, use and storage of fuel and herbicides) are anticipated to be less than significant and similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project. Shifting the boundary eastern boundary of the Project site 200 feet to the west would not result in any change with regard to exposure to existing low levels of residual pesticide residue as the levels are anticipated to be below regulatory threshold limits and would present a less than significant risk of upset during construction for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Therefore, potential impacts related to the transport, use, disposal and accidental release of hazardous materials; the creation of a hazard through reasonably foreseeable upset/release of hazardous materials; and cumulative hazards and hazardous material impacts, would be similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Hydrology and Water Quality

Under the Environmentally Sensitive Avoidance Alternative, impacts associated with a violation of water quality standards or waste discharge requirements would be less than significant similar to the proposed Project. Both the Environmentally Sensitive Avoidance Alternative and the proposed Project would purchase water from the Ranch Oasis Mutual Water Company and would not deplete groundwater supplies or interfere substantially with groundwater recharge. Under the Environmentally Sensitive Avoidance Alternative, the eastern boundary of the Fixed-Frame Configuration and HSAT Configuration would be shifted approximately 200 feet to the west. However, the shift would not result in any change in on- or off-site flooding or create or contribute runoff exceeding capacity. Both the Environmentally Sensitive Avoidance Alternative and the proposed Project would maintain existing drainage patterns and

the site would remain largely impervious. Compliance with provisions of the Construction General Stormwater Permit and Stormwater Pollution Prevention Plan would be applicable to both the Environmentally Sensitive Avoidance Alternative and the proposed Project such that erosion or on- or off-site siltation would be less than significant.

Both the Environmentally Sensitive Avoidance Alternative and the proposed Project avoid the Zone A (100-year Floodplain). However, segments of the Gen-Tie Line alignment and extension of the existing access road would align through Zone A. This could present a threat to workers during construction. Therefore, mitigation measure MM 4.11.5 would apply for both the Environmentally Sensitive Avoidance Alternative and the proposed Project to avoid exposure to flash flooding.

Overall potential impacts for the Environmentally Sensitive Avoidance Alternative related to: violation of water quality standards or waste discharge requirements; depletion of groundwater supplies or interference with groundwater recharge; substantial flooding on- or off-site/create or contribute runoff exceeding capacity; substantial erosion or siltation on- or off-site; or placement of people or structures within an area subject to flood hazards would be similar to the proposed Project.

Biological Resources

Under the Environmentally Sensitive Avoidance Alternative, the eastern boundary of both the Fixed-Frame Configuration and the HSAT Configuration would be shifted approximately 200 feet to the west. This shift would reduce the amount of mesquite series (a sensitive vegetation community) located within the 500-ft buffer of the Project site. Impacts to jurisdictional areas and flat-tailed horned lizard would be less than significant and similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Loggerhead shrike was observed during surveys of the Project area. The shift of the eastern boundary 200 feet to the west for both the Fixed-Frame Configuration and the HSAT Configuration would not change potential for impacts to loggerhead shrike and mitigation measures MM 4.12.4a (pre-construction nesting bird survey) and MM 4.12.4b (development of a WEAP) would apply to reduce impacts for both the Environmentally Sensitive Avoidance Alternative and the proposed Project. Likewise, the shift in the project boundary would result in similar potentially significant impacts to burrowing owls or nesting and migratory birds for both the Environmentally Sensitive Avoidance Alternative and the proposed Project. Mitigation measure MM 4.12.5 requiring pre-construction burrowing owl surveys and MM 4.12.6 requiring development of a Bird and Bat Conservation Strategy would still be applicable for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Shifting the eastern boundary 200 feet to the west for both the Fixed-Frame Configuration and the HSAT Configuration would result in less than significant impacts similar to the proposed Project. Likewise, overall, cumulative impacts to biological resources would be less than cumulatively considerable and similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Public Services and Utilities

