8.0 ALTERNATIVES

8.1 INTRODUCTION

The identification and analysis of alternatives is a fundamental concept under the California Environmental Quality Act (CEQA). This is evident in that the role of alternatives in an Environmental Impact Report (EIR) is set forth clearly and forthrightly within the CEQA statutes. Specifically, CEQA §21002.1(a) states:

> *"The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."*

The CEQA Guidelines require an EIR to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines §15126.6(a)). The CEQA Guidelines direct that selection of alternatives focus on those alternatives capable of eliminating any significant environmental effects of the project or of reducing them to a less-than significant level, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly. In cases where a project is not expected to result in significant impacts after implementation of recommended mitigation, review of project alternatives is still appropriate.

The range of alternatives required within an EIR is governed by the "rule of reason" which requires an EIR to include only those alternatives necessary to permit a reasoned choice. The discussion of alternatives need not be exhaustive. Furthermore, an EIR need not consider an alternative whose implementation is remote and speculative or whose effects cannot be reasonably ascertained.

Alternatives that were considered but were rejected as infeasible during the scoping process should be identified along with a reasonably detailed discussion of the reasons and facts supporting the conclusion that such alternatives were infeasible.

Based on the alternatives analysis, an environmentally superior alternative is designated among the alternatives. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives (CEQA Guidelines §15126.6(e)(2)).

8.2 CRITERIA FOR ALTERNATIVES ANALYSIS

As stated above, pursuant to CEQA, one of the criteria for defining project alternatives is the potential to attain the project objectives. Established objectives of the project applicant for the proposed projects include:

Overall objective: To utilize Imperial County's abundance of available solar energy (sunlight) to generate renewable energy, consistent with the County General Plan renewable energy objectives. The project applicant and the County identified the following objectives for the projects:

- Construct and operate a solar energy facility capable of producing up to 360 megawatts (MW) of electricity to help meet the State-mandated Renewable Energy Portfolio Standard (RPS) of providing 33 percent renewable energy by 2020.
- Construct and operate a solar power facility with minimal impacts to the environment.
- Operate a facility at a location that ranks amongst the highest in solar resource potential in the nation.

- Construct a facility at a location near the U.S. border to avoid issues of leapfrog development and dividing stretches of agricultural land.
- Interconnect with electrical transmission infrastructure either planned or being constructed by other nearby projects, interconnect to the ISO controlled transmission network, and maximize opportunities for the sharing or use of existing utility transmission corridor(s).
- Encourage economic investment and diversify the economic base for Imperial County.
- Operate a renewable energy facility that does not produce significant noise, emit any greenhouse gases, and minimizes water use.
- Help reduce reliance on foreign sources of fuel.
- Supply on-peak power to the electrical grid in California.
- Help California meet its statutory and regulatory goal of increasing renewable power generation, including greenhouse gas reduction goals of Assembly Bill (AB) 832 (California Global Warming Solutions Act of 2006).
- Sustain and stimulate the economy of Southern California by helping to ensure an adequate supply of renewable electrical energy while simultaneously creating additional construction and operations employment and increased expenditures in many local businesses.
- Contribute to Imperial County's economic growth and reputation as the renewable energy capital of the nation.

8.3 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT ALTERNATIVE

The CEQA Guidelines require analysis of the No Project Alternative (Public Resources Code Section 15126). According to Section 15126.6(e), "the specific alternative of 'no project' shall also be evaluated along with its impacts. The 'no project' analysis shall discuss the existing conditions at the time the Notice of Preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."

The No Project/No Development Alternative assumes that the FSF, RSF, ISF and LSF projects, as proposed, would not be implemented and the project sites would not be developed. The No Project/No Development Alternative would not meet any of the project objectives.

Environmental Impact of Alternative 1 – No Project/No Development Alternative

Aesthetics: Because the No Project/No Development Alternative would not modify the existing project sites or add construction to the project sites, there would be no changes to the existing condition of the sites. A significant glare impact has been identified associated with the projects potential to create glare on certain roadways where solar panels would face south. As such, this alternative would avoid the potential ground-level glare impact associated with the projects.

Agriculture: Under the No Project/No Development Alternative, the project sites would continue to be used for active agricultural uses. No conversion of farmland including land of Statewide Importance and Prime Farmland would occur and this alternative would not contribute to the conversion of agricultural lands or otherwise adversely affect agricultural operations. Cancellation of Williamson Act contracts would not be required under this alternative. The proposed projects result in a less than significant impact with regards to agricultural resources with mitigation incorporated. Compared to the proposed projects, this alternative would avoid the significant impact associated with the conversion of agricultural lands and the need for future restoration of the project study areas to enable for future agricultural use.

Air Quality: Under the No Project/No Development Alternative, there would be no air emissions due to project construction or operation, and no project- or cumulative-level air quality impact would occur. Therefore, no significant impacts to air quality or violation of air quality standards would occur under this

alternative. Moreover, this alternative would be consistent with existing air quality attainment plans and would not result in the creation of objectionable odors.

During construction, the projects would require incorporation of mitigation to minimize significant air quality impacts to a less than significant level. Therefore, this alternative would result in less air quality emissions compared to the proposed projects. It is important to note, however, that agricultural operations likely contribute to greater long-term and cumulative air quality impacts through soil preparation, dust generation, and operation of heavy equipment as compared to operations of the proposed solar farms. Additionally, the No Project/No Development Alternative would not reduce the long-term need for renewable electricity generation. As a consequence, while the No Project/No Development Alternative would not result in new impacts to air quality as a result of construction, it would likely not realize the overall benefits to regional air quality when compared to the operation of the proposed projects.

Biological Resources: Under the No Project/No Development Alternative, existing biological resource conditions within the project sites would largely remain unchanged and no impact would be identified. Also, unlike the proposed projects which require mitigation for impacts to raptor species such as burrowing owl, this alternative would not result in construction of solar facilities that could otherwise result in significant impacts to these biological resources. As with the proposed projects, this alternative would avoid any impacts associated with habitat modification, riparian or wetlands, the movement of fish and wildlife species, and would not conflict with policies or ordinances relative to protection biological species or any provisions of an applicable habitat conservation plan. Compared to the proposed projects, this alternative would avoid impacts to biological resources.

Cultural Resources: Based on the results of the records searches and pedestrian survey, the project sites should be considered moderately sensitive for the presence of archaeological resources. The projects include ground-disturbing activities that will extend to depths of 20 feet below the ground surface. As such, the projects have the potential to disturb previously undocumented cultural resources that could qualify as unique archaeological resources pursuant to CEQA. No significant paleontological resources impact has been identified for the proposed projects. Compared to the proposed projects, this alternative would avoid impacts to cultural resources.

Geology and Soils: Because there would be no development at the project sites under the No Project/No Development Alternative, no grading or construction of new facilities such as operations and maintenance buildings would occur. Therefore, there would be no impacts to project-related facilities as a result of local seismic or liquefaction hazards, unstable or expansive soils, or suitability of soils for supporting septic tanks. In contrast, the proposed projects would require the incorporation of mitigation measures to minimize impacts to a less than significant level. This alternative would also avoid the need for new on-site wastewater systems and the corresponding mitigation requirements for the projects. Compared to the proposed projects, this alternative would avoid significant impacts related to local geological and soil conditions.

