

APPENDIX A

NOP, INITIAL STUDY AND COMMENT LETTERS

NOP

Notice of Completion & Environmental Document Transmittal

See NOTE below

Mail to: State Clearinghouse, P O Box 3044, Sacramento, CA 95812-3044 (916) 445-0613

SCH# _____

Project Title: Campo Verde Solar Energy Project

Lead Agency: Imperial County Contact Person: David Black

Street Address: 801 Main Street Email: DavidBlack@co.imperial.ca.us

City: El Centro Zip 92243 County: Imperial Phone: (760) 482-4240

Project Location

County: Imperial City/Nearest Community: El Centro

Cross Streets: South of I-8, west of Drew Road Zip Code: 92243 Total Acres: 1,990

Assessor's Parcel No. Various Section: Various Twp.: 16 South Range: 12 East Base: San Bernardino

Within 2 Miles: State Hwy #: N/A Waterways: Westside Main Canal

Airports: N/A Railways: N/A Schools: Westside School

Document Type

- CEQA: [X] NOP [] Supplement/Subsequent EIR NEPA: [] NOI [] Joint Document [] Early Cons [] EA [] Final Document [] Neg Dec [] Other: [] Draft EIS [] Other: [] Draft EIR [] FONSI

Local Action Type

- [] General Plan Update [] Specific Plan [] Rezone [] Annexation [] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment [] General Plan Element [] Planned Unit Development [X] Use Permit [] Coastal Permit [] Community Planning_Dept. [] Site Plan [] Land Division (Subdivision, [] Other:

Development Type

- [] Residential: Units Acres [] Water Facilities: Type MGD [] Office: Sq. ft. Acres Employees [] Transportation: Type [] Commercial: Sq. ft. Acres Employees [] Mining: Mineral [] Industrial: Sq. ft. Acres Employees [X] Power: Type Solar Watts 150 MWAC [] Educational: [] Waste Treatment: Type [] Recreational: [] Hazardous Waste: Type [] Other:

Project Issues Discussed in Document

- [X] Aesthetic/Visual [X] Flood Plain/Flooding [] Schools/Universities [X] Water Quality [X] Agricultural Land [] Forest Land/Fire Hazard [] Septic Systems [] Water Supply/Groundwater [X] Air Quality [X] Geological/Seismic [] Sewer Capacity [] Wetland/Riparian [X] Archeological/Historical [] Minerals [X] Soil Erosion/Compaction/Grading [X] Wildlife [] Coastal Zone [X] Noise [] Solid Waste [X] Growth Inducing [X] Drainage/Absorption [] Population/Housing Balance [X] Toxic/Hazardous [X] Landuse [] Economic/Jobs [] Public Services/Facilities [X] Traffic/Circulation [X] Cumulative Effects [] Fiscal [] Recreation/Parks [X] Vegetation [] Other:

Present Land Use/Zoning/General Plan Use Agriculture, non-food crops. Zoned: A-2 - General Agriculture, A-2-R - General Agriculture, Rural Zone, and A-3 - Heavy Agriculture.

Project Description A solar project proposed on 1,990 acres of agricultural land. The project includes photovoltaic solar panels, transformers, inverters and supporting equipment arranged in rows. SEE ATTACHED.

NOTE: Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. from a Notice of Preparation or previous draft document) please fill it in.

Reviewing Agencies Checklist

Form A, continued

- Resources Agency
- Boating & Waterways
- Coastal Commission
- Colorado River Board
- Conservation
- Fish & Game
- Forestry
- Office of Historic Preservation
- Parks & Recreation
- Reclamation
- S.F. Bay Conservaion & Development Commission
- Water Resources (DWR)
- Business, Transportation & Housing**
- Aeronautics
- California Highway Patrol
- CALTRANS District # 11
- Department of Transportation Planning (headquarters)
- Housing & Community Development
- Food & Agriculture
- Health & Welfare**
- Health Services _____
- State & Consumer Services**
- General Services
- OLA (Schools)

KEY

- S = Document sent by lead agency
- X = Document sent by SCH
- ✓ = Suggested distribution

Cal-EPA

- Air Resources Board
- APCD/AQMD
- California Waste Management Board
- SWRCB: Clean Water Grants
- SWRCB: Delta Unit
- SWRCB: Water Quality
- SWRCB: Water Rights
- Regional WQBC # 7 (Palm Desert)
- Youth & Adult Corrections**
- Corrections
- Independent Commissions & Offices**
- Energy Commission
- Native American Heritage Commission
- Public Utilities Commission
- Santa Monica Mountains Conservancy
- State Lands Commission
- Tahoe Regional Planning Agency
- Other Department of Toxic Substance Control

Public Review Period (to be filled in by lead agency)

Starting Date November 15, 2011

Ending Date December 16, 2011

Signature _____

Date _____

Lead Agency: (Complete if applicable)

Consulting Firm: Ericsson-Grant, Inc.

Address: 418 Parkwood Lane

City/State/Zip: Encinitas

Contact : Kevin L. Grant, Principal

Email Address: kgrant@ericsson-grant.com

Phone: (858) 353-7073

For SCH Use Only:

Date Received at SCH _____

Date Review Starts _____

Date to Agencies _____

Date to SCH _____

Clearance Date _____

Notes:

Applicant: Campo Verde Solar, LLC

Address: 353 Sacramento St. - # 2100

City/State/Zip: San Francisco, CA 94111

Email Address: JCook@FIRSTSOLAR.COM

Phone: (510) 625-7455

INITIAL STUDY

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1. Project Title: Campo Verde Solar Project Date: November 10, 2011
 2. Lead Agency: Imperial County Planning & Development Services Department (ICPDS)
 3. Contact Person: Dave Black, Planner IV
 4. Address: 801 Main Street
EI Centro, CA 92243
 5. Phone Number: (760) 482-4320 Fax Number: (760) 353-8338
 6. Project Location: The project site is located in Imperial County approximately 7 miles southwest of the community of EI Centro, California generally south of I-8, west of Drew Road, and north and east of the Westside Main Canal.
 7. Project Sponsor: Campo Verde Solar, LLC
 8. Sponsor Address: 353 Sacramento St. - # 2100
San Francisco, CA 94111
 9. General Plan Designation: Agriculture
 10. Zoning: A-2 (General Agriculture), A-2-R (General Agricultural Rural Zone), A-3 (Heavy Agriculture)
 11. Description of project: See attached project summary.
 12. Surrounding Land Uses and Setting: See attached project summary.
 13. Other Agencies whose approval is required (e.g., permits, financing approval, or participation agreement): Bureau of Land Management

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a potentially significant impact as indicated by the checklist on the following pages.

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology & Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Hydrology & Water Quality |
| <input checked="" type="checkbox"/> Land Use & Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population & Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation / Traffic | <input type="checkbox"/> Utilities and Service and Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

- 1) Found that the proposed project COULD NOT have significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- 2) Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent in the form of mitigation measures which are described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.
- 3) Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- 4) Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one *effect* 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by

mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- 5) Found that although the proposed project could have a significant *effect* on the environment, because all potentially significant *effects* (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION, pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project nothing further is required.

PROJECT SUMMARY

LOCATION:

The proposed project site is located in Imperial County approximately 7 miles southwest of the community of El Centro, California (Figure 1). The project site is located generally south of I-8, west of Drew Road, and north and east of the Westside Main Canal.

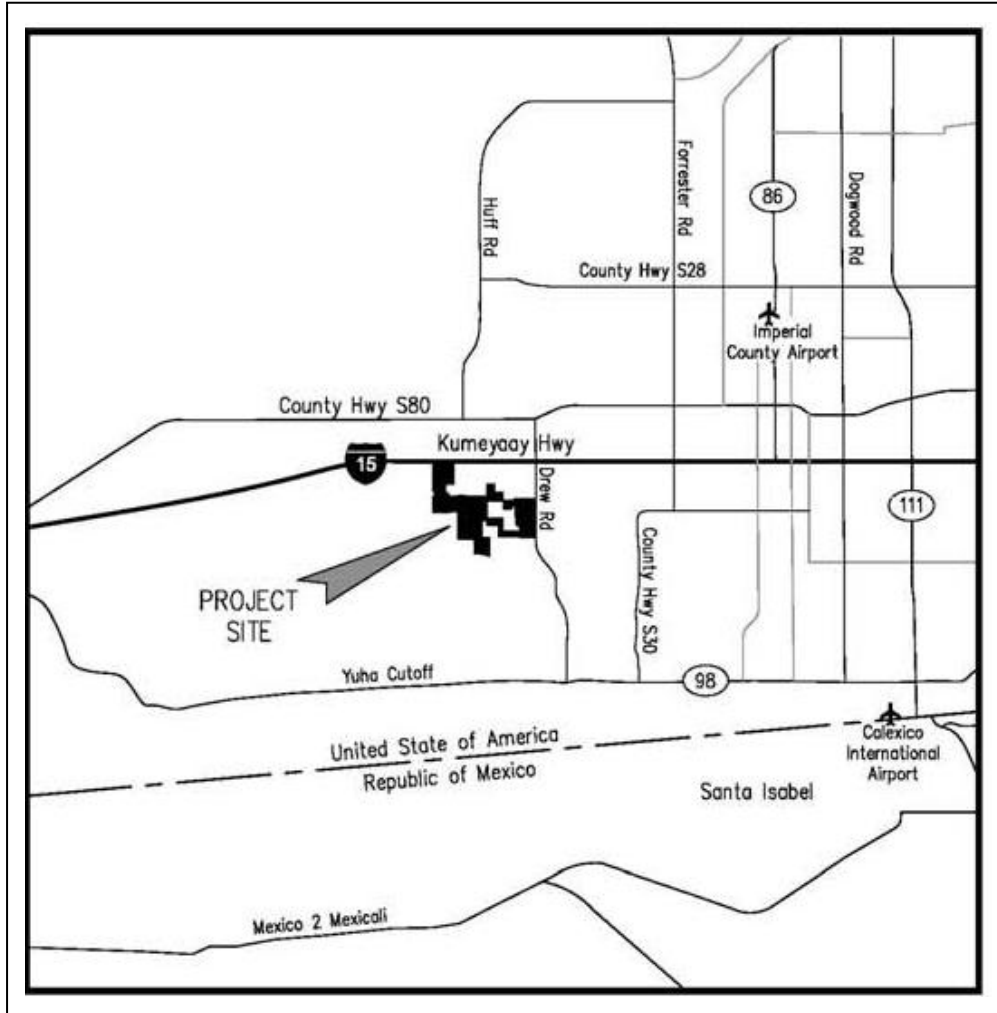


Figure 1 – Site Location Map

The solar facility site includes 27 parcels under private ownership by five separate owners (Figure 2). The project also includes a segment of transmission line that would extend south through land under the jurisdiction of the Bureau of Land Management (BLM) and connect with the Imperial Valley Substation.

