

4 Analysis of Long-Term Effects

4.1 Growth-Inducing Impacts

In accordance with Section 15126.2(d) of CEQA Guidelines, an EIR must:

“discuss the ways in which the 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 ... Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

Projects promoting direct growth will impose burdens on a community by directly inducing an increase in population or resulting in the construction of additional developments in the same area. For example, projects involving the expansion, modifications, or additions to infrastructure, such as sewer, water, and roads, could have the potential to directly promote growth by removing existing physical barriers or allowing for additional development through capacity increases. New roadways leading into a previously undeveloped area directly promote growth by removing previously existing physical barriers to development and a new wastewater treatment plant would allow for further development within a community by increasing infrastructure capacity. Because these types of infrastructure projects directly serve related projects and result in an overall impact to the local community, associated impacts cannot be considered isolated. Indirect growth typically includes substantial new permanent employment opportunities and can result from these aforementioned modifications.

The proposed project is located within the unincorporated area of Imperial County and it does not involve the development of permanent residences that would directly result in population growth in the area. The unemployment rate in Imperial County, as of September 2019 (not seasonally adjusted), was 20.7 percent (State of California Employment Development Department 2019). The applicant expects to utilize construction workers from the local and regional area, a workforce similar to that involved in the development of other utility-scale solar facilities. Based on the unemployment rate, and the availability of the local workforce, construction of the proposed project would not have a growth-inducing effect related to workers moving into the area and increasing the demand for housing and services.

Once construction is completed, the facility would be remotely operated, controlled and monitored and with no requirement for daily on-site employees. Security personnel may conduct unscheduled security rounds and would be dispatched to the project site in response to a fence breach or other alarm. It is anticipated that maintenance of the facilities would require minimal site presence to perform periodic visual inspections and minor repairs. On intermittent occasions, the presence of additional workers may be required for repairs or replacement of equipment and panel cleaning; however, because of the nature of the facilities, such actions would likely occur infrequently. Overall, minimal maintenance requirements are anticipated. The proposed project would not result in substantial population growth, as the number of employees required to operate and maintain the facility is minimal.

While the proposed project would contribute to energy supply, which indirectly supports population growth, the proposed project is a response to the state's need for renewable energy to meet its Renewable Portfolio Standard, and while it would increase the availability of renewable energy, it would also replace existing sources of non-renewable energy. Unlike a gas-fired power plant, the proposed project is not being developed as a source of base-load power in response to growth in demand for electricity. The power generated would be added to the state's electricity grid with the intent that it would displace fossil fueled power plants and their associated environmental impacts, consistent with the findings and declarations in SB 2 that a benefit of the Renewable Portfolio Standard is displacing fossil fuel consumption within the state. The project is being proposed in response to state policy and legislation promoting development of renewable energy.

The proposed project would supply energy to accommodate and support existing demand and projected growth, but the energy provided by the project would not foster any new growth because (1) the additional energy would be used to ease the burdens of meeting existing statewide energy demands within and beyond the area of the project site; (2) the energy would be used to support already-projected growth; or, (3) the factors affecting growth are so diverse that any potential connection between additional energy production and growth would necessarily be too speculative and uncertain to merit further analysis.

Under CEQA, an EIR should consider potentially significant energy implications of a project (CEQA Guidelines Appendix F(II); PRC Section 21100(b)(3)). However, the relationship between the proposed project's increased electrical capacity and the growth-inducing impacts outside the surrounding area is too speculative and uncertain to warrant further analysis. When a project's growth-inducing impacts are speculative, the lead agency should consider 14 CCR §15145, which provides that, if an impact is too speculative for evaluation, the agency should note this conclusion and terminate discussion of the impact. As the court explained in *Napa Citizens for Honest Gov't v. Napa County Board of Supervisors*, 91 Cal. App.4th 342, 368: "Nothing in the Guidelines, or in the cases, requires more than a general analysis of projected growth" *Napa Citizens*, 91 CA4th at 369. The problem of uncertainty of the proposed project's growth-inducing effects cannot be resolved by collection of further data because of the diversity of factors affecting growth.

While this document has considered that the proposed project, as an energy project, might foster regional growth, the particular growth that could be attributed to the proposed project is unpredictable, given the multitude of variables at play, including uncertainty about the nature, extent, and location of growth and the effect of other contributors to growth besides the proposed project. No accurate and reliable data is available that could be used to predict the amount of growth outside the area that would result from the proposed project's contribution of additional electrical capacity. The County of Imperial has not adopted a threshold of significance for determining when an energy project is growth-inducing. Further evaluation of this impact is not required under CEQA.

Additionally, the project would not involve the development of any new roadways, new water systems, or sewer; and thus, the project would not further facilitate additional development into outlying areas. For these reasons, the proposed project would not be growth-inducing.

4.2 Significant Irreversible Environmental Changes

In accordance with CEQA Guidelines Section 15126.2(c), an EIR must identify any significant irreversible environmental changes that would be caused by implementation of the proposed project being analyzed. Irreversible environmental changes may include current or future commitments to the use of non-renewable resources or secondary growth-inducing impacts that commit future generations to similar uses.

Energy resources needed for the construction of the proposed project would contribute to the incremental depletion of renewable and non-renewable resources. Resources, such as timber, used in building construction are generally considered renewable and would ultimately be replenished. Non-renewable resources, such as petrochemical construction materials, steel, copper, lead and other metals, gravel, concrete, and other materials, are typically considered finite and would not be replenished over the lifetime of the project. Thus, the project would irretrievably commit resources over the anticipated 25-year life of the project.

At the end of the project's operation term, the applicant may determine that the project should be decommissioned and deconstructed. Should the project be decommissioned, the project applicant is required to restore land to its pre-project state. Consequently, some of the resources on the site could potentially be retrieved after the site has been decommissioned. Concrete footings, foundations, and pads would be removed and recycled at an off-site location. All remaining components would be removed, and all disturbed areas would be reclaimed and recontoured. The applicant anticipates using the best available recycling measures at the time of decommissioning.

Implementation and operation of the proposed project would promote the use of renewable energy and contribute incrementally to the reduction in demand for fossil fuel use for electricity-generating purposes. Therefore, the incremental reduction in fossil fuels would be a positive effect of the commitment of nonrenewable resources. Additionally, the project is consistent with the state's definition of an "eligible renewable energy resource" in Section 399.12 of the California Public Utilities Code and the definition of "in-state renewable electricity generation facility" in Section 25741 of the California PRC.

4.3 Unavoidable Adverse Impacts

In accordance with CEQA Guidelines Section 15126(b), EIRs must include a discussion of significant environmental effects that cannot be avoided if the proposed project is implemented. The impact analysis, as detailed in Section 3 of this EIR, concludes that no unavoidable significant impacts were identified. Where significant impacts have been identified, mitigation measures are proposed, that when implemented, would reduce the impact level to less than significant.

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