Greenhouse Gas Emissions: Under the No Project/No Development Alternative, there would be no greenhouse gas (GHG) emissions resulting from project construction or operation. Therefore, no impact to global climate change would result from project-related GHG emissions, primarily associated with construction activities. For the proposed projects, a less than significant impact was identified for construction-related GHG emissions, and in the long-term, the projects would result in an overall beneficial impact to global climate change as the result of creation of renewable energy. While this alternative would not further implement policies (e.g., SB X1-2) for GHG reductions, this alternative would also not directly conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This alternative would not create any new GHG emissions during construction but would not lead to a long-term beneficial impact to global climate change. Compared to the proposed projects, while the No Project/No Development Alternative would not result in new GHG emissions during construction, it would be less beneficial to global climate change as compared to the proposed projects.

Hazards and Hazardous Materials: The No Project/No Development Alternative would not include any new construction. Therefore, no potential exposure to hazardous materials would occur. Workers would not be exposed to potential sources of lead and asbestos associated with the demolition of existing

on-site structures and oil wells would remain unchanged. Therefore, no impact is identified for this alternative for hazards and hazardous materials. As with the proposed projects, this alternative would not result in safety hazards associated with airport operations. The proposed projects resulted in less than significant impacts with mitigation incorporated. Compared to the proposed projects, this alternative would have less of an impact related to hazards and hazardous materials.

Hydrology/Water Quality: The No Project/No Development Alternative would not result in modifications to the existing drainage patterns or volume of storm water runoff as attributable to the proposed projects, as existing site conditions and on-site pervious surfaces would remain unchanged. In addition, implementation of the No Project/No Development Alternative would not require stormwater treatment controls that would be required for new project-related O&M and transmission facilities. Furthermore, no changes with regard to water quality would occur under this alternative. However, in the context of existing sediment TMDLs for local drainages, this alternative would not realize the benefits that could be attributed to the projects in terms of reductions in exposed soil surfaces which are identified as a principle contributor to existing water quality impairments. In this context, this alternative would not contribute to any real reduction in the potential for water quality impacts especially, since the projects would require additional mitigation, which would not otherwise be required under this alternative to address existing water quality impairments. Compared to the proposed projects, from a drainage perspective, this alternative would avoid changes to existing hydrology, which will require the implementation of mitigation to avoid potential impacts to existing County and IID drainage facilities to a less than significant level. Similar to the proposed projects, this alternative would not result in the placement of structures within a 100-year flood zone.

Land Use and Planning: The No Project/No Development Alternative would not result in the modification of the existing agricultural land use on the project sites and would maintain the current agricultural operations. Similar to the proposed projects, the No Project/No Development Alternative would not divide an established community. Unlike the proposed projects, the No Project/No Development Alternative would not require the issuance of a CUP and Variance to maintain the projects' consistency with the County's General Plan. As with the proposed projects, this alternative would not conflict with any applicable habitat conservation plan or natural community conservation plan. Compared to the proposed projects, this alternative would have less of an impact related to land use and planning.

Noise: This alternative would not require construction or operation of the project facilities; therefore, this alternative would not increase ambient noise levels within the vicinity of the project sites. For this reason, no significant noise impacts would occur. The proposed projects could result in significant noise impacts to a limited number of receptors and, therefore, would require mitigation to reduce these impacts to a less than significant level. Compared to the proposed projects, this alternative would reduce any potentially significant noise impacts and eliminate the need for the applied mitigation measures.

Public Services: The No Project/No Development Alternative would not increase the need for public services which would otherwise be required for the proposed projects (additional police or fire protection services). Therefore, no impact to public services is identified for this alternative. The proposed projects result in less than significant impacts; subject to payment of law enforcement and fire service fees. Compared to the proposed projects, this alternative would have fewer impacts related to public services.

Transportation/Traffic: Because there would be no new development under the No Project/No Development Alternative, no increase in vehicular trips during construction or operation would result for this alternative. For these reasons, no impact would occur and this alternative would not impact any applicable plan, ordinance, or policy addressing the performance of the circulation system, conflict with an applicable congestion management program, change air traffic patterns, substantially increase hazards due to a design feature, result in inadequate emergency access, or conflict with public transit, bicycle, or pedestrian facilities. Although the proposed projects would result in less than significant transportation/traffic impacts, compared to the proposed projects, this alternative would avoid an increase in vehicle trips on local roadways, and any safety related hazards that could occur in conjunction with the increase vehicle trips and truck traffic.

Utilities: The No Project/No Development Alternative would not require the expansion or extension of existing utilities, since there would be no new project facilities that would require utility service. The proposed projects would not result in any significant impacts to existing utilities and, in the case of water supply, would result in desirable benefits as a result of substantially reduced water demands. Compared to the proposed projects, this alternative would not realize the benefits of reduced water demands.

Conclusion: Implementation of the No Project/No Development Alternative would generally result in reduced impacts for a majority of the environmental issues areas considered in Chapter 4, Environmental Analysis when compared to the proposed projects. A majority of these reductions are realized in terms of significant impacts that are identified as a result of project construction. However, this alternative would not realize the benefits of reduced GHG emissions associated with energy use and reduced water supply demands, which are desirable benefits that are directly attributable to the proposed projects.

Comparison of the No Project/No Development Alternative to Project Objectives

The No Project/No Development Alternative would not meet any of the objectives of the projects. Additionally, the No Project/No Development Alternative would not help California meet its statutory and regulatory goal of increasing renewable power generation, including GHG reduction goals of Assembly Bill (AB) 832 (California Global Warming Solutions Act of 2006).

