CHAPTER 7.0
OTHER CEQA REQUIRED CONSIDERATIONS

This section discusses the additional topics statutorily required by the California Environmental Quality Act (CEQA). The topics indicated whether the proposed Project would: cause significant irreversible environmental changes; result in growth inducing impacts; or create unavoidable significant environmental impacts. A discussion of Mandatory Findings of Significance is also included. This section begins with a discussion of CEQA Guidelines, CEQA Appendix F, Energy Conservation.

7.1 ENERGY CONSERVATION

The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: 1) decreasing overall per capita energy consumption; 2) decreasing reliance on fossil fuels such as coal, natural gas and oil; and 3) increasing reliance on renewable energy sources.

To assure that energy implications are considered in project decisions, CEQA requires EIRs to include a discussion of potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see PRC section 21100(b)(3)).

The proposed Project includes a renewable energy project capable of producing 20 MW of electricity, a 34-5 kV Gen-Tie Line, a substation and IID switching Station. The solar generation facility would produce an alternative source of electricity that would help the State of California meet its goals for use and production of renewable energy. The production of ethanol would contribute to the production of renewable energy

7.1.1 ENERGY BACKGROUND

The study area for energy resources includes the entire State of California. The following sections describe the electricity supply in California, and summarize California's status in achieving statewide renewable energy goals.

A. CALIFORNIA'S ENERGY SUPPLY

In 2002, California established its Renewable Portfolio Standard (RPS) program to increase the annual percentage of renewable energy in the state's electricity mix by the equivalent of at least one percent of sales, with an aggregate total of 20 percent by 2017. The California Public Utilities Commission (CPUC) subsequently accelerated that goal to 2010 for retail sellers of electricity (Public Utilities Code Section 399.15(b)(1)). Governor Schwarzenegger signed EO S-14-08 in 2008, increasing the target to 33 percent renewable energy by 2020. Specifically, California's RPS requires retail sellers [investor-owned utilities (IOUs), electric service providers (ESPs) and community choice aggregators (CCAs)] regulated by the CPUC to procure 33 percent of their annual retail sales from eligible renewable sources by 2020. The RPS also requires retail sellers to achieve intermediate RPS targets of 20 percent from 2011-2013 and of 25 percent from 2014-2016. The CPUC and the California Energy Commission (CEC) are jointly responsible for implementing California's 33 percent RPS program (CPUC 2013).

California produces almost 70 percent of its electricity consumption from power plants located within the state, and the rest is imported. The amount of power imported in a given year varies due to several factors, including the availability of in-state hydropower. California's three large IOUs: Pacific Gas and Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E) currently provide approximately 68 percent of the state's electric retail sales. On August 1, 2013, the large IOUs reported in their Preliminary 2012 Annual RPS Compliance Reports that they served 19.6 percent of their retail electric load with RPS-eligible generation in 2012. PG&E served 19.04 percent of its 2012 retail sales with RPS-eligible renewable energy, SCE with 19.9 percent, and SDG&E with 20.31 percent. Pursuant to the procurement requirements in Senate Bill 2 (SB 2 [1X]), the IOUs must average 20 percent renewable energy during the first RPS compliance period (2011-13) (CPUC 2013).

California has exceeded the 8,000 MW goal for large-scale renewables with 10,500 MW added since January 2011, for a total of 17,124 MW. California's in-state operating renewable energy capacity was 27,500 MW as of June 19, 2017. The total includes a little more than 6,000 MW of self-generation capacity, 5,800 MW of which is self-generation solar photovoltaic (PV). The state is also expected to meet the 12,000 MW goal for distributed generation by 2020 (CEC 2017).

B. ENERGY RESOURCES

Issues related to energy use include the levels of consumption of non-renewable and renewable energy sources for the construction, operation, and reclamation of the proposed Project. Transportation energy use is related to the following factors: the efficiency of automobiles, trucks, off-road equipment, and other mobile transportation; the choice of employee travel mode (automobile, carpool, or public transit); and miles traveled for each mode. Energy would also be consumed with construction equipment and routine operation activities, and reclamation activities associated with Project.

