CHAPTER 4.0
ERRATA

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4.1 INTRODUCTION

This Errata has been prepared in response to additional information that became available subsequent to publication of the Draft EIR for the Campo Verde Solar Project (proposed project) which was circulated for a 50-day public review period in compliance with Public Resources Code 21091 from May 15, 2012 through July 3, 2012.

The minor modifications to the text of the Draft EIR set forth in this chapter provide clarification that does not: 1) constitute significant new information; 2) change to the project or environmental setting; 3) result in any new significant environmental impacts; and, 4) change any of the impact conclusions of the Draft EIR. In addition, these minor revisions to the text, as described below, would not cause a substantial increase in the severity of any environmental impacts. Rather, these changes merely clarify portions of the text. Amended text is identified by page number. Clarifications to the Draft EIR text are shown with underline and text removed from the Draft EIR is shown with ~~strikethrough~~.

4.2 CHANGES AND EDITS TO THE DRAFT EIR

The following changes and edits represent revisions to information included in the Draft EIR based upon: (1) additional or revised information required to prepare a response to a specific comment; (2) updated information required due to the passage of time; and/or (3) typographical errors. Given the minor changes associated with the document, the information added to the EIR does not meet the requirements for recirculation pursuant to CEQA Guidelines § 150885.5.

A brief description of what the change or edit is provided as well as a reference to where the change or edit occurs in the document (page number, paragraph, sentence, table, etc). Changes to the portion of text are included in quotes (“”). In cases where changes or edits are made to a Figure, the revised graphic appears in the Errata.

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EXECUTIVE SUMMARY

Page ES-1, the last paragraph under subsection ES.1, Project Background has been revised as follows:

> "On February ~~7~~6, 2012, the Applicant submitted a Variance Application to the ICPDS. The Variance Application was submitted to address gen-tie structures that may exceed the A-2 and A-3 zoning height limitation of 120 feet. If approved, the Variance would permit a maximum height of the gen-tie ~~Line~~ structures of ~~145~~ 135 feet. The Applicant may need to amend its variance application to seek permission to build gen-tie structures up to 145 feet pending the outcome of discussions with the Imperial Irrigation District regarding canal crossings."

Page ES-5, Table ES-1, Impact 4.1.2 has been revised as follows:

> "**Impact 4.1.2** The proposed project would convert agricultural fields to a solar generation facility thereby replacing vegetation with man-made structures. The project would alter the overall character of the project site and substantially alter views from ~~several residences~~ two residences and a school. Therefore, this impact is considered **potentially significant**."

Page ES-69, Table ES-1, the paragraph following MM 4.12.10c has been revised as follows:

> "Implementation of **MM 4.12.~~11~~12**, below, would address impacts to FTHL as a result of invasive, exotic plant species."

CHAPTER 1.0, INTRODUCTION

Page 1.0-2, the fourth paragraph has been revised as follows:

> "On February ~~7~~6, 2012, the Applicant submitted a Variance Application to the ICPDS. The Variance Application was submitted to address gen-tie structures that may exceed the A-2 and A-3 zoning height limitation of 120 feet. If approved, the Variance would permit a maximum height of 135 feet for the gen-tie ~~Line~~ structures ~~of 145 feet~~. The Applicant may need to amend the Variance application to seek permission to build gen-tie structures up to 145 feet pending the outcome of discussions with the Imperial Irrigation District regarding canal crossings."

Page 1.0-7, discussion under the United States Army Corps of Engineers has been revised as follows:

> "The United States Army Corps of Engineers (ACOE) possesses jurisdiction over waters of the United States and jurisdictional wetlands pursuant to the federal Clean Water Act. The ACOE regulates the discharge of dredge/fill material into such waters, including ditches and drains that could be jurisdictional. The Applicant has submitted a jurisdictional determination report to the ACOE to determine the scope of potential jurisdictional waters and, if required by the ACOE, will obtain permit coverage for any impacts to federal jurisdictional waters. The Corps has issued the Applicant a Preliminary Jurisdictional Determination that the project will not result in any fill impacts to waters under the Corps' jurisdiction. As such, the Applicant does not require a permit from the Corps." ~~.~~

Page 1.0-8, the second and third paragraphs under the heading "BLM and California State Historic Preservation Office (SHPO)" has been revised as follows:

> ~~"BLM is in the process of initiating formal Section 106 process because t~~The Class III cultural resources study for the gen-tie ~~is in the process of being~~ has been finalized and the BLM has initiated the Section 106 process.
>
> The BLM ~~will consult~~ has also initiated consultation with the SHPO and Advisory Council on Historic Preservation (ACHP) to evaluate the effect of the project on resources listed or eligible for listing under the National Register of Historic Places and California Register of History Places. Depending upon the results of this process, the agencies may enter into a Programmatic Agreement (PA), a Memorandum of Agreement (MOA) or other agreement to address and resolve any potential adverse effects."

Page 1.0-10, the last sentence under the paragraph under the heading "Imperial County Air Pollution Control District" has been revised as follows:

> "The project will obtain a Dust Control ~~Permit~~ Plan to comply with Rule 801 of Imperial County's Rules and Regulations for Construction and Earthmoving Activities.

Page 1.0-10, a new last sentence has been added to the paragraph under the heading "Imperial Irrigation District" as follows:

> "The Imperial Irrigation District (IID) has infrastructure on and surrounding the project site including drains, canals and overhead infrastructure. IID will review the project and will use the Final EIR in its approval of encroachment permits for crossings of IID canals, permits for construction water and power, and contracts for project water use and power during operation. IID may also review and approve agreements to transfer or quitclaim easements and/or fee parcels, for drainage, restrict surface access, and to abandon delivery gates and service pipes. The Applicant may also enter a Fallowing Agreement with IID under the District's Temporary Land Conversion Fallowing Policy."

Page 1.0-12, second sentence in the first paragraph under "1.7 Public Participation Opportunities/Comments and Coordination."

> "The Applicant held a BLM pre-application meeting on October 12, 2011 from 10:00 a.m. to 11:30 ~~p.m.~~ a.m. in the BLM El Centro Field Office."

Page 1.0-17, first bullet, the text has been revised as follows:

> "● Displacement of farmworker employment (A Fiscal Impact Analysis ~~is being~~ has been prepared for the proposed project separately from the EIR and was completed in March, 2012)."

Page 1.0-23, fourth bullet under comments from Carolyn Allen, the text has been revised as follows:

> **"●** Electrified fencing, no employees on site (No electrified fencing is proposed as part of the project. Four to ~~10~~ 12 workers would be on-site during operations)."

Page 1.0-34, last sentence of the first paragraph under the heading "Fire Protection" has been revised as follows:

> "Inverters ~~and transformers would~~ will be located ~~with~~in a pre-fabricated ~~enclosed structures~~ protective electrical equipment enclosure or shelter with adjacent transformer."

Page 1.0-36, last paragraph under the discussion of "Wastewater Treatment," additional text has been added as follows:

> "The project would include an on-site O&M building with a septic system, which requires a permit from the Imperial County Public Health Department. The Applicant is also seeking permission for a holding tank for domestic sewage from the construction trailers. During construction, portable toilets and a septic tank for temporary construction offices will be used to provide sanitary facilities. Thus, a less than significant impact is identified for this issue and it is not discussed further in the EIR."

Page 1.0-37 last paragraph and page 1.0-38 first paragraph, text has been revised as follows:

> "IID serves as the regional water supplier to the Imperial Unit which encompasses agricultural areas as well as the seven incorporated cities of Brawley, Calexico, Calipatria, El Centro, Holtville, Imperial and Westmorland. IID imports raw Colorado River water and delivers it untreated to agricultural, municipal, and industrial water users within its Service Area which includes the project site. IID has an annual apportionment of 3.1 million acre-feet of Colorado River water per year. Due to the dependability of IID's water rights, Colorado River flows, and storage facilities for Colorado River water, it is unlikely that the water supply of IID would ever be affected, even in dry years or under drought conditions. The Applicant may enter into a Fallowing Agreement with IID under IID's Temporary Land Conversion Fallowing Policy. The Fallowing Agreement which would assist IID in meeting its interim water supply policy obligations without fallowing active agricultural lands. Industrial water would be supplied to the project under an industrial service water agreement with the IID."

CHAPTER 2.0, PROJECT DESCRIPTION

Page2.0-2, the first paragraph has been revised as follows:

> "On February ~~7~~6, 2012, the Applicant submitted a Variance Application to the ICPDS. The Variance Application was submitted to address gen-tie structures that may exceed the A-2 and A-3 zoning height limitation of 120 feet. If approved, the Variance would permit a maximum height of the gen-tie ~~Line~~ structures of ~~145~~ 135 feet. The Applicant may need to amend its variance application to seek permission to build gen-tie structures up to 145 feet pending the outcome of discussions with the Imperial Irrigation District regarding canal crossings."

Page 2.0-3, third paragraph, fourth sentence, the text has been revised as follows:

> "The solar generation facility site includes a series of soil and concrete lined irrigation canals and ditches operated by the Imperial Irrigation District (IID) as well as private ditches."

Page 2.0-3, third paragraph, third sentence, the text has been revised as follows:

> "The 1,852 acres represents agricultural fields within the solar generation facility site minus other land (i.e., the acreage of ~~public~~ roads, IID canals, ditches and maintenance roads currently on the site)."

Page 2.0-8, Table 2.0-1, has been revised as follows:

"**TABLE 2.0-1**
PRIVATELY OWNED PARCELS – SOLAR GENERATION FACILITY SITE

Assessor's Parcel Number	Acreage	Zoning
051-360-018-000	1.80	~~A-3~~ A-2-R"

Page 2.0-18, second sentence in the first paragraph under the "Power Conversion Substation," has been revised as follows:

> "These DC cables then ~~fed~~ feed to a Power Conversion Station (PCS), comprised of DC to alternating current (AC) inverters and a medium voltage transformer."

Page 2.0-20, third sentence in the paragraph under the heading "Operations and Maintenance Building"

> "The maximum building height will be approximately 18 feet and ~~up to~~ approximately 3,000 square feet in area."

Page 2.0-22, last sentence of the second paragraph, under the heading "Fire System" has been revised as follows:

> "A Fire Management Plan will be prepared and the final site plan would be designed in accordance with Fire Department requirements for access so as not to interfere with emergency service providers' ability to access to the site. Access to all nearby properties ~~would remain in place~~ will be maintained."

Page 2.0-26, the paragraph under "Air Quality & Dust Suppressants" has been revised as follows:

> "The project will adhere to the applicable rules of the Imperial County Air Pollution Control District (ICAPCD) and will develop and implement a plan to minimize fugitive dust emissions. During construction, roads and work areas will be watered and/or dust palliatives will be applied as need to suppress dust. When earth moving activities are completed in an area, all exposed soil would be coated with a permeable dust suppressant as required. The roadways within and around the solar field will be compacted native soil and would also be treated with a dust suppressant as required."

Page 2.0-28, last sentence in the first paragraph, has been revised as follows:

> "Such trips are anticipated to result in a daily maximum of 40 or 50 trips (during washing events which are not anticipated to occur) and more commonly 20 trips or less during routine operation of the project."

Page 2.0-28, second sentence of the first paragraph under the heading "Stormwater," the text has been revised as follows:

> "Each developed ~~parcel~~ area will include a retention basin to hold stormwater flows from most storm events."

Page 2.0-28, the first paragraph under the heading "Noise" has been revised as follows:

> "During operation, the primary sources of noise would be the substation transformer, as well as the inverters and transformers distributed throughout the solar generation facility site."

Page 2.0-30, second sentence in the first paragraph under Section 2.1.5A has been eliminated as follows:

> "The proposed approximately 1.4 mile gen-tie would exit the southwest corner of the solar generation facility site (privately owned land), cross the Westside Main Canal, and enter BLM land (refer to **Figure 2.0-4**). ~~The private parcel crossed by the gen-tie is agricultural land.~~ The elevations on this parcel range from 24 to 25 feet below mean sea level. This segment of the gen-tie would extend south from the solar generation facility site and cross over the Westside Main Canal. The Applicant controls the portion of the solar generation facility site impacted by the gen-tie through a purchase agreement. The crossing of the Westside Main Canal would require approval from IID. Additional easements may be obtained from adjacent private landowners."

Page 2.0-30, Table 2.0-2, the following revisions have been made:

TABLE 2.0-2
PRIVATELY OWNED PARCELS – GEN-TIE

Assessor's Parcel Number	~~Acreage~~ Description	Nearest Cross Street/Intersection
APN 051-350-010	Fallow farmland between solar site and BLM lands	Liebert and Mandrapa Roads
APN 051-350-011	Fallow farmland between solar site and BLM lands	Liebert and Mandrapa Roads
APN 051-350-014	Part of solar project site	Liebert and Mandrapa Roads
~~APN 051-350-012~~	~~Temporary construction or aerial easement~~	~~Liebert and Mandrapa Roads~~
APN 051-350-008	Temporary construction easement and/or aerial easement	Liebert and Mandrapa Roads

Source: Imperial County Zoning Maps.