8.4 ALTERNATIVE 2: REDUCED ACREAGE ALTERNATIVE (AVOID PRIME FARMLAND)

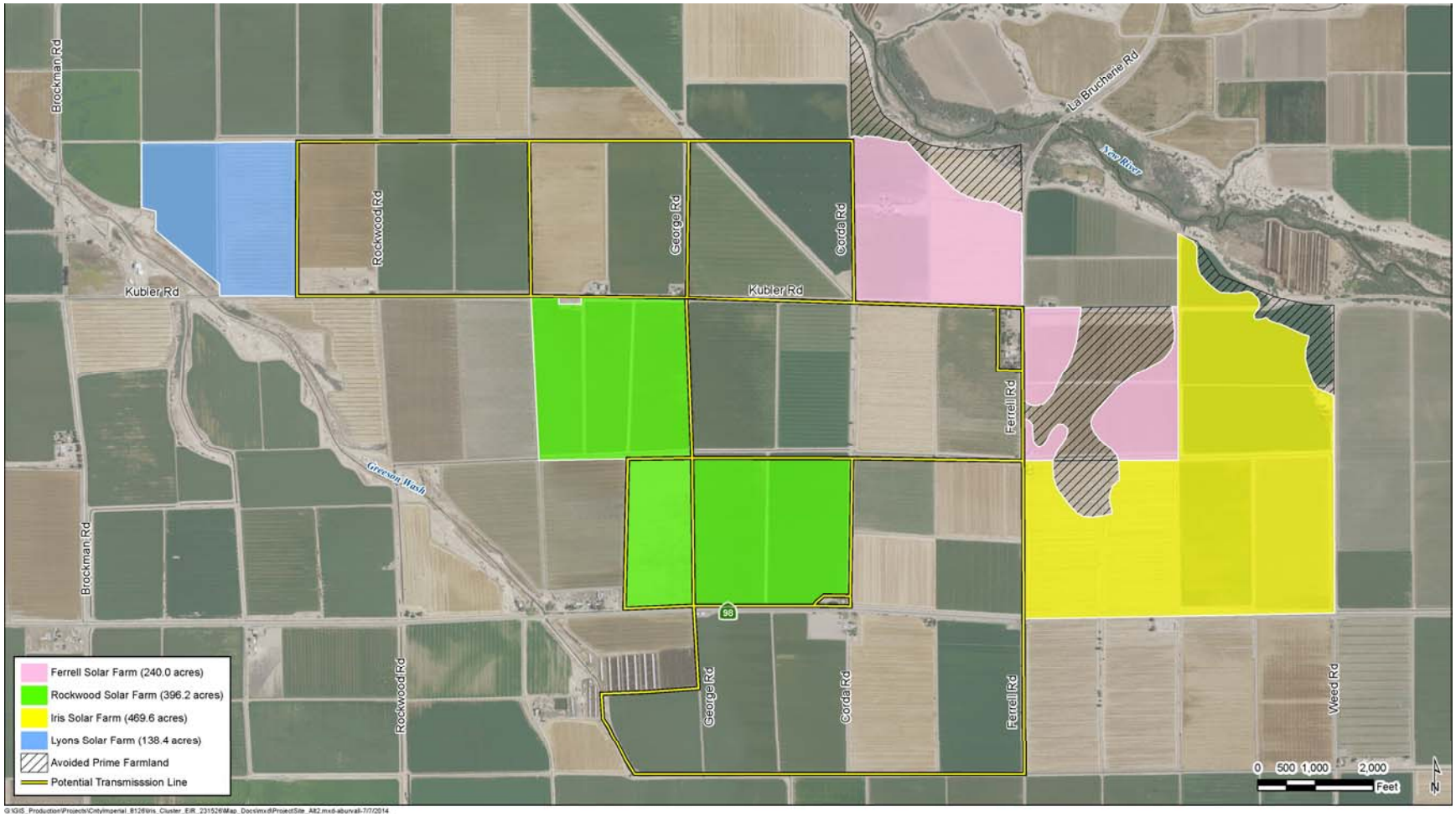
The purpose of this alternative is to avoid the Prime Farmlands located within the project sites, specifically associated with the FSF and ISF. The 2010 Important Farmland maps for Imperial County indicate that a majority of the project sites are comprised of Farmland of Statewide Importance with small isolated areas designated as Prime Farmland and “other.” This alternative is illustrated in Figure 8.0-1, which shows the location of the Prime Farmland that would be avoided (approximately 160.4 acres) and the total acreage of the projects with the exclusion of Prime Farmland. (NOTE: this alternative would not avoid several pockets of Prime Farmland as shown on Figure 8.0-1 as these represent small, isolated pockets of land, which would likely not remain economically viable or practically feasible to farm as they would be surrounded by solar uses.)

Environmental Impact of Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland)

Aesthetics: Under Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland), the overall size of the solar energy facilities would be reduced. However, the transmission line would still be required, which would connect through the project area and ultimately to the Imperial Valley Substation. No significant visual aesthetic impact associated with the proposed projects has been identified as the project facilities would not impact scenic resources, or result in the degradation of the existing visual character of the project study areas. However, a significant ground level glare impact has been identified. Because this alternative would also involve installation of solar panels that would face in a southerly direction, this alternative would also have the potential for a significant ground level glare impact. As such, this alternative would not avoid or reduce any significant impacts identified for the projects and the aesthetic impact would be similar to the proposed project.

Agriculture: Under Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland), the majority of the project sites that contain Prime Farmlands would continue to be used for active agricultural uses. However, since this alternative would include the use of large acreages of Farmland of Statewide Importance for the solar facilities, similar mitigation would be required for this alternative to reduce significant farmland impacts to a less than significant level. Impacts associated with contributing to the conversion of other agricultural lands or otherwise affecting agricultural operations would still occur. Compared to the proposed projects, this alternative would reduce the significant impacts associated with these agricultural issues.

Figure 8.0-1. Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland)



Air Quality: Under Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland), air emissions during construction would be less than the proposed projects because the reduced site development. A less than significant impact with mitigation incorporated has been identified for the proposed projects during construction. The same mitigation measures would be required for this alternative as with the proposed projects. This alternative would be consistent with existing air quality attainment plans and would not result in the creation of objectionable odors. It is important to note, however, that agricultural operations contribute more to long-term and cumulative air quality impacts through soil preparation and dust creation than would operation of the proposed solar farms. Additionally, this alternative would provide less megawatt generation as compared to the proposed projects, thereby reducing its ability to provide a long-term source of renewable energy. Compared to the proposed projects, while Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) would result in less air quality impacts, it would likely provide less desirable benefits to overall regional air quality as attributable to the proposed projects.

Biological Resources: Under Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland), potential impacts to several of the burrowing owl locations identified within the project area and indirect impacts associated with burrowing owls in the adjacent drainage canals, especially along Kubler Road would be avoided as compared to the proposed projects. Mitigation would still be required for impacts to burrowing owl; however, the overall number of burrowing owl locations potentially impacted would be less. Impacts to wetlands, migratory corridors, and other wildlife and habitats would be similar to that described for the projects. Compared to the proposed projects, this alternative would result in a reduction in impacts to biological resources, but would still require mitigation.

Cultural Resources: Based on the results of the records searches and pedestrian survey, the project sites are considered moderately sensitive for the presence of archaeological resources. Under Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland), ground-disturbing activities will extend to depths of 20 feet below the ground surface, similar to the proposed projects. As such, this alternative has the potential to disturb previously undocumented cultural resources that could qualify as unique archaeological resources pursuant to CEQA. Mitigation is required, in the form of monitoring during construction, to ensure that should unanticipated discovery of cultural resources or human remains be encountered, and proper measures are implemented to ensure these potential impacts are addressed. Compared to the proposed projects, this alternative would incur similar impacts to cultural and paleontological resources by virtue that the project sites would still be developed with solar uses in the same general location as the proposed projects.

Geology and Soils: Under Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland), while the overall project footprint would be reduced, grading and construction of new facilities such as O&M buildings, transmission facilities, and solar arrays would still occur. Therefore, this alternative would still be subject to potential impacts related to seismic or liquefaction hazards and unstable or expansive soils. Additionally, this alternative would require the construction of on-site wastewater facilities, which could be constructed on poorly suited soils thereby requiring the prescribed mitigation. Similar to the projects, this alternative would require the incorporation of mitigation measures identified for the proposed projects to minimize these impacts to a less than significant level. Compared to the proposed projects, this alternative would result in similar geological and soil impacts.