Each of the of the five solar development projects proposed as part of the Seville Solar Farm Complex, two are currently built: Seville 1 Solar and Seville 2 Solar. Construction of the Seville 3 Solar project to the west could potentially overlap with construction of the proposed Project.

7.2 ENERGY THRESHOLDS AND ENERGY RESOURCE IMPACTS

7.2.1 ENERGY THRESHOLDS

Based on Appendix F, Energy Conservation, of the CEQA Guidelines, a project would result in significant impacts related to energy if construction, operation, or reclamation of the proposed facilities would result in the wasteful, unnecessary, or inefficient use of energy resources. Environmental effects may include the Project's energy requirements and its energy use efficiencies by amount and fuel type during construction, operation and reclamation; the effects of the Project on local and regional energy supplies; the effects of the Project on peak and base period demands for electricity and other forms of energy; the degree to which the Project complies with existing energy standards; the effects of the Project on energy resources; and the Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives, if applicable. The discussion of energy resources impacts collectively addresses these topics.

Energy consumption is analyzed in this EIR due to the potential direct and indirect environmental impacts associated with the project. Such impacts include the depletion of non-renewable resources (oil, natural gas, coal, etc.) and emissions of pollutants during both the construction and long-term operational phases.

7.2.2 ENERGY CONSUMPTION

A. ENERGY USAGE

Energy usage is typically quantified using the British thermal unit (BTU). Total energy usage in California was 7,620 trillion BTUs in 2014 (the most recent year for which this specific data is available), which equates to an average of 196 million BTUs per capita. Of California's total energy usage, the breakdown by sector is 39 percent transportation, 24 percent industrial, 19 percent commercial, and 18 percent residential. Electricity and natural gas in California are generally consumed by stationary users such as residences and commercial and industrial facilities, whereas petroleum consumption is generally accounted for by transportation-related energy use (EIA 2017). In 2014, taxable gasoline sales (including aviation gasoline) in California accounted for 14,573,637,973 gallons of gasoline (BOE 2016). The electricity consumption attributable to nonresidential land uses in Imperial County from 2012 to 2015 is shown in **Table 7.1-1**. As indicated, the demand has decreased since 2012.

TABLE 7.1-1
NONRESIDENTIAL ELECTRICITY CONSUMPTION IN IMPERIAL COUNTY 2012–2015

Year	Nonresidential Electricity Consumption (in millions of kilowatt hours)
2015	812
2014	913
2013	928
2012	935

Source: ECDMS 2017.

Table 7.1-2 shows the natural gas consumption attributable to nonresidential land uses in Imperial County from 2012 to 2015. Nonresidential demand has decreased, despite an increase in population.

TABLE 7.1-2
NONRESIDENTIAL NATURAL GAS CONSUMPTION IN IMPERIAL COUNTY 2012–2015

Year	Nonresidential Natural Gas Consumption (in millions of therms)
2015	24
2014	26
2013	29
2012	30

Source: ECDMS 2017.

Daily automotive fuel consumption in Imperial County from 2012 to 2016 is shown in **Table 7.1-3**.

TABLE 7.1-3
ANNUAL AUTOMOTIVE FUEL CONSUMPTION IN IMPERIAL COUNTY 2012–2017

Year	On-Road Automotive Fuel Consumption (gallons)	Off-Road Automotive (Construction Equipment) Fuel Consumption (gallons)
2016	131,366,785	4,706,338
2015	129,705,670	4,462,796
2014	128,815,435	4,113,291
2013	127,168,920	3,829,982
2012	129,661,140	3,618,055

Source: CARB 2014a (EMFAC).

7.3 REGULATORY FRAMEWORK

7.3.1 STATE

A. CALIFORNIA'S ENERGY EFFICIENCY STANDARDS FOR RESIDENTIAL AND NONRESIDENTIAL BUILDINGS (TITLE 24)

Title 24, California's energy efficiency standards for residential and nonresidential buildings, was established by the California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. In 2013, the CEC updated Title 24 standards with more stringent requirements. The 2013 standards are expected to substantially reduce the growth in electricity and natural gas use. Additional savings result from the application of the standards to building alterations. For example, requirements for cool roofs, lighting, and air distribution ducts are expected to

save additional electricity. These savings are cumulative, doubling as years go by. The 2016 standards have been approved and will go into effect on January 1, 2017. California's energy efficiency standards are updated on an approximate three-year cycle.

