

# **2 INTRODUCTION**

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# 2 INTRODUCTION

This section summarizes the purpose of the Environmental Impact Report (EIR), describes the sequence of environmental procedures that must be followed pursuant to State of California law, discusses the intended uses of the EIR, discusses the Projects' relationship to the County of Imperial (County) General Plan, defines the scope and organization of the EIR, identifies a contact person for the Projects, and defines terms and acronyms that are frequently used throughout this document.

## 2.1 BACKGROUND AND PURPOSE

### 2.1.1 PROJECT BACKGROUND

This EIR has been prepared to evaluate the potential environmental effects associated with implementation of the proposed Hudson Ranch Power II Geothermal Flash Power Plant (HR-2) and the proposed Simbol Calipatria Plant II mineral extraction plant (SmCP-2) in the County of Imperial. Hudson Ranch Power II, LLC (HR-2) has submitted an application for a Conditional Use Permit (CUP) to the County to construct and operate a 49.9-megawatt (MW) geothermal flash plant and wellfield within approximately 238.13-acres of private land within the Salton Sea Known Geothermal Resource Area (KGRA, Zone A-2-R-G). The proposed HR-2 and SmCP-2 Project sites are located within an unincorporated area of the County approximately 2.3 miles west-southwest of the Town of Niland, California, at the southwest corner of English Road and McDonald Road.

In addition, Simbol, Inc. (Simbol) has submitted a separate application for a CUP to the County to construct and operate the proposed SmCP-2 Project, a commercial lithium carbonate production plant adjacent to the HR-2 Project site. The SmCP-2 facility would process geothermal brine from the proposed HR-2 plant to produce lithium carbonate product and other products for commercial sale. Because the SmCP-2 plant would be dependent on the geothermal brine produced by the HR-2 geothermal flash plant; the SmCP-2 plant would not be constructed without the HR-2 geothermal flash plant. The co-location of the two projects is desired because it would minimize the distance required to move the geothermal brine between the two facilities.

The County of Imperial is the public agency with the principal responsibility for granting approval of the proposed Projects; therefore, the County is the "Lead Agency" for proposed Projects under the California Environmental Quality Act of 1970 (CEQA), as defined in CEQA Guidelines Section 15367. The County has determined that preparation of an EIR is necessary due to the potentially significant environmental effects that could result from implementation of the proposed Projects. This EIR is intended to serve as an informational disclosure document that addresses potential environmental effects of the proposed Projects

and identifies feasible mitigation measures and alternatives that could reduce or avoid these effects. As the Lead Agency, the County must use information contained in this EIR to weigh the environmental consequences of the proposed Project before making a final decision whether to grant approval of, or conditional approval of, the Projects. Other affected responsible agencies will also need to consider information provided in this EIR during their respective processing of related permits for the Project. The County of Imperial has prepared this EIR document pursuant to the following:

- CEQA statutes outlined in Public Resources Code (PRC) Section 21000 et seq.;
- State Guidelines for Implementation of CEQA (CEQA Guidelines), as amended (California Code of Regulations (CCR), Title 14, Chapter 3, Section 15000 et seq.);
- County of Imperial Land Use Ordinance, Section 90508.02; and
- County of Imperial's Rules and Regulations to Implement CEQA, as amended.

## **2.1.2 PREVIOUS ENVIRONMENTAL REVIEW**

### **PREVIOUS INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

Hudson Ranch Power II, LLC submitted an application for CUP #G10-0002 to the County of Imperial on July 7, 2010, for construction and operation of the proposed HR-2 Project. The County prepared an Initial Study/Mitigated Negative Declaration in accordance with CEQA (California PRC Section 21000 et seq.), which was adopted by the County Planning Commission on December 8, 2010. The Planning Commission's decision was appealed to the County Board of Supervisors. The Board directed County Planning and Development Services Department to reassess the analysis of the Project's potential impacts in light of public comments challenging the adequacy of the Initial Study/Mitigated Negative Declaration (County of Imperial 2011, p. 3), and a decision was made by the County to prepare a new CEQA document—an EIR for the County decision-makers' consideration. This document is available for review at <http://www.icpds.com/?pid=574>.

### **MASTER EIR**

The proposed Project site is located within the Salton Sea KGRA. The 1981 Salton Sea Anomaly Master EIR (Master EIR), prepared by the County of Imperial and incorporated herein by reference, addressed the environmental impacts of developing up to 1,400 MW of geothermal energy, including geothermal power plants with related production wells and islands; injection wells and islands; and related brine pipelines within the Salton Sea KGRA. It also evaluated the impacts of electrical transmission facilities that would be necessary to export the energy produced to Southern California utilities (County of Imperial 1981). The Master EIR was prepared to provide information on the cumulative environmental impacts associated with the pattern and timing of full geothermal development within the Salton Sea KGRA and to identify and analyze mitigation measures that could equitably be applied to geothermal projects within the study area.

## 2.2 TYPE OF DOCUMENT

This EIR has been prepared as a project-level EIR pursuant to CEQA Guidelines, Section 15161. The project-level EIR analysis primarily focuses on the physical environmental changes that would occur as a result of constructing and operating the proposed HR-2 and SmCP-2 Projects.

## 2.3 INTENDED USES OF THE EIR

As the CEQA Lead Agency, the County of Imperial will use this EIR analysis as the primary decision-making tool to assess the proposed Project's environmental impacts. The County's decision-makers will consider the entire administrative record, including the conclusions of a Final EIR, before deciding whether to certify the Final EIR document and to take action on the Project application. In addition, the Projects would be subject to various federal and state laws, some of which could require regulatory action or approval by other governmental agencies.

Prior to construction and operation of the proposed HR-2 Project and the SmCP-2 Project, all necessary regulatory permits would be secured by Hudson Ranch Power II, LLC, and Simbol, Inc., respectively.

### 2.3.1 POTENTIAL PERMITS FOR HR-2

Permits and approvals that may be obtained from the County of Imperial, Planning Commission and/or County staff for the HR-2 Project include the following:

- Certification of the EIR and approval of findings of fact pursuant to CEQA Guidelines, Section 15091.
- Approval of CUP #G10-0002 for geothermal flash power plant operations and wells.
- Adoption of a Project Mitigation Monitoring and Reporting Program (MMRP).