Greenhouse Gas Emissions: Under Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland), the overall project footprint would be reduced thereby contributing to reductions in GHG emissions during project construction. However, as a consequence of the reduced size of the projects, this alternative would result in a reduced power production capacity as compared to the proposed projects; hence, the overall benefits of the projects to global climate change through the creation of renewable energy would also be reduced. This alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Similar to the proposed projects, this alternative would not exceed SCAQMD's threshold of 3,000 tCO_{2e}. Compared to the proposed projects, this alternative would contribute to similar and desirable reductions in GHG emissions and associated contribution to global climate change through the production of renewable energy, although to a lesser degree.

Hazards and Hazardous Materials: Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) would have the potential for exposure of construction workers to lead and asbestos associated with the demolition of existing on-site structures and plugged and abandoned oil wells. Therefore, this alternative would have a similar impact with associated mitigation measures as the proposed projects related to known hazards and hazardous materials within the project sites. Impacts associated with wildfire hazards and airport safety would be similar to that described for the proposed projects. Compared to the proposed projects, this alternative would result in similar hazards and hazardous materials impacts.

Hydrology/Water Quality: Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) would result in modifications to the existing drainage patterns and the volume of storm water runoff, as this alternative would introduce impervious area on-site, although to a lesser degree than the proposed projects. Because the overall project footprint would be reduced, this alternative would realize a minor reduction in the corresponding impacts to hydrology and on-site drainage; however, the same mitigation measures would be applicable to this alternative. Similar to the proposed projects, no impacts would result from flooding and facilities will not be placed within floodplains. Compared to the proposed projects, this alternative would result in fewer hydrology/water quality impacts.

Land Use and Planning: Similar to the proposed projects, Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) would not divide an established community or result in incompatibilities with adjacent agricultural uses. Similar to the proposed projects, Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) would require the approval of a CUP and Variance to maintain consistency with the County's General Plan. As with the proposed projects, this alternative would not conflict with any applicable habitat conservation plan or natural community conservation plan. Compared to the proposed projects, land use and planning impacts resulting from this alternative would be similar to those identified for the proposed projects.

Noise: As with the proposed projects, Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) would result in significant, but mitigable noise impacts associated with construction activities. Compared to the proposed projects, this alternative would require the operations of the same facilities required for the projects and, therefore, would not reduce any significant noise impacts nor eliminate the need to incorporate mitigation measures. As with the proposed projects, operational impacts associated with this alternative would not expose persons or generate noise levels in excess of applicable noise standards, exposure persons to, or generate excessive groundborne vibration, or expose persons to excessive aircraft noise. Compared to the proposed projects, this alternative would result in a similar impact related to noise for the proposed projects.

Public Services: Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) would require increased public services, specifically law enforcement and fire protection services. While the overall project footprint would be slightly smaller, the impacts of this alternative to public services and associated service ratios would be similar. Like the proposed projects, this alternative would be conditioned to provide law enforcement and fire service development impact fees. Compared to the proposed projects, this alternative would result in a similar impact related to public services.

Transportation/Traffic: This alternative would result in a similar level of vehicle and truck trips within the project sites as compared to the proposed projects. However, the increase in vehicular traffic was identified as a less than significant impact for the proposed projects. In this context, Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) would not reduce or avoid an impact related to transportation/traffic, and would result in less than significant impacts similar to the proposed projects. As with the proposed projects, this alternative would not impact any applicable plan, ordinance, or policy addressing the performance of the circulation system, conflict with an applicable congestion management program, change air traffic patterns, substantially increase hazards due to a design feature, result in inadequate emergency access, or conflict with public transit, bicycle, or pedestrian facilities. Compared to the proposed projects, this alternative would result in a similar impact related to transportation/traffic.

Utilities: Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) would require water service and energy for the operation of the proposed projects. This alternative would allow agricultural operations to continue for a portion of the project sites, which utilizes more water than solar farm

activities. As a consequence, this alternative would result in increased water demands when compared to the proposed projects, but would continue to experience desirable benefits related to the reductions in agricultural water demands. Compared to the proposed projects, this alternative would result in a similar impact related to utilities.

Conclusion: Implementation of Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) would result in reduced impacts for the following environmental issues areas as compared to the proposed projects: agriculture, air quality, biological resources, greenhouse gas emissions (construction phase only), and hydrology/water quality. This alternative would not result in any greater environmental impacts when compared to the proposed projects.

Comparison of Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) to Project Objectives

Alternative 2: Reduced Acreage Alternative (Avoid Prime Farmland) would meet most of the basic objectives of the proposed projects and should remain under consideration. However, this alternative would make it more difficult to achieve the overall objective of providing a total of 360 megawatts of renewable solar energy, as there would be less area available for the placement of PV or CPV structures.

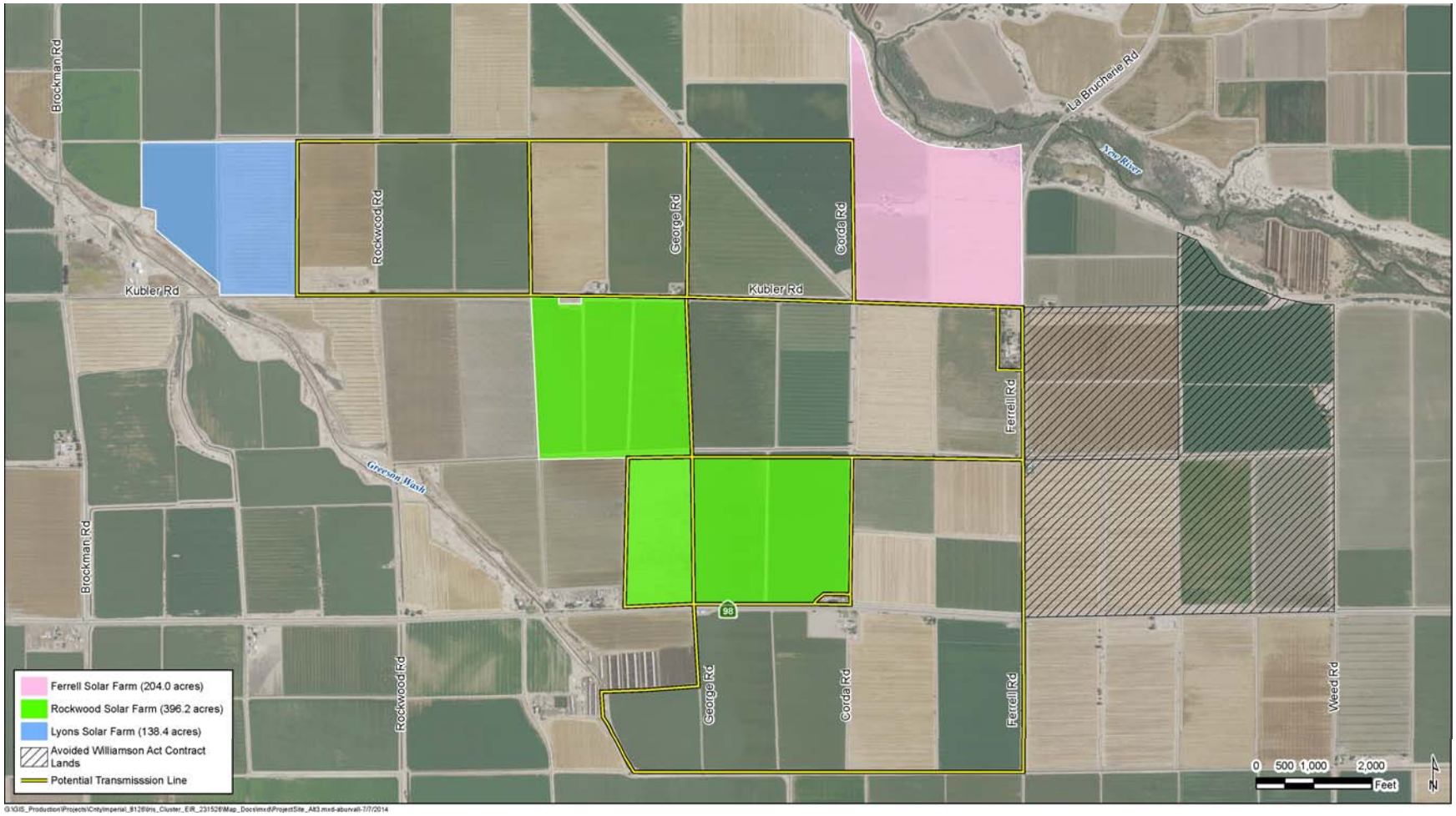
8.5 ALTERNATIVE 3: REDUCED ACREAGE (AVOID WILLIAMSON ACT LAND)