The Environmentally Sensitive Avoidance Alternative would result in public services impacts similar to the proposed Project. Specifically, under both the Environmentally Sensitive Avoidance Alternative and proposed Project, a similar increase in the demand for fire services and law enforcement services would occur because under both the Environmentally Sensitive Avoidance Alternative and the proposed Project, similar activities, structures, and infrastructure are proposed. Shifting the eastern boundary of both the Fixed-Frame Configuration and the HSAT Configuration 200 feet to the west would not change demand for fire protection or law enforcement. Mitigation measure MM 4.13.3 which requires the Applicant to mitigate for impacts to law enforcement services would be applicable for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Both the Environmentally Sensitive Avoidance Alternative and the proposed Project would rely on groundwater and require water distribution and storage infrastructure. The amount of groundwater required may be slightly less due to the 200-foot shift of the eastern boundary line. However, impacts to groundwater supply and water distribution and storage impacts would be similar and less than significant. The Water Supply Assessment for the prepared for the Seville Solar Farm Complex indicated that there is adequate groundwater to serve project development over the next 20 years. Water demand may be reduced slighting as a result of shifting the eastern property boundary line for both the Fixed-Frame Configuration and the HSAT Configuration because the total area of the project would be reduced by 200 feet times the length of the eastern boundary. This would result in less water for dust control during construction and potentially few panels to wash during operation. Overall, cumulative groundwater supply impacts and cumulative water distribution and storage impacts would be similar and less than cumulatively considerable for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Shifting the eastern boundary 200 feet to the west for both the Fixed-Frame Configuration and the HSAT Configuration would not affect the amount of solid waste generated by the Project or the amount of landfill capacity required to accommodate the waste on a project level as well as cumulatively. Impacts to solid waste and land fill capacity would be similar, less than significant and less than cumulatively considerable for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Electrical service would be required from IID for both the Environmentally Sensitive Avoidance Alternative and the proposed Project. Shifting the eastern boundary of both the Fixed-Frame Configuration and the HSAT Configuration 200 feet to the west would not change the need to expand existing infrastructure and add new electrical components for both the Environmentally Sensitive Avoidance Alternative and the proposed Project. Mitigation measure MM 4.13.11 requiring the Applicant to undertake a distribution circuit system study through consultation with IID energy would still apply. Cumulative impacts to electrical service would be less than cumulatively considerable and similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Energy Resources

Energy would be required as part of construction and operation of both the Fixed-Frame Configuration and the HSAT Configuration in the form of fuel associated with construction worker commutes and equipment. Shifting the eastern property boundary of both the Fixed-Frame Configuration and the HSAT Configuration would not result in a substantial change in the amount of fuel required during construction. The Project does not have any unusual characteristics that would result in excessive fuel consumption from on-road vehicles. Fuel consumption associated with on-road vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Thus, impacts associated with the wasteful, inefficient and unnecessary consumption of energy would be less than significant and similar for both the Environmentally Sensitive Avoidance Alternative and the proposed Project.

Both the Environmentally Sensitive Avoidance Alternative and the proposed Project would not result in the net consumption of electricity or natural gas because both are energy generating facilities. The proposed Project and the Environmentally Sensitive Avoidance Alternative may consume an estimated 250 kW-hours (Fixed-Frame) or 300 kWh (HSAT) of electrical energy daily from the IID power system to operate the solar panel trackers on-site security system and the solar facility monitoring and control system when the solar panels are not generating power. Because both the proposed Project and the Environmentally Sensitive Avoidance Alternative are anticipated to generate approximately 20 MWs for delivery to IID for sale to California customers, a substantial increase in demand for electricity requiring new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure

would not occur. Overall, both the Environmentally Sensitive Avoidance Alternative and the proposed Project's contribution to cumulative energy usage is considered less than cumulatively considerable.