B. California Green Building Standards

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. CALGreen also has voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2013 and went into effect July 1, 2014.

C. Recent CEQA Litigation

In *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, the court observed that CEQA Guidelines Appendix F lists environmental impacts and mitigation measures that an EIR may include. Potential impacts requiring EIR discussion include:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

D. Local

County of Imperial General Plan

The Renewable Energy and Transmission Element of the County's General Plan identifies goals, objectives, and policies and programs for geothermal and other renewable energy land uses in Imperial County. Renewable Energy and Transmission Element policy provisions provide direction for renewable energy development as well as government actions and programs. Imperial County's Goals and Objectives are intended to serve as long-term principles and policy statements representing ideals which have been determined by the Board of Supervisors as being desirable and deserving of community time and resources to achieve. Policy provisions that are relevant to the proposed project are listed below.

Objective 3.3: Encourage the development of services and industries associated with renewable energy facilities.

Objective 5.2: Encourage development of utility-scale distributed generation projects in the County.

7.4 ENVIRONMENTAL SETTING

A. SEVILLE 4 SOLAR PROJECT

The Project is a proposal to build a nominal 20-megawatt (MW) alternating current (AC) solar generation facility using photovoltaic (PV) technology. The net electrical output of the Seville 4 Solar Project is anticipated to be approximately 20 MWs, alternating current (AC). The Project consists of the solar generation facility and associated 34.5-kilovolt (kV) transmission line (gen-tie), Project substation and access road, all on private land. The proposed Project substation would increase the voltage to 92 kV, then deliver the generated power to the existing Imperial Irrigation District (IID) switch yard and connected 92 kV transmission line.

IID Energy provides electric power to more than 150,000 customers in the Imperial Valley and parts of Riverside and San Diego counties. As the sixth largest utility in California, IID Energy controls more than 1,100 megawatts of energy derived from a resource portfolio that includes its own generation, and long- and short-term power purchases.

7.4.1 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

Criteria for determining the significance of noise impacts were developed based on information contained in the CEQA Guidelines Appendix F. Based on Appendix F of the CEQA Guidelines, energy impacts are considered to be significant if the project would result in any of the following:

1) Develop land uses and patterns that cause wasteful, inefficient, and unnecessary consumption of energy or construct new or retrofitted buildings that would have excessive energy requirements for daily operation.

The impact analysis focuses on the one source of energy consumption associated with the proposed Project; the automotive fuel necessary for Project construction and routine operational maintenance.

B. ISSUES NOT ANALYZED

One of the obvious benefits of solar energy is that the production of electricity from this source involves almost no non-renewable resources. In contrast, fossil fuel–fired electric generation from coal, oil, or natural gas results in substantial consumption of non-renewables. Renewable energy-generating facilities are considered a beneficial impact statewide. In addition, unlike other land uses, the proposed Project would not result in the net consumption of electricity or natural gas due to its nature as an energy generating facility. While, as stated in Section 2.0, Project Description, 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 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, the Project is anticipated to generate approximately 20 MWs. Because the proposed Project is anticipated to generate approximately 20 MWs of electricity for delivery to IID for sale to California customers, electricity and natural gas consumption associated with the Project would be of no impact and are not discussed further in the EIR.

C. METHODOLOGY

The amount of automotive fuel use from worker commutes during both construction and operations was estimated using the California Air Resources Board's (CARBs) EMFAC2014 computer program. EMFAC provides projections for typical daily fuel usage in Imperial County. The amount of total construction-related fuel use from off-road construction equipment was estimated using ratios provided in the Climate

Registry (2015) General Reporting Protocol for the Voluntary Reporting Program, Version 2.1. Operational fuel use associated with routine maintenance, and fuel use associated with Project reclamation activities were also estimated using ratios provided in the Climate Registry General Reporting Protocol for the Voluntary Reporting Program, Version 2.1 (Climate Registry 2015).