The purpose of this alternative is to avoid Williamson Act Contract lands that are located within the project sites, specifically the FSF and ISF sites. Figure 8.0-2 depicts the configuration of this alternative and the total acreage of the projects with the exclusion of Williamson Act Contract lands. This alternative would reduce the size of the projects by approximately 662~~684~~ acres as compared to the proposed projects. Under the provisions of the Williamson Act (California Land Conservation Act 1965, Section 51200), landowners contract with the County to maintain agricultural or open space use of their lands in return for reduced property tax assessment. The contract is self-renewing and the landowner may notify the County at any time of intent to withdraw the land from its preserve status. Withdrawal involves a ten-year period of tax adjustment to full market value before protected open space can be converted to urban uses. Consequently, land under a Williamson Act Contract can be in either a renewal status or a nonrenewable status. Lands with a nonrenewable status indicate the farmer has withdrawn from the Williamson Act Contract and is waiting for a period of tax adjustment for the land to reach its full market value. Nonrenewable and cancellation lands are candidates for potential urbanization within a period of ten years.

There are three active Williamson Act Contracts within the FSF and ISF project sites. Agricultural Preserve 160 includes the two parcels associated with Contract 2003-02 (APNs: 059-050-003 and 059-120-001); and one parcel associated with Contract 2004-01 (APN: 059-050-002) within the ISF project study area. One parcel associated with Contract 2003-001 (APN: 059-050-001) is also part of Agricultural Preserve 160 and is located within the FSF project site.

It is important to note that the continuation of the Williamson Act program within Imperial County is now in question as a result of a vote by the Board of Supervisors to discontinue funding for the program. On February 23, 2010, the Imperial County Board of Supervisors voted to not accept any new Williamson Act contracts and not to renew existing contracts, due to the elimination of the subvention funding from the state budget. The County reaffirmed this decision in a vote on October 12, 2010, and notices of nonrenewal were sent to landowners with Williamson Act contracts following that vote. The applicable deadlines for challenging the County's actions have expired, and therefore all Williamson Act contracts in Imperial County will terminate on or before December 31, 2018.

Figure 8.0-2. Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land)



Environmental Impact of Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land)

Aesthetics: This alternative would reduce the overall size of the solar facilities. However, the transmission line would still be required, which would connect through the project area and ultimately to the Imperial Valley Substation. Similar to the proposed projects, no significant aesthetic impact would occur given that the project facilities would not be constructed within a scenic vista or in close proximity to a designated scenic highway. However, this alternative would result in a similar glare impact as the proposed project. Compared to the proposed projects, this alternative would not avoid or reduce any aesthetic impacts identified for the projects and would result in similar impacts to visual resources and aesthetics.

Agriculture: Under Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land), a majority of the project sites that contain Prime farmlands and land under Williamson Act Contracts would continue to be used for active agricultural uses. In this context and when compared to the proposed projects, this alternative would reduce significant impacts associated with the conversion of Prime Farmland and Williamson Act contracted lands, and would also reduce impacts associated with conversion of other agricultural lands that would otherwise affecting agricultural operations. The reduction in project size under this alternative would not remove the remaining portions of the project sites that are designated as Farmland of Statewide Importance. As a result, mitigation prescribed for the projects would still be required to minimize impacts to Important Farmlands and ensure the future agricultural productivity of the project sites following site restoration. Compared to the proposed projects, by virtue that this alternative reduces the amount of Important Farmland impacted by the projects, this alternative would result in fewer impacts to agricultural resources.

Air Quality: Under Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land), air emissions during project construction would be less than the proposed projects because the reduced site development. Because less overall development would occur, this alternative would result in fewer air quality emissions during construction compared to the proposed projects, although the same mitigation measures would be required. This alternative would be consistent with existing air quality attainment plans and would not result in the creation of objectionable odors. It is important to note, however, that agricultural operations contribute more to long-term and cumulative air quality impacts through soil preparation and dust creation than would operation of the proposed solar farm. Additionally, this alternative would provide less megawatt generation as compared to the proposed projects, thereby reducing the project's ability to provide a long-term source of renewable energy. Compared to the proposed projects, while this alternative would result in fewer air quality impacts during construction, it would likely provide less desirable benefits to overall regional air quality as attributable to the proposed projects.

Biological Resources: Under Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land), potential direct and indirect impacts to several of the burrowing owl locations identified on the project sites and within adjacent drainage canals, especially along Kubler Road would be avoided as compared to the proposed projects. Mitigation would still be required for impacts to burrowing owl; however, the overall number of burrowing owl locations potentially impacted would be less. Impacts to wetlands, migratory corridors, and other wildlife and associated habitats would be similar to that described for the projects. Compared to the proposed projects, this alternative would result in fewer impacts to biological resources, but would still require mitigation.

Cultural Resources: Based on the results of the records searches and pedestrian survey, the project sites are considered moderately sensitive for the presence of archaeological resources. Under Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land), ground-disturbing activities will extend to depths of 20 feet below the ground surface, similar to the proposed projects. As such, this alternative has the potential to disturb previously undocumented cultural resources that could qualify as unique archaeological resources pursuant to CEQA. Mitigation is required, in the form of monitoring during construction, to ensure that should unanticipated discovery of cultural resources or human remains be encountered, proper measures are implemented to ensure these potential impacts are addressed.

Compared to the proposed projects, this alternative would incur similar impacts to cultural and paleontological resources by virtue that the project sites would be located in the same general location as the proposed projects.