6.4.2 ALTERNATIVE 2 - NO PROJECT ALTERNATIVE

Alternative 2 is the No Project Alternative. Analysis of the No Project Alternative is required by CEQA Guidelines Section 15126.6(e)(1). The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed Project. This alternative considers the circumstance under which the Project does not proceed. This discussion analyzes the impacts of the No Project Alternative by projecting what can reasonably be expected to occur in the foreseeable future if the Project were not approved, as compared to the proposed Project. For the purposes of this analysis, the No Project Alternative assumes that the proposed Project would continue to remain as low gradient desert and idle agricultural land with no development of a solar generation facility. In addition, the Gen-Tie Line would not be constructed, the existing access road would not be extended and the proposed Seville 4 Substation and IID Switching station would not be constructed on Lot D.

Characteristics

Under the No Project Alternative, the Seville 4 Solar Project would not be constructed. The proposed Project site would remain in its existing state as low gradient desert and approximately 60 acres of idle farmland. Approval of CUP 17-0006, GPA 17-0002, and one Zone Change (ZC 17-0001) would not be granted to develop the Project. Instead, under the analysis of the No Project Alternative, the proposed Project site is assumed to remain in its existing condition as desert and idle farmland, although it is also possible that the approximately 60 acres of the idle farmland could be reestablished as farmland should it become economically feasible to do so. In addition, the alignment of the Gen-Tie Line would not be disturbed, the existing access road would not be extended and Lot D would remain in its existing, vacant state and the Seville 4 Substation and IID Switching Station would be constructed.

Relationship to Project Objectives

Implementation of the No Project Alternative would fail to fulfill the Project's objectives to develop the Seville 4 Solar Project. Failure to construct the Project would forego development of a new source of renewable energy and forfeit locating a project of this size on previously disturbed land in a rural setting in proximity to the existing IID infrastructure (i.e. the Anza Substation).

The Project site would remain in its existing state and would not support the objective of producing on-peak renewable power to the electrical grid in California, assisting California in meeting its current and future Renewable Portfolio Standard goals, or support the greenhouse gas reduction goals of Assembly Bill 32 (California Global Warming Solutions Act of 2006). The Applicant would not be able to meet its obligation to meet the terms and requirements of its Power Purchase Agreement, as well as the other objectives for the Project outlined above. Therefore, the No Project Alternative would not achieve the objectives of the proposed Project.

Comparative Impacts

Aesthetics

Under the No Project Alternative, the aesthetic condition of the Project area (Project site, Gen-Tie Line corridor, Lot D) would remain as it currently exists. Alteration of the site from low gradient desert and idle farmland to development as a solar generation facility with supporting structures including Gen-Tie Line, Substation and IID Switching Station would not occur.

The Project is not located in a scenic vista nor does it contain any outstanding aesthetic features. No change in the existing visual quality of the Project site would occur under the No Project Alternative. Because no PV panels would be placed on the Project site under the No Project Alternative, no glare would be created at KOP# 3 on the IID's "R" Transmission Line. Therefore, potential impacts related to a scenic vista, the existing visual character, light and glare and cumulative impacts would be less under the No Project Alternative compared to the proposed Project.

Land Use

The Project site has an existing General Plan land use designation of Agriculture and a zoning designation of A-2, General Agriculture. Solar energy electrical generators, electrical power generating plants, substations, and facilities for the transmission of electrical energy are allowed as conditional uses in the A-2 designation. The proposed Project requires a CUP application for the proposed Project; one General Plan Amendment to add the RE Overlay Zone delineation to the existing Agricultural land use designation; and one Zone Change to add the "RE" Renewable Energy Overlay Zone to the existing A-2 General agriculture zone.

Under the No Project Alternative, no CUP application would be required as the Project area would not be developed with a solar generation facility including a Gen-Tie Line, Substation and IID Switching Station. This analysis assumes that the existing land use pattern would remain unchanged as approximately 60 acres of idle farmland and low gradient desert within the Fixed-Frame Configuration or HSAT Configuration. However, it is acknowledged that the idle farmland could be reestablished as active farmland within the A-2 designation. Overall, potential impacts to alternative-specific and cumulative land use conflicts with applicable land use plans, policies and regulations would be similar under the No Project Alternative compared to the proposed Project.