Subsequent approvals from other local agencies and County Departments may also include:

- An authority to construct and permit to operate, approved by the Imperial County Air Pollution Control District (ICAPCD).
- An Encroachment Permit for new or altered driveways, approved by the Public Works Department<sup>1</sup>
- A Grading Permit approved by the Planning and Development Services Department.
- A Site Improvement Plan and Grading Plan approved by the Public Works Department.

<sup>1</sup> Encroachment permits for driveway access from McDonald Road have been obtained (Permit Nos. 12483-11, 12482-11, and 12481-11) (Ruelas 2012).

- Encroachment permits issued by the Imperial Irrigation District (IID).
- Applicable Building Permit(s).
- A Permit for potable water treatment facilities from Department of Environmental Health Services.

### **2.3.2 POTENTIAL PERMITS FOR SMCP-2**

Permits and approvals that may be obtained from the County of Imperial, Planning Commission and/or County staff for the SmCP-2 Project include the following:

- Certification of the EIR and approval of findings of fact pursuant to CEQA Guidelines, Section 15091.
- Approval of CUP #12-0005 for mineral extraction plant operations.
- Adoption of a Project Mitigation Monitoring and Reporting Program (MMRP).

Subsequent approvals from other local agencies and County Departments may also include:

- An authority to construct and permit to operate, approved by the ICAPCD.
- An Encroachment Permit for new or altered driveways, approved by the Public Works Department.
- A Site Improvement Plan and Grading Plan approved by the Planning and Development Services Department.
- A Grading Permit approved by the Public Works Department.
- Applicable Building Permit(s).
- A Permit for potable water treatment facilities from Department of Environmental Health Services.
- An Encroachment Permit for crossing the "O" Lateral, approved by the Imperial Irrigation District.

Several other state and local agencies may also consider the information provided in this EIR to inform their respective decisions regarding issuance of specific permits related to project construction and operation. A list of the state and local permits and consultations that may be required for construction, operation, and decommissioning of the proposed Projects is contained in Chapter 3, Project Description.

### **2.3.3 RELATIONSHIP TO IMPERIAL COUNTY GENERAL PLAN**

The County of Imperial General Plan serves as a blueprint for the County's ideal use of its resources, expresses the development goals of the community, and is the foundation upon which all land use decisions are made.

The proposed Project site is located in an unincorporated area of the County of Imperial within the Salton Sea KGRA, and is subject to the County's General Plan and Land Use Ordinance within the Geothermal Overlay Zone. The proposed HR-2 and the SmCP-2 Projects are consistent with the Geothermal/Alternative Energy and Transmission Element (County of Imperial, 2006, p. 44) and the Land Use Element (County of Imperial 2008a, p. 49) of the County's General Plan, with the approval of a Conditional Use Permit (CUP). In addition, both proposed Projects are considered to be consistent with the County's Land Use Ordinance. Pursuant to Title 9, Division 5, Chapter 8 of the Land Use Ordinance, "electrical generation plants (less than 50-MW)", "mining and mineral extraction" "resource extraction and energy development" and "facilities for the transmission of electrical energy (100-200 kV)" are uses that are permitted in the A-2-R Geothermal "G" Overlay Zone (County of Imperial 2008b), subject to the County's approval of a CUP for each of the Projects.

This EIR addresses the proposed Projects' environmental effects and incorporates mitigation measures that are based on previously adopted County development policies and standards to mitigate anticipated impacts. Sections 4.1 through 4.16 of this EIR evaluate the proposed Project's consistency with applicable County of Imperial General Plan policies.

### **2.3.4 ADDITIONAL ACTIVITIES CONSIDERED IN THIS EIR**

Under CEQA, a "project" is defined as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment" (CEQA Guidelines 15378(a)). The lead agency must assess all environmental impacts that would occur as a result of a proposed project and this assessment is not limited only to the project components as defined in a single permit application. As described in Chapter 3, Project Description, electricity for the proposed Simbol Calipatria Plant II (SmCP-2) Project would be provided via a new Imperial Irrigation District (IID) 92-kV distribution ~~transmission~~ line along Schrimpf Road and a new IID substation. These new structures would be developed as components of the proposed Simbol Calipatria Plant I (SmCP-1) Project, which would be located west of the of the SmCP-2 Project site. The SmCP-1 Project is being processed under a separate Imperial County Conditional Use Permit application (CUP #12-0004) and a separate EIR is being prepared to address the construction, operation and decommissioning of the proposed SmCP-1 mineral extraction plant and related facilities (SCH No. 201241067).

In the interest of full disclosure and to allow decision-makers to reach an informed decision on whether to permit the SmCP-2, information on the environmental effects of SmCP-1's related transmission components are included in this document as part of the "whole of the action" under CEQA.

## **2.4 EIR ORGANIZATION AND SCOPE**

The structure of the Final EIR is identified below. The Draft EIR was organized into nine (9) chapters, including the Executive Summary. Within Chapter 4.0 the environmental impacts associated with implementation of the proposed projects are addressed.

This section describes CEQA requirements and content of this Final EIR.

### **SECTION I INTRODUCTION**

This section describes CEQA requirements and content of this Final EIR.

### **SECTION II. CORRECTIONS AND ADDITIONS**

This section provides a list of those revisions made to the Draft EIR text and figures as a result of comments received and/or clarifications subsequent to release of the Draft EIR for public review. The Draft EIR, as revised, is included as part of the Final EIR.

### **SECTION III. RESPONSES TO COMMENT LETTERS RECEIVED ON THE DRAFT EIR**

This section provides copies of the comment letters received and individual responses to written comments. In accordance with Public Resources Code 21092.5, copies of the written proposed responses to public agencies will be forwarded to the agencies at least 10 days prior to certifying the EIR. The responses conform to CEQA Guideline 15088, providing "... good faith, reasoned analysis in response."

### **SECTION IV. MITIGATION MONITORING AND REPORTING PROGRAM**

This section includes the Final Mitigation Monitoring and Reporting Program (FMMRPs) for the HR-2 Project and for the SmCP-2 Project which identify the mitigation measures, timing and responsibility for implementation of the measures.