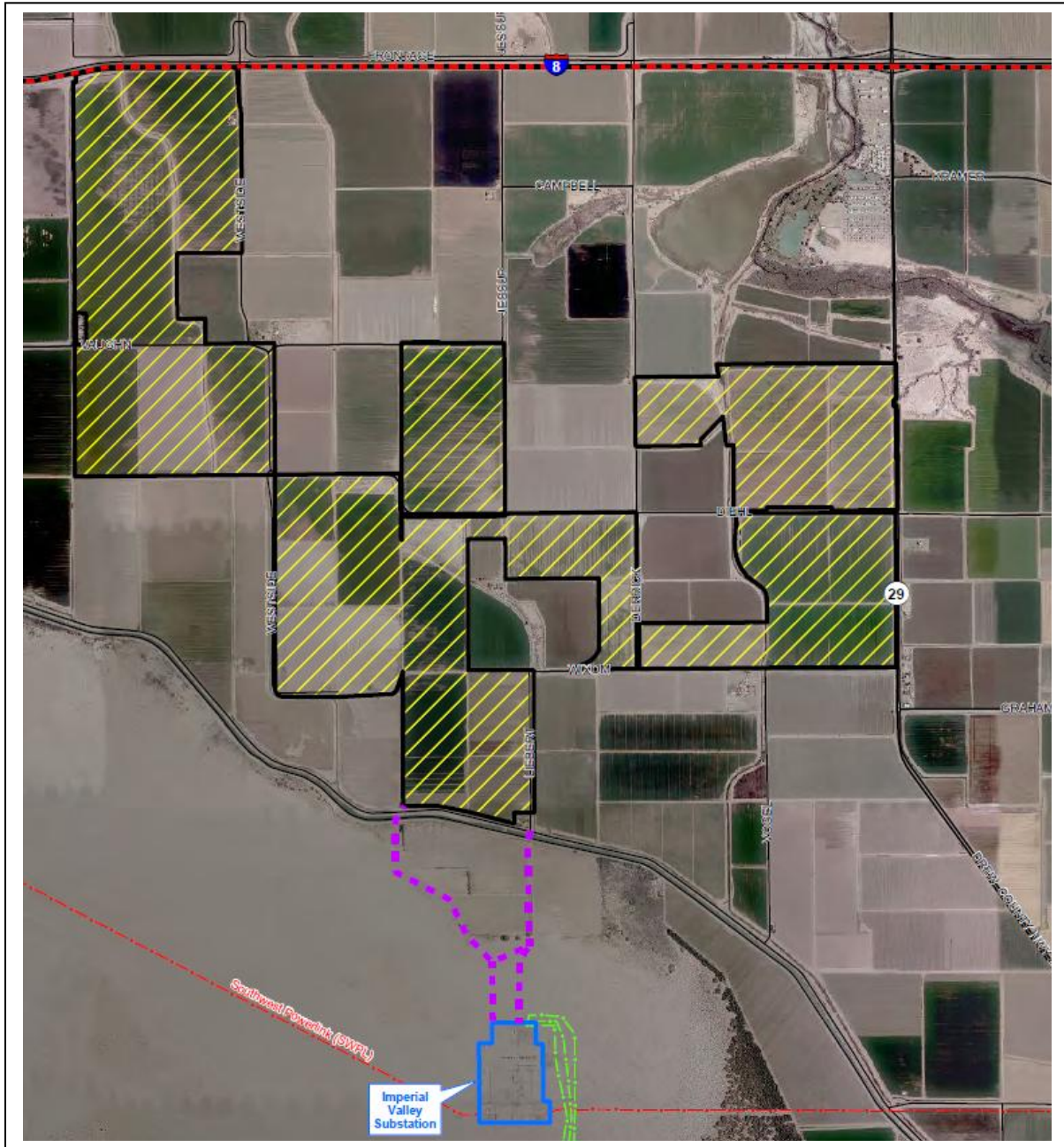
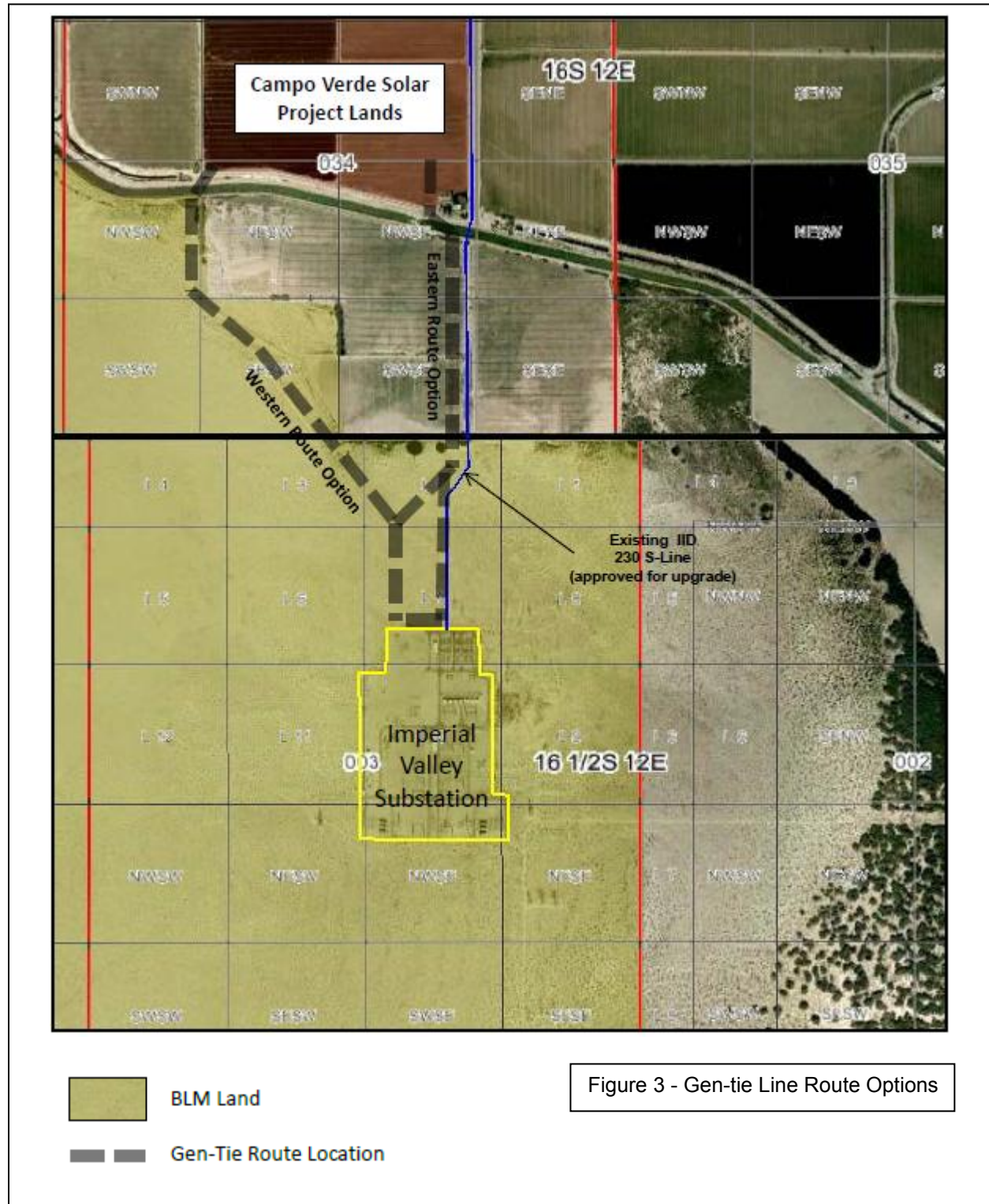


Figure 2 – Project Site Parcels

The proposed transmission line corridor would extend south from the project site through BLM land within BLM-designated Utility Corridor "N", connecting to the north side of the Imperial Valley Substation (Figure 3). The portion of the transmission line located through BLM land will undergo separate environmental review to fulfill the requirements of the National Environmental Policy Act (NEPA). The NEPA analysis will be prepared by the BLM.



THE PROJECT:

The proposed Campo Verde Solar project is located on approximately 1,990 acres of agricultural land. The project includes photovoltaic (PV) panels (either single-axis trackers or fixed-tilt supports) that would convert sunlight into direct current (DC) electricity. The PV modules would be grouped in blocks along with Power Conversion Station (PCS) with inverters, three-phase pad mounted transformers and circuit breakers to form 1 to 1.5 -megawatt alternating current (AC) blocks. The project also includes an on-site substation and a transmission line (Gen-tie Line) interconnection to the Imperial Valley Substation. The portion of the project on BLM land will undergo separate environmental review to fulfill the requirements of the National Environmental Policy Act (NEPA). The NEPA analysis will be prepared by the BLM.

The project will also include one or more small meteorological monitoring stations per block to track solar insolation, temperature, wind direction, and speed. The site will be fenced with a chain-link security fence approximately 8 feet high. Site security will be provided with a small guard station provided at gated access points. Security cameras may be deployed throughout the site and monitored at the guard station and remotely by a security service at night. Lights, triggered by motion sensors and powered by station power with backup battery power, will also be installed at each entry gate and at each PCS.

A site control center (SCC) will provide control, monitoring, alarm, and data storage functions for plant systems as well as communication with the solar field Supervisory Control and Data Acquisition (SCADA) system. The project's lighting system will provide operation and maintenance personnel with illumination for both normal and emergency conditions near the main entrance and the project substation. Underground metal structures will have cathodic protection as necessary based on soil conditions.

If the project were ever to be decommissioned, the panels, support structures, and electrical equipment would be removed and the site would be returned to agriculture.