Transportation and Circulation

Near-Term Year 2018 construction-related traffic impacts would not occur under the No Project Alternative. Increases in vehicle traffic related to operation and maintenance (Near-Term Year 2018 Plus Cumulative Plus Project; Long-Term Year 2050) of the Project would also not occur under the No Project Alternative. No major changes in traffic volumes or patterns would occur on SR 78 and no new access road to the Project site would be constructed off of SR 78. Therefore, potential impacts related to roadway Level of Service standards, hazardous design features and cumulative impacts would be less under the No Project Alternative compared to the proposed Project. If the 60 acres of idle farmland were re-established as active farmland under the No Action Alternative, some traffic would be associated with agricultural operations.

Air Quality

Under the No Project Alternative, air pollutant emissions during both Project construction and operations would not occur. Likewise, the Project's potential to conflict with or obstruct an air quality plan or violate an air quality standard would not occur under the No Project Alternative. Therefore, potential impacts to air quality would be less under the Project site's existing condition as low gradient desert and idle farmland under the No Project Alternative compared to the proposed Project. If the 60 acres of idle farmland on the Project site were reestablished as active farmland, air quality dust emissions may be less than those during Project construction but greater in association with agricultural operations when compared to Project operations. No sensitive receptors would be impacted and no objectionable odors would be generated by the No Project Alternative. Impacts would be similar for the Proposed Project because no sensitive receptors would be impacted by dust or objectionable odors.

Overall, potential impacts related to air quality plans and standards, objectionable odors, sensitive receptors and cumulative impacts would be less under the No Project Alternative compared to the proposed Project.

Climate Change and Greenhouse Gases

Short-term construction-related greenhouse gas (GHG)/climate impacts would not occur under the No Project Alternative as no construction would take place in the Project area. Likewise, minimal operational GHG/climate change impacts resulting from operations and maintenance vehicle trips would not occur under the No Project Alternative. Therefore, GHG/climate change impacts would be less if the No Project Alternative were implemented compared to the proposed Project. However, if the 60 acres of idle farmland were reestablished as active farmland, GHGs would be generated in association with the operation of farm equipment and pumping of water to irrigate the fields. No such long-term impacts would be associated with the proposed Project.

Overall, potential impacts related to GHG generation and cumulative impacts would be less under the No Project Alternative compared to the proposed Project.

Geology and Soils

Under the No Project Alternative, no structures would be built within the Project area. Impacts associated with geologic hazards (i.e. seismic ground shaking, liquefaction, unstable soils, erosion, expansive soils, soil corrosivity) would be avoided as none of the proposed structures (i.e. PV panels, Gen-Tie Line, Seville 4 Substation, IID Switching Station, etc.) would be developed. Therefore, geology and soils impacts would be less under the No Project Alternative compared to the proposed Project. Impacts from geologic hazards would also likely be less than those from the proposed Project if the 60 acres of idle farmland are reestablished as active farmland under the No Project Alternative rather than a solar facility as would occur under the proposed Project.

Overall, potential impacts related to seismic ground shaking, liquefaction, unstable soils, erosion, expansive soils, soil corrosivity and cumulative impacts would be less under the No Project Alternative compared to the proposed Project.

Cultural Resources, Tribal Cultural Resources and Paleontological Resources

Cultural resource impacts to historic resources and prehistoric isolates would be similar for both the No Action Alternative and the proposed Project as there are no historic resources on the Project site. Construction activities required to install the Project (i.e. solar panel footing installation, inverter pads, etc.) would not occur thus the five prehistoric isolates identified on the Project site would not be disturbed. The No Action Alternative would also avoid impacting thirteen archaeological sites that were identified as potentially eligible for the CRHR. The No Action Alternative would also avoid impacts to unrecorded subsurface archaeological resources, subsurface human remains and unknown fossil remains.