D. PROJECT IMPACTS AND MITIGATION MEASURES

Wasteful, Inefficient, and Unnecessary Consumption of Energy

Impact 7.1.1 The Project would not use energy in a wasteful manner. The impact would be **less than significant**.

Table 7.1-4 summarizes energy consumption associated with the proposed Project.

TABLE 7.1-4
PROPOSED PROJECT ENERGY CONSUMPTION

Energy Type	Annual Energy Consumption	Percentage Increase Countywide
Automotive Fuel Consumption		
On-Road Vehicles		
Construction Worker Commutes[1] (272 trips daily for 6 months)	9,360 Gallons	0.007%
Operational Worker Commutes[1] (10 trips daily)	716 Gallons	0.0005%
Off-Road Vehicles		
Construction Equipment[2]	51,823 Gallons	1.1%
Operational Equipment[2]	22,956 Gallons	0.5%

Sources:
[1] CARB, EMFAC2014.
[2] Climate Registry (2015) General Reporting Protocol for the Voluntary Reporting Program, Version 2.1 (CO_2e outputs derived from the "Air Pollutant Emission Assessment, Seville 4 Solar Project Construction and Operations, Imperial County, California" memo (EMA 2017d) are multiplied by 1,000 then divided by 10.15 [Metric Tons of CO_2e x 1,000 ÷ 10.15]).

As indicated in the table, on-road vehicles associated with construction and operations of the Project are estimated to consume approximately 9,360 gallons and 716 gallons of fuel per year, respectively (construction activities are estimated to last six months). These activities would increase countywide automotive fuel consumption by less than one percent.

The amount of on-road fuel use was estimated using CARB's EMFAC2014 computer program. 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.

As indicated, the Project's fuel consumption from off-road vehicles associated with construction and operations of the Project are estimated to consume approximately 51,823 gallons and 22,956 gallons of fuel per year, respectively. These activities would increase countywide automotive fuel consumption by approximately one percent. As such, the use of off-road vehicles associated with the Project would have a nominal effect on local and regional energy supplies. No unusual Project characteristics would necessitate the use of off-road equipment that would be less energy-efficient than at comparable construction sites in the region or state.

Reclamation of the Project would commence at the end of the proposed 30-year Project life (40 years if a 10-year extension is requested and approved), or at the expiration of any subsequent extensions of the

Project approvals. Reclamation activities would likely include dismantling and removal of all structures (fencing, racks, PV panels, system wiring, inverters, gen-tie power line, substation and switch station) constructed on the Seville 4 Project site. Once the structures are removed the land would be prepared (via grading, etc.) for its subsequent use. Reclamation activities such as these described would likely consume fuel similar to those occurring during construction.

Therefore, it is expected that off-road vehicle fuel consumption associated with the proposed Project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

As previously described, the proposed Project would not result in the net consumption of electricity or natural gas because it is an energy generating facility. 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 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. Because the proposed Project is anticipated to generate approximately 20 MWs for delivery to IID for sale to California customers, the proposed Project would not cause a substantial increase in demand for electricity would result in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure. This is a **less than significant** impact.

Mitigation Measures

None required.

Significance After Mitigation

Not Applicable.

7.1.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The geographic extent of the cumulative setting for energy consumption consists of Imperial County and the IID energy service territory. The IID energy service territory covers 6,471 square miles, including all of Imperial County along with parts of Riverside and San Diego counties.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

Contribution to Cumulative Energy Usage

Impact 7.1.2 The proposed Project, combined with other large-scale proposed, approved and reasonably foreseeable renewable energy projects, would not develop land uses and patterns that cause wasteful, inefficient, and unnecessary consumption of energy or that would have excessive energy requirements for daily operation. Therefore, impacts to energy usage are **less than cumulatively considerable**.

Quantifying and/or analyzing energy consumption by cumulative projects in the area would be speculative in nature, as the proposed land use types, intensities, and sizes of projects are unknown at this time. However, each cumulative project would require separate discretionary approval and CEQA assessment, which would address potential energy consumption impacts and identify necessary mitigation measures, where appropriate.