## **CHAPTER 1 – EXECUTIVE SUMMARY**

Chapter 1 includes a brief description of the proposed Projects and their alternatives and provides a matrix summarizing the Projects' environmental impacts and associated mitigation measures. Chapter 1 also describes the areas of controversy associated with the Projects and issues to be resolved. Chapter 1 provides the reader with a brief overview of the Projects and implications associated with implementation of the proposed projects.

## **CHAPTER 2 – INTRODUCTION**

Chapter 2 briefly describes the purpose of the EIR, common terminology that is used in the EIR, the public scoping process and the decision-making process, and the format and content of the EIR. Chapter 2 also identifies the discretionary actions required for the proposed Projects and the primary contact person for the EIR.



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## **CHAPTER 3 – PROJECT DESCRIPTION**

Chapter 3 provides a detailed description of the proposed Projects, their location, and the objectives to be achieved by their implementation. Construction details and operational aspects of the proposed Projects are described in this chapter of the EIR.

## **CHAPTER 4 – ENVIRONMENTAL ANALYSIS**

Chapter 4 describes the existing setting for the affected environment, identifies the CEQA standards of significance, analyzes environmental impacts, provides mitigation measures that reduce impacts, and discusses any residual impacts that would remain after mitigation has been applied.

The following major environmental topics are addressed in this section:

**Aesthetics**: This section describes the existing landscape characteristics, considers consistency of the Projects with applicable County of Imperial General Plan policies, and analyzes the Projects with regard to the County's Land Use Ordinance relative to viewsheds.

**Agricultural Resources**: This section describes the agricultural resources on the Project site and the potential impacts of the conversion of farmland, potential conflicts with Williamson Act contracts, and other changes that could result in conversion of adjacent farmland. The impact evaluation identifies potential land use compatibility conflicts associated with new development adjacent to farmland.

**Air Quality**: This section discusses local and regional air quality impacts associated with implementation of the Projects. Both short-term construction-related impacts and long-term operational air quality impacts, including objectionable odors, are examined.

**Biological and Natural Resources**: This section examines the Projects' potential impacts on habitat, vegetation, and wildlife. The analysis emphasizes the potential degradation or elimination of important habitat and the impacts on listed, proposed, and candidate threatened and endangered species.

**Cultural and Paleontological Resources**: This section addresses potential impacts on both archaeological and paleontological resources/features occurring on and in the vicinity of the Project site.

**Geology, Soils, and Mineral Resources**: This section describes the geology and soil conditions of the proposed Project site and general vicinity and analyzes issues that could occur with implementation of the Projects (e.g., exposure of people and property to potential geologic, seismic, and other natural hazards such as earthquakes, liquefaction, soil expansion, landform alteration, and erosion). This section also assesses the impacts related to mineral resources.

**Hazards and Hazardous Materials**: This section assesses the likelihood of the presence of hazardous materials and hazardous conditions on the Project site and in the surrounding area and evaluates their potential impact on human health and the environment.

**Hydrology and Water Quality:** This section describes the existing hydrologic conditions of the Project area and provides information on existing surface water and groundwater conditions. In addition, the Projects' construction and operational water quality impacts are examined.

**Land Use and Planning:** This section describes the existing land use characteristics of the Project area and identifies land use designations, zoning, and relevant County of Imperial General Plan land use policies. This section also addresses land use impacts associated with implementation of the proposed Projects, including compatibility with surrounding land uses and consistency with County land use goals and policies.

**Population and Housing:** This section discusses how the proposed Projects would affect the population and impact housing resources in the Project area.

**Noise:** This section describes the existing noise setting at the Project sites, as well as noise impacts anticipated to result from construction and operation of the proposed Projects. Specific noise sources evaluated for this analysis include construction activity and mechanical equipment.

**Public Services:** This section describes public services currently available to serve the Projects and identifies any expansion of capacity or services that would be necessary to meet demands generated by the proposed Projects. This section includes a discussion of fire, law enforcement, schools, and other public services.

**Recreation:** This section describes the parks and recreational uses within the vicinity of the Project sites. It also discusses the applicable plans and policies for recreational uses and evaluates potential impacts to recreational resources.

**Transportation and Traffic:** This section addresses impacts on the local and regional road systems.

**Utilities and Services:** This section describes utilities and service systems currently available to serve the Projects and identifies any expansion of capacity that would be necessary to meet the demands generated by the proposed Projects. It also discusses water, wastewater, solid waste collection systems, and landfill facilities.

**Climate Change and Greenhouse Gas Emissions:** This section describes the setting and regulatory conditions of County of Imperial and the surrounding area in terms of greenhouse gases (GHG) and climate change and identifies potential related impacts that may occur as a result of implementation of the proposed Projects.

## **CHAPTER 5 – CUMULATIVE IMPACTS**

Chapter 5 provides a list of projects that could contribute to cumulative impacts and evaluates the potential combined effects of these projects with the proposed Projects. Projects considered in the cumulative

impacts analysis includes existing projects; those that have been approved but not yet constructed; land use or permit applications that are currently in process; and, other reasonably foreseeable future projects.

## **CHAPTER 6 – ALTERNATIVES**

Chapter 6 fulfills the requirements of Section 15126.6 of CEQA Guidelines by addressing a range of reasonable alternatives that could achieve the basic objectives of the Projects while avoiding or reducing the significant environmental effects associated with the Projects. Chapter 6 provides a comparative analysis between the Projects and the selected alternatives.

## **CHAPTER 7 – CEQA MANDATED SECTIONS**

Chapter 7 describes and analyzes other topical issues that must be described as mandated by CEQA. These include significant and unavoidable environmental effects that would occur as a result of the proposed Projects implementation and growth-inducing impacts.

## **CHAPTER 8 – PREPARERS**

Chapter 8 identifies the contributing authors and agencies that assisted in the preparation of this EIR document.

## **APPENDICES**

The appendices to this EIR include all technical reports, the Project Notice of Preparation (NOP) and Initial Study, scoping response letters and comments, and other technical materials that support the analysis. All appendices are contained in Volume II (Technical Appendix) of this EIR. The appendices are also available on the County Planning and Development Services Department's website at: <http://www.icpds.com/?pid=574>.

## **2.5 ENVIRONMENTAL REVIEW PROCESS**

CEQA requires lead agencies to solicit and consider feedback from other governmental agencies, local community groups, and interested members of the public. Agency and public participation in the decision-making process is enabled through the public scoping period. After a project is permitted, CEQA also requires enforcement of a MMRP to ensure full and timely implementation of all applicable mitigation measures.