Overall, potential impacts to cultural resources would be less under the No Project Alternative than under the proposed Project. If under the No Project Alternative the 60 acres of idle farmland are reestablished as active farmland, the Project site would be disturbed, but likely only to the same levels as had occurred in association with tilling the land for agricultural use. There would also be no guarantee of avoidance or mitigation as is prescribed for the potential CRHR-Eligible Resources under the proposed Project if the 60 acres was re-established as active farmland.

Overall, potential impacts related to CRHR-eligible resources, unrecorded subsurface archaeological resources, subsurface human remains, unknown fossil remains and cumulative impacts to archaeological, historic and paleontological resources would be less under the No Project Alternative compared to the proposed Project.

Noise

Short-term construction-related noise impacts would not occur under the No Project Alternative. Therefore, temporary increases in noise levels resulting from construction (especially if occurring during the nighttime hours) would be avoided. Similarly, without development of the proposed Project, long-term operational noise would be avoided. Under the No Project Alternative, the site would remain in its current state of low gradient desert and approximately 60 acres of idle farmland, resulting in no change from the current ambient noise levels. Therefore, noise impacts would be less under the No Project Alternative if the Project site remains in its current state as both construction and operational noise levels would be less compared to the proposed Project. If the 60 acres of idle farmland on the Project site is instead reestablished as active farmland, noise levels from the No Project Alternative would likely be somewhat similar to the proposed Project during construction, but may be slightly greater than the operational noise levels of the proposed Project.

Overall, potential impacts related to temporary and long-term noise increases (from traffic and stationary sources), groundborne vibration and cumulative impacts would be less under the No Project Alternative compared to the proposed Project.

Agricultural Resources

For the analysis of the No Project Alternative, the Project site is assumed to remain in its existing condition as low gradient desert and approximately 60 acres of idle farmland. However, it is also possible that the 60 acres could be reestablished as farmland should it become economically feasible to do so. Were this to occur, impacts to agricultural resources would be less under the No Project Alternative, compared to the proposed Project which would temporarily convert Farmland of Local Importance to other non-agricultural uses.

Hazards and Hazardous Materials

Under the No Project Alternative, the proposed Project site is assumed to remain in its existing condition as low gradient desert and approximately 60 acres of idle farmland. No hazardous materials would be transported to the site for use during construction, operation or reclamation. No reasonably foreseeable upset or release of hazardous materials would occur for either the No Project Alternative or the proposed Project. Therefore, potential impacts from hazards and hazardous materials would be slightly less under the No Project Alternative compared to the proposed Project. If, however, the approximately 60 acres of idle farmland on the Project site was reestablished as active farmland, there would be some hazards associated with the transport, storage and use of diesel fuel, pesticides and fertilizer.

Overall, potential impacts related to the transport, use, disposal and accidental release of hazardous materials; the upset or release of hazardous materials onsite; and cumulative impacts would be less under the No Project Alternative compared to the proposed Project.

Hydrology and Water Quality

Implementation of the No Project Alternative would not result in substantial changes to existing runoff rates or patterns. Without the introduction of a solar generation facility, no new pervious surfaces or structures would be developed on the Project site and groundwater would continue to be allowed to percolate uninhibited over the Project site. No retention basins would be constructed or needed as there would be no change in runoff patterns or quantities in association with the No Project Alternative as compared to the proposed Project which requires 18 acres of retention.

Under the No Project Alternative, no erosion or siltation would occur as a result of construction activities. The No Project Alternative would also avoid placing a solar generation facility within areas identified by FEMA as Zone A. Therefore, impacts to hydrology and water quality would likely be less under the No

Project Alternative. However, if the approximately 60 acres of idle farmland on the Project site were to be reestablished as active farmland, a greater amount of groundwater would be required to sustain agricultural production than would be required for the proposed Project (145 AF during construction and 5 AF for operation). The California Department of Water Resources estimates that annual groundwater recharge for the entire Ocotillo-Clark Valley Groundwater Basin averages 2,300 AF/. Historically (between 1983 and 1996), when water demand for the Allegretti Farms agricultural operations was reportedly 3,250 to 6,050 AF/Y, the groundwater table under the Allegretti Farms property dropped over 50 feet. As a result, no more than 2,000 AF/Y would likely be for available for agriculture on the Allegretti Farms property without resulting in an annual overdraft of the basin. (Note: The issue of groundwater use is also discussed under Public Services and Utilities).