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the follow:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to previously-prepared or outside documents should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

OFFICIAL CHECKLIST:

AESTHETICS Would the project:	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) The project site is located in an unincorporated portion of Imperial County characterized by flat, agricultural land. No scenic vistas or areas with high visual quality would be disrupted. Impacts are anticipated to be less than significant.
- b) The project site consists of agricultural parcels of land that have been cultivated and disturbed. As a result, development of the project site is not anticipated to substantially damage scenic resources, including, but limited to, trees, rock outcroppings, and historic buildings. Moreover, the project site is not located adjacent to a scenic highway. The initial segment for future Scenic Highway Designation status of SR 98 lies between the San Diego County line and its junction with State Route 98 which is over 16 miles southwest of the western boundary of the project site. Therefore, no impact is anticipated and impacts to resources within a state scenic highway will not be discussed in the EIR.
- c) The proposed project is the construction of a solar facility, which would include low-lying solar panels, three-phase transformers and circuit breakers. The highest point on the fixed tilt supports (the uppermost solar panel) is up to approximately 7 feet above the ground surface. The highest point on the single axis-trackers would be approximately 9 to 11 feet occurring during the morning and evening hours when the panels are tilted to face the rising or setting sun. This is based on a 4-panel high mounting system. Using the fixed-tilt mounting system, panels will be mounted at an angle of approximately 25 degrees. The degree of tilt will change over the course of each day for the single-axis trackers. The PV units will be mounted on driven pile foundations to support the panel mounting system. The Power Conversion System (PCS) electrical equipment (inverters and transformers) will be located in a pre-fabricated protective enclosure about 10 to 12 feet high. In addition, an operation and maintenance (O&M) building would be developed on site and would have a maximum height of approximately 18 feet. The project will change the look and character of the site. Changes in the views of the site from Key Observation Points will be analyzed. Therefore, a potentially significant impact is identified for this issue area. Impacts to visual character and quality of the site will be addressed in the EIR.
- d) The project's lighting system will provide operation and maintenance personnel with illumination for both normal and emergency conditions near the main entrance and the project substation. Lighting will be designed to provide the minimum illumination needed to achieve safety and security objectives and will be directed downward and shielded to focus illumination on the desired areas only. Lights, triggered by motion sensors and powered by station power with backup battery power, will also be installed at each entry gate and at each PCS. There will be no lighting in the solar field. Therefore, light trespass on surrounding properties will be minimal. If lighting at individual solar panels or other equipment is needed for night maintenance, portable lighting will be used. The solar panels are generally non-reflective. Therefore, a less than significant impact is identified for light and glare impacts. This will be acknowledged in the EIR.

II. AGRICULTURE AND FOREST RESOURCES -- In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 511 04(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) Based on the farmland maps prepared by the *California Department of Conservation* (2006), the project site contains Prime Farmland and Farmland of Statewide importance. Therefore, a potentially significant impact would result from the conversion of Farmland of Statewide Importance to non-agricultural use, as proposed on the project site. A Land Evaluation Site Assessment (LESA) will be prepared for the proposed project and conversion of farmland will be addressed in the EIR. This issue is considered potentially significant.

b) The land encompassed by the project parcels is currently zoned A-2 (General Agriculture), A-2-R (General Agricultural Rural Zone) and A-3 (Heavy Agriculture) and designated by the General Plan as "Agriculture." Solar energy facilities are allowed uses within these zones subject to a Conditional Use Permit. The Applicant is not proposing a change in the Land Use Designation or zoning of the project parcels. Furthermore, the A-2 and A-3 zones allow for the development of solar energy farms and the Board of Supervisors has determined that solar projects are consistent with agriculture related zones. The Board of Supervisors has taken public comments on solar projects and approved previous solar farms as a temporary use on a case-by-case basis. Thus, the project does not conflict with existing zoning for agriculture. The original configuration of the project site contained four parcels encompassing approximately 276 acres which are subject to the Williamson Act. After discussions with the County and other stakeholders, these parcels have been removed from the project. Therefore, contract conversion of land under Williamson Act Contract is not an issue and will not need to be discussed in the EIR.

- c) Based on the Imperial County General Plan, Conservation and Open Space Element, mixed chaparral, pinyon-juniper habitats, and the montane hardwood-conifer forest are located in restricted areas of the County. Mixed chaparral and pinyon-juniper habitats are located in the extreme southwestern corner of Imperial County; montane hardwood-conifer forest is in the extreme northwestern corner of Imperial County. Thus, there are no existing forest lands, timberlands, or timberland zoned Timberland Production either on-site or in the immediate vicinity that would conflict with existing zoning or cause rezoning. Therefore, no impact is identified for this issue area.
- d) There are no existing forest lands either on-site or in the immediate vicinity of the project site. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area.
- e) The proposed project would introduce a solar facility into an area used for agriculture and would temporarily convert this farmland to non-agricultural uses. This action would not result in conversion of adjacent farmland to non-agricultural uses. This is a potentially significant impact that will be discussed in the EIR.

III. AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to the following determinations. Would the project:	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) The project site is located within the Salton Sea Air Basin (SSAB) and is subject to the Imperial County Air Pollution Control District (ICAPCD) Rules and Regulations. Construction of the proposed project would potentially create temporary emissions of dust, fumes, equipment exhaust, and other air contaminants that may conflict with the ICAPCD Rules and Regulations. Thus, a potentially significant impact is identified for this issue area.
- b,c) Currently, the SSAB is either in attainment or unclassified for all federal and state air pollutant standards with the exception of O₃ (8-hour) and total suspended particulate matter less than 10 microns in diameter (PM₁₀). Air pollutants transported into the SSAB from the adjacent South Coast Air Basin (Los Angeles, San Bernardino County, Orange County, and Riverside County) and from Mexicali (Mexico) substantially contribute to the non-attainment conditions in the SSAB. Thus, a potentially significant impact is identified for this issue area. The proposed construction phase of the project may result in a cumulatively considerable net increase of one or more criteria pollutants as a result of point, and non-point source emissions, for which the project region is in nonattainment under applicable federal and state ambient air quality standards. Thus, a potentially significant impact is identified for this issue area. No sensitive receptors immediately surrounding the project site have been identified. No stationary source emissions are proposed from the project; however, temporary construction air quality emissions have the potential to result in a significant impact.

To address the above-identified issues, an analysis of air quality impacts is being prepared for the proposed project and these potential air quality impacts will be addressed in the EIR.

- d) The project site and surrounding areas are currently agricultural land with the northernmost portion adjacent to Interstate 8. No sensitive receptors (housing, schools, churches) exist on the project site but one school and a few residences do occur within the immediate vicinity. These are not expected to be impacted by substantial pollutant concentrations from the construction activities. Impacts are anticipated to be less than significant, but will be acknowledged and/or analyzed in the EIR.
- e) The proposed project is the installation of a solar facility. The project, by its nature, is not anticipated to generate objectionable odors. No impact is identified for this issue area.

IV. BIOLOGICAL RESOURCES Would the project:	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances Protecting biological resource, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) Nearly all the project lands are disturbed agricultural lands with very little native vegetation / habitats. Biological surveys of these lands have been conducted with the focus of documenting the habitat, potential jurisdictional state / federal waters, and wetlands, and documenting suitable threatened, endangered, and sensitive wildlife species habitats. The CNDDDB RareFind also indicated that two sensitive species are known to be in the general project vicinity: western burrowing owl (*Athene cunicularia*) and flat-tailed horned lizard (*Phrynosoma mcallii*). The potential range for the desert tortoise (*Gopherus agassizii*) is outside of, but close to, the project area.

The flat-tailed horned lizard is a Bureau of Land Management (BLM) sensitive species. According to the *Flat-tailed Horned Lizard Rangeland Management Strategy* (2003), the historical range of the flat-tailed horned lizard is located primarily in Imperial Valley. The project proposes to interconnect to the Imperial Valley Substation via one of two routes located on BLM land. The BLM land has the potential to provide habitat for the flat-tailed horned lizard. A flat-tailed horned lizard habitat assessment/survey shall be conducted to determine if potential/suitable habitat is present on the project site as part of BLM's analysis under NEPA.

The project area (non-BLM land) does not include any potential habitat for the flat-tailed horned lizard (no native habitats) but does include potential habitat for the burrowing owl. Thus, a potentially significant impact is identified for sensitive species. This issue will be addressed in the EIR.

- b,c) The earthen drains and canals on the solar site were checked for indications of wetland vegetation and wildlife use. The remainder of the site is under active agriculture and did not require extensive surveys as native botanical resources are not present in these areas and wildlife habitats are limited. Because there is potential for riparian and wetlands on the project site, this issue is considered potentially significant and will be addressed in the EIR.
- d) The proposed solar facility includes the installation of a chain link perimeter fence, which would inhibit medium- and large- sized mammals from moving through the site. Small- sized mammals would not be inhibited from moving through the solar facility.
- e) The Imperial County General Plan Open Space Conservation Policy requires detailed investigations to be conducted to determine the significance, location, extent, and condition of natural resources in the County, and to notify any agency responsible for protecting plant and wildlife before approving a project which would impact a rare, sensitive, or unique plant or wildlife habitat. In accordance with this policy, biological studies have been prepared for the project site. The Imperial County General Plan Land Use Element Policy notes that the majority of the privately owned land in the County is designated "Agriculture," which is also the predominate area where burrowing owls create habitats, typically in the brims and banks of agricultural fields. Because the project site has the potential for burrowing owl, a potentially significant impact is identified. The results of the biological studies will be discussed in the EIR.
- f) Imperial County does not have a Habitat Conservation Plan (HCP). Thus, no conflicts or impacts would occur between the portion of the project on private lands in Imperial County and an adopted HCP. The portion of the Gen-tie Line extending south from the solar facility site into BLM land is in an area designed as "Utility Corridor N" in the California Desert Conservation Area (CDCA). The transmission line is an allowable use under the CDCA. The transmission line will undergo a separate environmental review to fulfill the requirements of NEPA. Thus, a less than significant impact is anticipated with regard to the CDCA Plan. This will be discussed in the EIR.