As noted in Impact 7.1.1, the proposed Project would not result in significant energy consumption impacts and would not be considered inefficient, wasteful, or unnecessary with regard to energy. Thus, the proposed Project's contribution to cumulative energy usage would be less than cumulatively

considerable. Likewise, cumulative impacts to energy use are less than cumulatively considerable as the proposed Project would generate 20 MW of renewable energy.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

7.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. In addition, Section 15093(a) of the CEQA Guidelines requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits of a proposed Project against its unavoidable environmental risks when determining whether to approve the project. The County of Imperial can approve a project with unavoidable adverse impacts if it adopts a "Statement of Overriding Considerations" setting forth the specific reasons for its decision. Based on the analysis provided in Sections 4.1 through 4.13, the proposed Seville 4 Solar project would not result in any significant and unavoidable adverse impacts.

7.3 GROWTH-INDUCING IMPACTS

A. INTRODUCTION

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

> *"…the way in which a proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth… It is not assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment."*

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

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

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

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

B. COMPONENTS OF GROWTH

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

C. PROJECT-SPECIFIC GROWTH-INDUCING IMPACTS

Growth Inducement Potential

As described in Chapter 2.0, Project Description, the Seville 4 Solar Project proposes to build, operate, and maintain a 20 MW/AC renewable energy facility. The Fixed-Frame Configuration would occupy 146 acres including 128 acres of panels and an 18-acre retention basin in the southeast portion of the Project site (refer to Figure 2.0-5A in Chapter 2.0). The HSAT Configuration would occupy 174 acres including 156 acres of panels and six retention basins totaling 18-acres (refer to Figure 2.0-5B in Chapter 2.0). The entire Project including an additional 7 acres associated with the Gen-Tie, Seville 4 Substation, IID Switch Station, and access road extension would bring total acreage to 153 acres for the Fixed-Frame Configuration and 181 acres for the HSAT Configuration.

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

- One PV energy project on a portion of the 572.10 acres comprising Lot 8 of Tract Map 00988, Section 25, T12S, R9E.
- Extending the existing access road from State Route (SR) 78 and construction of internal access roads in Lot 8;
- A new electrical substation (Seville 4 Substation) and IID Switching Station on Lot D;
- A 34.5- kV Gen-Tie Line

[Note: 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.]

As described in Section 4.2, Land Use, the proposed Project site is located in unincorporated Imperial County, and is subject to the Imperial County General Plan and Land Use Ordinance. The site encompasses seven existing legal property parcels (refer to Table 2.0-1 in Chapter 2.0) with a General Plan designation of Agriculture and A-2 - General Agriculture.

The Seville 4 Solar Project requires a CUP from Imperial County to construct and operate a solar generation facility on the proposed Project site. In addition, the Project requires one General Plan Amendment (GPA 17-0002) to add the Renewable Energy "RE" Overlay Zone designation to the existing Agriculture land use designation and one Zone Change (ZC 17-0001) to add the "RE" Renewable Energy Overlay Zone to the existing "A-2" General Agriculture zone.

Approval of the CUP, GPA and ZC by the Imperial County Board of Supervisors would allow the Project to attain consistency with the General Plan and Land Use Ordinance. By its nature as a solar generation

facility, the Project would not directly induce growth. Instead, the Project would provide renewable energy to meet existing and future electricity demands of the region and provide a new source of renewable energy to assist the State of California in achieving the Renewable Portfolio Standard.

Growth Effects of the Project

Existing and Proposed Land Uses

Criterion "e" in Section 4.9, Agricultural Resources section of this Draft EIR (Section 4.9) inquires whether the project would "Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use." The Project would conditionally allow a solar generation facility on lands designated for agriculture on the Imperial County General Plan Land Use Map. Although implementation of the proposed Project would result in the temporary conversion of agricultural land, at the end of the useful life of the Project, the Seville 4 Solar project would be removed and the Project site would be reclaimed to approximate the existing low gradient desert or idle farmland.

Infrastructure

The project does not include any O&M buildings and thus would not require the development and extension of infrastructure facilities located in and/or adjoining the Project site. Likewise, the Project is not expected to have an impact on infrastructure availability to adjacent parcels. If temporary power is needed during construction, electricity could be obtained from the existing IID network of 12.5 kV distribution lines on the Property. No off-site extensions are proposed.