Geology and Soils: While the overall projects footprint would be reduced under this alternative, grading and construction of new facilities such as an O&M building and auxiliary facilities would still occur. Therefore, impacts related to seismic or liquefaction hazards and unstable or expansive soils would be similar under this alternative when compared to the proposed projects. Likewise, this alternative would require on-site wastewater facilities which could be constructed on poorly suited soils. Compared to the proposed projects, this alternative would result in similar impacts related to geologic and soil hazards and would require the incorporation of mitigation measures similar to the proposed projects.

Greenhouse Gas Emissions: Under Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land), the overall project footprint would be reduced thereby contributing to reductions in GHG emissions during project construction. However, as a consequence of the reduced size of the projects, this alternative would result in a reduced power production capacity as compared to the proposed projects; hence, the overall benefits of the projects to global climate change through the creation of renewable energy would also be reduced. This alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Although this alternative would result in reduced construction emissions, this alternative would still require mitigation during construction, similar to the proposed projects, to reduce the identified impact to a less than significant level. Compared to the proposed projects, this alternative would contribute to similar and desirable reductions in GHG emissions and associated contribution to global climate change through the production of renewable energy, although to a lesser degree.

Hazards and Hazardous Materials: Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) would have the potential exposure of construction workers to lead and asbestos associated with the demolition of existing on-site structures and plugged and abandoned oil wells. Therefore, this alternative would have a similar impact with associated mitigation measures as the proposed projects related to known hazards and hazardous materials within the project sites. Impacts associated with wildfire hazards and airport safety would be similar to that described for the proposed projects. Compared to the proposed projects, this alternative would result in similar hazards and hazardous materials impacts.

Hydrology/Water Quality: Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) would result in modifications to the existing drainage patterns and the volume of storm water runoff, as this alternative would introduce impervious area on-site, although to a lesser degree than the proposed projects. Because the overall project footprint would be reduced, this alternative would realize a minor reduction in the corresponding impacts to hydrology and on-site drainage; however, the same mitigation measures would be applicable to this alternative. Similar to the proposed projects, no impacts would result from flooding and facilities would not be placed within floodplains. Compared to the proposed projects, this alternative would result in fewer hydrology/water quality impacts.

Land Use and Planning: Similar to the proposed projects, Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) would not divide an established community or result in incompatibilities with adjacent agricultural uses. Similar to the proposed projects, Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) would require the approval of a CUP and Variance to maintain consistency with the County's General Plan. As with the proposed projects, this alternative would not conflict with any applicable habitat conservation plan or natural community conservation plan. Compared to the proposed projects, land use and planning impacts resulting from this alternative would be similar to those identified for the proposed projects.

Noise: As with the proposed projects, Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) would result in significant, but mitigable noise impacts associated with construction activities. Compared to the proposed projects, this alternative would not reduce any potentially significant impacts to noise nor eliminate the need to incorporate mitigation measures. Impacts associated with this alternative would not expose persons or generate noise levels in excess of applicable noise standards,

exposure persons to, or generate excessive groundborne vibration, or expose persons to excessive aircraft noise. Compared to the proposed projects, operational and construction-related noise impacts under this alternative would be similar to the proposed projects.

Public Services: Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) would require increased public services, specifically law enforcement and fire protection services. While the overall project footprint would be smaller, the impact to public services would be similar, and this alternative would be conditioned to provide law enforcement and fire service fees. Compared to the proposed projects, this alternative would result in a similar impact to public services.

Transportation/Traffic: Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) would not reduce or avoid an impact to transportation/traffic as this alternative would increase vehicle and truck trips on local roadways. However, given that these increases are minor and identified as less than significant for the proposed projects, this finding would also be applicable to this alternative. As with the proposed projects, this alternative would not impact any applicable plan, ordinance, or policy addressing the performance of the circulation system, conflict with an applicable congestion management program, change air traffic patterns, substantially increase hazards due to a design feature, result in inadequate emergency access, or conflict with public transit, bicycle, or pedestrian facilities. Compared to the proposed projects, this alternative would result in a similar impact related to transportation/traffic.

Utilities: Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) would require water service and energy for the operation of the proposed projects. This alternative would allow agricultural operations to continue for a portion of the project sites, which utilizes more water than solar farm activities. As a consequence, this alternative would result in increased water demands when compared to the proposed projects, but would continue to experience desirable benefits related to the reductions in agricultural water demands. Compared to the proposed projects, this alternative would result in a similar impact related to utilities.

Conclusion: Implementation of Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) would result in reduced impacts for the following environmental issues areas as compared to the proposed projects: agriculture, air quality, biological resources, greenhouse gas emissions (construction phase only), and hydrology/water quality. This alternative would not result in any greater environmental impacts when compared to the proposed projects.

Comparison of Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) to Project Objectives

Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) would meet most of the basic objectives of the proposed projects and should remain under consideration. However, this alternative would make it more difficult to achieve the overall objective of providing a total of 360 megawatts of renewable solar energy, as there would be less area available for the placement of PV or CPV structures.

8.6 ALTERNATIVE 4: ALTERNATIVE LOCATION – PRIVATELY OWNED, NON-AGRICULTURAL LAND

In certain cases, an evaluation of an alternative location in an EIR is necessary. Section 15126(f)(A) of the CEQA Guidelines states, “Key question. The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.”

The purpose of this alternative is to develop the proposed projects on privately owned, non-agricultural land. This alternative would avoid the temporary conversion of agricultural land to non-agricultural uses associated with the proposed projects. This alternative is illustrated in Figure 8.0-3.

Figure 8.0-3. Alternative 4: Alternative Location – Privately Owned, Non-Agricultural Land

As shown on the Imperial County Land Use Plan map, the majority of private land in the County is designated for agricultural purposes and these lands are generally used for agricultural production.

Within the County, there are pockets of non-agriculturally designated lands that are designated as urban area and specific plan areas. The Mesquite Lake Specific Plan Area (SPA) consists of approximately 5,100 acres located in central Imperial County between SR-86 on the west and SR-111 plus ¼ mile on the east, and bordered by Harris Road on the south and Keystone Road on the north. The SPA is already in use by the Holly Sugar Plant, the Mesquite Lake Recovery Facility, and the Imperial Valley Resource Recovery Plant. The SPA is made up of approximately 70 parcels with 52 landowners. The County designated the Mesquite Lake SPA on the 1993 General Plan to provide an opportunity to develop new job-producing light, medium, and heavy industrial uses. The overall goal of the Specific Plan is to support economic development within Imperial County, and allow for heavy industrial development in an area that is away from urban conflicts and its cities through job creation in the employment sectors of manufacturing, fabrication, processing, wholesaling, transportation, and energy resource development; and to create and preserve an area where a full range of industrial uses with moderate to high nuisance characteristics may locate.

As described in the Specific Plan, existing infrastructure needed to serve industrial development is very limited. Required improvements would include water and sewage treatment facilities, electrical substation, a fire station, stormwater retention basins, and extensive road improvements.