V. CULTURAL RESOURCES	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) All of the parcels comprising the project site have been disturbed by past farming and/or other activities. Thus, the presence of significant or un-damaged cultural resources on the site is unlikely. Surveys on the site have verified the presence of historical canals in the area but none of these would be affected by the project. This is considered a less than significant impact, but will be discussed in the EIR.
- b) A search of sacred lands on file at the Native American Heritage Commission shall be conducted to determine if any designated Sacred Lands are present in the immediate project vicinity. Thus, a potentially significant impact has been identified for this issue, and this issue will be addressed in the EIR.
- c) Many paleontological fossil sites recorded in Imperial County have been discovered during construction activities. Paleontological resources are typically impacted when earthwork activities such as mass excavation cut into geological deposits (formations) with buried fossils. It is not known if any paleontological resources are located on the project site. Based on the San Diego-El Centro Sheet Geologic Map of California prepared by the Division of Mines and Geology, dated 1962, the project site is underlain by geologic units comprised of quaternary lake deposits of the ancient Lake Cahuilla. This type of deposit arrived during the late Pleistocene age (the last 10,000 years) and is suitable for discovery of paleontological resources. Thus, a potentially significant impact has been identified for this issue area, and this issue will be addressed in the EIR.
- d) As described in item "a)" above, there it is unlikely that human remains would be found on the project site based on years of disturbance associated with agricultural activities. Nevertheless, potential for previously unknown human remains may be discovered. This issue is potentially significant unless mitigation is incorporated and will be discussed in the EIR.

VI. GEOLOGY AND SOILS	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong Seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction and seiche/tsunami?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial risk to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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- a-i) The project site is not located within a State of California, Alquist-Priolo Earthquake Fault Zone. Thus, no impact is identified for this issue area.
 - a-ii) The project site is located in the seismically active Imperial Valley in Southern California and is considered likely to be subjected to moderate to strong ground motion from earthquakes in the region. The site could be affected by the occurrence of seismic activity to some degree, but no more than the surrounding properties. Additionally, Imperial County is classified as Seismic Zone 4 by the Uniform Building Code, (Sections 1626 through 1635), which requires developments to incorporate the most stringent earthquake resistant measures. A potentially significant impact has been identified for this issue, and it will be evaluated in the EIR.
 - a-iii) The project site may contain soils that are subject to liquefaction. A geotechnical study has been prepared for the project site and its findings will be discussed in the EIR. Thus, a potentially significant impact is identified for liquefaction and seismic-related ground failure.

The project site is not near a large body of water and is not along the coast. Therefore, no impact would occur with respect to a seiche or tsunami.

- a-iv) The project site is not located within a State of California, Alquist-Priolo Earthquake Fault Zone. In addition, as identified in the Seismic and Public Safety Element of the County of Imperial General Plan, the hazard of landsliding is unlikely due to the regional planar topography. Thus, no impact is identified for these issue areas.
- b) Soil erosion could result during construction of the proposed project in association with grading and earthmoving activities. Minimal grading would be done on the project site because the current topography is suitable for the placement of PV panels with little site preparation or improvements. Existing vegetation will be grubbed from the site and the soil surface will be smoothed and compacted to prepare the site for installation of the solar panels. However, impacts are considered less than significant because erosion would be controlled on-site in accordance with County standards including preparation, review and approval of a grading plan by the County Engineer.

Following construction, the solar field will be coated with a permeable dust suppressant and the roadways within and around the solar field will be covered with gravel. Thus, erosion impacts would be reduced to less than significant levels through County standards and design features. However, erosion will be discussed in the EIR.

- c) According to the Soil Survey of Imperial County, the proposed project is underlain with Holtville silty clay wet; Imperial Silty Clay, wet; Imperial - Glenbar silty clay loams, wet, 0 to 2 percent slopes; Indio loam, wet; Vint loamy very fine sand, wet; and, Vint and Indio very fine sandy loams, wet; Meloland very fine sandy loam, wet; and Meloland and Holtville loams, wet (United States Department of Agriculture Soil Conservation Service, 1981). Some of these soils are considered potentially unstable. Therefore unstable soils have been identified as potentially significant that will be addressed in the EIR based on the findings of the geotechnical report prepared for the project site.
- d) According to the Soil Survey of Imperial County, the proposed project is underlain with Holtville silty clay wet; Imperial Silty Clay, wet; Imperial - Glenbar silty clay loams, wet, 0 to 2 percent slopes; Indio loam, wet; Vint loamy very fine sand, wet; and, Vint and Indio very fine sandy loams, wet; Meloland very fine sandy loam, wet; and Meloland and Holtville loams, wet (United States Department of Agriculture Soil Conservation Service, 1981). A majority of these soils have a low expansion potential. However, potential for expansive soils throughout the site are not known and are considered potentially significant. A geotechnical report is being prepared for the project site and will be used to formulate the analysis of expansive soils in the EIR.
- e) Some of these soils on the project site are incapable of adequately supporting the use of septic tanks. The project would include an on-site operations and maintenance (O&M) building and there is a plan for a septic system. Therefore, soil ability to support septic tanks will be analyzed in the EIR.

VII. GREENHOUSE GAS EMISSIONS	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a,b) The proposed project has the potential to generate greenhouse gas emissions during construction in association with travel required to and from the project site by construction workers and delivery of materials. During the up to 24 month construction period, the average number of construction workers on site would be expected to average up to approximately 150 each day with a peak of 500. In the long-term, the project is expected to provide a benefit with respect to reduction of greenhouse gas emissions. A Greenhouse Gas Emissions/Climate Change technical report is being completed for the proposed project. Thus, a potentially significant impact is identified for these issue areas.

VIII. HAZARDS AND HAZARDOUS MATERIALS –	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Create a Significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a Significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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- a,b) The operation of the solar facility will potentially handle hazardous materials. The hazardous materials handled onsite would be limited to small amounts of everyday use cleaners, common chemicals used for maintenance, and other common chemicals. The project will be required to comply with State laws and County Ordinance restrictions, which regulate and control the materials handled on-site. Such hazardous wastes would be transported off-site for disposal according to applicable State and County restrictions and laws governing the disposal of hazardous waste during construction and operation of the project. Disposal of hazardous wastes on the project site is not part of the proposed project. However, a potentially significant impact remains for this issue area, and this issue will be addressed in the EIR.

The project site is currently used as agricultural land. Therefore, there is a potential that the project may contain contaminated soils. A Phase I Environmental Site Assessment has been completed for the proposed project and no recognized or significant environmental conditions associated with contamination or hazardous materials were identified. A potentially significant, but mitigable impact is identified for this issue area with regard to use of hazardous materials during construction.

- c) The project site is located within one-quarter mile of an existing school. However, the only hazardous materials that would be used by the Project within one-quarter mile of the school would be the fuels used by equipment during construction. This would be similar to the fuel used by the agricultural equipment currently conducting farming on the same lands. This will be evaluated in the EIR,
- d) The project site is not listed as a hazardous materials site pursuant to Government Code, Section 65962.5. No impact is identified for this issue area.
- e,f) The project site is not located within two miles of a public airport or a private airstrip. Thus, no impact is identified for these issue areas.
- g) As identified in the Seismic and Public Safety Element of the County of Imperial General Plan, the "Imperial County Emergency Plan" addressed Imperial County's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and nuclear defense operations. The proposed circulation plan for the project site will be required to provide emergency access points and safe vehicular travel. In addition, local building codes would be followed to minimize flood, seismic, and fire hazard. Thus, the proposed project would not impair the implementation or physically interfere with any adopted emergency response plans or emergency evacuation plans. No impact is identified for this issue area.
- h) The project site is not characterized as an area of urban/wildland interface. According to the Imperial County Natural Hazard Disclosure (Fire) Map prepared by the California Department of Forestry and Fire Protection (2000) the project site does not fall into an area characterized as either: (1) a wildland area that may contain substantial forest fire risk and hazard; or (2) very high fire hazard severity zone. Thus, the project site would not expose people or structures to significant risk of loss injury or death involving wildland fire. No impact is identified for this issue area.

IX. HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table <i>level</i> (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits <i>have been granted</i>)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect the flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss injury or death <i>involving</i> flooding, including flooding as a result of the failure of a <i>levee</i> or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Compared to the existing irrigated agriculture on the site, the proposed project would not generate an increase in the amount of runoff water from the site. What little water could be used for panel washing will continue to percolate through the ground, as a majority of the surfaces on the project site will remain pervious. Thus, the proposed project will not substantially alter the existing drainage pattern of the site, substantially increase the rate of runoff, or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Therefore, a less than significant impact is identified for these issue areas.

b) The proposed project does not propose the use of groundwater. Water will continue to percolate through the ground, as a majority of the surfaces on the project site will remain pervious. No impact is identified for this issue area.

c,d,e) Most of the project site will be drained by sheet flow to on- and off-site drainages as it is currently configured. Thus the project would not substantially alter the existing drainage pattern of the site or area. Increased amounts of erosion or surface runoff are not anticipated, nor are increased amounts of

polluted runoff. Local containment will be provided around the transformers within the project substation to prevent any associated hazardous materials from leaving the site. Furthermore, the project would be required to comply with the requirements of a stormwater permit. Impacts would be less than significant.

- f) The project is not anticipated to degrade water quality based on the required stormwater permit as well as BMPs. This issue is considered less than significant.
- g,h) According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, the majority of the project site is located in Zone X, which is an area determined to be outside of the 0.2% annual chance of a flood. A portion of the project site is located in Zone A, which is an area subject to 1% annual chance of a flood. However, the project does not propose the placement of housing or structures within a 100-year flood hazard area. Thus, no impact is identified for these issue areas.
- i) No dams or levees are in the vicinity of the project site. Thus, no impact is identified relative to the failure of a levee or dam.
- j) No bays or lakes are located within a two-mile radius of the project site. Furthermore, the project site is over 100-miles inland from the Pacific Ocean. In addition, the project site is relatively flat and level. Therefore, there is no potential for the project site to be inundated by seiches, tsunamis, or mudflows. Thus, no impact is identified for these issues.

X. LAND USE AND PLANNING				
Would the project:	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (include, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) The proposed project does not physically divide any established community. Thus, no impact is identified for this issue area.
- b) The project site is currently designated by the General Plan as "Agriculture." No land use amendment would be required for the portion of the project located within the County's jurisdiction, as the facility is an allowed use within the existing zones subject to a Conditional Use Permit. The County identifies agricultural land as a form of open space. As such, there are activities such as hunting, bike riding, walking, and bird watching that can take place in agricultural areas. The project is anticipated to be compatible with these uses on adjacent lands. Thus, this impact is considered less than significant.

The impact to recreation use caused by the transmission line on BLM lands would be assessed by BLM as part of the environmental review carried out under NEPA.

- c) Imperial County is not within the jurisdiction of any adopted habitat conservation plan (HCP) or natural community conservation plan (NCCP), or other approved local, regional or state habitat conservation plan. Therefore, no impact to an HCP or NCCP would occur and this issue will not be examined in the EIR.