Agency and public involvement in the decision-making process generally occurs through the steps described below.

### **NOTICE OF PREPARATION AND INITIAL STUDY**

In accordance with Section 15082 of the CEQA Guidelines, the Imperial County Planning and Development Services Department issued a Notice of Preparation (NOP) of an EIR for the Hudson Ranch Power II

Geothermal Flash Plant (HR-2) Project and an accompanying Initial Study (SCH# 2010101065). The NOP was published in the Imperial Valley Press newspaper on April 27, 2011, and was submitted to federal, state, and local agencies and other interested parties for a 35-day public review period beginning on April 27, 2011, and ending on June 1, 2011.

In March 2012, Simbol, Inc. submitted its CUP application to include the proposed Simbol Calipatria Plant II (SmCP-2) Project as part of the evaluation under CEQA. In response, a Revised NOP/Initial Study was issued on April 2, 2012, which announced another 35-day public comment period.

In response to the NOPs, the County received comment letters from the following agencies: Governor's Office of Planning and Research (State Clearinghouse and Planning Unit); Marine Corps Air Station Yuma, Arizona; California Department of Toxic Substances Control (DTSC); California Department of Transportation (Caltrans); Colorado River Board (CRB); the Native American Heritage Commission (NAHC); and Imperial Irrigation District (IID). The Notices of Preparation and scoping letters are included in Appendices A-1 and A-2 within Volume II (Technical Appendix) of this EIR.

## **PUBLIC SCOPING MEETINGS**

Two public scoping meetings were held by County of Imperial to solicit input from interested agencies and the public regarding the proposed Projects, alternatives, mitigation measures, and environmental impacts to be analyzed in the EIR. The first public meeting was held on Thursday, May 26, 2011, at 6:00 p.m. in the County Administrative Center, Board Chambers, El Centro, California. Following issuance of the Revised Initial Study/NOP, a subsequent public meeting was held on April 26, 2012, at 7:00 p.m. at the same location. No members of the public attended either of the Public Scoping meetings and no oral and/or written comments were received. Table 2-1 summarizes the comments received during the public scoping process.

**TABLE 2-1 SUMMARY PUBLIC SCOPING COMMENTS**

<b>COMMENT SUMMARY</b>	<b>WHERE COMMENT IS ADDRESSED IN THE EIR</b>
<b>GOVERNOR'S OFFICE OF PLANNING AND RESEARCH (STATE CLEARINGHOUSE AND PLANNING UNIT) - APRIL 26, 2011</b>	
Confirmed filing of NOP and identified the state mandated review period as April 26, 2011 through May 25, 2011.	Comment noted.
<b>GOVERNOR'S OFFICE OF PLANNING AND RESEARCH (STATE CLEARINGHOUSE AND PLANNING UNIT) - APRIL 5, 2012</b>	
Confirmed receipt of corrections to the proposed project information and identified an extension for the public review period to end on May 7, 2012.	Comment noted.
<b>U.S. MARINE CORPS AIR STATION (MCAS) YUMA, ARIZONA - MAY 12, 2011</b>	
The letter from MCAS Station Yuma noted the following: <ul style="list-style-type: none"> <li>– The property is located beneath two military low-level routes, Visual Routes 1211 and 288. The site may experience noise, vibrations, and interference from the over-flight of low-flying military aircraft that operate in this area. The Marine Corps Air Station requests that the March Air Force Reserve Base be contacted to comment on the</li> </ul>	Section 4.7, Hazards and Hazardous Materials Section 4.9, Noise

**TABLE 2-1 SUMMARY PUBLIC SCOPING COMMENTS**

<b>COMMENT SUMMARY</b>	<b>WHERE COMMENT IS ADDRESSED IN THE EIR</b>
<p>Project regarding these routes.</p> <ul style="list-style-type: none"> <li>– March Air Force Reserve Base was contacted in June 2011 and identified no potential hazards, provided project facilities do not exceed 300 feet in height (Nichols 2011).</li> </ul>	
<b>CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL (DTSC) - MAY 11, 2011</b>	
<p>The letter from DTSC recommended that the EIR:</p> <ul style="list-style-type: none"> <li>– Identify whether conditions within the Project area may pose a threat to human health or the environment.</li> <li>– Search standard regulatory databases to identify any existing environmental contamination issues within the project area.</li> <li>– Identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project area that may be contaminated and the government agency to provide appropriate regulatory oversight.</li> <li>– Include the findings of any investigations conducted at the site, including any Phase I or Phase II Environmental Site Assessment, and a summary of any sampling results in which hazardous materials were found above regulatory standards.</li> <li>– Conduct investigations to evaluate any structures that are demolished for the Project for the presence of hazardous chemicals, mercury, asbestos-containing materials, or lead-based paints or products.</li> <li>– Conduct a health risk assessment, if necessary, to determine past, present, or future releases of hazardous materials that may pose a risk to human health or the environment.</li> <li>– Conduct sampling on any imported soils to ensure they are free of contaminants.</li> <li>– Evaluate on-site soils and groundwater for agriculture-related contaminant residuals, including pesticides, chemicals, and organic waste.</li> <li>– Identify any hazardous wastes that may be generated by operation of the proposed project or hazardous wastes that may be handled, stored, or used by the Project.</li> </ul>	<p>Section 4.6, Hazards and Hazardous Materials Section 4.3, Air Quality</p>
<b>CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS) - MAY 23, 2011</b>	
<p>The letter from Caltrans confirmed receipt of the NOP and noted:</p> <ul style="list-style-type: none"> <li>– The project would use existing county roads or permitted highway access locations to access State Route 111.</li> <li>– No new utility crossings on state facilities would occur as part of the Project.</li> </ul>	<p>Comments noted.</p>
<b>CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS) - MAY 15, 2012</b>	
<p>The letter from Caltrans noted the following:</p> <ul style="list-style-type: none"> <li>– The TIS methodology identifies an assumed 55/45 directional split. Please explain how this directional split was determined. Caltrans traffic volume data indicates a greater directional split between the ranges of 85/15 and 70/30. Please re-evaluate the directional split for the project area.</li> </ul>	<p>The Traffic Impact Study (TIS), dated May 2012, is included in Appendix L of the EIR (Volume II). The directional split was determined by traffic counts obtained in January 2011.</p>
<ul style="list-style-type: none"> <li>– The plan indicates an approach taper length of 390 feet (ft) which does not meet the Caltrans Highway Design Manual (HDM) requirements. The approach taper length (L) is equal to the width (W) of the turn lane multiplied by the design speed (V). <math>L=VW= 02 \text{ ft} (65\text{mph}) = 780 \text{ ft}</math>. Please refer to the Caltrans HDM figure 405.2A for guidance.</li> </ul>	<p>This comment refers to a set of preliminary improvement drawings presented to Caltrans. It is not a comment on the scope of the EIR or the TIS.</p>