Although crop production is a principal existing use, encompassing approximately 1,420 acres within the SPA, extensive fallow areas also exist as a result of the high alkaline soils that reduce agricultural productivity. This high alkaline condition results in marginal agricultural productivity in comparison to typical conditions found in other irrigated farmland of the Imperial Valley. Based on a review of the Department of Conservation's FMMP maps, Prime Farmland is generally located in the southwest portion of the SPA. East of Dogwood Road, the SPA contains land classified as Other Land. The northwestern portion of the SPA is classified as Urban and Built-Up Land. This alternative would include development of the proposed projects within the portion of the SPA classified as Other Land and Built-up Land by the Department of Conservation.

Aesthetics: The SPA is surrounded by agricultural lands. Residential areas are located approximately one mile south of the SPA. The transmission line would still be required, which would need to be constructed to serve the solar facilities and ultimately connect to the Imperial Valley Substation. These proposed transmission lines would be placed in closer proximity to urban areas (Cities of Imperial and El Centro to the south). Depending on the route of the proposed transmission line, the transmission line would be more readily visible to more people as compared to the proposed projects. Compared to the proposed projects, this alternative would result in slightly greater impacts.

Agriculture: This alternative would avoid impacts associated with the conversion of agricultural lands to non-agricultural uses. Based on a review of the Department of Conservation's FMMP maps, Prime Farmland is generally located in the southwest portion of the SPA. East of Dogwood Road, the SPA contains land classified as Other Land. The northwestern portion of the SPA is classified as Urban and Built-Up Land. This alternative would include development of the proposed projects within the portion of the SPA classified as Other Land and Built-up Land by the Department of Conservation. Compared to the proposed projects, this alternative would avoid impacts associated with the conversion of agricultural lands to non-agricultural uses.

Air Quality: Similar to the proposed projects, this alternative would develop 1,400~~1,422~~ acres with solar farms and supporting uses. Based on this consideration, this alternative would generate air emissions similar to the proposed projects. A less than significant impact with mitigation incorporated was identified for the proposed projects during construction. This alternative would be consistent with existing air quality attainment plans and would not result in the creation of objectionable odors. It is important to note, however, that agricultural operations contribute more to long-term and cumulative air quality impacts through soil preparation and dust creation than would operation of the proposed solar farms. Residential areas are located approximately one mile south of the SPA. Depending on the route of the proposed transmission line, the transmission line would be constructed near more sensitive receptors compared to

the proposed projects. Compared to the proposed projects, this alternative could expose more people to construction-related emissions, and would result in slightly greater impacts than the proposed projects.

Biological Resources: Under this alternative, potential impacts to burrowing owl locations identified within the project sites and indirect impacts associated with burrowing owls in the adjacent drainage canals would be avoided as compared to the proposed projects. However, this alternative would also require the construction of supporting infrastructure that has the potential to result in biological impacts. Additionally, there is the potential presence of wetlands along the drainage swales and natural depressions in portions of the SPA (EDAW Inc., 2006). While these areas are highly altered by agricultural operations and degraded by off-road vehicle activity, potential wetland areas may, nonetheless, be regulated by state and federal agencies. Compared to the proposed projects, development of this site would result in greater impacts to Waters of the U.S., particularly to wetlands.

Cultural Resources: This alternative would require the construction of supporting infrastructure that has the potential to result in cultural resources impacts. While this alternative may avoid the specific impacts on the proposed project sites, this alternative would also require the construction of supporting infrastructure that has the potential to result in cultural resources impacts. Compared to the proposed projects, although this alternative would try to avoid cultural resources to the extent feasible, depending on the route of the proposed transmission line, this alternative could result in greater impacts to cultural resources.

Geology and Soils: The Imperial Fault passes through the SPA, generally on a north-south alignment. The area in the vicinity of the fault is within the Alquist-Priolo Special Studies Zone. Ground shaking can expose employees to injury from structural damage or collapse of electrical distribution facilities. The County enforces the Alquist-Priolo Earthquake Fault Zoning Act to ensure that habitable structures, built on or near active faults, be designed and constructed in compliance with the County Land Use Ordinance. Compared to the proposed projects, this alternative could result in greater impacts related to geology and soils.

Greenhouse Gas Emissions: This alternative would result in the same power production capacity as the proposed projects; hence, the overall benefits of the projects to global climate change through the creation of renewable energy would be the same. This alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Although this alternative would result in construction emissions, this alternative would still require mitigation during construction, similar to the proposed projects, to reduce the identified impact to a less than significant level. Compared to the proposed projects, this alternative would contribute similar and desirable benefits to reductions in global climate change through the production of renewable energy.

Hazards and Hazardous Materials: As previously mentioned, the County designated the Mesquite Lake SPA on the 1993 General Plan to provide an opportunity to develop new job-producing light, medium, and heavy industrial uses. As such, siting the proposed projects within the SPA has the potential to expose employees to hazards and hazardous materials associated with industrial processes. There are other hazards that could result from implementation of this alternative, depending on the specific locations and conditions of the various sites that would need to be developed. Certain sites needed in order to implement this alternative would need to be remediated before implementation of the alternative. Compared to the proposed projects, the degree of impact related to hazards and hazardous materials associated with this alternative would likely be similar to the proposed projects.

Hydrology/Water Quality: With implementation of the proposed mitigation measures, potential hydrology/water quality impacts under this alternative would be similar to those associated with the proposed projects. The SPA is designated Zone C, “indefinite minor flooding,” and contains a depressed “sink” area adjacent to Keystone Road that causes water to be detained during heavy rainstorms and can make Keystone Road impassible. Because of this condition of intermittent flooding, the Specific Plan includes requirements for stormwater management and a master drainage plan to be implemented through construction of retention basins. The construction and operation of the proposed projects would not place structures within a 100-year flood hazard area as mapped on the most recent federal Flood

Insurance Rate Map. Compared to the proposed projects, this alternative would result in a greater impact.

Land Use and Planning: As previously mentioned, the County designated the Mesquite Lake SPA on the 1993 General Plan to provide an opportunity to develop new job-producing light, medium, and heavy industrial uses. Similar to the proposed projects, this alternative would not divide an established community or result in incompatibilities with adjacent agricultural uses. Alternative fuel power-generating facilities (anaerobic digesters, biomass, biosolid, and solar conversion and/or transformation) are allowed uses within the Mesquite Lake Heavy Industrial (MLI-3) zone, subject to approval of a CUP from the County. As with the proposed projects, this alternative would not conflict with any applicable habitat conservation plan or natural community conservation plan. Compared to the proposed projects, land use and planning impacts resulting from this alternative would be similar to those identified for the proposed projects.

Noise: The SPA is surrounded by agricultural lands and is already in use by the Holly Sugar Plant, the Mesquite Lake Recovery Facility, and the Imperial Valley Resource Recovery Plant. Residential areas are located approximately one mile south of the SPA. As with the proposed projects, this alternative would result in significant, but mitigable noise impacts associated with construction activities. The transmission line would still be required, which would need to be constructed to serve the solar facilities and ultimately connect to the Imperial Valley Substation. These proposed transmission lines would be placed in closer proximity to urban areas (cities of Imperial and El Centro to the south). Depending on the route of the proposed transmission line, the construction of the transmission line could expose more sensitive receptors to construction noise. Compared to the proposed projects, this alternative could result in greater impacts than the proposed projects.