XI. MINERAL RESOURCES				
Would the project:	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a, b)The project site is used for agriculture. According to the Conservation and Open Space Element of the County of Imperial General Plan, no known mineral resources occur within the project site nor does the project site contain mapped mineral resources. As such, the proposed project would not adversely affect the availability of any known mineral resources within the project site. Thus, no impact is identified for these issue areas.

XII. NOISE				
Would the project result in:	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a,c,d) The proposed project has the potential to exceed construction noise (temporary noise) standards on-site and off-site (e.g., sensitive habitat areas). A noise analysis is being prepared to identify any potential short-term construction and long-term operational impacts of the proposed project. Thus, potentially significant impacts have been identified for these issue areas. These issues will be addressed in the EIR.

e) The proposed project is a solar facility development. Operation of the facility would not create excessive groundborne vibration or noise levels. In addition, grading associated with project development is unlikely to generate groundborne vibration or noise levels through blasting or other construction related activity, as the project is characterized by flat topography. Therefore, no impact is identified for this issue area.

e,f) The project site is not located within two miles of a public airport or a private airstrip. Thus, the project site would not be exposed to excessive aircraft noise. No impacts have been identified for these issue areas.

XII. POPULATION AND HOUSING	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) The project, as a solar facility, does not propose the development of housing on the project site. The project would require approximately 4 to 8 full-time personnel for operations and maintenance of the solar facility and one security guard. Thus, the proposed project would not result in substantial population growth as the number of employees required to operate and maintain the facility is minimal. The project would provide electricity to off-set a portion of current electricity generated by fossil-fuel sources. Thus the project would not induce substantial population growth. No impact would occur for this issue.

b-c) The proposed project site is currently used for agriculture and there are no farmhouses on the properties. As a result, development of the proposed solar facility would not displace substantial numbers of existing housing or people requiring construction of replacement housing elsewhere. No impact would occur for these issues.

XIII. PUBLIC SERVICES	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a-1) The project site is within the jurisdiction of the Imperial County Fire Department. The proposed project will pose a very small fire risk. All vegetation will be removed from the site and the solar field does not incorporate any flammable materials. The project would include an on-site O&M building and the electrical equipment (inverters and transformers) throughout the solar field would be located within pre-fabricated enclosed structures. The final site plan would be designed in accordance with Fire

Department requirements for access and would not impact the ability to provide emergency access to the site. The project also would not hinder the ability to access nearby properties. Thus, impacts to fire protection are considered less than significant.

a-2) Police protection to the project site would be under the jurisdiction of the Imperial County Sheriff Department. The project site incorporates a variety of security features to protect the site including a chain-link security fence approximately 8 feet high. Site security will be provided with a small guard station provided at the gated access points. Security cameras will be deployed throughout the site and monitored at the guard station and remotely by a security service at night. Lights, triggered by motion sensors and powered by station power with backup battery power, will also be installed at each entry gate and at each inverter. Thus, impacts to police protection are considered less than significant.

a-3, a-4, a-5) The proposed solar facility would not result in a substantial increase in population because it neither includes a residential component nor would it generate the need for new housing to accommodate workforce population. Based on the nature of the project as a solar facility, no increase in schools, parks, or other public facilities are anticipated. As such, the proposed project would not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed. Therefore, no impact is identified for this issue area.

<i>XIV. RECREATION</i>	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a, b)The proposed project is a solar facility and would not create a demand for recreation or parks in the County. No impact is identified for these issue areas.

<i>XVI. TRANSPORTATION/TRAFFIC</i>	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion/management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflicts with adopted policies, plans, programs, regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a,b)The construction phases of the proposed project would result in an increase of traffic on area roadways and intersections, which may reduce levels of service below County thresholds and result in a potentially significant impact. A traffic impact study is being prepared. Thus a potentially significant impact is identified for this issue area. This issue will be addressed in the EIR.

c) The proposed project would not result in changes to existing air traffic patterns through an increase in traffic levels or change in location. Thus, no impact is identified for this issue area.

d) The proposed project would not change the existing surrounding circulation network. Thus, no impact with regard to an increase in hazards due to a design feature or incompatible uses is identified for this issue area.

e) The proposed circulation plan for the project site will be required to provide emergency access points and safe vehicular travel. The final site plan would be designed in accordance with Fire Department requirements for access and would not impact the ability to provide emergency access to the site. The project also would not hinder the ability to access nearby properties. Thus, no impact is identified for this issue area.

f) The proposed project would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Thus, no impact is identified for this issue area.

<i>XVII. UTILITIES AND SERVICE SYSTEMS</i>	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a,e) The project would include an on-site O&M building with a planned septic system. During construction, portable toilets will be used to provide needed sanitary facilities. Thus, a less than significant impact is identified for this issue area.

b,d)The proposed project is anticipated to result in a minimal increase in water demand/use during construction and operation. This water will be obtained under an agreement with IID. During construction, water will be used to facilitate soil compaction and to control fugitive dust on exposed soils. During operation, the project will use water only for periodic washing of the solar panels and reapplication of the soil binding agent if necessary. An agricultural farm currently uses more water than the proposed solar facility would need during construction and operation. Thus, a less than significant impact is identified for this issue.

c) The project site is relatively flat and will be drained by sheet flow to on- and off-site drainages as it is currently configured. No new drainage facilities are proposed. This impact is considered less than significant, but will be acknowledged in the EIR.

f-g) During operations of the proposed project, waste generation will be minor. Solid wastes will be disposed of using a locally-licensed waste hauling service. Thus, a less than significant impact is identified for this issue.

<i>XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.</i>	Potentially Significant (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) Implementation of the proposed project has the potential to impact agricultural resources, air quality, sensitive biological resources, cultural resources, and transportation/circulation. These issues will be further evaluated in the EIR.

b) The proposed project has the potential to result in a cumulatively considerable net increase or one or more criteria pollutants for which the project region is in non-attainment under applicable federal and state ambient air quality standards. Therefore a potentially significant cumulative impact may occur. An

analysis of air quality impacts is being prepared for the proposed project and will be discussed in the EIR.

- c) The proposed project has the potential to result in significant environmental effects, which could directly or indirectly cause adverse effects on human beings. As demonstrated in this Initial Study, the proposed project has the potential to result in significant impacts to air quality, geology/soils, hazards and hazardous materials, and noise. These impact areas could result in direct or indirect adverse effects on human beings. Thus, these issues will be discussed in the EIR.

REVIEWING AGENCIES (Copies and/or Notice Provided)

LOCAL AGENCIES

- AG. DEPT.
- APCD
- ASSESSOR
- C.E.O.
- COUNTY COUNSEL
- E.H.S. DIVISION
- FIRE /O.E.S.
- FISH & GAME (COUNTY)
- IMPERIAL IRRIGATION DISTRICT
- PUBLIC WORKS DEPT.
- SHERIFF
- OTHER

CITIES

- BRAWLEY
- CALEXICO
- CALIPATRIA
- EL CENTRO
- HOLTVILLE
- IMPERIAL
- WESTMORLAND

LIBRARIES

- CALEXICO
- COACHELLA VALLEY
- BRAWLEY
- EL CENTRO
- HOLTVILLE
- IMPERIAL
- IMPERIAL VALLEY COLLEGE
- INDIAN HILL
- MEYER MEMORIAL
- PALO VERDE
- SAN DIEGO STATE UNIVERSITY

STATE AGENCIES

- AIR RESOURCES BOARD
- CALTRANS District 11/San Diego
- CALIFORNIA HIGHWAY PATROL
- DEPT. OF FISH & GAME *TRUSTEE AGENCY*
- HISTORIC PRESERVATION
- HOUSING & COMMUNITY DEVELOPMENT
- CALIFORNIA INTEGRATED WASTE BOARD
- STATE LANDS COMMISSION *TRUSTEE AGENCY*
- MINE RECLAMATION (OMR)
- NATIVE AMERICAN HERITAGE
- OFFICE OF PLANNING & RESEARCH (OPR)
- PARKS & RECREATION DEPT. *TRUSTEE AGENCY*
- REGIONAL WATER QUALITY BOARD
- RESOURCE AGENCY
- SCAG
- STATE GEOLOGIST
- WATER RESOURCE BOARD
- OTHER: DEPARTMENT OF CONSERVATION

FEDERAL AGENCIES

- BUREAU OF LAND MANAGEMENT (BLM)
- BUREAU OF MINES
- BUREAU OF RECLAMATION
- BORDER PATROL
- MARINE CORPS. AIR STATION, YUMA
- NAVAL AIR FACILITY, EL CENTRO
- SOIL CONSERVATION SERVICE
- U.S. FISH & WILDLIFE SERVICE
- OTHER

**FOR ADDITIONAL & GENERAL NOTICING
SEE DISTRIBUTION LIST IN PROJECT FILE**

NOP COMMENT LETTERS



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

Notice of Preparation

November 15, 2011

To: Reviewing Agencies
Re: Campo Verde Solar Energy Project
SCH# 2011111049

Attached for your review and comment is the Notice of Preparation (NOP) for the Campo Verde Solar Energy Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

David Black
Imperial County
801 Main Street
El Centro, CA 92243

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

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IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

**Document Details Report
State Clearinghouse Data Base**

SCH# 2011111049
Project Title Campo Verde Solar Energy Project
Lead Agency Imperial County

Type NOP Notice of Preparation
Description A solar project proposed on 1,990 acres of agricultural land. The project includes photovoltaic solar panels, transformers, inverters and supporting equipment arranged in rows.

Lead Agency Contact

Name David Black
Agency Imperial County
Phone (760) 482-4240 **Fax**
email DavidBlack@co.imperial.ca.us
Address 801 Main Street
City El Centro **State** CA **Zip** 92243

Project Location

County Imperial
City El Centro
Region
Cross Streets So. of I-8, W. of Drew Rd.
Lat / Long
Parcel No. Various
Township 16S **Range** 12E **Section** Variou **Base** SBB&M

Proximity to:

Highways
Airports
Railways
Waterways Westside Main Canal
Schools Westside School
Land Use Agriculture, non-food crops.
Z: A-2- General Agriculture, A-2-R-General Agriculture, Rural Zone, and A-3 Heavy Agriculture.