**TABLE 2-1 SUMMARY PUBLIC SCOPING COMMENTS**

<b>COMMENT SUMMARY</b>	<b>WHERE COMMENT IS ADDRESSED IN THE EIR</b>
<ul style="list-style-type: none"> <li>– Figure 6-4 identifies that the AM peak left turn lane volume from NB SR-111 to westbound (WB) McDonald Rd is 154 vehicles per hour (vph). Caltrans guidance advises an exclusive left turn lane should be provided when volumes exceed 100 vph.</li> </ul>	<p>This comment refers to an advanced copy of the Traffic Impact Study previously submitted to Caltrans.</p> <p>This comment is addressed in the Traffic Impact Study (dated May 2012 and included in Appendix L) and in Section 4.14, Traffic and Circulation.</p>
<ul style="list-style-type: none"> <li>– During construction at the SR –111/ McDonald Rd. intersection the NB northbound left turn and EB right turn volumes are high. Is there any planned temporary mitigation for these volumes during construction? This direct impact needs to be addressed.</li> </ul>	<p>This comment refers to an advanced copy of the Traffic Impact Study previously submitted to Caltrans.</p> <p>This comment is addressed in the Traffic Impact Study (dated May 2012 and included in Appendix L) and in Section 4.14, Traffic and Circulation.</p>
<ul style="list-style-type: none"> <li>– The NB left turn construction volume warrants installation of an exclusive left-turn pocket. The left turn project as shown on the plan provided should be installed prior to construction activities. If this is not possible due to the construction schedule, the Traffic Management Plan (TMP), which Caltrans will need to approve, should provide additional measures to address this issue.</li> </ul>	<p>This comment refers to an advanced copy of the Traffic Impact Study previously submitted to Caltrans.</p> <p>Impacts associated with construction of the proposed HR-2 Project and the SmCP-2 Project are addressed in the Traffic Impact Study (dated May 2012 and included in Appendix L) and Section 4.14, Traffic and Circulation.</p>
<ul style="list-style-type: none"> <li>– Figure 4-1 incorrectly labels McDonald Road as W Schrimpf.</li> </ul>	<p>This comment refers to an advanced copy of the Traffic impact Study submitted to Caltrans. Figure 4-1 has been corrected in the current version of the Traffic Impact Study, which is dated May 2012 and is included in Appendix L.</p>
<ul style="list-style-type: none"> <li>– The future year roadway network assumes an exclusive WB left turn lane at the SR111/Sinclair Rd. intersection. Explain the basis of this assumption.</li> </ul>	<p>Traffic Impact Study (Appendix L) and Section 4.14, Traffic and Circulation.</p>

**TABLE 2-1 SUMMARY PUBLIC SCOPING COMMENTS**

<b>COMMENT SUMMARY</b>	<b>WHERE COMMENT IS ADDRESSED IN THE EIR</b>
<ul style="list-style-type: none"> <li>– Table 6.4 identifies that all key study intersections would operate at level of service (LOS) C or better under Future Year Base plus project conditions except for the SR-111/ Sinclair Rd. intersection. Table 6.4 also identifies that the SR-111/McDonald Rd. intersection is at LOS D in the AM with project.</li> </ul>	<p>This comment refers to an advanced copy of the Traffic Impact Study previously submitted to Caltrans.</p> <p>Future operation of key study intersections is addressed in the Traffic Impact Study (dated May 2012 and included in Appendix L) and Section 4.14, Traffic and Circulation.</p>
<ul style="list-style-type: none"> <li>– The future year AM base peak hour delays identified in Table 6.2 do not match the future year AM base peak hour delays without project identified in Table 6.4.</li> </ul>	<p>This comment refers to an advanced copy of the Traffic Impact Study previously submitted to Caltrans.</p> <p>Table 6.2 has been corrected in the current version of the Traffic Impact Study (May 2012), which is included in Appendix L.</p>
<ul style="list-style-type: none"> <li>– The Caltrans truck traffic volume data indicates approximately 18% of the vehicles at this location are trucks. However the TIS indicates 2% heavy vehicle factor. Please explain these discrepancies.</li> </ul>	<p>This comment refers to an advanced copy of the Traffic Impact Study previously submitted to Caltrans.</p> <p>This information has been corrected in the current version of the Traffic Impact Study (dated May 2012), which is included in Appendix L.</p>
<ul style="list-style-type: none"> <li>– The TIS construction trip assignments on pages 46 and 52 indicate all truck and construction workers will enter and exit the project using SR-111/ McDonald Rd intersection. However, Figure 8-3 indicates nearly all construction traffic will utilize the SR-III/Sinclair Rd. intersection for access and figure 8-6 indicates nearly all construction traffic will utilize the SR-111McDonald Rd. intersection for access. Please explain these discrepancies.</li> <li>– How will the project ensure all construction traffic uses SR-111 and McDonald Road for access instead of SR-111 and Sinclair Road?</li> </ul>	<p>These comments refer to an advanced copy of the Traffic Impact Study submitted to Caltrans.</p> <p>Impacts during construction are addressed in the Traffic Impact Study (dated May 2012 and include in Appendix L) and Section 4.14, Traffic and Circulation.</p>
<ul style="list-style-type: none"> <li>– What are the traffic volumes and impacts if both the Hudson Ranch II project and SmCP-2 project are being constructed concurrently?</li> </ul>	<p>Construction traffic volumes and impacts (including the scenario if both HR-2 and SmCP-2 are under construction concurrently) are addressed in the Traffic Impact Study (Appendix L) and Section 4.14, Traffic and Circulation.</p>