Figure 2.0-13 has been revised to reflect the affected parcels included in Table 2.0-2. The revised Figure appears on page 4.0-8 of this Errata.

Page 2.0-37, first sentence of second paragraph has been revised as follows to indicate that both types of poles may be used:

> "The project would use self-supporting single concrete poles or self-supporting single steel poles made of self-weathering or galvanized steel to better blend into the surrounding environment."

Page 2.0-37, paragraph below the heading "Private Land", second sentence, the text has been revised as follows:

> "Access to the portions of the gen-tie line on BLM-managed land ~~and on private land~~ would be provided during both construction and operation by using existing unpaved roads on the parcels being crossed, if possible."

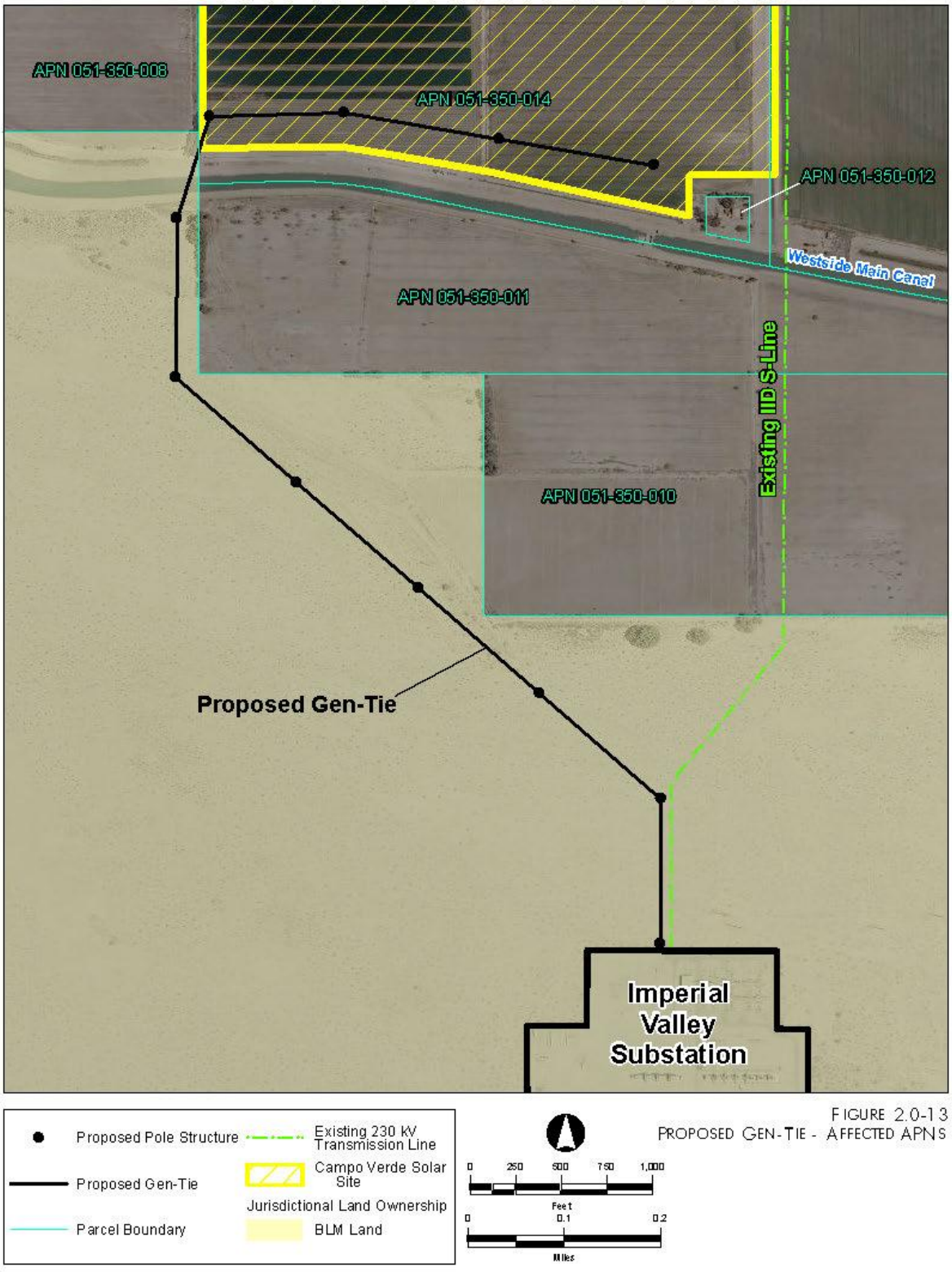


FIGURE 2.0-13
PROPOSED GEN-TIE - AFFECTED APNS

Page 2.0-37, first sentence under the heading "Disturbance Area," the text has been revised to correct the impact area for the gen-tie footings as follows:

> "A 100-foot by ~~150~~ 250-foot (~~15,000~~ 25,000 square foot) area around each structure on BLM land would be cleared of obstructions to ensure safety for construction."

Page 2.0-39, first sentence under the heading "Vegetation Clearing," the text has been revised to correct the impact area for the gen-tie footings as follows:

> "A temporary workspace approximately 100-foot by ~~150~~ 250-foot on BLM lands would be cleared of any obstructions (such as large rocks and large vegetation) that could create safety risks for construction."

Page 2.0-43, the third sentence under the heading "Site Excavation" has been revised as follows to reflect this change:

> "A ~~site grading permit~~ construction permit is required for the earthmoving activities associated with the project."

Page 2.0-46, first sentence in the first paragraph at the top of the page has been eliminated as follows:

> "~~ROW easements located on private lands will include adaptive provisions for the implementation of the Weed Control Plan.~~ Prior to implementation, the Applicant will work with the BLM and any other landowners to obtain authorization of the weed control treatment that is required."

Page 2.0-46, first sentence under the heading "Decommissioning and Restoration of Gen-Tie" has been revised as follows:

> "This section outlines the measures that will be taken at such time in the future when the BLM ROW has expired, is not renewed, and the project is decommissioned. At this time, these actions are anticipated to include:"

Pages 2.0-49 through 2.0-57 Table 2.0-5 on pages 2.0-49 through 2.0-57 has been revised to correct inconsistencies in table formatting and header sentence formatting as follows:

TABLE 2.0-5
APPLICANT PROPOSED MEASURES INCLUDED AS PART OF PROPOSED PROJECT ON BLM-MANAGED LAND

BIOLOGICAL RESOURCES
Vegetation
Adverse effects on vegetation disturbance during construction would be minimized as follows:
• Prohibit vehicle operation off BLM designated routes by construction workers, including construction work and employee access, except where access is authorized by the BLM in the ROW grant. • Existing access roads would be used to the maximum extent allowable and development of overland travel routes would be minimized. • Vegetation disturbance including its removal would be minimized wherever possible. Access road construction activities shall implement drive and crush to minimize impacts to the roots of desert shrubs rather than grading, where possible. To the extent possible, grading and grubbing of vegetative cover will be avoided on all tower pad locations and all vehicular traffic will travel only on access routes authorized in the ROW grant.
The following prescriptions would prevent the spread of invasive weeds into previously un-infested

TABLE 2.0-5
APPLICANT PROPOSED MEASURES INCLUDED AS PART OF PROPOSED PROJECT ON BLM-MANAGED LAND

areas in the designated construction right-of-way:
• In advance of construction activities, all construction equipment arriving on site would have the tires, axles, frame, running boards, under-carriages, and any equipment parts designed to hold soil or rock shall be washed and cleaned at a documented location to prevent transport of invasive weed species transport into project areas. • A qualified weed specialist, vegetation ecologist, or desert botanist would survey the tower pad locations, stringing and tensioning sites, existing access roads that require improvements, and construction material staging areas prior to construction to identify any infestations of invasive plant. • Before beginning construction activities, these infestations would be controlled through acceptable mechanical (e.g., topsoil excavation and removal/disposal), hand pulling, or herbicide applications. • If direct control methods or removal of invasive weed infestations in construction disturbance areas is not feasible, the invasive plants may be cut and disposed of or otherwise destroyed in a manner that the BLM specifies. • The lead environmental construction monitor would instruct construction personnel about invasive weed identification and the legal requirement for controlling and preventing the spread of invasive weed infestations.
Wildlife
Compensation for habitat modifications per coordination with responsible resource agencies.
• Project habitat compensation for both streambed alteration agreements and special-status species may be satisfied by the Applicant independently, or by depositing compensation funds into the Renewable Energy Action Team (REAT) Account established with the National Fish and Wildlife Foundation (NFWF).
Construction activities and vehicle operation would be conducted to minimize potential impacts or disturbance of wildlife.
• Speed limits along the right-of-way and access roads will be limited to 15 mph. In addition, construction and maintenance employees would exercise caution when traveling to and from the project site on designated routes on BLM lands to reduce the potential for wildlife mortality. • Prohibit vehicle operation off BLM designated routes by all project personnel except where authorized by the BLM. • Equipment stockpiles and vehicle parking will occur only on designated wire tensioning (pull) sites or on private lands. • On BLM lands, the minimum number and types of vehicles and equipment would be limited to those necessary for project construction. • Implement the "List of Standard Mitigation Meausres for Flat-tailed Horned Lizard", as outlined in the Flat-tailed horned lizard Rangewide Management Strategy (2003) • Develop and implement a Bird and Bat Conservation Strategy (BBCS) - formerly known as an Avian and Bat Protection Plan (ABPP).
Design would minimize electrocution and collision potential for raptors.

TABLE 2.0-5
APPLICANT PROPOSED MEASURES INCLUDED AS PART OF PROPOSED PROJECT ON BLM-MANAGED LAND

Wildlife(Continued)
• Design would space conductors and ground wires sufficiently apart so that raptors cannot contact two conductors or one conductor and a ground wire to cause electrocution as outlined in Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (APLIC 2006).
Conduct pre-construction surveys prior to project initiation: • Preconstruction clearance surveys will be conducted by qualified biologists for sensitive wildlife including, but not limited to, burrowing owl, kit fox, and American badger. FTHL surveys will be conducted pursuant to the methods outlined in the FTHL Rangewide Management Strategy, 2003. • For the protection of migratory birds during the breeding season (January 15 through August 15), prior to any project related activities, an approved biologist with a minimum of three years of experience conducting migratory bird surveys and implementing the requirements of the Migratory Bird Treaty Act (MBTA) shall conduct a preconstruction migratory bird nesting survey in the project area. If any active nest is located, the nest area shall be flagged or otherwise marked for avoidance, and a 200-foot buffer zone shall be flagged, a 300-foot buffer shall be established for nests of federally listed birds and a 500-foot buffer will be established for all nesting raptor species. No work activity shall occur within these avoidance buffer areas until an approved biologist determines that the fledglings are independent of the nest or has verified nest failure. If is the biologist or a construction worker discovers an occupied burrowing owl burrow, the construction contractor will halt construction activities and notify the California Department of Fish and Game, in Ontario at (909) 484-0167, MCRodriguez@dfg.ca.gov and the BLM, El Centro, Resources Section, (760) 337-4400 immediately. Construction would be avoided during the passerine and raptor nesting season (e.g., April 1 to August 31), if possible.
Special Status Species
Survey and avoid and/or salvage special-status plant species in areas to be disturbed by project activities.
• Comprehensive focused surveys conducted during the appropriate season and designed with appropriate agency consultation would be conducted prior to any project-related ground disturbing activities to identify any special-status plant populations on proposed tower pads, pulling and splicing sites, staging areas, or any other construction sites that would be temporarily or permanently disturbed. • If special-status plant(s) are identified during the pre-construction surveys, plant locations would be delineated on aerial photography and incorporated into the construction plan as areas to be avoided. In addition, identified populations would be marked in the field with stakes and flagging. Realignments would be implemented to avoid those populations within the designated tower pad and access routes, unless the BLM approves making no realignment. • Where avoidance is infeasible, a Plant Salvage Plan would be developed by the Applicant and submitted for approval from the appropriate responsible agencies.
Implement conservation measures to decrease the likelihood of take of special status wildlife species and impacts to critical habitat.

TABLE 2.0-5
APPLICANT PROPOSED MEASURES INCLUDED AS PART OF PROPOSED PROJECT ON BLM-MANAGED LAND

Special Status Species (Continued)

- Flag or otherwise mark the outer boundaries of the project construction areas where necessary to define the limit of work activities.
- Minimize habitat degradation by limiting travel to existing roads and surface disturbance to previously disturbed areas.
- Implement WEAP training for all project personnel.
- Employ BLM-approved biologists to monitor construction activities within the right-of-way. These monitors will have the authority to halt construction activities when wildlife would be adversely affected. The biological monitors will alert take appropriate actions to ensure impacts to wildlife are avoided within the right-of-way. Pulling, staging, and equipment storage sites where construction activities would be intense and extended overtime, may be temporarily fenced to keep wildlife from entering these zones.
- Conduct passive exclusion according to CDFG guidelines if kit fox and/or American badger burrows are located where ground disturbing activities are authorized.