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Noise; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Geologic/Seismic

Reviewing Agencies Caltrans, Division of Aeronautics; Department of Conservation; California Energy Commission; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 6; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 7

Date Received 11/15/2011 **Start of Review** 11/15/2011 **End of Review** 12/14/2011

Regional Water Quality Control Board (RWQCB)

- RWQCB 1**
Cathleen Hudson
North Coast Region (1)
- RWQCB 2**
Environmental Document
Coordinator
San Francisco Bay Region (2)
- RWQCB 3**
Central Coast Region (3)
- RWQCB 4**
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S**
Central Valley Region (5)
- RWQCB 5F**
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R**
Central Valley Region (5)
Redding Branch Office
- RWQCB 6**
Lahontan Region (6)
- RWQCB 6V**
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7**
Colorado River Basin Region (7)
- RWQCB 8**
Santa Ana Region (8)
- RWQCB 9**
San Diego Region (9)
- Other** _____

- _____
Conservancy

- Caltrans, District 8**
Dan Kopulsky
- Caltrans, District 9**
Gayle Rosander
- Caltrans, District 10**
Tom Dumas
- Caltrans, District 11**
Jacob Armstrong
- Caltrans, District 12**
Marlon Regisford

Cal EPA

- Airport/Energy Projects**
Jim Lerner
- Transportation Projects**
Douglas Ito
- Industrial Projects**
Mike Tollstrup
- State Water Resources Control Board**
Regional Programs Unit
Division of Financial Assistance
- State Water Resources Control Board**
Student Intern, 401 Water Quality
Certification Unit
Division of Water Quality
- State Water Resources Control Board**
Phil Crader
Division of Water Rights
- Dept. of Toxic Substances Control**
CEQA Tracking Center
- Department of Pesticide Regulation**
CEQA Coordinator

- Native American Heritage Comm.**
Debbie Treadway
- Public Utilities Commission**
Leo Wong
- Santa Monica Bay Restoration**
Guangyu Wang
- State Lands Commission**
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)**
Cherry Jacques

Business, Trans & Housing

- Caltrans - Division of Aeronautics**
Philip Crimmins
- Caltrans - Planning**
Terri Pencovic
- California Highway Patrol**
Suzann Ikeuchi
Office of Special Projects
- Housing & Community Development**
CEQA Coordinator
Housing Policy Division

Dept. of Transportation

- Caltrans, District 1**
Rex Jackman
- Caltrans, District 2**
Marcelino Gonzalez
- Caltrans, District 3**
Bruce de Terra
- Caltrans, District 4**
Lisa Carboni
- Caltrans, District 5**
David Murray
- Caltrans, District 6**
Michael Navarro
- Caltrans, District 7**
Elmer Alvarez

- Fish & Game Region 1E**
Laurie Harnsberger
- Fish & Game Region 2**
Jeff Drongesen
- Fish & Game Region 3**
Charles Amor
- Fish & Game Region 4**
Julie Vance
- Fish & Game Region 5**
Leslie Newton-Reed
Habitat Conservation Program
- Fish & Game Region 6**
Gabrina Gatchel
Habitat Conservation Program
- Fish & Game Region 6 I/M**
Brad Henderson
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Game M**
George Isaac
Marine Region

Other Departments

- Food & Agriculture**
Sandra Schubert
Dept. of Food and Agriculture
- Dept. of General Services**
Public School Construction
- Dept. of General Services**
Anna Garbeff
Environmental Services Section
- Dept. of Public Health**
Bridgette Binning
Dept. of Health/Drinking Water
- Delta Stewardship Council**
Terry Macaulay

Independent Commissions, Boards

- Delta Protection Commission**
Linda Flack
- Cal EMA (Emergency Management Agency)**
Dennis Castrillo

Resources Agency

- Resources Agency**
Nadell Gayou
- Dept. of Boating & Waterways**
Nicole Wong
- California Coastal Commission**
Elizabeth A. Fuchs
- Colorado River Board**
Gerald R. Zimmerman
- Dept. of Conservation**
Elizabeth Carpenter
- California Energy Commission**
Eric Knight
- Cal Fire**
Allen Robertson
- Central Valley Flood Protection Board**
James Herota
- Office of Historic Preservation**
Ron Parsons
- Dept of Parks & Recreation**
Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery**
Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm.**
Steve McAdam
- Dept. of Water Resources Resources Agency**
Nadell Gayou

Fish and Game

- Dept. of Fish & Game**
Scott Flint
Environmental Services Division
- Fish & Game Region 1**
Donald Koch

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net



November 18, 2011

Mr. David Black

**Imperial County Department of Planning & Development
Services**

801 Main Street
El Centro, CA 92243

Re: SCH#2011111049 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the "Campo Verde Energy Project;" located in Imperial County, California

Dear Mr. Black:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604). The court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources, impacted by proposed projects including archaeological, places of religious significance to Native Americans and burial sites. The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect.

The NAHC Sacred Lands File (SLF) search resulted as follows: **Native American cultural resources were not identified** within the project area identified. Also, the absence of archaeological resources does not preclude their existence. . California Public Resources Code §§5097.94 (a) and 5097.96 authorize the NAHC to establish a Sacred Land Inventory to record Native American sacred sites and burial sites. These records are exempt from the provisions of the California Public Records Act pursuant to California Government Code §6254 (r). The purpose of this code is to protect such sites from vandalism, theft and destruction. The NAHC

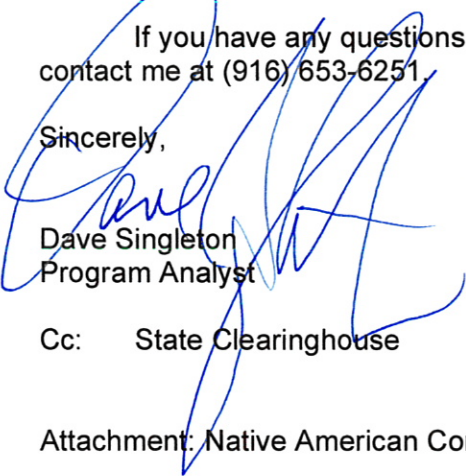
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followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation-tribal input on specific projects.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

California Native American Contacts

Imperial County
November 18, 2011

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
PO Box 1120 Diegueno/Kumeyaay
Boulevard , CA 91905
gparada@lapostacasino.
(619) 478-2113
619-478-2125

Manzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
PO Box 1302 Kumeyaay
Boulevard , CA 91905
ljbirdsinger@aol.com
(619) 766-4930
(619) 766-4957 Fax

Campo Band of Mission Indians
Monique LaChappa, Chairwoman
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA 91906
miachappa@campo-nsn.gov
(619) 478-9046
(619) 478-5818 Fax

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas
P.O. Box 775 Diegueno -
Pine Valley , CA 91962
(619) 709-4207

Cabazon Band of Mission Indians
Judy Stapp, Director of Cultural Affairs
84-245 Indio Springs Cahuilla
Indio , CA 92203-3499
markwardt@cabazonindia

(760) 342-2593
(760) 347-7880 Fax

Ewiiapaayp Tribal Office
Will Micklin, Executive Director
4054 Willows Road Diegueno/Kumeyaay
Alpine , CA 91901
wmicklin@leaningrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

Ewiiapaayp Tribal Office
Michael Garcia, Vice Chairperson
4054 Willows Road Diegueno/Kumeyaay
Alpine , CA 91901
michaelg@leaningrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

Cocopah Museum/Cultural Resources Dept.
Jill McCormick, Tribal Archaeologist
County 15th & Ave. G Cocopah
Sommerton , AZ 85350
culturalres@cocopah.com
(928) 530-2291 - cell
(928) 627-2280 - fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011111049; CEQA Notice of Preparation (NOP); draft Environmental Impact Report for the Campo Verde Solar Energy Project; located in Imperial County, California for which a Sacred Lands File search and Native American Contacts list were requested.

California Native American Contacts

Imperial County
November 18, 2011

Quenchan Indian Nation
THPO
P.O. Box 1899 Quechan
Yuma , AZ 85366
b.nash@quechantribe.com
(928) 920-6068 - CELL
(760) 572-2423

Campo Band of Mission Indians
Andrea Najera, Cultural Resources Manager
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA
(619) 478-9046
(619) 478-5818 - FAX

Ah-Mut-Pipa Foundation
Preston J. Arrow-weed
P.O. Box 160 Quechan
Bard , CA 92222 Kumeyaay
ahmut@earthlink.net
(928) 388-9456

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator
240 Brown Road Diegueno/Kumeyaay
Alpine , CA 91901
FIREFIGHTER69TFF@AOL.
COM
((619) 884-8437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
P.O. Box 1120 Diegueno/Kumeyaay
Boulevard , CA 91905
(619) 478-2113

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011111049; CEQA Notice of Preparation (NOP); draft Environmental Impact Report for the Campo Verde Solar Energy Project; located in Imperial County, California for which a Sacred Lands File search and Native American Contacts list were requested.

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST, M.S. 240

SAN DIEGO, CA 92110

PHONE (619) 688-6960

FAX (619) 688-4299

TTY 711

*Flex your power!
Be energy efficient!*

November 30, 2011

11-IMP-8

PM 29.93

Campo Verde Solar Energy Project

SCH # 2011111049

David Black
Planning & Development Services
Imperial County
801 Main Street
El Centro, CA 92243

Dear Mr. Black:

The California Department of Transportation (Caltrans) received a copy of the Notice of Preparation (NOP) for the proposed Campo Verde Solar Energy project located in proximity to Interstate 8 (I-8). Caltrans has the following comments:

Visual aspects of the project including glint and glare should be documented not to have any potential impacts to motorists driving on I-8.

It is understood by our agency that no new utility crossings on state facilities will occur as a result of this project.

If you have any questions, please contact Marisa Hampton of the Development Review Branch at (619) 688-6954.

Sincerely,

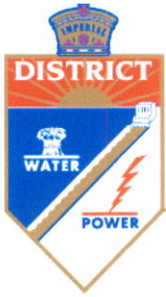
A handwritten signature in blue ink, appearing to read "JMA".

JACOB M. ARMSTRONG, Chief
Development Review Branch

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IID

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GS-EREP

December 12, 2011

Mr. Armando G. Villa
Director
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Campo Verde Solar Energy Project NOP of a DEIR

Dear Mr. Villa:

On November 22, 2011 we received from the Imperial County Planning and Development Services Dept., the Notice of Preparation (NOP) for a Draft Environmental Report (DEIR) for the Campo Verde Solar Energy (CVSE) Project. The proposed 1,990-acre solar photovoltaic energy-generating facility is located in Imperial County approximately 7 miles southwest of the community of El Centro, California, south of I-8 and west of Drew Road and northeast of Westside Main Canal.