**TABLE 2-1 SUMMARY PUBLIC SCOPING COMMENTS**

<b>COMMENT SUMMARY</b>	<b>WHERE COMMENT IS ADDRESSED IN THE EIR</b>
<ul style="list-style-type: none"> <li>– Please include the fair share calculations and contributions for the proposed traffic signals within the report mitigation section.</li> </ul>	Section 4.14, Traffic and Circulation
<ul style="list-style-type: none"> <li>– A Traffic Control Plan may be required by the developer for approval by the lead agency and Caltrans prior to construction. The plans shall be prepared in accordance with Caltrans's Manual of Traffic Controls for Construction and Maintenance Work Zones.</li> </ul>	Section 4.14, Traffic and Circulation
<ul style="list-style-type: none"> <li>– Any work performed within Caltrans R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. Current policy allows Highway Improvement Projects costing \$1 million or less to follow the Caltrans Encroachment Permit process.</li> </ul>	Section 4.14, Traffic and Circulation
<b>COLORADO RIVER BOARD OF CALIFORNIA (CRB) – MAY 27, 2011</b>	
<p>The CRB had no comments regarding the NOP. However, the letter from CRB requested that the County to check with IID regarding any specific requirements IID may have regarding the following:</p> <ul style="list-style-type: none"> <li>– Water diverted from IID canals during well drilling and facility construction and use during the Project operation.</li> <li>– An Encroachment Permit from IID.</li> <li>– The Project's connection to IID's interconnection transmission line/power grid system.</li> </ul>	Comments noted. See summary of comments from IID, below.
<b>COLORADO RIVER BOARD OF CALIFORNIA (CRB) - MAY 3, 2012</b>	
<p>The CRB had no comments regarding the Revised NOP. However, the letter from CRB requested that the County to check with IID regarding any specific requirements IID may have regarding the following:</p> <ul style="list-style-type: none"> <li>– Regarding the encroachment permit;</li> <li>– Water supply to the power plant during the construction, maintenance, and the operation process needed in both the power plant site and the minerals extraction plant facilities; and</li> <li>– The electrical connection to the IID power transmission line and or substation.</li> </ul>	Comments noted. See summary of comments from IID, below.
<b>NATIVE AMERICAN HERITAGE COMMISSION (NAHC) – APRIL 28, 2011</b>	
<p>The NAHC letter dated April 28, 2011 indicated:</p> <ul style="list-style-type: none"> <li>– The NAHC Sacred Lands file search did not identify any Native American cultural resources within the Area of Potential Effect (APE) based on the USGS coordinates of the project location provided.</li> <li>– The NAHC recommends early consultation with local tribes in the Project area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). A contact list of Native American tribe contacts was included as an attachment to the letter.</li> <li>– The NAHC recommends contacting the California Historic Resources Information System (CHRIS)/California Office of Historic Preservation for pertinent archaeological data within or near the APE.</li> <li>– The NAHC recommends avoidance, as defined by CEQA Guidelines Section 15370 (a) to pursuing a project that would damage or destroy Native American cultural resources</li> </ul>	Section 4.5, Cultural Resources



**TABLE 2-1 SUMMARY PUBLIC SCOPING COMMENTS**

<b>COMMENT SUMMARY</b>	<b>WHERE COMMENT IS ADDRESSED IN THE EIR</b>
<p>and Section 2138.2 that requires documentation, data recovery of cultural resources.</p> <ul style="list-style-type: none"> <li>– In addition, Public Resources Code Section 5097.98, California Government Code Section 27491 and the Health &amp; Safety Code 7050.5 provide provisions for accidentally discovered archeological resources during construction and made the processes to be follow in the event of an accidental discovery of any human remains in a project location other than a “dedicated ceremony.”</li> </ul>	
<b>NATIVE AMERICAN HERITAGE COMMISSION (NAHC) – APRIL 6, 2012</b>	
<p>The NAHC letter dated April 6, 2012 indicated:</p> <ul style="list-style-type: none"> <li>– The NAHC Sacred Lands file search did not identify any Native American cultural resources within the project area; however the absence of archaeological resources does not preclude their existence.</li> <li>– The NAHC recommends early consultation with local tribes in the Project area to avoid unanticipated discoveries of cultural resources or burial sites once the project is underway. Culturally affiliated tribes may have knowledge of the religious and cultural significance of the historic properties in the APE. A contact list of interested Native American tribe contacts was included as an attachment to the letter.</li> <li>– The NAHC recommends avoidance, as defined by CEQA Guidelines Section 15370 (a) to pursuing a project that would damage or destroy Native American cultural resources. In addition, Public Resources Code Section 5097.98, California Government Code Section 27491 and the Health &amp; Safety Code 7050.5 provide for provisions for accidentally discovered archeological resources during construction and made the processes to be follow in the event of an accidental discovery of any human remains in a project location other than a “dedicated ceremony.”</li> </ul>	Section 4.5, Cultural Resources
<b>IMPERIAL IRRIGATION DISTRICT (IID) – MAY 26, 2011</b>	
<p>The IID letter dated May 26, 2011, requested that the following be considered in the EIR:</p> <ul style="list-style-type: none"> <li>– IID water facilities that could be impacted are the “O” Lateral and “N” Drain.</li> <li>– Any construction or operation on IID property or within its existing and proposed right-of-way (ROW) or easements would require an encroachment permit.</li> </ul>	Chapter 3, Project Description Section 4.4 Biological Resources Section 4.7, Hydrology and Water Quality
<ul style="list-style-type: none"> <li>– Grading, construction, and de-silting operations would be completed under a stormwater general permit with erosion-related best management practices (BMPs) in use. It is recommended that downstream flows be monitored for a potential increase in downstream sedimentation, with corrective measures to be planned and implemented, if needed.</li> </ul>	Section 4.7, Hydrology and Water Quality
<ul style="list-style-type: none"> <li>– The Project’s water supply requirements can be provided for only under the IID’s Interim Water Supply Policy; there is no “landlord allocation” available for industrial purposes. All new non-agricultural water project supply requests are processed in accordance with the Interim Water Supply Policy.</li> </ul>	Section 4.15, Utilities
<ul style="list-style-type: none"> <li>– Additionally, 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 in accordance to the relevant land use permitting/approving agencies.</li> </ul>	Section 4.15, Utilities