Overall, potential impacts related to water quality standards/waste discharge requirements; ground water supply/recharge; on- or off-site flooding, erosion or siltation; placement within an area subject to flood hazards and cumulative impacts would be less under the No Project Alternative compared to the proposed Project.

Biological Resources

Under the No Project Alternative, the proposed Project would not be developed and the Project site would remain in its existing condition as low gradient desert and approximately 60 acres of idle farmland. If the Project was not developed, impacts from implementation of the proposed Project to biological resources such as special status plants and animals (e.g. Loggerhead Shrike, Burrowing Owl) and nesting and migratory birds would be avoided. Therefore, impacts to biological resources would be less under the No Project Alternative if the Project site were to remain as low gradient desert and approximately 60 acres of idle farmland. If the idle farmland were to be reestablished as active farmland under the No Project Alternative, indirect impacts, such as dust on plants and noise disturbance to animals, could occur. Likewise, if any special status plants or animals are present, they could be disrupted, harmed or damaged if the Project site is actively farmed. Thus, impacts to biological resources may be greater under the proposed Project if the 60 acres of idle farmland are reestablished as active farmland. However, if the idle farmland is not actively farmed, impacts to biological resources would be less than would occur under the proposed Project.

Overall, potential impacts related to special status animal species (flat-tailed horned lizard, loggerhead shrike, burrowing owl,); nesting and migratory birds would be less under the No Project Alternative if it is implemented and without the 60 acres of idle farmland being converted to active farmland. The No Project Alternative would have less impacts with regard to wildlife movement corridors than the proposed Project as no fence would be erected around the Project site.

Public Services and Utilities

Under the No Project Alternative the Project site would not be developed with a solar field. Likewise, no Gen-Tie, Seville 4 Substation or IID Switching Station would be constructed. If the Project site is allowed to remain in its existing condition as low gradient desert and approximately 60 acres of idle farmland, impacts to the ICFD and ICSO level-of-service would be avoided; no groundwater would be used; no water distribution or storage would be needed; no solid waste pick-up or disposal would be necessary; and no additional electrical infrastructure would need to be extended. In addition, no new renewable energy would be generated by the Project and distributed to the California electricity grid. Therefore, impacts related to public services and utilities would be less if the proposed Project continues in its present condition as low gradient desert and approximately 60 acres of idle farmland under the No Project Alternative as compared to the proposed Project. However, if under the No Project Alternative the approximately 60 acres of idle farmland on the Project site were reestablished as active farmland, groundwater would be pumped which would result in a greater demand for electricity compared to the

proposed Project. If the approximately 60 acres of idle farmland on the Project site were reestablished as active farmland, impacts related to utilities would be greater under the No Project Alternative compared to the proposed Project.

Overall, potential impacts to fire protection, law enforcement services, groundwater supply, water distribution and storage, solid waste service and landfill capacity, and electrical service would be less under the No Project Alternative compared to the proposed Project.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based upon the evaluation described in this section, the No Project Alternative (Alternative 2) is considered to be the environmentally superior alternative as it would avoid all adverse impacts associated with the proposed Project. The No Project Alternative was determined to have less adverse environmental impacts than the proposed Project on most issues overall assuming that the site remains in its existing condition as low gradient desert and approximately 60 acres of idle farmland.

Under CEQA Guidelines Section 15126.6 (e)(2), if the environmentally superior alternative is the No Project Alternative, another environmentally superior alternative must be selected from the other alternatives analyzed. After the No Project Alternative, the alternative with the least potential impacts would be the Environmentally Sensitive Avoidance Alternative. When compared to the proposed Project, this alternative resulted in one impact that would be less than would occur in association with implementation of the proposed Project. No impacts were considered greater for the Environmentally Sensitive Avoidance Alternative compared to the proposed Project. Therefore, the Environmentally Sensitive Avoidance Alternative would be the environmentally superior alternative.