The Imperial Irrigation District (IID) submits the following comments to the NOP:

1. Just as the California Department of Transportation objects to unnecessary crossing of the state's highways for safety reasons, IID is equally concerned about numerous crossing of the major IID irrigation canals. A case in point is the potential impacts to the Westside Main Canal (WSM) due to the Project's electrical transmission line (gen-tie) crossings for interconnection to the Imperial Valley Substation. While IID is not predicting the outcome of a study of the effects of a gen-tie tower being knocked over into the WSM, it is worth analyzing to develop a proposed mitigation strategy. Given that this project is one of many seeking approval by the County of Imperial (County) and Bureau of Land Management (BLM) and planning to cross the WSM, the safety of the IID irrigation system must be taken into consideration. Thus, the Project proponent is strongly advised to contact IID's Chief Civil Engineer at (760) 339-9559.
2. The Project could potentially involve using the banks of the WSM as an access road. Project proponent may not use IID's canal or drain banks to access the project site. For further information on this matter, contact IID's Chief Civil Engineer.
3. Additionally, IID has become aware that several of the solar energy generation projects being reviewed by the County and the BLM as stand-alone projects, are part of a larger proposal submitted by San Diego Gas & Electric (SDG&E) to the California Independent System Operator (CALISO), to develop a Locational Constrained Resource Interconnection Facility (LCRIF) named the "Imperial Valley Solar Collector Project." The proposed LCRIF has not been studied either operationally, as to its effect on the IID

balancing authority, or environmentally as to its effect on the resources within the Imperial County. SDG&E is suggesting that there are not sufficient facilities in Imperial County to transmit new renewable resources and that the gen-ties approved or in the process of being approved, for the various solar projects in the vicinity of the Imperial Valley Substation, should become part of a larger interconnected facility to transfer energy to the CALISO.

4. The apparent piecemealing being done regarding the effects of the various solar projects that together will form the framework for the LCRIF facilities is a cause of concern for IID given the potential impacts to our electrical balancing authority and our irrigation system integrity. A concern that is exacerbated by the fact that the County and BLM are being asked to approve projects that are part of a bigger whole without completing the full analysis of the entirety of the projects' impacts.
5. If SDG&E seeks approval from the County and the BLM for its LCRIF proposal and required facilities, IID will be able to review the many impacts and participate in the environmental and operational review. Until that time, any approval for the CVSE Project or any other renewable generation development in the same vicinity as the proposed LCRIF should be limited to the generation project as described and analyzed in the environmental documents for the project. The above mentioned LCRIF proposal is not part of the CVSE project description. Any Conditional Use Permit or BLM Right-of-Way Grant should specifically limit the use of the permitted facilities for the purposes studied and until such time as a new permit application is received that addresses any required mitigation for an expanded use.
6. Temporary interconnection to the IID S-Line that traverses the site is subject to IID's non-discriminatory Open Access Transmission Tariff provisions including availability of electrical energy facilities, capacity and deliverability on and from the IID's transmission system. For further information on this matter Project proponent should contact IID's Interconnection Transmission Contracts Administrator at (750) 482-3639 or access the IID website at: <http://www.oatioasis.com/iid/index.html>.
7. Project proponent assumes that permanent electrical service for the O&M building and for substation backfeed power will be provided by IID. Power to O&M building would be served from the "L-67" circuit out of Dixieland Substation. However, power is limited around proposed CVSE Project and a Distribution Circuit Analysis needs to be performed by IID Distribution Planning Engineering in order to identify what kinds of Distribution System improvements are necessary to provide such service. At this time, the IID has not received an electrical service request from the CVSE Project proponent. Thus, Project proponent is urged to contact IID Energy - Customer Operations & Planning Section at (760) 482-3402 for additional information and guidance regarding electrical service for the Project. It is important to note that all costs associated with the relocation and/or upgrade of IID electrical infrastructure to service the Project will be the responsibility of the Project proponent.
8. All new non-agricultural water project supply requests are processed in accordance with the IID's Interim Water Supply Policy for Non-Agricultural Projects (IWSP) (see <http://www.iid.com/index.aspx?page=152> for a link to the IWSP). In order to obtain a water supply from IID for the project, the Project proponent will be required to comply with all applicable IID policies and regulations and may be required to enter into a water supply agreement with IID. Such policies and regulations require, among other things,

that all potential environmental and water supply impacts of the Project have been adequately assessed, appropriate mitigation has been developed and appropriate conditions have been adopted by the relevant land use permitting/approving agencies. Furthermore, the Project proponent will be required to meet standards for water use efficiency and best management practices, including but not limited to those established by the County, as well as other water use efficiency standards, adopted by IID or local government agencies. For additional information regarding the Interim Water Supply Policy, the IID Water Supply Planning/Colorado River Manager may be contacted at (760) 339-9038.

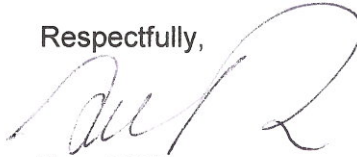
9. The DEIR/EA should address impacts to IID's drains. 33.3% of water delivered to agricultural users is discharged into the IID's drainage system. Reduction in field drainage due to land use conversion has an incremental effect on both drain water quality and volume of impacted drain and subsequent drainage path to the Salton Sea. This affects drainage habitat (flora and fauna) and the elevation of the Salton Sea (shoreline habitat and exposed acreage that may have air quality issues). Additionally certain direct-to-Sea drains have been identified as pupfish drains which require additional protections under state and federal Endangered Species Acts.
10. Furthermore, the DEIR/EA should also contain an assessment or analysis of cumulative impacts considering other non-agricultural facilities whose water use (or potential water use) would reduce the inflow conveyed to IID drains and subsequently, the Salton Sea.
11. The CVSE Project will impact numerous IID Water Department facilities in addition to the WSM, such as the Wormwood Lateral 7, Fig Canal, Fern Canal, Fern Sidemain Canal, Fern Lateral 7, Westside Drain, Dixie Drain No. 3, Dixie Drain No. 3-A, Wixom Drain, Diehl Drain, and Fig Drain.
12. The agricultural water delivery gates and small parcel water service pipes that exist in the project area, shall not to be used for the solar project, except those designated in the water supply agreement. CVSE shall plug the outlets of delivery gate and service pipes prior to commencing construction at each parcel and shall be abandoned with an Abandonment Request Form (ARF). The ARF is available at the following IID web site link: <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2587>. The ARF shall be submitted prior to commencing construction at each parcel. Abandoned delivery gates and small parcel service pipes can be re-established in the future, upon written request. CVSE shall continue to pay Water Availability Charges after the gates are abandoned.
13. Any existing canal and drain facilities within the project site are to be abandoned and quitclaimed by IID. CVSE shall execute an Abandonment Agreement with IID for these facilities. The Abandonment Agreement will include provisions for the canal and drain facilities to remain in service with IID for the parcels they serve until agricultural activities are suspended. The Agreement will also address IID requirements for returning the project site to a condition to support agricultural production in the event the facility is decommissioned and deconstructed. The IID Real Estate Section should be contacted at (760) 339-9239 for further details.
14. All existing underground tile drain pipe outlets into IID drains that serve the CVSE Project area are to be plugged prior to construction at each parcel. IID is to be notified 48 hours in advance of plugging, for on-site inspection and verification.

15. The CVSE project description states that the CVSE site's soil surface will be smoothed and compacted and that some drains may be removed. This will cause a greater volume of runoff to discharge and concentrate into the remaining drains, which is not an insignificant impact to drains, site runoff flows, or proposed storm water detention facilities, as stated in the NOP, and must be mitigated. IID drains are designed for farm drainage not storm water runoff. On site storm water runoff must be contained in retention ponds for release per IID requirements to make sure drain capacities are not exceeded. Consequently, a comprehensive IID hydraulic drainage system analysis is required to properly design system modifications to mitigate project impacts. The detailed drainage analysis will review the project's drainage hydraulics relative to IID system's hydraulics. Completion of the analysis may indicate the need for additional capital improvements, the cost of which would be borne by CVSE. IID's hydraulic drainage system analysis includes an associated drain impact fee.
16. IID is working on development of a program to address operation and maintenance of the drainage system for non-agricultural connections. The program will provide a mechanism to ensure the drainage system is properly operated and maintained for non-agricultural connections. Non-agricultural connections such as CVSE will be required to execute an agreement with IID regarding drain operation and maintenance costs.
17. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities.
18. Any construction or operation on IID property or within its existing and proposed right of way or easements will require an encroachment permit, including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities. A copy of the encroachment permit application is included in the IID's *Developer Project Guide 2008*, and can be accessed at: <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2328>. Also, instructions for the completion of encroachment applications can be found at <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2335>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits.
19. An IID encroachment permit is required in order to utilize existing surface water drain pipe connections to drains, and receive drainage service from IID. Surface water drain pipe connections are to be modified in accordance with IID standards.
 - a. Construction Storm Water Permit: A construction storm water permit from the California Regional Water Quality Control Board (CRWQCB) is required before commencing construction. Copies of this permit and the Storm Water Pollution Prevention Plan for the CVSE Project are to be submitted to IID.

- b. An industrial storm water permit from CRWQCB is required for operation of the proposed solar facility. A copy of this permit is to be submitted to IID.
20. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, canals, drains, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**
21. IID remains supportive of the CVSE Project and all renewable generation projects in the Imperial County in general and offers its assistance in the review of how to avoid unnecessary impacts to vital IID facilities or undermine IID's electrical balancing authority, as well as requirements for constructing around all IID facilities and interconnecting to IID's electrical grid.