**TABLE 2-1 SUMMARY PUBLIC SCOPING COMMENTS**

<b>COMMENT SUMMARY</b>	<b>WHERE COMMENT IS ADDRESSED IN THE EIR</b>
<ul style="list-style-type: none"> <li>– We suggest that the project proponent make a good faith effort to provide in the DEIR, discussion and analysis on the use of fresh water for cooling given the fact that dry cooling technologies for power plant cooling is encouraged and preferred in the desert region due to the scarcity of water resources, and at the very least, alternative water sources are favored to fresh water.</li> </ul>	Section 4.15, Utilities Chapter 6 Alternatives
<ul style="list-style-type: none"> <li>– The project proponent should demonstrate that alternative water supply sources and alternative cooling technologies are environmentally undesirable or economically unsound.</li> </ul>	Chapter 6, Alternatives
<ul style="list-style-type: none"> <li>– The Draft EIR should address impacts to IID's drains. Thirty-three percent of the water delivered to agricultural users is discharged into the IID's drainage system. Reduction in the field drainage due to land use conversion has an incremental effect on both drain water quality and volume and the 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).</li> <li>– Additionally, certain 'direct-to-sea drains have been identified as pupfish drains, which require additional protections under the California Endangered Species Act (CESA) and the federal Endangered Species Act (ESA).</li> </ul>	Section 4.7, Hydrology and Water Quality Section 4.3, Air Quality Section 4.4, Biological Resources
<ul style="list-style-type: none"> <li>– Any new, relocated, upgraded, or reconstructed IID facilities required for and by the Project (which can include, but are not limited to, electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the Project's CEQA and/or National Environmental Policy Act (NEPA) documentation, environmental impact analysis, and mitigation.</li> </ul>	Chapter 3, Project Description, throughout the EIR
<b>CALIFORNIA DEPARTMENT OF FISH AND GAME (CDFG) – MAY 2, 2012</b>	
<p>The CDFG letter dated May 2, 2012, requested that the following be considered in the EIR:</p> <ul style="list-style-type: none"> <li>– The proposed Project site is located in potential habitat for the Western Burrowing Owl (<i>Athene cunicularia</i>). This species is designated as California Species of Special Concern. Section 15380 of the California Environmental Quality Act (CEQA) requires the lead agency to treat sensitive species as though they were listed, if the species meets the criteria for listing described in the section. The Department believes that the proposed Project could further the decline of the above sensitive species. This species must be treated as though it were listed and appropriate avoidance, mitigation, and compensation for impacts need to be identified.</li> </ul>	Section 4.4, Biological Resources
<ul style="list-style-type: none"> <li>– Unavoidable impacts to the Western Burrowing Owl should be mitigated through acquisition and protection, in perpetuity, of high quality biological habitat. In addition, surveys and mitigation should be consistent with the 1995 Department Staff Report on Burrowing Owl Mitigation.</li> </ul>	Section 4.4, Biological Resources
<ul style="list-style-type: none"> <li>– The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.</li> </ul>	Section 4.4, Biological Resources

**TABLE 2-1 SUMMARY PUBLIC SCOPING COMMENTS**

<b>COMMENT SUMMARY</b>	<b>WHERE COMMENT IS ADDRESSED IN THE EIR</b>
<ul style="list-style-type: none"> <li>– The Department is emphasizing in comment letters on projects with impacts to lakes or streambeds that alternatives and mitigation measures must be addressed in CEQA certified documents prior to submittal of an application of a Streambed Alteration Agreement (SAA). Any information which is supplied to the Department after the CEQA process is complete will not have been subject to the public review requirements of CEQA.</li> </ul>	Section 4.4, Biological Resources Section 4.7, Hydrology and Water Quality
<ul style="list-style-type: none"> <li>– In order for the Department to process a SAA agreement, the CEQA-certified documents must include an analysis of the impacts of the proposed Project on the lake or streambed, an analysis of the biological resources present on the site, copies of biological studies conducted on the site, biological survey methodology, and a discussion of any alternative, avoidance, or mitigation measures which will reduce the impacts of the proposed development to a level of insignificance. In addition, a discussion of potential adverse impacts from any increased runoff, sedimentation, soil erosion, and/or pollutants on streams and watercourses on or near the Project site, with mitigation measures proposed to alleviate such impacts must be included in the CEQA -certified documents.</li> </ul>	Section 4.4, Biological Resources Section 4.7, Hydrology and Water Quality

### **DRAFT EIR**

In the preparation of the Draft EIR, lead agencies must consider public and agency comments received and respond to these comments in the Final EIR. Following completion of the Draft EIR, County of Imperial filed a Notice of Completion (NOC) with the State Clearinghouse on July 2, 2012, to begin the public review period.

### **PUBLIC NOTICE/REVIEW OF DRAFT EIR**

Agencies, organizations, and other interested parties were encouraged to review and comment on the issues presented in the Draft EIR during the public review period, which was from July 2, 2012, through August 17, 2012. A Notice of Availability of the Draft EIR was published in the Imperial Valley Press on July 3, 2012,

Copies of the Draft EIR and appendices were made available for review electronically at <http://www.icpds.com/?pid=574> and hard copies were available for review at the Imperial County Planning and Development Services Department, 801 Main Street, El Centro, California 92243.

### **RESPONSE TO COMMENTS/FINAL EIR**

Comments received during the public review period of the Draft EIR have been reviewed and responded to in this Final EIR (See Section III). The Final EIR will then be reviewed by the Imperial County Planning as a part of the procedure to adopt the EIR. Additional information on this process may be obtained by contacting the County of Imperial Planning and Development Services Department at (760) 482-4236.

Copies of the Final EIR and appendices can also be reviewed electronically at <http://www.icpds.com/?pid=574> and hard copies are available for review at the Imperial County Planning and Development Services Department, 801 Main Street, El Centro, California 92243.