As a general rule, extension of utilities or increased capacity of infrastructure has the potential to result in growth inducement. Any such improvements not only accommodate a project for which they are built but also for any other projects in the surrounding area that would be proposed or become feasible as a result of the availability of new infrastructure.

However, the proposed Project site is located in a rural and remote area of west-central Imperial County with limited infrastructure. The extension of IID electrical lines, if needed, would be limited to serving the proposed Project and are not considered growth inducing. Thus, implementation of the proposed Project would not contribute to growth in this area of the County.

Housing

The Regional Housing Needs Allocation has determined that the unincorporated area of the county will need 13,427 housing units for the period 2006–2014 (PMC 2013, p. 3). No housing is proposed as part of the Seville 4 Solar project nor is the Project anticipated to induce growth in other regions.

Roadways

The proposed Project includes extending the existing private access road that extends south off of SR 78 as well as an internal road network to accommodate vehicular access throughout the Project site. No off-site improvements to area roadways would be necessary to accommodate the proposed Project.

D. Secondary Effects of Growth

The Seville 4 Solar Project would not result in the introduction of people and activities to an area of low gradient desert and approximately 60 acres that were previously active farmland. Secondary effects of the proposed Project would include the creation of increased traffic, noise, and air emissions during construction. However, during operation and maintenance of the Project, traffic, noise and air emissions would not increase substantially over existing levels currently experienced at the site. No long-term increase in traffic, noise or air emissions would occur as a result of the proposed Project.

7.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

A. INTRODUCTION

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

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

Buildout of the proposed Project area would result in the temporary conversion of approximately 60 acres formerly used for agricultural purposes to a solar generation facility.

Development of the Project site would irretrievably commit building materials and energy to the construction and maintenance of the Seville 4 Solar project including the Gen-Tie Line, Seville 4 Substation and IID Switching Station. Renewable, nonrenewable, and limited resources that would likely be consumed as part of the development of the proposed Project would include, but are not limited to, oil, gasoline, lumber, sand and gravel, asphalt, water, steel, and similar materials. Energy would also be irreversibly consumed, both as part of the construction and during operation of the proposed Project.

7.5 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

The Project's impacts on biological resources and cultural resources are evaluated in Section 4.12, Biological Resources, and Section 4.7, Cultural Resources, of this DEIR, respectively. Both sections identify mitigation measures to reduce impacts to these resources. Upon implementation these of these measures, impacts to biological and cultural resources will be less than significant.

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

The Project would result in short-term air quality impacts as a result of construction. However, the Seville 4 Solar Project would expand the renewable energy sector in Imperial County and reduce the emission of GHGs from the generation of electricity. In doing so, the Project would assist the State of California in achieving the RPS. Development of the site may result in disadvantages to long-term preservation goals for agricultural resources. The 60 acres of idle farmland on the Project site has not been farmed in recent years and is reverting to open desert. At the end of the useful life of the Project, the solar generation facilities (PV panels, inverters, etc.) would be removed and the Project site would be reclaimed to approximate the existing low gradient desert or idle farmland. Therefore, the proposed Project would result in less than significant impacts to long-term environmental goals.

3) The project has possible environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The Project's potential cumulative impacts are summarized in Chapter 5.0 of this DEIR. Sections 4.1 through 4.13 evaluate cumulative impacts related to each resource and technical discussion area and identify mitigation measures addressing each cumulatively considerable impact, if necessary. Upon implementation of these measures, cumulative impacts will be less than considerable.

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

Potential adverse impacts on humans are discussed and evaluated in Section 4.4, Air Quality, Section 4.10, Hazards and Human Health, Section 4.8, Noise, and Section 4.5, Climate Change and Greenhouse Gases. As appropriate, each section identifies mitigation measures to reduce significant impacts associated with these resource areas. In addition, the proposed Project would remain subject to applicable local, state, and federal regulations intended to avoid adverse effects on humans. The Seville 4 Solar project would comply with all required regulatory/legal requirements, and project-specific conditions of approval, and would therefore result in less than significant impacts on humans.