Waters of the U.S.

The following actions would be implemented to minimize impacts to waters of the U.S.:

- A survey of "waters of the U.S." was completed and submitted to the ACOE. In addition, a delineation and drainage report was submitted to the CDFG and an investigation of the project site by the CDFG was conducted to determine if the project may impact fish or wildlife resources. On BLM lands, an overhead crossing of the Westside Main Canal by the gen-tie is expected, although no construction activities are expected to result in the placement of fill material or divert, obstruct, or change the natural flow of the bed or channel.
- The Project would have a design consistent with ACOE and CDFG guidance to minimize impacts to floodplains and jurisdictional waters of the U.S., and construction of the transmission line would incorporate best management practices (BMPs), include erosion control measures, and comply with all ACOE, CDFG, and State water quality permit terms and conditions to protect water quality in the Project area.
- Placement of towers in washes will be avoided to the extent possible through project engineering design. Washes will be flagged prior to ground-disturbing activities by a qualified resource specialist. All construction activities would take place outside the flagged areas to ensure minimum habitat disturbance.
- Any direct or indirect impacts to Waters of the U.S. and streambeds would be mitigated by restoring the impact area to a state that encourages native vegetation to reestablish to its pre-construction condition and reduces the effects of erosion on the drainage system.
- Additional compensatory, restoration, or avoidance mitigation measures identified by regulatory agencies (e.g., ACOE, CDFG) as part of the permitting process would be implemented.

CULTURAL RESOURCES

Preparation of a Treatment Plan for avoiding and mitigating unavoidable direct adverse effects on resources eligible for listing in the National Register of Historic Places would be prepared and implemented.

TABLE 2.0-5
APPLICANT PROPOSED MEASURES INCLUDED AS PART OF PROPOSED PROJECT ON BLM-MANAGED LAND

Special Status Species (Continued)
• Treatment of cultural resources will follow the procedures established by the ACHP for compliance with Section 106 of the National Historic Preservation Act (NHPA) and also for compliance with CEQA. • A Class III intensive pedestrian inventory will be undertaken for all portions of the Project that have not been previously surveyed or have been identified by the BLM as requiring an inventory to identify properties that are eligible for listing in the National Register of Historic Places (NRHP). • A Treatment Plan will be prepared to identify methods of avoiding or mitigating effects. A cultural resources evaluation report will be submitted to the BLM for review, and for consultation purposes, as part of the development of the Treatment Plan. • Adverse effects to cultural resources will be avoided to the extent possible. Final design of the Project (e.g., tower placement and work areas) will include measures to avoid NRHP eligible sites. The final list of sites to be avoided during construction will be specified in the Treatment Plan. The Treatment Plan will also include detailed measures to ensure this avoidance is implemented during construction. • An Unanticipated Discovery Plan would be developed to outline procedures to be undertaken if unexpected resources are encountered during the course of construction. • A cultural resources monitor will be available to respond to the BLM within 48 hours to cultural resource issues that arise during construction. • Consultation will be conducted at the direction of BLM with concerned Native American groups to determine if the archaeological sites have additional sensitivities (i.e., Traditional Cultural Properties [TCPs]).
AIR QUALITY
The following mitigation measures would be implemented during the construction of the Proposed Project to reduce the exhaust emissions of CO, NO_X, VOC, SO_X, and PM_{10}:
• Heavy duty off road diesel engines over 50 horsepower will meet Tier I ARB/EPA standards for off-road equipment and will be properly tuned and maintained to manufacturers' specifications to ensure minimum emissions under normal operations; • Construction vehicles will have 1996 and newer model engines; • Visible emissions from all heavy duty off road diesel equipment will not exceed 20 percent opacity for more than three minutes in any hour of operation; • A comprehensive inventory (i.e., make, model, year, emission rating) of all heavy-duty off-road equipment (50 horsepower or greater) that will be used an aggregate of 40 hours per week or more during the duration of the construction project will be submitted to the Imperial County Air Pollution Control District, if needed.
The following mitigation measures would be implemented for the Proposed Project to reduce fugitive dust emissions (including PM_{10}):
• Water or chemical dust suppressants approved by the BLM will be applied to unstabilized surfaces of disturbed areas and/or unpaved roadways in sufficient quantity and frequency to maintain a stabilized surface.

TABLE 2.0-5
APPLICANT PROPOSED MEASURES INCLUDED AS PART OF PROPOSED PROJECT ON BLM-MANAGED LAND

Air Quality (Continued)
• Water or water-based chemical additives will be used in such quantities to control dust on areas with extensive traffic including unpaved access roads. Water, organic polymers, lignin compounds, or conifer resin compounds will be used depending on availability, cost, and soil type. • Vehicle speeds on unpaved roadways will be restricted to 15 mph. • Vehicles hauling dirt will be covered with securely-fastened tarp or other means approved by the BLM.
WATER RESOURCES
A stormwater pollution prevention plan (SWPPP) would be prepared as required by the State General Construction Activity Storm Water Permit. The SWPPP will include:
• An outline of the areas of vegetative soil cover or native vegetation onsite that will remain undisturbed during the construction project. • An outline of all areas of soil disturbance including cut or fill areas which will be stabilized during the rainy season by temporary or permanent erosion control measures, such as seeding, mulch, or blankets, etc. • An outline of the areas of soil disturbance, cut, or fill which will be left exposed during any part of the rainy season, representing areas of potential soil erosion where sediment control BMPs are required to be used during construction. • A proposed schedule for the implementation of erosion control measures. • The SWPPP will include a description of the BMPs and control practices to be used for both temporary and permanent erosion control measures.
Surface waters, wells and springs adjacent to construction areas would be protected.
• Surface waters (canals), springs, and wells within 1,000 feet of construction activities will be identified. Construction activities will be limited in the following manner: (1) construction activities will not be carried out within 100 feet of these resources without using BMPs; (2) blasting will be prohibited within 500 feet of a well; and (3) only size limited blasting will be authorized within 1,000 feet of a well. If damage occurs to a well or spring, the affected area will be repaired by the contractor. • The use or storage of hazardous material near a canal, well, or spring will be prohibited. Additionally, special precautions will be implemented to prevent spills of hazardous materials, discharges of foreign materials, and sedimentation discharges near a canal, well or spring. • Dewatering activities for tower footings or other deep excavations will be planned to minimize the effect on wells and springs.

TABLE 2.0-5
APPLICANT PROPOSED MEASURES INCLUDED AS PART OF PROPOSED PROJECT ON BLM-MANAGED LAND

GEOLOGY AND SOILS
The project would be designed to prevent damage resulting from seismic activity in the project area.
• Measures will be taken to the extent possible to avoid sites for transmission towers that are located within known fault zones. • A geotechnical engineering investigation consistent with California geologic and engineering standards will be conducted for the Proposed Project by a licensed geotechnical engineer. • All practicable precautions will be taken to design and construction of transmission towers and new substations, substation facility improvements, and equipment to withstand the projected ground shaking in the area.
Construction, operation, and maintenance activities will be restricted when the soil is too wet to adequately support construction or maintenance equipment (i.e., when heavy equipment creates ruts in excess of 4 inches deep over a distance of 100 feet or more in wet or saturated soils). Where the soil is deemed too wet, one or more of the following measures will apply:
• Construction and maintenance vehicles will be rerouted around wet areas onto existing roads that do not cross sensitive resource areas. • If wet areas cannot be avoided, implement BMPs for use in these areas during construction and access road improvement, and during subsequent reclamation of these areas. BMPs may include use of wide-track or balloon-tire vehicles and equipment use of geotextile cushions, pre-fabricated equipment pads, and other materials to minimize damage to the substrate where determined necessary by resource specialists and in consultation with appropriate resource agencies. If BMPs cannot be successfully applied to wet or saturated soil areas, construction or routine maintenance activities would not be allowed in these areas until the Project environmental monitor(s) determine it is acceptable to proceed.
Areas of expansive soils would be mitigated to minimize damage from shrink/swell actions on equipment foundations.
• Prior to construction, soils will be evaluated by a geotechnical engineer to determine if they are expansive and if they may have potential effects on the proposed facilities. Where they represent a potential hazard, solutions recommended by the proposed project's geotechnical engineer, such as excavation and replacement of the expansive soils with compacted backfill, will require BLM approval. If imported backfill material is used, it will be certified to be from a non-agricultural area and to be free of invasive weeds and propagules (i.e., seeds and root/stem/rhizome fragments), and the soil material will be a match with the native soil in the project area.
Monitoring of the erosion control measures will continue until reclamation efforts are considered complete and successful. Measures to be implemented during the proposed project construction and reclamation are listed below. These measures will minimize the effects of grading, excavation, soil compaction, and other surface disturbances in all project areas. Schedules and specifications for these features would be part of the final construction plan.
• Confine all vehicular traffic associated with construction to areas designated in the construction, operation, and maintenance (COM) Plan. • Limit disturbance and removal of soils and vegetation to the minimum area necessary for access

TABLE 2.0-5
APPLICANT PROPOSED MEASURES INCLUDED AS PART OF PROPOSED PROJECT ON BLM-MANAGED LAND

and construction. • Where vegetation removal is necessary, use cutting/mowing methods instead of blading, wherever possible. Fire will not be used to remove vegetation. • Adhere to a construction methodology that mitigates impacts in sensitive areas during severe weather events. • Inform all construction personnel before they are allowed to work on the Proposed Project of the environmental concerns, pertinent laws and regulations, and elements of the erosion control plan. A multi-hour environmental training would be provided for project management, foremen, and construction personnel. • Minimize grading to the extent possible. When required, grading will be conducted away from washes and artificial waterways to reduce the potential of material entering watercourses. • Slope and berm graded material, where possible, to reduce surface water flows over unit area across the graded area. • Replace excavated materials in disturbed areas and minimize the time between excavation and backfilling. • Direct the dewatering of excavations onto stable surfaces to avoid soil erosion. • Use detention basins, certified weed-free straw bales/rolls, or silt fences, where appropriate. • Use drainage control structures, where necessary, to direct surface drainage away from disturbance areas and to minimize runoff and sediment deposition downslope from all disturbed areas. Control structures include culverts, ditches, water bars (berms and cross ditches), and sediment traps. • Implement other applicable BMPs to minimize erosion-related impacts during construction, to improve access roads, and to facilitate their subsequent reclamation.
VISUAL RESOURCES
The following mitigation measures will be implemented to minimize visual impacts:
• Non-specular materials will be used for conductor and structure materials to minimize reflections and glare. • After Project construction is complete, ground surfaces within the transmission line right-of-way and areas outside the right-of-way that are disturbed during project construction would be restored to their original condition and grade, as outlined in the Reclamation Plan. • Staging areas would be revegetated as necessary, according to the Vegetation Restoration Plan. • Existing rock formations and vegetation would be retained whenever possible.
TRAFFIC AND TRANSPORTATION
The following measures would be implemented to minimize impacts to traffic and roads. Traffic controls shall include ensuring that:
• The locations of intersections of existing access roads are highly visible by placing signage and traffic control crews to ensure that people are aware of the presence of crossing or slow-moving construction vehicles. • Following construction, or during construction as necessary to maintain safe driving conditions, any damage to existing roadways caused by construction vehicles would be repaired.

TABLE 2.0-5
APPLICANT PROPOSED MEASURES INCLUDED AS PART OF PROPOSED PROJECT ON BLM-MANAGED LAND

PUBLIC HEALTH AND SAFETY
Detailed information about the use, storage and disposal of hazardous materials would be provided in the Health and Safety Plan that would be developed by the construction contractor and with the approval of the BLM.
A Fire Prevention and Response Plan (FPRP) will be developed and implemented after approval by the BLM during construction, operation, and maintenance of the proposed transmission line.
During Project construction, on -going training would be provided by the Applicant to the US Border Patrol agents who work in the area for the duration of the Project about any safety issues related to BP access to the gen-tie ROWs or the solar energy generation facilities. At least two training sessions for the Border Patrol will be conducted at their convenience at the beginning of construction and at the beginning of operations (generally one for a day shift and one for a night shift) to explain the development process, hazards to the agents and their vehicles during construction and operations, depth of holes (as potential hiding places for undocumented persons), dangers of collapse of earthen excavations, any risks from electrical/shock, and staffing during the construction phase. The Project Applicant will provide access for Border Patrol agents to no-electrified secured areas if they need to pursue individuals.