### **CERTIFICATION OF FINAL EIR/PROJECT CONSIDERATION**

The County of Imperial Planning Commission will consider the Final EIR and make its decision regarding the Projects (the Planning Commission's decisions regarding the Projects may be appealed to the Board of Supervisors). If, in the exercise of its independent judgment and review, the Commission (or Board) finds that the Final EIR is "adequate and complete," the Commission (or Board) may certify the Final EIR at a public hearing. The "rule of adequacy" generally holds that the Final EIR can be certified if it shows a good faith effort at full disclosure of environmental information and provides sufficient analysis to allow decisions to be made regarding the Project in contemplation of its environmental consequences.

Upon review and consideration of the Final EIR, the Planning Commission may take action to approve, revise, or reject the Project. A decision to approve the Projects would be accompanied by written findings in accordance with CEQA Guidelines, Section 15091, and, if applicable, Section 15093. An MMRP, as described below, would also be adopted for mitigation measures that have been incorporated into or imposed upon the Projects to reduce or avoid significant impacts to the environment. The MMRP would be designed to ensure that these measures are carried out during project implementation.

### **MITIGATION MONITORING AND REPORTING PROGRAM**

Section 21086.1 of CEQA requires that public agencies adopt a program for monitoring mitigation measures or conditions of project approval that reduce or eliminate significant impacts to the environment. As such, the County has prepared a Mitigation Monitoring and Reporting Plan (MMRP) for each of the proposed Projects as separate documents, which are included in Section IV of this Final EIR. The MMRPs will be submitted to approving agencies along with the Final EIR prior to considering the proposed projects for approval. Any mitigation measures adopted by the Planning Commission (or Board of Supervisors) as conditions for approval of the Projects will be included in each of the MMRPs to track and verify compliance.

## **2.6 IMPACT TERMINOLOGY**

Terms that are used frequently in this EIR are defined below to aid the reader in understanding the meaning of the language used throughout the document.

**Cumulatively Considerable:** The incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (CEQA Guidelines, Section 15065(a)(3)).

**Less than Cumulatively Considerable:** The incremental effects of the individual project are not significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (CEQA Guidelines, Section 15065(a) (3)).

**Less than Significant Impact:** A less than significant impact is adverse but would not cause substantial change in the environment and does not require mitigation.

**No Impact:** No impact to the environment would occur as a result of the Project.

**Potentially Significant Impact:** A significant impact for which there is not enough information to draw a firm conclusion; however, for the purpose of this EIR, they are considered significant. Such impacts are equivalent to Significant Impacts and require mitigation, if feasible, to eliminate the impact or reduce it to less than significant.

**Significant Impact:** A significant impact exceeds the defined CEQA thresholds of significance. A significant impact would or could potentially cause a substantial adverse change in the environment and would require mitigation, if feasible, to eliminate the impact or reduce it to less than significant.

**Significant and Unavoidable:** A significant and unavoidable impact cannot be eliminated or reduced to a less than significant level through the incorporation of feasible mitigation.

**Standards of Significance:** Standards, or “thresholds,” of significance used by County of Imperial for the purpose of this EIR are based on CEQA guidelines; scientific data; regulatory performance standards of federal, state, and local agencies; and County goals, objectives, and policies.

## **2.7 COMMONLY USED TERMS**

Identified below are common terms used throughout this document. A complete list of acronyms and abbreviations is provided in the Table of Contents.

**Applicant(s):** Any person or other legal entity that applies to the County to develop or improve any portion of the real property within the Project boundaries. The term includes Hudson Ranch Power II, LLC, Simbol, Inc. and all successors-in-interest.

**Brine:** A geothermal solution containing appreciable amounts of sodium chloride or other salts.

**Cooling Tower:** A structure in which heat is removed from circulating cooling water heated by condensing geothermal steam.

**County:** County of Imperial.

**Developer:** Any person or other legal entity that performs actual construction activities that convert the Project site to urban uses. Such activities include, but are not limited to, grading, building construction, and installation of infrastructure.

**Depleted Brine:** Brine from SmCP-2 from which minerals have been removed. Depleted brine would be returned to HR-2 for injection into the geothermal resource.

**Draft EIR:** Draft Environmental Impact Report.

**Final EIR:** Final Environmental Impact Report.

**Geothermal Flash Power Plant:** Geothermal flash plants pull deep, high-pressure hot water into lower-pressure tanks, causing some of the fluid to rapidly vaporize, or “flash”. The resulting flashed steam is then used to drive turbines.

**Geothermal Steam Condensate:** Water formed by condensation of geothermal steam.

**General Plan:** The County of Imperial General Plan, adopted November 1993; various updates to elements have been made, with the latest updates occurring in January 2008.

**Known Geothermal Resource Area:** A region identified by the U.S. Geological Survey as containing geothermal resources.

**Land Use Ordinance:** The Land Use Ordinance of the County of Imperial, as adopted November 24, 1998, and as revised in 2008.

**Projects or Proposed Projects:** The development or improvement of the Project site, as defined by the Project application.

**Project Site:** The real property described within the Project’s conditional use permit application and includes the geographic area within which project facilities would be sited, including well pads, geothermal facilities, pipelines, roadways, freshwater and stormwater retention ponds, and mineral extraction plant facilities.

**Project Area:** The area around (i.e., outside of) the Project site.

**Spent Brine:** Post-clarifier brine from the HR-2 geothermal flash plant from which the heat has been removed. This brine would be sent to the SmCP-2 plant for mineral extraction.

## **2.8 REFERENCES**

County of Imperial. 2011. Official Proceedings, Imperial County Board of Supervisors Regular Meeting, Tuesday, March 15, 2011.

\_\_\_\_\_. 2008a. Land Use Element of the General Plan, prepared by Imperial County Planning and Development Services Dept. Amended Jan 29, 2008.

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<http://library.municode.com/index.aspx?clientId=16410&stateId=5&stateName=California>.  
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\_\_\_\_\_. 1993. General Plan EIR, prepared by Brian F. Mooney & Associates in 1993; and as Amended by County in 1996, 1998, 2001, 2003, 2006 and 2008.

\_\_\_\_\_. 1981. Final Master Environmental Impact Report for development of the Salton Sea Anomaly and Final Environmental Impact Report for Magma Power Plant #3 (SCH 80102409), prepared by Westec, 1981.

Nichols, D. 2011. Personal Communication (telephone) between Lt. Coronel Dan Nichols, March Air Force Base and Andrea Castillo, Ecology and Environment, Inc. June 15, 2011.

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