Should you have any questions, please do not hesitate to contact me by phone at 760-482-3609 or by e-mail at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,



Donald Vargas
Environmental Specialist

Kevin Kelley – General Manager
Michael Campbell – Chief Admin. Officer
Jesse Silva – Manager, Water Dept.
Joel Ivy – Interim Manager, Energy Dept.
Jeff M. Garber – General Counsel
Paul G. Peschel – Executive Program Manager
Carlos Villalon – Asst. Mgr., Water Dept. System Control & Monitoring
Juan Carlos Sandoval – Asst. Mgr. Energy Dept.
Carlton L. King – Asst. Mgr., Energy Dept. Customer Service Operations
Mike L. King – Manager, Water Dept. Colorado River Water Issues
Tina Shields – Asst. Mgr., Water Dept. Resources Planning & Management
David L. Barajas – General Supt., Energy Dept. System Planning & Engineering
Michael S. Trump – General Supt., Energy Dept. Customer Operations & Planning
Ismael Gomez – Chief Engineer, Water Dept. Engineering Services
Bruce Wilcox – Environ. Proj. Mgr., Water Dept. QSA Water Transfer
Randy Gray – Interim Supervisor, Real Estate & Right-of-Way
Vikki Dee Bradshaw – Interim Supervisor, Environmental Services

December 15, 2011

In regards to: Campo Verde Solar Project

HAND DELIVERED

David Black
Imperial County Planning & Development
801 Main Street
El Centro, CA 92243

RECEIVED

DEC 15 2011

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Dear Mr. Black and County Officials:

We are writing this letter to you to address our concerns with the Campo Verde Solar Project. We are homeowner's presently residing at 1280 Drew Road, which is directly across the road from this project. We are worried about how this will affect the livelihood of our family.

The land we currently built our home on has been in our family since the 1930's. Our grandfather, Woodrow Preece purchased this land, and the land just to the south of us, to make a home for his family. He loved this land and thought it was the most beautiful and peaceful place to raise his family. In following our grandfather's tradition, we too, had the same idea and decided to build a home for our family. We couldn't think of a better way to raise our children and show them the beauty of the Imperial Valley at the same time.

Now, to our astonishment, we are being told that our beautiful views will now be a sea of black solar panels. Not to mention the many other environmental changes/impacts that will come with this project. We have the following concerns that we will further elaborate on in this letter:

- Aesthetics
- Air Quality/Soil Erosion
- Temperature increase
- Noise
- Wildlife
- Traffic
- Property value
- Employment
- Safety

Aesthetics - In your initial study, you indicate that no scenic vistas or areas with high visual quality would be disrupted and the impacts are to be less than significant. This is not true for my family and neighbors in the surrounding area. This will have a huge impact on our scenic views of the area. Imagine going from beautiful views of green farm ground and mountain ranges to this: 11 foot solar panels bordered by an eight foot chain link fence topped with barbed wire for as far as the eye can see.

In speaking with James Cook from First Solar on December 6, 2011, he informed us that the project on the east side running down Drew Road from Diehl to Wixom, would be pushed back 800 feet from the road for our benefit. What benefit will another 800 feet of dirt give us? First Solar should be made to landscape this area to create a barrier between our home and the solar panels. Some ideas might be to farm this 800 foot strip or plant large trees, such as Eucalyptus or Oleanders that will block the panels and make a better view for all of us in this area.

Air Quality/Soil Erosion - Soil erosion will occur as a result of taking this land out of farm ground. We quite often have very high winds in our area. The system of leaves and roots in grass plants allow them to trap millions of tons of dust and dirt from the air annually. Up to 90% of the weight of a grass plant is in the root system. This makes grass very efficient at preventing erosion. Many other solar projects in other parts of the Country and in foreign countries have grass planted in and around the solar panels. Why is the County not requiring some kind of landscaping/grass to be put down in the subject ground area? After 20-25 years of the land being fallowed, it is very unlikely this land can be put back into production.

In speaking with the representatives from First Solar, we were told the subject ground would eventually return to its natural state and be similar to the ground surrounding the Imperial Valley Substation. Please refer to Exhibit A attached to this letter. This picture was taken on Thanksgiving Day, 2011, from our front yard and shows the enormous amount of blowing dirt in the air. Imagine having 1900 acres of dirt blowing into your home and into the Seeley and El Centro area. According to your initial report, the solar field will be coated with a permeable dust suppressant. How often will this need to be done and what type of suppressant will be used?

How will the chemicals for weed control affect us? We called Imperial County Environmental Health to ask about this and were told that we would likely be asked to leave our home when this is done. If we have to leave our home, how safe could this be? How often will this need to be applied and what type of impact will this have on my land, my animals and most importantly, my family?

Where will the runoff water go from the rains we get in the Imperial Valley? During flashfloods and heavy rains, what will happen to our roads? At this time, the corner of Diehl and Drew Roads flood whenever we have a heavy downpour and it washes out our drain ditch. Diehl Road east of Drew Road floods quite often when we have heavy rains. Please see Exhibit B attached to show the condition of the roads in this area on December 13, 2011, after we had a two day rain.

Temperature Increase – Grasses provide a cooling effect that reduces surface temperature 30 to 40 degrees as compared to bare soil. One acre of grass has the cooling effect of a 70-ton air conditioner. We are losing 1900 acres of grass farm ground, not to mention the temperature of the solar panels themselves. The solar panels can reach extremely high temperatures. How is this going to affect us and our neighbors when we have high winds in the area? The wind will be blowing the heat right into our homes. We will not only have higher power bills, but the heat could become unbearable. We have two small children and animals, how will this affect them?

Noise – We are concerned with the noise levels of the inverters. As you know, living in the country has many advantages, one being the sounds of nature and not much else. Landscaping and/or vegetation, including grass, help to muffle objectionable noises. With the removal of all grass and vegetation, we are concerned the noise levels of the inverters will very be noticeable.

What are the hours of construction? Will the construction crews be working through the night or just during normal business hours?

Wildlife – How will this project impact the burrowing owl? We have at least 6 burrowing owls that make their home on our property. A project of this size could have a significant impact on the existence of the burrowing owl causing hundreds of them to be displaced from their homes.

Traffic – There will be a significant increase in traffic due to construction crews and vehicles. This will not only create more greenhouse emissions, but will do further damage to already damaged country

roads. Many of our country roads in this area are already in need of major repair. Is the County going to create a plan to repair the roads, once the construction process is complete?

Property value – The value of our property and neighboring properties will be affected. The placement of a solar project across from our home could reduce our property value by 20 to 30%. In today's real estate market, we need to be increasing property values, not dragging them down even further.

Employment - The representatives from First Solar are trying to make us believe this and all other solar projects will be creating jobs for the Imperial Valley. At best, it will only create temporary employment, which will eventually turn into 3 or 4 permanent jobs when all is said and done. What about the hundreds, if not thousands, of farm workers that will be displaced from their jobs? This solar project will end up eliminating more jobs than it will create.

Safety - What type of hazard will the solar panels pose to us? At such high temperatures, the solar panels can overheat and catch fire. The panels can also catch fire from faulty wiring. If too much power is pumped through inadequate wiring, the insulation can melt away and expose the wire, which can cause a fire. Is the Imperial County Fire Department equipped to handle fires such as these? If the panels catch fire, will toxic fumes from the cadmium telluride affect us? What about the thousands of lightning strikes we get each year?

As we all know in the Imperial Valley, earthquakes are a part of life for us. Will these solar panels be engineered to withstand a large earthquake? The Easter 2010 earthquake destroyed parts of Drew Road, Brockman Road, and Lyons Road, which left us with only one route to access our home. If another large earthquake were to strike, what kind of emergency plan does the County have in mind? How will the County ensure these solar projects are not endangering the residents living amongst them?

Our family is not against solar energy, but we do feel that it should not be placed near families that will be forced to live with them everyday. Solar energy and the ever changing solar panels in production may cause serious health issues for us and our neighbors.

We hope that you will take our concerns into consideration. Thank you in advance for taking the time to address all of these pertinent issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "Douglas Wayne Skains, Jr. and Heather Skains". The signature is written in a cursive style and is positioned to the right of a horizontal line that extends from the left margin.

Douglas Wayne Skains, Jr. and Heather Skains



Exhibit A



Exhibit B

RECEIVED

DEC 16 2011

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

December 16, 2011
1210 Drew Road
El Centro, California 92243

ATTENTION: David Black
Imperial County Planning & Development
801 Main Street
El Centro, CA 92243

Dear Mr. Black and County Officials:

We are writing this letter in order to voice our opinions about the proposed CAMPO VERDE SOLAR PROJECT. This project is virtually across the street from our family home. Also it is my understanding that SILVERLEAF is also proposing another project directly in front of our home. My father, Atta Mohammed Khan purchased 120 acres of land and built a home where he happily raised his family. I also built my home and raised my family here. I had hopes that my son would also someday have a family and remain here at the 'ranch' so that his kids would also have the wonderful opportunities that 'ranch' life has to offer. This dream now may never take place because of all of the known and unknown concerns that this project will bring.

We attended the 'snow job' meeting on December 6, 2011 with the First Solar Company. Their claim, of course, is that it is a win-win situation. But how is this a win-win situation for the families that live in this area. Here are a few of my family's most urgent concerns.

* We will have lost our beautiful views of green crops, glorious mountains, and stunning sunsets. Instead, we get black solar panels, an eight foot chain link fence and rolls of barbed wire on top of the fence. It's going to appear that we live next to a prison instead of the area in which my dad decided farm and live.

* We were told that there are no health issues with the solar panels. I don't think that concern has been studied enough. This is a fairly new technology therefore, more time and more experience is needed in order to answer the question about health hazards. Only time will tell what will be the affects of solar panels for the families living near them.

* There are lots of other safety issues: the heat from the panels, the extreme heat that winds will push towards our homes, the traffic during the building phase and the maintenance of the panels. First Solar representatives said I should feel safer because they will have security guards roaming the area. But my response to them was that I have never felt unsafe in this farmland that my dad decided to buy. The mere fact that they need security guards makes me feel unsafe.

* Also at the meeting on December 6, I ask a question that First Solar could not answer. I was asked to write it down and they would get back to me. As of today, no response has been received. The question was: When those 2000 acres no longer need water for irrigation, will the water that we use for our homes (from the canal across the street) be affected? My feeling is that of course it will. The fields will no longer need water so less water will flow in the canals, therefore, less water for our household use. Our families can not survive without daily water coming to us.

* Where is this solar energy going? Is it going to benefit the people of the Imperial Valley? It is going directly to San Diego Gas and Electric. It is not going to lower our electricity bill. Our families in the area already pay outrageous amounts during the summer, now we'll pay more because of the environmental heat which will be a bi-product of the solar panels.

So in closing, first of all, thank you for understanding our concerns about solar panels (First Solar Project) being so close to our living environment. We sincerely hope that you consider these issues in your decision making process.

Sincerely,

Salvador Garcia and Sarah Khan Garcia
Email address: skgarcia2004@yahoo.com