Page 2.0-57, the Reduced Size Solar Generation Facility has been added as Alternative 3 and the No Action Alternative has been renumbered to Alternative 4, as follows:

"2.2 ALTERNATIVES

This EIR considered three alternatives in addition to the proposed project:

- **Alternative 1 - Alternative Gen-Tie Across BLM Land** - This alternative includes the same approximate 1,990 acre solar generation facility site as the proposed project and proposes a gen-tie that would follow the existing IID S-line and associated access road. A 0.9 mile Gen-tie is proposed including a 0.1 mile segment on the solar generation facility site. The gen-tie would also cross approximately 0.4 miles of BLM land and 0.4 miles of private land.
- **Alternative 2 - Private Land Gen-Tie Alternative -** This alternative includes the same approximate 1,990 acre solar generation facility site as the proposed project and proposes a 1.85 mile gen-tie that would originate from the western side of the solar generation facility site (0.1 mile segment) and cross approximately 1.75 miles of private lands to the west. The gen-tie would follow existing field roads and ditches to the Imperial Solar Energy Center West site. From this point, the proposed project would use available capacity on Imperial Solar Energy Center West's gen-tie line that has an approved right-of-way to the Imperial Valley Substation.
- **Alternative 3 – Reduced Size Solar Generation Facility Alternative -** This alternative represents an overall reduction in the size of the solar generation facility within the existing facility layout identified for the proposed project. The Reduced Size Solar Generation Alternative uses the fixed-tilt solar panel mounting configuration and the same type of PV technology as the proposed project. This alternative can be developed on reduced acreage for the following reasons: eliminating the horizontal tracker configuration which requires more land area per electrical output; increasing the array density within the fixed-tilt configuration; using a more efficient class of PV modules that have become available; and focusing on the most suitable

parcels included in the solar generation facility. This improved efficiency and site design reduces the land area required for the facility by approximately 27 percent, while maintaining the same 140-plus MWAC power output. The facility, while reduced in area, will use approximately the same or less Power Conversion Stations, Electrical Collection System, Substation and Switchyard and Operations and Maintenance Building, and will follow the same construction process and operations and maintenance protocol, as the proposed project. The Reduced Size Solar Generation Alternative is also capable of interconnecting using the same gen-tie alignment as the proposed project, the gen-tie across BLM land, or the private land gen-tie.

- **Alternative ~~3~~ 4 - No Action Alternative** – This alternative would result in continued use of the project site for agricultural production. The proposed Campo Verde Solar Project would not be developed."

Page 2.0-59, fifth bullet under the heading "B. Imperial Irrigation District (IID)"

"● Water Supply Agreements for construction and permanent water ~~(IID will be making CEQA findings specifically related to the water supply agreements so we need to make sure the discussion of water supply by IID is adequate within the EIR)~~."

SECTION 4.1, AESTHETICS

Page 4.1-25, Impact 4.1.2 has been revised as follows:

"**Impact 4.1.2** The proposed project would convert agricultural fields to a solar generation facility thereby replacing vegetation with man-made structures. The project would alter the overall character of the project site and substantially alter views from ~~several residences~~ two residences and a school. Therefore, this impact is considered **potentially significant**."

Page 4.1-29, MM 4.1.2 has been revised to include KOP #7 as follows:

"**MM 4.1.2** Prior to issuance of construction permits, the Applicant shall work with affected landowners and ICPDS to develop a visual screening program that will screen views of the project from KOP #2, #7, #8 and #9, if determined to be needed by each landowner."

Page 4.1-30, third paragraph under the discussion of "Glare" has been revised as follows:

"As such, the PV solar modules would not create a significant source of glare during sunlight hours. Also, the project would not use other reflective materials such as fiberglass, aluminum or vinyl/plastic siding, ~~galvanized products,~~ and brightly painted steel roofs that have the potential to create on- and off-site glare. Therefore, operations and maintenance of the project is not anticipated to create a new source of glare that would adversely affect day or nighttime views in the area. Thus, glare impacts are considered **less than significant**."

SECTION 4.2, LAND USE

Page 4.2-27, the number "9" in the third full sentence of the first paragraph has been eliminated:

"Because such height limits would not occur automatically, there would be no cumulative contribution to height limits with development of the cumulative projects ~~9~~."

Page 4.2-28, the first paragraph, second and third full paragraphs have been revised as follows:

> "However, lands surrounding the project site are currently in agricultural use and are zoned for agriculture. ~~Solar projects developed adjacent to agricultural areas are subject to dust and particles from periodic spraying being carried by the wind and depositing on PV panels. These represent nuisance issues rather than insurmountable cumulative land use incompatibilities or conflicts.~~ The proposed project is consistent with the Imperial County General Plan with a CUP. While the implementation of the project would temporarily convert the site from agricultural fields to a solar facility, it would be developed consistently with the land uses allowed on the site and there would be no conflicts with the Imperial County General Plan or zoning. The proposed project, in combination with other cumulative projects, would result in a less than cumulatively considerable contribution to land use compatibility. Therefore, this impact is considered **less than cumulatively considerable**."

SECTION 4.3, TRANSPORTATION AND CIRCULATION

Page 4.3-21, the text in the second paragraph under the heading "Proposed Action Operations and Maintenance Trip Generation" has been revised as follows:

> "During a typical year, assuming a worst-case scenario where panel washing is necessary (rather than the panels being cleaned by rainfall), the project will require up to 10 daily water trucks for panel washing over approximately 15 business days; however, the washing frequency is estimated from one to four times a year. During the washing period, the total project daily traffic may increase to 40 or 50 ADT over a 15 business day period. However, panel washing is not anticipated to be necessary."

Page 4.3-50, Timing/Implementation and Enforcement/Monitoring have been added following Impact 4.3.3 as follows:

> *"Timing/Implementation: Intersection must meet failing conditions during the project's construction period.*
>
> *Enforcement/Monitoring: Imperial County Planning and Development Services."*

SECTION 4.4, AIR QUALITY

The Air Quality Assessment was revised and updated in response to comments received from the ICAPCD and LIUNA. Accordingly, Section 4.4, Air Quality was also revised. The Air Quality Assessment (Revised, July 2012) is included as Appendix C and Section 4.4, Air Quality is included as Appendix D of this Final EIR. Please refer to these Appendices to review the revisions noted in Chapter 3.0.

SECTION 4.6, GEOLOGY AND SOILS

Page 4.6-14, second sentence of the third paragraph, has been revised to remove the parenthetical reference to panel washing as follows.

> "The generally flat topography of the site and the low average annual precipitation for the area would reduce the likelihood of substantial erosion and loss of topsoil. Daily operations and routine maintenance ~~(such as occasional PV panel washing)~~ are not anticipated to increase erosion. Further, to control erosion during operation of the project, the solar field would be coated with a permeable dust suppressant and the roadways within and around the solar field would be covered with gravel. Likewise,

during operation soil erosion and sedimentation would be controlled in accordance with the Best Management Practices (BMPs) included as part of the project's Storm Water Pollution Prevention Plan (SWPPP) (discussed further in Section 4.11, Hydrology and Water Quality). Thus, erosion impacts would be reduced to less than significant levels during operations."

Page 4.6-18, under the heading "Significance After Mitigation" at the bottom of the page, the text has been revised as follows:

"Project-specific impacts are mitigated on a project-by-project basis. Following implementation of the mitigation measures MM ~~4.6.2~~ 4.6.1, MM 4.6.4 and MM 4.6.6, geology and soils impacts would be reduced to less than cumulatively considerable levels."

Response to Comment 8-53: The commenter suggests revising mitigation measures MM 4.6.4 and MM 4.6.6 to provide additional detail clarifying the standards to be used in the analysis of site conditions and the development of design recommendations.

Page 4.6-15, MM 4.6.4 has been revised as follows:

"**MM 4.6.4** The proposed solar generation facility and the private-land portion of the gen-tie shall be designed in accordance with a Geotechnical Evaluation that will be prepared by a licensed professional engineer ~~during the final design phase~~. ~~The Final Geotechnical Evaluation report will be submitted to Imperial County Department of Planning and Development Services for review and approval prior to issuance of building permits as required by the Imperial County. The Final Geotechnical Evaluation report will include an analysis and recommendations regarding design for expansive soil conditions.~~ Prior to the final design of the Project, the Geotechnical Evaluation shall be conducted to identify the presence and potential impact of expansive soils throughout the project site. The testing and analysis conducted as a part of the Geotechnical Evaluation shall be done under the guidance of a licensed professional engineer in general accordance with the applicable American Society for Testing and Materials (ASTM) standards and other locally-accepted testing methods. The Geotechnical Evaluation shall provide design recommendations for the expansive soil conditions identified at the project site that are in conformance with applicable industry standards. The Geotechnical Evaluation shall be submitted to Imperial County for review and approval prior to issuance of building permits, as required by Imperial County."

Pages 4.6-16 to -17, MM 4.6.6 has been revised as follows:

"MM 4.6.6 ~~A Field Resistivity and Ground Potential Rise Evaluation shall be prepared by a qualified engineer, which shall include specific measures to address corrosion impacts.~~ The proposed solar generation facility and the private-land portion of the gen-tie shall be designed in accordance with a Corrosion Analysis that will be prepared by a licensed professional engineer. The Geotechnical Evaluation required in MM 4.6.4 above shall include Soil Resistivity Testing and Chemical Testing to identify the

corrosion potential of the existing soil throughout the project site. Soil Resistivity Testing shall utilize the Wenner 4-point method. Chemical Testing shall be in accordance with ASTM or other locally-accepted testing and reporting standards. Following completion of the Geotechnical Evaluation, a Corrosion Analysis shall be prepared by a qualified engineer to model the effects of corrosion on project components. The Corrosion Analysis shall be based on standards developed by ASTM, the National Bureau of Standards (NBS), the International Organization for Standards (ISO), the National Association of Corrosion Engineers (NACE) International, and other applicable standards. The Corrosion Analysis shall provide design recommendations for the corrosive soil conditions identified at the project site that are in conformance with applicable industry standards. ~~Potential measures may include, but are not limited to~~, Design recommendations may include galvanization, epoxy coatings, thicker steel, and cathodic protection. The Corrosion Analysis shall be submitted to Imperial County for review and approval prior to issuance of the structural post building permit, as required by Imperial County. Results and recommendations of the Corrosion Analysis shall be implemented into the structural design of the project."

SECTION 4.7, CULTURAL RESOURCES

Page 4.7-1, third paragraph, the last sentence has been replaced as follows:

"Information contained in this section is summarized from multiple sources including *Inventory, Evaluation and Analysis of Impacts on Historic Resources on Private Lands Within the Area of Potential Effect of the Campo Verde Solar Project, Imperial County, California* prepared by ASM Affiliates, Inc (Davis et. al, 2011), *Inventory Report of the Cultural Resources Within the Campo Verde Solar Energy Gen-tie Line, Imperial County, California* (Mitchell, 2011) and the "California Historical Resources Information System Records Search" prepared by the South Coastal Information Center (SCIC, 2011). The non-confidential version of ~~This~~ the document is provided on the attached CD of Technical Appendices as **Appendix E** of this EIR."

Page 4.7-8, in the last sentence under the first paragraph under the heading "The Kumeyaay," has been revised as follows:

"The Kumeyaay are the Yuman-speaking native people of central and southern San Diego County and the northern Baja Peninsula in Mexico. Spanish missionaries and settlers used the collective term Diegueño for these people, which referred to people living near the presidio and mission of San Diego de Alcalá. Today, these people refer to themselves as Kumeyaay or as ~~Tipai~~ Ipai and ~~Ipai~~ Tipai, which are northern and southern subgroups of the Kumeyaay (Mitchell, 2011)."

SECTION 4.8, NOISE

Page 4.8-18, second sentence under the heading "Transformer/Inverter and Array Tracker Noise Levels," "kV" has been added as follows:

> "The two smaller transformers consist of a 1 megavolt-amp (MVA) from 200 volt (V) to 12-kV and a 1-MVA from 12-V to 34.5-kV."

SECTION 4.9, AGRICULTURAL RESOURCES

Page 4.9-14, with respect to mitigation measure MM 4.9.1a, under Option 2 for both Non-Prime Farmland and Prime Farmland, the following revisions have been made:

> "**MM 4.9.1a** **Non-Prime Farmland**
>
> - **Option 2**: The Permittee shall pay an "Agricultural In-Lieu Mitigation Fee" in the amount of 20% of the fair market value per acre for the ~~total~~ acres of non-prime farmland impacted by the project ~~proposed site~~ based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee, will be placed in a trust account administered by the Imperial County Agricultural Commissioner's office and will be used for such purposes as the acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County.
>
> **Prime Farmland**
>
> - **Option 2:** The Permittee shall pay an "Agricultural In-Lieu Mitigation Fee" in the amount of 30% of the fair market value per acre for the ~~total~~ acres of prime farmland impacted by the project ~~the proposed site~~ based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee, will be placed in a trust account administered by the Imperial County Agricultural Commissioner's office and will be used for such purposes as the acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County."

Page 4.9-15, last sentence in the paragraph under the heading "Significance After Mitigation" has been revised as follows:

> "Implementation of any of the options under MM 4.9.1a, in combination with MM4.9.1b, ~~and of MM 4.9.2~~ would reduce the impacts associated with the temporary conversion of farmland, including Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland to a **less than significant level**."