Table 6.0-1, below, provides a summary of the potential impacts of the alternatives evaluated in this section, as compared with the potential impacts of the proposed Project.

TABLE 6.0-4 COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT ISSUE AREA/IMPACT	ENVIRONMENTALLY SENSITIVE AVOIDANCE ALTERNATIVE	NO PROJECT ALTERNATIVE
Impact 4.1.1 – Adverse Effect on Scenic Vista	S	B
Impact 4.1.2 – Degrade Existing Visual Character or Quality of the Site	S	B
Impact 4.1.3 – New Source of Substantial Light or Glare	B	B
Impact 4.1.4 – Cumulative Visual Impacts	S	B
Impact 4.2.1 – Conflict With Any Applicable Land Use Plan, Policy, or Regulation	S	S
Impact 4.2.2 – Cumulative Conflicts with Applicable Land Use Plans, Policies, or Regulations	S	S
Impact 4.2.3 – Cumulative Land Use Compatibility/Conflict Impacts	S	S
Impact 4.3.1 – Conflict with an Applicable Plan/Level of Service Standard (Near-Term Year 2018)	S	B
Impact 4.3.2 – Substantially Increase Hazards Due to a Design Feature	S	B
Impact 4.3.3 – Cumulative Impacts to Roadway Segment LOS (Near-Term Year 2018 Plus Cumulative Plus Project)	S	B
Impact 4.3.4 – Conflict With an Applicable Plan/Level of Service Standard (Long-Term Year 2050)	S	B
Impact 4.3.5 – Substantially Increase Hazards Due to a Design Feature	S	B
Impact 4.3.6 – Cumulative Impacts to Roadway Segment LOS (Year 2025)	S	B
Impact 4.4.1 – Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard	B	B
Impact 4.4.2 – Expose Sensitive Receptors to Substantial Pollutant Concentrations	S	B
Impact 4.4.3 – Create Objectionable Odors Affecting a Substantial Number of People	S	B
Impact 4.4.4 – Violate Air Quality Standard/Cause Air Quality Violation	B	B
Impact 4.5.1 – Generation of Greenhouse Gas Emissions	B	B
Impact 4.5.2 – Conflict with an Applicable Plan, Policy, or Regulation Adopted to Reduce Greenhouse Gas Emissions	B	B
Impact 4.6.1 – Strong Seismic Ground Shaking	S	B
Impact 4.6.2 – Liquefaction	S	B
Impact 4.6.3 – Unstable Soils – Seismic/Differential Settlement	S	B
Impact 4.6.4 – Erosion	S	B
Impact 4.6.5 – Expansive Soils	S	B
Impact 4.6.6 – Soil Corrosivity	S	B

