

CHAPTER 7.0

**OTHER CEQA REQUIRED
CONSIDERATIONS**

7.0 OTHER CEQA REQUIRED CONSIDERATIONS

This section discusses the additional topics statutorily required by the California Environmental Quality Act (CEQA). The topics discuss whether the project causes significant irreversible environmental changes, growth inducing impacts, or unavoidable significant environmental impacts. It also identifies effects found not to be significant (i.e. all issues determined to be less than significant under CEQA).

7.1 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. In addition, Section 15093(a) of the CEQA Guidelines requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. The County of Imperial can approve a project with unavoidable adverse impacts if it adopts a “Statement of Overriding Considerations” setting forth the specific reasons for its decision. Based on the analysis provided in Sections 4.1 through 4.12, the proposed project would not result in any significant and unavoidable adverse impacts.

7.2 GROWTH-INDUCING IMPACTS

A. INTRODUCTION

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

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

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

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

Growth inducement may constitute an adverse impact if the growth is inconsistent with the land use plans, growth management plans, and growth policies for the area affected. Local land use plans provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by public utilities and services. A project that would induce unplanned growth or growth that conflicts with the local land use plans could indirectly cause additional adverse

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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

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

A. INTRODUCTION

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

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar

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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 IMPACT ANALYSIS

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.

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