Page 4.9-16, the last two sentences in the first paragraph have been revised as follows:

> "Agricultural land currently surrounds the solar energy facility site, while native desert surrounds the portion on BLM land (see Figure 4.9-1). The proposed project would place a solar generation facility in an area currently used for agriculture. The project does not

include the extension of utilities or infrastructure that would pressure nearby lands to urbanize with residential, commercial, or other urban levels of development. Moreover, the project is not anticipated to result in the indirect conversion of farmland on adjoining or nearby properties. ~~However, the Silverleaf Solar project is proposed adjacent to the southern, western and eastern boundaries of the Campo Verde Solar Energy project. Thus, the potential exists for further conversion of agricultural land in the immediate and general vicinity of the project site, separate from the proposed project.~~"

SECTION 4.10, HAZARDS AND HAZARDOUS MATERIALS

On page 4.10-2, in the paragraph at the top of the page, the last sentence has been deleted as follows:

"effluent limitations and state water quality standards, requires permits for the discharge of pollutants into navigable waters, provides enforcement mechanisms, and authorizes funding for wastewater treatment works construction grants and state revolving loan programs, as well as funding to states and tribes for their water quality programs. Provisions have also been added to address water quality problems in specific regions and specific waterways. The project would be subject to the General Permit for Discharges of Storm Water Associated with Construction Activity (NPDES No. CAS000002) (Construction General Permit Order 2010-2014-DWQ, effective February 14, 2011 during construction. ~~Operation of the project would be covered under Industrial Storm Water General Permit Order 97-03-DWQ (General Industrial Permit) - NPDES permit (No. CAS000001)~~."

Pages 4.10-21 and 4.10-22, mitigation measure MM 4.10.2b has been revised as follows:

"**MM 4.10.2b** ASTs containing sulfuric acid, ammonium nitrate solution, and anhydrous ammonia shall be removed from the following locations and wherever else present on the project site prior to commencing earth moving activities: east central side of APN 051-360-32; northwest and northeast side, southeast corner and northeast corner of APN 051-310-40; southern edge of APN 051-360-04; southwest corner of APN 051-310-50; northeast corner of APN 051-310-40; east-central side of APN 051-360-32; southeast corner of APN 051-360-03; and the southeast corner of APN 051-360-02. <u>The removal and disposition of such ASTs shall be in accordance with applicable regulations</u>."

SECTION 4.11, HYDROLOGY AND WATER QUALITY

Page 4.11-21, beginning in the second paragraph under the heading "Reduction in Water Quantity and Quality", the following additions and revisions have been made:

"Agricultural runoff contributes significantly to total inflows to the Salton Sea. As irrigated agricultural land is converted to nonagricultural use, the associated runoff ceases to drain into the New and Alamo rivers, ultimately reducing the sea's total inflows. As described above, the proposed project will convert approximately 1,852 acres of active farmland. The projects listed in **Table 4.11-2** contain a total of approximately 12,343 acres of irrigated agricultural land. The average annual water consumption per-acre within the Imperial Irrigation District is 4.63 acre-feet, per acre, per year (IID, 2011). For the project site, total water consumption based on the average

annual usage is 8,575 acre-feet of water. One third of the applied irrigation water (~~2,830~~ 2,858 acre-feet) is returned to the drainage system and ultimately the Salton Sea. The total drainage area for the Salton Sea is 8,360 square miles. The Sea has a total volume of approximately 7,500,000 acre-feet and a surface area of 240,639 acres. Under average irrigation practices the removal of the Campo Verde project area from agricultural production represents a reduction of less than one-tenth of one percent (0.04%) in the ~~amount~~ volume of water ~~reaching~~ in the Salton Sea. ~~Under normal precipitation conditions the reduction is 0.0001%. Neither~~ This reduction would be ~~noticeable~~ undetectable.

From 1950 to 2002 average annual inflow into the Salton Sea was 1.3 million acre-feet and 80 percent of this total came from the Imperial Valley. Assuming that flows have been reduced due to the Quantification Settlement Agreement (approximately 150,000 acre-feet less), current annual inflow to the Salton Sea is approximately 1.15 million acre-feet. The proposed project would result in a reduction of 2,858 acre-feet per year of runoff to the Salton Sea. This amount represents less than three tenths of one percent of the annual average inflow to the Salton Sea, and just four one-hundredths of one percent of the total volume in the Salton Sea. Given a total surface area of 376 square miles (240,639 acres) and a total volume of 7.2 million acre-feet, the reduction of 2,585.3 acre-feet per year is estimated to reduce the surface elevation of the Salton Sea by 0.14 inches.

Based on the assumption that an average acre of agricultural land uses 4.63 acre-feet per year and assuming a worst-case scenario in which implementation of all the projects listed in **Table 4.11-2** results in the conversion of the entire 12,343 acres, under average irrigation practices this represents a total water consumption of 57,148 acre-feet of water. Again, one third of this (~~18,859~~ 19,049 acre-feet) is returned to the drainage system and ultimately the Salton Sea. The removal of these 12,343 acres of agricultural land would result in a reduction of less than three-tenths of one percent (0.25%) in the ~~amount~~ volume of water ~~reaching~~ in the Salton Sea. This estimate is considered conservative because the estimate assumed all project acreage was in agricultural production. Small percentages of each project contain land that is not in agricultural production.

As described above, from 1950 to 2002 average annual inflow into the Salton Sea was 1.3 million acre-feet and 80 percent of this total came from the Imperial Valley. Assuming that flows have been reduced due to the Quantification Settlement Agreement (approximately 150,000 acre-feet less), current annual inflow to the Salton Sea is approximately 1.15 million acre-feet. The cumulative projects listed in **Table 4.11-2** would result in a reduction of 19,409 acre-feet per year of runoff to the Salton Sea. This amount represents approximately 1.65 percent of the annual average inflow to the Salton Sea, and three tenths of one percent of the total volume in the Salton Sea. Given a total surface area of 376 square miles (240,639 acres) and a total volume of 7.2 million acre-feet, the reduction of 2,585.3 acre-feet per year is estimated to reduce the surface elevation of the Salton Sea by 0.95 inches.

The surface elevation of the Salton Sea fluctuates annually by approximately 12 inches, reaching its maximum annual elevation between March and June and its minimum elevation between October and November as a result of irrigation practices. Given the

seasonal fluctuation, a drop in surface elevation between 0.14 (project related) and 0.95 inches (cumulative projects) is considered to be negligible and would not result in significant impacts on habitat areas. Habitat impacts from the reduction of flows and the minor water elevation change would be well within the seasonal fluctuation in surface elevation. The habitat conditions along the shoreline of the Salton Sea currently experiences, and has adjusted to, the seasonal water level fluctuations that the project's effect would be within (PMC, 2011).

Furthermore, the proposed project's and cumulative projects' reduction in agricultural water use would support the IID's needs in fulfilling its legal obligations under State Water Resources Control Board (SWRCB) orders, the Quantification Settlement Agreement and IID Water Transfer Agreement, which includes mitigation of water quality and biological impacts to the Salton Sea. As such, the proposed project is consistent with the IID Water Transfer Agreement HCP EIR/EIS, the existing Section 7 Biological Opinion, and IID CESA Permit 2081. Additionally, IID has created an Equitable Distribution Plan (EDP) to give itself the flexibility to meet changing circumstances in supply and demand. The EDP would essentially create an agricultural fallowing incentive program in the event of a supply/demand imbalance. By October of each year, IID staff must forecast water demand and available supply and recommend whether there will be a supply/demand imbalance (SDI). With the knowledge that the proposed project is anticipated to use up to 20 acre-feet of water per year during its lease period, instead of a more intense agricultural water use, IID can account for this lower water demand when determining whether there will be a SDI and may help prevent the need to activate the EDP, which will allow more agricultural landowners to use their agricultural water supply, which is expected to result in a neutral net impact on water flowing to the sea (ESA, 2012b).

Likewise, in the years when IID must trigger the EDP, the water conservation from the proposed project and other cumulative projects reduces the need to induce fallowing on as many agricultural acres to generate the additional water conservation needed to meet its transfer obligations and Salton Sea mitigation obligations. According to IID's EDP Negative Declaration, in 2003, IID implemented a rotation fallowing program to successfully create conserved water to deliver to the Salton Sea and now IID plans to increase fallowing incrementally to a maximum of about 25,000 acres. With the knowledge that the proposed projects will be using less water, IID can fallow less than the 25,000 acres to produce the same amount of water needed to meet its transfer obligations and conserve water to deliver to the Salton Sea (PMC, 2011). In this context, to the extent IID believes mitigation is needed in implementing the EDP, IID controls the mitigation by selecting how many farmland acres to enroll in its fallowing program to create the Salton Sea mitigation water (ESA 2012b).

As a result, IID acknowledged in its Negative Declaration adopting the EDP that the fallowing necessary to provide the transfer and Salton Sea mitigation water would not have a significant impact on water quality or biology. Specifically, it states for biology, "Implementation of the EDP would not have an effect on any biological resources within the IID water service area. The EDP could result in minor short-term changes in the location of water use and therefore, the volume of flows in the drains. However, any changes in the location of flows would be temporary and negligible, and well within historic variations, and therefore are not expected to result in any adverse effects on

biological resources that rely on the drains for habitat....[i]t is expected that under an SDI [state and federal refuges in the IID service area] will have sufficient supply to maintain current uses and operations and/or to fulfill obligations under environmental permits issued to IID (ESA 2012b). Previous environmental documentation has made a similar finding, that there would be no impact as a result of cumulative development related to the EDP (see Imperial Solar Energy Center South Project EIR/EA).

As for water quality, it states, "The proposed EDP would not result in any impacts associated with hydrology and water quality....the magnitude of any potential change is anticipated to be minimal and, due to constant variation in cropping patterns and locations of idled lands, most likely will be undetectable when compared to the existing condition" (PMC, 2011).

Therefore, the cumulative water quantity and quality impacts to the Salton Sea, IID's drainage system and the New River are considered **less than significant**, and the project's contribution to these impacts is considered to be less than cumulatively considerable. It should be noted that the reduction in agricultural runoff would result in an incremental improvement in water quality due to the reduced amount of agriculture related pollutants."

SECTION 4.12, BIOLOGICAL RESOURCES

The Biological Technical Report was revised and updated in response to comments received LIUNA. Accordingly, Section 4.12, Biological Resources, also was revised. The Final Biological Technical Report with 2012 Spring Surveys is included as Appendix A and Section 4.12, Biological Resources (with revisions from 2012 Spring Surveys) is included as Appendix B of this Final EIR. Please refer to these Appendices to review the revisions noted in Chapter 3.0.

CHAPTER 6.0, ALTERNATIVES

Page 6.0-2 and 6.0-3, the first paragraph of the discussion under the heading "6.2 Alternatives Considered But Not Selected For Analysis" has been divided into three paragraphs and headings have been added to the text as follows:

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 transmission 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) access to the California Independent System Operator (CAISO) transmission system to send electricity to consumers.

The proposed project site is currently designated "Agriculture" in the Imperial County General Plan and zoned A-2 - General Agriculture, A-2-R - General Agriculture, Rural Zone, and A-3 - Heavy Agriculture. The site was chosen for the reasons identified above regarding utility-scale solar projects. The southwestern portion of Imperial County has year-round unobstructed access to sunlight during daytime hours. Likewise, sufficient land area is available to accommodate a utility-scale solar project. The flat topography

and contiguous nature of large blocks of land are ideal for the project. Lastly, and perhaps most importantly, is the site's proximity relative to the Imperial Valley Substation, a CAISO interconnection point. Access to connect to the substation is a key factor in providing utility-scale solar power to the transmission grid for distribution to consumers.

"Alternative Site Location"

Choosing an "Alternative Site" was considered, but not selected for detailed analysis. A feasible alternative site would likely either be an area already designated for future residential development or contain Prime Farmland or Farmland of Statewide Importance (95% of all agricultural lands in Imperial County). Likewise, an alternative site, if vacant and undisturbed, could potentially have greater impacts on habitat for endangered and threatened species than a site that is actively cultivated for agricultural purposes. The Applicant does not own or possess access to an alternative site in Imperial County to develop the proposed project. Moreover, alternative locations are not available in closer proximity to the Imperial Valley Substation, which is entirely surrounded by land managed by the Bureau of Land Management (BLM), which is 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 and the result in additional and greater impacts associated with such a location and a longer gen-tie.

"Larger Solar Generating Facility"

A larger solar generation facility site of approximately 2,266 acres in size was also considered but not selected for detailed analysis. This alternative included the same parcels as the proposed project (which total 1,990 acres) plus four additional contiguous parcels (051-300-009-000, 051-300-008-000, 051-310-026-000, and 051-300-005-000) totaling approximately 276 acres which are under Williamson Act Contract. The addition of these parcels would allow the generation of 35 to 50 MWs of additional solar energy while impacting the same amount of BLM land to connect to the Imperial Valley Substation as the proposed project. The gen-tie for a larger solar project would follow the same route as the proposed gen-tie. While this alternative would meet the project objectives and provide more renewable energy, it would result in greater impacts to agricultural lands, including loss off prime farmland and cancellation of four Williamson Act Contracts. In addition, some of these parcels were located close to the Fig Lagoon which is used by several bird species. Exclusion of these parcels could reduce potential biological impacts. For these reasons, this alternative was not selected for analysis.