TABLE 6.0-4 COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT ISSUE AREA/IMPACT	ENVIRONMENTALLY SENSITIVE AVOIDANCE ALTERNATIVE	NO PROJECT ALTERNATIVE
Impact 4.6.7 – Cumulative Exposure to Geologic and Seismic Impacts	S	L
Impact 4.7.1 – Impacts to Historical Resources	S	L
Impact 4.7.2 – Impacts to Archaeological Resources - Prehistoric Isolates	S	L
Impact 4.7.3 – Impacts to Archaeological Resources Potentially Eligible for the CRHR	L	L
Impact 4.7.4 – Impacts to Unrecorded Subsurface Archaeological Resources	S	L
Impact 4.7.5 – Impacts to Subsurface Human Remains	S	L
Impact 4.7.6 – Impacts to Unknown Fossil Remains	S	L
Impact 4.7.7 – Cumulative Impacts to Archaeological and Historic Resources	S	L
Impact 4.8.1 – Noise Levels in Excess Of Standards/Substantial Temporary Noise Increase	S	L
Impact 4.8.2 – Exposure to Groundborne Vibration	S	L
Impact 4.8.3 – Long-Term Exposure to Increased Traffic Noise	S	L
Impact 4.8.4 – Long-Term Exposure to Increased Stationary-Source Noise	S	L
Impact 4.8.5 – Contribution to Cumulative Noise Levels	S	L
Impact 4.9.1 – Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance	S	L
Impact 4.9.2 – Indirect Environmental Effects of Conversion of Farmland	S	L
Impact 4.9.3 – Cumulative Agricultural Resources Impacts	S	L
Impact 4.10.1 – Hazardous Materials Transport, Use, Disposal and Accidental Release	S	L
Impact 4.10.2 – Create a Hazard Through Reasonably Foreseeable Upset/Release of Hazardous Materials	S	L
Impact 4.10.3 – Cumulative Hazards and Hazardous Materials Impact	S	L
Impact 4.11.1 – Violate Water Quality Standards or Waste Discharge Requirements	S	L
Impact 4.11.2 – Result in Depleted Groundwater Supplies or Interfere Substantially with Groundwater Recharge	S	L
Impact 4.11.3 – Result in Substantial Flooding On- Or Off-Site/ Create or Contribute Runoff Exceeding Capacity	S	L
Impact 4.11.4 – Result in Substantial Erosion or Siltation On- or Off-site	S	L
Impact 4.11.5 - Result in Placement of People or Structures within an Area Subject to Flood Hazards	S	L

TABLE 6.0-4 COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT ISSUE AREA/IMPACT	ENVIRONMENTALLY SENSITIVE AVOIDANCE ALTERNATIVE	NO PROJECT ALTERNATIVE
Impact 4.11.6 - Cumulative Impact to Hydrology and Water Quality	**S**	**L**
Impact 4.12.1 - Impacts to Jurisdictional Areas	**S**	**L**
Impact 4.12.2 - Impacts on Jurisdictional Area	**S**	**L**
Impact 4.12.3 - Impacts to Special Status Species – Flat-tailed horned lizard	**S**	**L**
Impact 4.12.4 - Impacts to Special Status Species – Loggerhead Shrike	**S**	**L**
Impact 4.12.5 - Impacts to Special Status Species – Burrowing Owl	**S**	**L**
Impact 4.12.6 - Impacts to Nesting and Migratory Birds	**S**	**L**
Impact 4.12.7 - Impacts to Wildlife Movement	**S**	**L**
Impact 4.12.8 - Cumulative Impacts to Biological Resources	**S**	**L**
Impact 4.13.1 - Impacts to ICFD Services	**S**	**L**
Impact 4.13.2 – Cumulative ICFD Services	**S**	**L**
Impact 4.13.3 - Impacts to ICSO Services	**S**	**L**
Impact 4.13.4 - Cumulative Impacts to ICSO Services	**S**	**L**
Impact 4.13.5 - Impacts to Groundwater Supply	**S**	**L**
Impact 4.13.6 - Water Distribution and Storage Impacts	**S**	**L**
Impact 4.13.7 - Cumulative Groundwater Supply Impacts	**S**	**L**
Impact 4.13.8 - Cumulative Water Distribution and Storage Impacts	**S**	**L**
Impact 4.13.9 - Impacts to Solid Waste Service and Landfill Capacity	**S**	**L**
Impact 4.13.10 - Cumulative Impacts to Solid Waste Service and Landfill Capacity	**S**	**L**
Impact 4.13.11 - Impacts to Electrical Service and Infrastructure	**S**	**L**
Impact 4.13.12 - Cumulative Impacts to Electric Service	**S**	**L**
Impact 7.1.1 - Wasteful, Inefficient, and Unnecessary Consumption of Energy	**S**	**L**
Impact 7.1.2 - Contribution to Cumulative Energy Usage	**S**	**L**

Notes: S = Similar Impact compared to the Proposed Project

L = Less Impact compared to the Proposed Project

G = Greater Impact compared to the Proposed Project.