"Distributed Generation"

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. California currently has over 773 MW of distributed PV systems which cover over 40 million square feet (CPUC 2010).

Even assuming that there are enough additional sites throughout California for installation of sufficient distributed PV to accomplish the project's objective of generating 139 MW, this alternative cannot feasibly accomplish most of the project's objectives.

Because distributed generation is not geographically constrained, there is no guarantee that any portion of the solar installation would occur in Imperial County. As such, this alternative would not meet any of the County's objectives (i.e., economic investment in the County; diversifying the County's economic base; generating local jobs and tax revenue; reinforcing the County's position as a leader in renewable energy production; and expanding the local renewable energy sector). Furthermore, because distributed PV can be installed anywhere in the State, such installations could be installed in areas that do not meet the objective of locating the project in an area that ranks among the highest in solar resource potential. 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 139 MW of generating capacity; or, 2) support the objective of assisting the State of California meet to its RPS goals. For these reasons, a distributed solar alternative was not considered for further analysis.

"Reduced Power Output Alternative"

Lastly, a reduced size project alternative that results in a reduction in power output would not meet the Project Objectives and was therefore not analyzed in detail. However, the Applicant is continually working to refine the project design to increase project efficiency and further reduce impacts to the environment and natural resources. Therefore, the project layout and associated impacts identified and analyzed in this Draft EIR are considered a conservative (worse case) scenario, and may be further revised and reduced in the Final EIR.

Page 6.0-4, the bullet list of alternatives has been revised as follows to renumber Alternative 3 to Alternative 4.

"● **Alternative ~~3~~ 4- No Action Alternative** – This alternative would result in continued use of the project site for agricultural production. The proposed Campo Verde Solar Project would not be developed."

Page 6.0-9, Table 6.0-1 has been revised to add APN 051-0350-012 as follows:

TABLE 6.0-1
PRIVATELY OWNED PARCELS – ALTERNATIVE GEN-TIE ON BLM LANDS

Assessor's Parcel Number	Acreage	Nearest Cross Street/Intersection
APN 051-350-014	Part of solar project site	Liebert and Mandrapa Roads
APN 051-350-010	1.5 acres	Liebert and Mandrapa Roads
APN 051-350-011	3.6 acres	Liebert and Mandrapa Roads
APN 051-350-012	1.02	Liebert and Wixom Roads

Source: Imperial County Zoning Maps.

Page 6.0-14, the first paragraph after Table 6.0-4 has been revised as follows:

"No federally listed, state-listed or BLM sensitive plant species are known or expected to occur within the Alternative Gen-Tie across BLM land based on spring surveys ~~completed for other transmission projects paralleling the IID S-Line route~~ conducted for this gen-tie alignment. Spring rare plants ~~are being done~~ conducted in March, April, and ~~possibly~~ May 2012~~, depending on conditions and guidance from the BLM~~. Based on survey results ~~from other projects~~, there are no anticipated impacts to federally listed, state-listed or BLM sensitive plant species if the project uses the Alternative Gen-Tie route."

Page 6.0-15, the text of the third to the last paragraph has been revised as follows:

"Impacts to Burrowing Owl (BUOW) resulting from implementation of the Alternative Gen-Tie across BLM land would be similar to but slightly less than that described for the proposed gen-tie in Section 4.12, Biological Resources. Two suitable but unoccupied BUOW burrows were observed within the survey area. Removal of these burrows is not anticipated because they would be spanned by the Alternative Gen-Tie across BLM land. Fourteen suitable but inactive burrows were observed in the survey area during the spring surveys that were conducted. In addition, adjacent suitable foraging habitat for these burrows would not be removed during construction activities. Therefore, impacts to BUOW would be similar for both the Alternative Gen-Tie across BLM land and the proposed project."

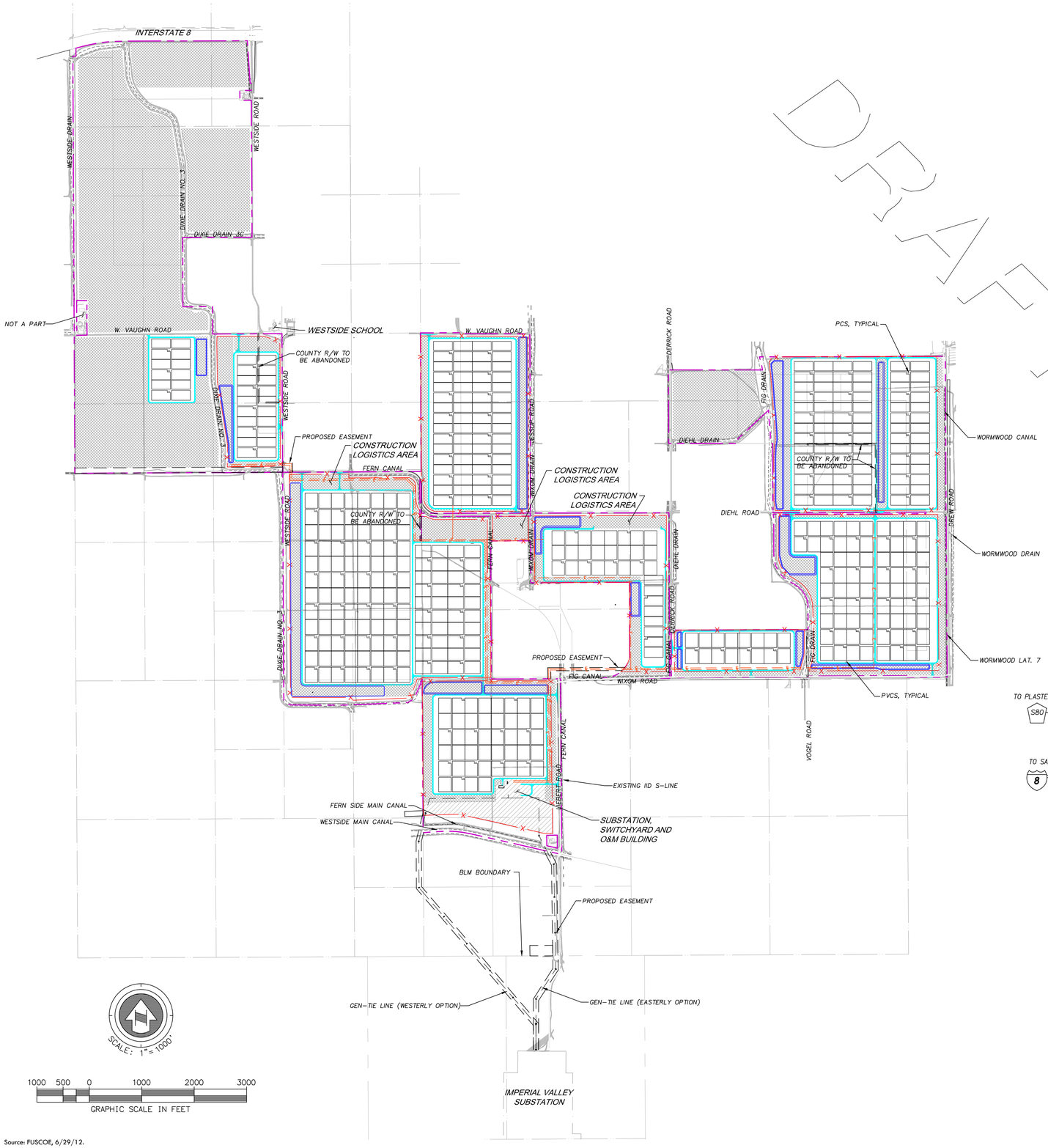
Page 6.0-24 through 6.0-27, the following text has been added to describe the Reduced Size Solar Generation Facility Alternative:

6.4.3 ALTERNATIVE 3 - REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE

Commencing with the scoping period and through its direct outreach efforts, Campo Verde has received input from various stakeholders inquiring whether the company could reduce impacts from the solar generation facility to agricultural and environmental resources. In response to those requests and through the work of its design, engineering and supply chain teams, Campo Verde has developed a reduced size layout for the solar generation facility that reduces the amount of land necessary for the solar generation facility while maintaining the power output of the project. This alternative layout remains entirely within the scope and footprint of the proposed solar generation facility described in Chapter 2.0, but reduces the land area required for the facility and, as a result, reduces the impact to agricultural and environmental resources. The description of this "Reduced Size Solar Generation Facility Alternative" and its corresponding impacts to each resource area is set out in this Attachment. Campo Verde requests that the County include this alternative as a new alternative (Alternative 4) in the Final EIR, subject to the County's independent review and assessment of the information set out below and any follow-up information which the County may request from Campo Verde. **Figure 6.0-4** depicts the Reduced Size Solar Generation Facility Alternative.

Characteristics

The Reduced Size Solar Generation Facility Alternative represents an overall reduction in the size of the solar generation facility within the existing facility layout identified as the proposed action in Chapter 2. This alternative utilizes the fixed-tilt solar panel mounting configuration and the same type of PV technology identified in Chapter 2. This alternative is able to be developed on a reduced acreage due to



Source: FUSCOE, 6/29/12.

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DRAFT

OWNER/OPERATOR

CAMPO VERDE SOLAR, LLC
525 MARKET STREET, 15TH FLOOR
SAN FRANCISCO, CA 94105

GENERAL CONTRACTOR

FIRST SOLAR ELECTRIC (CALIFORNIA), LLC
350 W. WASHINGTON STREET, SUITE 600
TEMPE, ARIZONA 85281

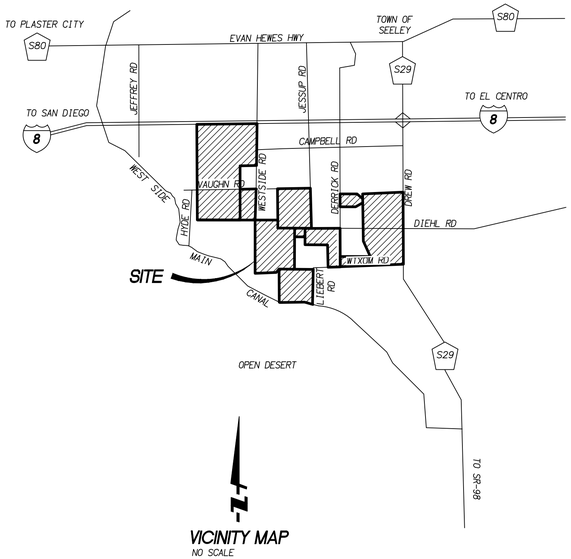
SITE INFORMATION

SITE AREA: 1,998.37 AC

LEGEND

ITEM	STANDARD DRAWING	SYMBOL
PROJECT BOUNDARY		
EXISTING TELEPHONE		
EXISTING OVERHEAD ELECTRIC		
PROPOSED ELECTRIC		
PROPOSED ACCESS		
PROPOSED RETENTION POND		
PROPOSED FENCE		
RESERVE AREA FOR PV ARRAYS		
SUBSTATION/SWITCHYARD/O&M AREA		
PROPOSED SOLAR ARRAY		

NOTES:
1. SEE ALTA MAP FOR SECTION LINES, EASEMENTS, RIGHT OF WAYS, AND ADDITIONAL PROPERTY INFORMATION
2. NOT FOR CONSTRUCTION
3. ARRAY CONFIGURATION AND FENCE LOCATIONS SUBJECT TO CHANGE DURING DETAIL DESIGN AND PERMITTING
4. CONSTRUCTION LOGISTICS AREAS SHOWN ARE CONCEPTUAL AND SUBJECT TO CHANGE



VICINITY MAP
NO SCALE

F

4.0-30

PAUL D. HAALAND, PE R.C.E. NO. 63656 EXP. 09-30-12 DATE

FIGURE 6.0-4
REDUCED SIZE SOLAR GENERATION FACILITY

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eliminating the horizontal tracker configuration which requires more land area per electrical output, increasing the array density within the fixed- tilt configuration, utilizing a more efficient class of PV modules that is now available, and by focusing on the most suitable land of the parcels included in the solar generation facility. This improved efficiency and site design reduces the land area required for the facility by approximately 27 percent, while maintaining the same 140-plus MWAC power output. The facility, while reduced in area, will utilize approximately the same or less Power Conversion Stations, Electrical Collection System, Substation and Switchyard and Operations and Maintenance Building, and will follow the same construction process and operations and maintenance protocol, as described in Chapter 2.0. The facility is also capable of interconnecting using any of the three interconnection gen-tie lines identified in Chapters 2.0 and Chapter 6.0.

Table 6.0-11 below shows the assessor's parcel numbers, acreage and zoning for the Reduced Size Solar Generation Facility Alternative.

TABLE 6.0-11
140-MW CAMPO VERDE - PRIVATELY OWNED PARCELS

Assessor's Parcel Number	Assessor's Acreage	Zoning
051-300-029-000	79.88	A-2-R, A-2
051-300-025-000	164.86	A-2-R
051-300-030-000	40.00	A-2-R
051-330-015-000	119.18	A-2-R, A-3
051-330-020-000	40.00	A-2-R
051-330-005-000	80.00	A-3
051-350-005-000	28.80	A-3
051-330-019-000	101.90	A-2-R, A-3
051-350-014-000	184.00	A-3
051-360-018-000	1.80	A-2-R
051-360-001-000	57.06	A-2-R
051-360-002-000	23.16	A-2-R
051-360-003-000	32.03	A-2-R
051-360-004-000	55.00	A-2-R
051-360-032-000	203.72	A-2-R, A-2
051-310-060-000	1.26	A-2-R
051-310-040-000	92.23	A-2
051-310-059-000	31.96	A-2-R
051-310-057-000	25.27	A-2-R
051-310-056-000	80.65	A-2-R
051-310-058-000	0.91	A-2-R
051-330-016-000	0.29	A-2-R
	1,443.96	

Source: Campo Verde Solar, LLC, 2012.

Structures and Facilities

The facility will utilize approximately the same or less Power Conversion Stations, Electrical Collection System, Substation and Switchyard and Operations and Maintenance Building as described in Chapter 2.0.

Construction Activities

The construction activities for the Reduced Size Solar Generation Facility Alternative would be the same as that described for the proposed project. Refer to Chapter 2.0, subsection 2.1.4, item D, "Construction Process for the Solar Generation Facility." In addition, the duration of construction and the types of construction equipment would also be the same.

Operations and Maintenance Activities

The operations and maintenance activities for the Reduced Size Solar Generation Facility Alternative would be the same as that described for the proposed project. Refer to Chapter 2.0, subsection 2.1.4, item E, "Operations and Maintenance of Solar Generation Facility."

Decommissioning Activities

The decommissioning activities for the Reduced Size Solar Generation Facility Alternative would be the same as that described for the proposed project. Refer to Chapter 2.0, subsection 2.1.4, item F, "Decommissioning Plan."

Design Features, BMPs, and Other Conditions

The design features and BMPs for the Reduced Size Solar Generation Facility Alternative would be the same as that described for the proposed project. Refer to Chapter 2.0, subsection 2.1.5, item J, "Operations and Maintenance of Solar Generation Facility".

Relationship to Project Objectives

Implementation of the Reduced Size Solar Generation Facility Alternative would fulfill the project's objectives to construct a solar generation facility. Development of the project would create a new source of renewable energy on previously disturbed land in a rural setting in proximity to the existing electric transmission system. Likewise, the Reduced Size Solar Generation Facility Alternative would support the objective or reducing the emission of GHGs from the generation of electricity. The Reduced Size Solar Generation Facility Alternative would allow the Applicant to meet its obligation to meet the terms and requirements of its Power Purchase Agreement which would aid progress in fulfilling the state's RPS and compliance with Executive Order S-14-08 and SB X1-2.

Comparative Impacts

Since the Reduced Size Solar Generation Facility Alternative is a subset of the originally proposed project and located wholly within the same footprint, the environmental impacts that would result from implementation of this alternative would be the same or less than the impacts described for the proposed project in the DEIR. The sections below describe the impacts of the Reduced Size Solar Generation Facility Alternative relative to the proposed project impacts.

Aesthetics

The Reduced Size Solar Generation Facility Alternative would result in the same types of impacts to aesthetic resources as those described for the proposed project in Section 4.1 of the DEIR. However,

visual impacts would be reduced for the Reduced Size Solar Generation Facility Alternative because some of the locations that would be visually affected by the proposed project would no longer be affected in the same manner by this alternative.

Because the northern-most parcels associated with the proposed project would no longer be developed under this alternative, the impacts shown for the proposed project to viewers traveling on I-8 (the visual simulation from KOP#1 shown in Figure 4.1-3) would not be seen. If visible at all, the view from this KOP of the Reduced Size Solar Generation Facility Alternative would be similar to the project visibility shown in the other visual simulation from I-8 (KOP#3) where it could possibly be faintly visible in the background but not very noticeable (as shown in Figure 4.1-5).

Likewise, because the parcels immediately south of KOP#8 would no longer be developed as part of the Reduced Size Solar Generation Facility Alternative, the visual impacts to the residence at that location shown on Figure 4.1-10 would also no longer occur. The solar generation facility could still be seen from this location but at a considerably greater distance to the east and southeast.

Moreover, because this alternative would use the fixed-tilt mounting technology, the height profile of the project would be lower (up to 7 feet for fixed tilt versus up to 11 feet for trackers) and the buffers between the panels and local roads would be greater which would result in lesser visual impacts. This is demonstrated in the visual simulations that were prepared for the proposed project at KOPs #2 and #9 (Figures 4.1-4 A and B and Figures 4.1-11 A and B) to show the visual difference between the fixed and tracker systems.

Because of changes to the visual impacts as described above, visual mitigation measure MM 4.1.2 described on page 4.1-29 of the DEIR could be amended to remove visual screening from KOP#8 as the nearby parcels would no longer be developed. Likewise, screening from KOP#2 would also no longer be required for this alternative because the lower profile trackers and larger buffers would be used and also (more importantly) the decision was made by the Imperial County School Board to close the Westside School at this location.

Land Use

The Reduced Size Solar Generation Facility Alternative would result in the same types of land use impacts as those described for the proposed project in Section 4.2 of the DEIR. As a subset of the proposed project, all lands associated with this alternative are also all currently designated by the General Plan as "Agriculture."

Transportation and Circulation

Impacts to traffic and circulation that would result from the Reduced Size Solar Generation Facility Alternative would be similar to that described for the proposed project in Section 4.3 of the DEIR. The amount of traffic generated by the project during construction is expected to be the same because the construction timeframe, number of construction worker and delivery trips, and location of construction staging areas would not change. Likewise, operational activities and associated traffic impacts would also be the same as it would still be a 140-plus MWAC facility requiring the same level of operations and maintenance personnel, deliveries, and activity.

Air Quality

The Reduced Size Solar Generation Facility Alternative would result in similar air quality impacts and be subject to mitigation as described for the proposed project. The construction air impacts associated with this alternative would be generally the same as the proposed project because the construction

timeframe, construction equipment, and area under construction at one time are expected to be the similar to the proposed project. Also, the air quality impacts resulting from traffic are expected to be the same because the timeframe, number of construction worker and delivery trips, and location of construction staging areas would not change. Likewise, operational activities and associated air impacts would also be the same as it would still be a 140-plus MWAC facility requiring the same level of maintenance.

Climate Change and Greenhouse Gases

The climate change and greenhouse gas impacts resulting from the Reduced Size Solar Generation Facility Alternative would be the same as described for the proposed project. The construction air impacts associated with this alternative would be generally the same as the proposed project because the construction timeframe, construction equipment, and area under construction at one time are expected to be the same as the proposed project. Also, the same amount of fossil-fired generation would be displaced as the project output stays the same.

Geology and Soils

The geology and soils impacts from the Reduced Size Solar Generation Facility Alternative would be the same as that described for the proposed project in Section 4.6 of the DEIR. The impacts and mitigation for seismic ground shaking, unstable soils, erosion, septic design, and corrosivity would be the same for this alternative.

Cultural and Paleontological Resources

The Reduced Size Solar Generation Facility Alternative would result in the same types of impacts to cultural and paleontological resources as those described for the proposed project in Section 4.7 of the DEIR. The potential for impacts to identified and unidentified resources would be similar to the proposed project except that some of the ineligible historical resources (canals / drains) on the parcels not included in this alternative would no longer have any potential to be affected. The identified mitigation for cultural and paleontological resources would be applied to this alternative in the same manner as the proposed project.

Noise

The noise impacts generated by the Reduced Size Solar Generation Facility Alternative would be generally the same as those described for the proposed project in Section 4.8 of the DEIR. Under this alternative, construction noise would not occur on or near the parcels that have been removed from the project footprint. Traffic noise from construction would be expected to be the same because the construction timeframe, number of construction worker and delivery trips, and location of construction staging areas would not change. Operational noise would be the same except that maintenance activities would not occur on the removed parcels.

Agricultural Resources

The Reduced Size Solar Generation Facility Alternative would result in the same types of impacts to agricultural resources as those described for the proposed project described in Section 4.9 of the DEIR. Because of the smaller footprint, fewer acres of agricultural lands would be affected by this alternative. Table **6.0-12** below shows the acreage of the various types of agricultural lands that would be impacted by the Reduced Size Solar Generation Facility Alternative:

TABLE 6.0-12
IMPORTANT FARMLANDS ON REDUCED FOOTPRINT SITE

Agriculture Classification	Approximate Acreage on Project Site	Acreage Converted With Project Implementation
Prime Farmland	473.36	438.39
Farmland of Local Importance	30.74	27.30
Farmland of State Importance	867.21	820.02
Unique Farmland	21.59	21.00
Subtotal Important Farmlands	1392.90	1306.71
Other Land	49.84	25.18
Total	1442.74	1331.89

Source: Ericsson-Grant, Inc, 2011.

Hazards and Hazardous Materials

The Reduced Size Solar Generation Facility Alternative would result in the same hazard and hazardous materials impacts as that described for the proposed project in Section 4.10 of the DEIR. The same risks would occur and the same hazardous materials would be used during construction and operations. Because of its smaller size, the project risks would occur on a smaller area for this alternative.

Hydrology and Water Quality

The same types of hydrology and water quality impacts would occur as a result of implementation of the Reduced Size Solar Generation Facility Alternative as described for the proposed project in Section 4.11 in the DEIR. This alternative would be expected to use the same amount of water for construction and operation as described for the proposed project. The construction and operational impacts would occur over a smaller footprint and the same regulatory requirements for grading, drainage, erosion control, and potential discharges would apply.

Biological Resources

The types of impacts to biological resources that would occur as a result of implementing the Reduced Size Solar Generation Facility Alternative would be the same as those described for the proposed project in Section 4.12 of the DEIR. The same species and habitats would be affected and the same mitigation measures would be appropriate. However, the habitat acreage that would be potentially affected would be less and, as a result, the amount of mitigation would vary for some specific biological resources accordingly. **Table 6.0-13** below identifies the acreages of habitats that would be affected by the Reduced Size Solar Generation Facility Alternative.

TABLE 6.0-13
TEMPORARY AND PERMANENT ACREAGE DISTURBANCE TO VEGETATION COMMUNITIES
SOLAR ENERGY FACILITY SITE

Vegetation Community	Temporary	Permanent
Active Agriculture (AG-A)	1,158.39	1,158.39
Arrow Weed Thicket (AS)	--	--
Arrow Weed Thicket Disturbed (AS-D)	2.17	2.17
Athel Tamarisk Type Woodland (AW)	.71	.71
Common Reed Marsh- Disturbed (CRM-D)	--	--
Developed (DEV)	--	--
Disturbed Wetland (DW)	--	--
Fallow Agriculture (AG-F)	123.11	123.11
Open Water with Arrow Weed Thicket (OW)	--	--
Quailbush Scrub (BSS)	31.61	31.61
Quailbush Scrub- Disturbed (BSS-D)	15.50	15.50
Tamarisk Thicket (TS)	0.40	0.40
Total Impacts	1,331.89	1,331.89

Source: Heritage, 2012.

Specific changes to biological impacts that would result from reducing the project footprint under this alternative would include the removal of potential impacts to SWFL and YCR associated with the marginal habitats in Dixie 4 Drain, Forget Me Not Drain 1, and Westside Drain. Also, potential impacts to BUOW would be reduced because the number of active burrows that could potentially be impacted would drop from 55 to 27 in the survey area. As a result, the amount of needed mitigation would also be reduced.

CEQA PROCEDURAL CONSIDERATIONS

The Reduced Size Solar Generation Facility Alternative does not require recirculation of the EIR for further public comment pursuant to CEQA. As documented through the analysis of the comparative impacts of Alternative 3 above, the environmental impacts that would result from implementation of this alternative are the same or less than the impacts described for the proposed project in the Draft EIR. Thus, the addition of Alternative 3 to the Final EIR does not deprive the public of an opportunity to comment on "a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect . . . that the project's proponents have declined to implement." 14 Cal. Code Regs. §15088.5(a) (emphasis added). As a result, the reduced size alternative does not constitute "significant new information" that requires recirculation under CEQA. See Cal. Pub. Res. Code § 21092.1; 14 C.C.R. 15088.5. *See also Laurel Heights Improvement Ass'n v. Regents of the Univ. of California*, 6 Cal .4th 1112, 1138-40 (1993)."

Page 6.0-24, the heading for 6.4.3 has been revised as follows to renumber Alternative 3 to Alternative 4 following the addition of the Reduced Size Solar Generation Facility:

"~~6.4.3~~ 6.4.4 ALTERNATIVE ~~3~~ 4 - NO PROJECT ALTERNATIVE

Alternative ~~3~~ 4 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 project site would continue to remain in agricultural uses and that the proposed solar generation facility would not be built on the site. Likewise, the proposed gen-tie would not be constructed."

Page 6.0-27, first sentence under the heading "6.5 Environmentally Superior Alternative," has been revised as follows:

"Based upon the evaluation described in this section, the ~~No Project Alternative~~ Reduced Size Solar Generation Facility (Alternative 3) is considered to be the environmentally superior alternative, as it would ~~avoid all~~ lessen adverse impacts associated with the proposed project. Likewise, the Alternative Gen-tie Across BLM Land would be the preferred gen-tie alignment as it is the shortest route resulting in the least disturbance and the fewest impacts."

Table 6.0-~~11~~-14, 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-~~11~~14
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT

ISSUE AREA/IMPACT	ALTERNATIVE GEN-TIE ACROSS BLM LAND	PRIVATE LAND GEN-TIE ALTERNATIVE	REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE	NO PROJECT ALTERNATIVE
AESTHETICS				
Impact 4.1.1 Adverse Effect on Scenic Vista	S	S	B	B
Impact 4.1.2 Degrade Existing Visual Character or Quality of the Site	S	S	B	B
Impact 4.1.3 New Source of Substantial Light or Glare	S	S	B	B
Impact 4.1.4 Cumulative Visual Impacts	S	S	B	B
LAND USE				
Impact 4.2.1 Conflict With Any Applicable Land Use Plan, Policy, or Regulation	S	S	B	B
Impact 4.2.2 Cumulative Land Use Impacts	S	S	B	B
Impact 4.2.3 Land Use Conflicts	S	S	B	B
TRANSPORTATION AND CIRCULATION				
Impact 4.3.1 Impacts to Intersection, Roadway and Freeway Segment LOS (Year 2011 Plus Project)	B	W	B	B
Impact 4.3.2 Impacts to Intersection, Roadway and Freeway Segment LOS (Year 2013)	B	W	B	B
Impact 4.3.3 Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS (Year 2013)	B	W	B	B
AIR QUALITY				
Impact 4.4.1 Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard	B	S	B	W
Impact 4.4.2 Expose Sensitive Receptors to Substantial Pollutant Concentrations	S	S	B	B
Impact 4.4.3 Violate Air Quality Standard/Cause Air Quality Violation	S	S	B	W
Impact 4.4.4 Cumulative Substantial Pollutant Concentrations	S	S	B	W

TABLE 6.0-~~11~~14
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT

ISSUE AREA/IMPACT	ALTERNATIVE GEN-TIE ACROSS BLM LAND	PRIVATE LAND GEN-TIE ALTERNATIVE	REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE	NO PROJECT ALTERNATIVE
CLIMATE CHANGE AND GREENHOUSE GASES				
Impact 4.5.1 Generation of Greenhouse Gas Emissions	B	S	B	W
Impact 4.5.2 Conflict with an Applicable Plan, Policy, or Regulation Adopted to Reduce Greenhouse Gas Emissions	S	S	B	S
GEOLOGY AND SOILS				
Impact 4.6.1 Strong Seismic Ground Shaking	B	W	B	B
Impact 4.6.2 Liquefaction/Unstable Soils	B	W	B	B
Impact 4.6.3 Erosion	B	W	B	B
Impact 4.6.4 Expansive Soils	B	W	B	B
Impact 4.6.5 Soil Capability to Support Septic Systems	S	S	B	B
Impact 4.6.6 Soil Corrosivity	B	W	B	B
Impact 4.6.7 Cumulative Geology and Soils Impacts	B	W	B	B
CULTURAL RESOURCES				
Impact 4.7.1 Changes in Setting to the Westside Main Canal System	S	W	S	B
Impact 4.7.2 Impact to Archaeological Site CA-IMP-11758	S	S		B
Impact 4.7.3 Impacts to Unrecorded Subsurface Archaeological Resources	S	S	B	B
Impact 4.7.4 Impacts to Subsurface Human Remains	S	S	S	B
Impact 4.7.5 Impacts to Fossil Remains	S	S	B	B
Impact 4.7.6 Cumulative impacts to Archaeological and Historic Resources	S	S	B	B
Impact 4.7.7 Cumulative Impacts to Paleontological Resources	S	S	B	B
NOISE				
Impact 4.8.1 Noise Levels in Excess of Standards/Substantial Temporary Noise Increase	S	S	B	B
Impact 4.8.2 Noise Levels in Excess of Standards/Substantial	S	S	S	B

TABLE 6.0-~~11~~14
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT

ISSUE AREA/IMPACT	ALTERNATIVE GEN-TIE ACROSS BLM LAND	PRIVATE LAND GEN-TIE ALTERNATIVE	REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE	NO PROJECT ALTERNATIVE
Permanent Noise Increase				
Impact 4.8.3 Cumulative Noise Increases	S	S	S	B
AGRICULTURAL RESOURCES				
Impact 4.9.1 Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance	S	S	B	B
Impact 4.9.2 Conversion of Farmland	S	S	B	B
Impact 4.9.3 Cumulative Agricultural Resources Impacts	S	S	B	B
HAZARDS AND HAZARDOUS MATERIALS				
Impact 4.10.1 Hazardous Materials Transport, Use, Disposal and Accidental Release	S	S	S	B
Impact 4.10.2 Hazard Through Upset/Release of Hazardous Materials	S	S	S	B
Impact 4.10.3 Emit Hazardous Emissions	S	S	S	B
Impact 4.10.4 Cumulative Hazards and Hazardous Materials Impact	S	S	S	B
HYDROLOGY AND WATER QUALITY				
Impact 4.11.1 Violate Water Quality Standards or Waste Discharge Requirements	S	S	S	B
Impact 4.11.2 Result in Substantial Erosion or Siltation On- or Off-site	S	S	B	B
Impact 4.11.3 Result in Substantial Flooding On- Or Off-Site/Create or Contribute Runoff Exceeding Capacity	S	S	B	B
Impact 4.11.4 Cumulative Impact to Hydrology and Water Quality	S	S	B	B
BIOLOGICAL RESOURCES				
Impact 4.12.1 Impacts to Special-Status Species – Plants	S	S	B	B
Impact 4.12.2 Impacts on Special Status Species – Birds (Southwestern Willow Flycatcher)	S	S	B	B

TABLE 6.0-~~11~~14
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT

ISSUE AREA/IMPACT	ALTERNATIVE GEN-TIE ACROSS BLM LAND	PRIVATE LAND GEN-TIE ALTERNATIVE	REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE	NO PROJECT ALTERNATIVE
Impact 4.12.3 Impacts on Special Status Species – Birds (Yuma Clapper Rail)	S	S	B	B
Impact 4.12.4 Impacts on Special Status Species – Birds (Greater Sandhill Crane)	S	S	B	B
Impact 4.12.5 Impacts on Special Status Species – Birds (Mountain Plover)	S	S	B	B
Impact 4.12.6 Impacts on Special Status Species – Raptors (Burrowing Owls)	S	S	B	B
Impact 4.12.7 Impacts on Special Status Species – Raptors (Golden Eagles)	S	S	B	B
Impact 4.12.8 Impacts to Nesting Raptors	S	S	B	B
Impact 4.12.9 Impacts on Special Status Species – Mammals (Pallid Bats and California Leaf-nosed Bats)	S	S	B	B
Impact 4.12.10 Impacts on Special Status Species – Reptiles (Flat tailed horned lizard)	S	B	B	B
Impact 4.12.11 Impacts on Special Status Species – Reptiles (Colorado desert fringe-toed lizard)	S	B	B	B
Impact 4.12.12 Substantial Adverse Effect on Riparian Habitat or Other Sensitive Natural Community	S	B	B	B
Impact 4.12.13 Substantial Adverse Effect on Federally Protected Wetlands	S	B	B	B
Impact 4.12.14 Interfere with Migratory Fish or Wildlife Movement/Impede the Use of Native Wildlife Nursery Sites	S	S	B	B
Impact 4.12.15 Conflict with Local Policies or Ordinances Protecting Biological Resources	S	S	B	B

TABLE 6.0-~~11~~14
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT

ISSUE AREA/IMPACT	ALTERNATIVE GEN-TIE ACROSS BLM LAND	PRIVATE LAND GEN-TIE ALTERNATIVE	REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE	NO PROJECT ALTERNATIVE
Impact 4.12.16 Conflict with the Provisions of a Habitat Conservation Plan	**S**	**B**	**B**	**B**
Impact 4.12.17 Cumulative Impacts to Biological Resources	**S**	**B**	**B**	**B**

Notes: S = Similar Impact compared to the Proposed Project
B = Better Impact compared to the Proposed Project
W = Worse Impact compared to the Proposed Project.

CHAPTER 7.0 - OTHER CEQA REQUIRED CONSIDERATIONS

The commenter notes discrepancies in the header and page numbering in Chapter 7.0. The following pages have been revised to correct the header and page numbers in Chapter 7.0 of the Draft EIR.

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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 nonresidential 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 Campo Verde Solar Project proposes to build, operate, and maintain a 140+ MW solar energy facility on approximately 1,990 acres of private land in southern Imperial County. The proposed project includes solar generation equipment and associated facilities on privately owned land as well as a 230-kilovolt (kV) aboveground Gen-Tie that will connect the generation facilities with the Imperial Valley Substation.

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 twenty-seven parcels (refer to Table 2.0-1 in Chapter 2.0) with a General Plan designation of Agriculture and A-2 - General Agriculture, A-2-R - General Agriculture, Rural Zone, and A-3 - Heavy Agriculture zoning.

The project requires a CUP from Imperial County to construct and operate a solar energy facility on the proposed project site. The project also requires a Variance in order for the Gen-Tie pole structures to exceed the height limit for electric line tower. The existing zoning allows for a maximum height limit of 120 feet. However, the project may include some poles which may be up to 145 feet in height.

Approval of the CUP and Variance by the Imperial County Board of Supervisors would allow the project to attain consistency with the General Plan and Land Use Ordinance allowable land uses. By its nature as a solar energy 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 energy 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 conversion of agricultural land, it is not anticipated to result in growth-related land use impacts as it

~~5.0 CUMULATIVE IMPACTS SUMMARY~~7.0 OTHER CEQA REQUIRED CONSIDERATIONS

does not propose residential development or other use that would attract a population base. At the end of the useful life of the project, the Applicant plans to remove and/or properly abandon facilities and equipment associated with the project and restore the solar energy facility site back to irrigated agricultural production.

Infrastructure

Development of the project site would not result in the development and extension of infrastructure facilities located in and/or adjoining the project site. The project is not expected to have an impact on infrastructure availability to adjacent parcels. The project will not require new utility lines or extension of existing utility and service lines. Thus, there is no potential for the project to result in growth inducement.

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. The proposed project site is located in a rural area of Imperial County with limited infrastructure; no new infrastructure or utilities are included as part of the proposed project. Thus, implementation of the proposed project would not contribute to growth in this area of the County.

Housing

The Regional Housing Needs Assessment has determined that the unincorporated area of the county will need 13,427 housing units for the period 2006–2014. No housing is proposed as part of the Campo Verde Solar Project nor is the project anticipated to induce growth in other regions.

Roadways

Vehicular access to and throughout the project area would be provided via existing roadways as well as internal roads constructed in the PV solar fields. No improvements to area roadways would be necessary to accommodate the proposed project.

D. SECONDARY EFFECTS OF GROWTH

The Campo Verde Solar Project would not result in the introduction of people and activities to an area that is currently in agricultural use. Secondary effects of the proposed solar energy facility 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. No long-term increase in traffic, noise or air emissions would occur as a result of the proposed project.

7.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

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 parcels previously used for agricultural purposes to solar energy production and transmission.

Development of the project site would irretrievably commit building materials and energy to the construction and maintenance of the solar energy facility, Gen-Tie and associated buildings and infrastructure proposed upon project buildout. 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 developments within the proposed project area.

7.4 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 traffic and air quality impacts as a result of construction. However, the Campo Verde 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 important agricultural resources. However, the Applicant plans to remove and/or properly abandon facilities and equipment associated with the project and restore the solar energy facility site back to irrigated agricultural production at the end of the useful life of the project. Upon implementation of these measures, impacts to long-term environmental goals will be less than significant.

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.

~~5.0 CUMULATIVE IMPACTS SUMMARY~~7.0 OTHER CEQA REQUIRED CONSIDERATIONS

The project's potential cumulative impacts are summarized in Chapter 5.0 of this DEIR. Sections 4.1 through 4.12 evaluate cumulative impacts related to each technical discussion area and identify mitigation measures addressing each cumulatively considerable impact. 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 Campo Verde 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.

~~5.0 CUMULATIVE IMPACTS SUMMARY~~7.0 OTHER CEQA REQUIRED CONSIDERATIONS

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