Public Services: This alternative would require increased public services, specifically law enforcement and fire protection services. Similar to the projects, this alternative would be conditioned to provide law enforcement and fire service fees. Compared to the proposed projects, this alternative would result in a similar impact to public services.

Transportation/Traffic: This alternative would not reduce or avoid an impact to transportation/traffic as this alternative would increase vehicle and truck trips on local roadways. As with the proposed projects, this alternative would not impact any applicable plan, ordinance, or policy addressing the performance of the circulation system, conflict with an applicable congestion management program, change air traffic patterns, substantially increase hazards due to a design feature, result in inadequate emergency access, or conflict with public transit, bicycle, or pedestrian facilities. Compared to the proposed projects, this alternative would result in a similar impact to the proposed projects

Utilities: This alternative would require water service and energy for the operation of the proposed projects. As with the proposed projects, panel washing and other maintenance would be required. Compared to the proposed projects, this alternative would have similar water demands and associated impacts related to utilities.

Conclusion: Compared to the proposed projects, implementation of Alternative 4: Alternative Location – Privately Owned, Non-Agricultural Land would avoid impacts on agriculture. Overall, this alternative would result in greater impacts related to aesthetics, air quality, biological resources, cultural resources, geology and soils, hydrology/water quality, and noise.

Comparison of Alternative 4: Alternative Location – Privately Owned, Non-Agricultural Land to Project Objectives

Alternative 4: Alternative Location – Privately Owned, Non-Agricultural Land would meet most of the basic objectives of the proposed projects. However, this alternative would not meet the following objectives:

- Construct and operate a solar power facility with minimal impacts to the environment;

- Construct a facility at a location near the U.S. border to avoid issues of leapfrog development and dividing up stretches of agricultural land; and
- Interconnect with electrical transmission infrastructure either planned or being constructed by other nearby projects, interconnect to the ISO controlled transmission network, and maximize opportunities for the sharing or use of existing utility transmission corridor(s).

The proposed project sites are located in a portion of the County that will achieve the project objectives of constructing a solar facility at a location near the U.S. border to avoid issues of leapfrog development and dividing up stretches of agricultural land, and more importantly, interconnecting with electrical transmission infrastructure either planned or being constructed by other nearby projects, maximizing opportunities for the sharing or use of existing utility transmission corridor(s). The ability to share electrical transmission infrastructure is very important to the feasibility of the projects, and to the extent that sharing infrastructure minimizes impacts to the environment. Locating the projects in another portion of the County (which would be required in order to locate the projects on privately owned, non-agricultural land) would require the construction of additional transmission infrastructure in order to connect to the Imperial Valley Substation. With respect to the proposed projects, sharing transmission with the adjacent Mount Signal and Calexico Solar Farm Projects maximizes this utility and minimizes potential environmental impacts. Alternative 4: Alternative Location – Privately Owned, Non-Agricultural Land would avoid impacts on agriculture. However, this alternative would result in greater environmental impacts on other issue areas including aesthetics, air quality, biological resources, cultural resources, geology and soils, hydrology/water quality, and noise.

Furthermore, this alternative site location is not available for purchase and development within a reasonable timeframe due to the large number of parcels and individual land owners (e.g., 70 parcels and 52 landowners), makes securing the site impracticable.

8.7 ALTERNATIVE 5: ALTERNATIVE LOCATION – DESERT LAND

The purpose of Alternative 5: Alternative Location – Desert Land is to develop the proposed projects on desert land to avoid the conversion of agricultural land to non-agricultural uses. This alternative would include development of the proposed projects in the Yuha Desert, taking advantage of the existing Utility Corridor "N," other nearby solar projects (i.e., Imperial Solar Energy Center West), and the existing Imperial Valley Substation. This alternative would minimize the construction of miles of additional transmission infrastructure because it would share transmission with adjacent projects to maximize this utility and minimize potential environmental impacts. This alternative would avoid the construction of the solar farms on agricultural lands, as well as miles of additional transmission infrastructure on agricultural lands in order to connect to the Imperial Valley Substation. This alternative would require a right-of-way (ROW) grant with the BLM to construct, operate, maintain, and decommission the proposed projects on BLM lands. The California Desert Conservation Act (CDCA) Plan would also need to be amended to identify the projects as suitable for solar energy development.

Aesthetics: The overarching management goals for visual resources in the area are established by the CDCA Plan. Visual resources are susceptible to impacts from surface disturbing activities, construction activities, the presence of solar panels, and ancillary buildings associated with solar energy development. These impacts contribute to visual contrast, considered by BLM to be the leading indicator of visual-impact between the project facilities and the adjacent landscape. Depending on the location of the proposed projects under this alternative, this alternative could affect views from areas such as National Historic Trails, Wilderness areas, or culturally sensitive landscapes. Excessive dust generated by construction could also be considered a visual quality impact. Compared to the proposed projects, this alternative could result in greater aesthetics impacts.

Agriculture: Under this alternative, the projects would be developed on desert land. The Yuha Desert does not contain agricultural land. Compared to the proposed projects, this alternative would avoid impacts associated with the conversion of agricultural lands to non-agricultural uses.

Air Quality: Because a majority of roads in the desert are not paved, construction vehicles would have to travel on access roads, which are typically unpaved and would likely result in higher amounts of dust emissions. Compared to the proposed projects, although mitigation measures would be implemented to reduce emissions to a less than significant level, overall, this alternative is anticipated to result in greater air quality impacts.

Biological Resources: Under this alternative, the projects would be developed in the Flat-tailed Horned Lizard (FTHL) Rangewide Management Strategy, Yuha Basin Management Area (MA). In accordance with the Rangewide Management Strategy, occupancy of FTHL within the MA is assumed; therefore, there is a potential to impact FTHL within the MA. There is a one percent disturbance threshold within the Yuha MA. Based on the Record Decision for the Ocotillo Sol Project (BLM/CA/EA-2013/022+1793), the total disturbance (with the Ocotillo Sol Project) in the MA is 0.805 percent. This leaves approximately 112 acres before the BLM reaches the 1 percent disturbance cap. The four solar energy facilities would encompass 1,400~~1,422~~ acres. Based on the remaining acres allowed before the BLM reaches the 1 percent disturbance cap, the projects would exceed this threshold. This is considered a significant impact. Compared to the proposed projects, this alternative would result in greater biological resource impacts.

Cultural Resources: This alternative would require construction has potential to result in cultural resources impacts. Compared to the proposed projects, this alternative has a higher potential to disturb cultural resources because of the desert's generally undisturbed nature as opposed to the project study areas that have been disturbed due to disking over time from farming activity. For example, 29 prehistoric sites, one historic site, and eight isolates were reported as being located within the project footprint of the transmission corridor (located on BLM lands) associated with the Imperial Solar Energy South Project. The potential of finding cultural resources on a highly disturbed site is anticipated to be lower compared to a generally undisturbed site. Compared to the proposed projects, this alternative is likely to result in greater cultural resource impacts.

Geology and Soils: Grading and construction of new facilities such as transmission facilities and solar facilities would still occur under this alternative. Similar to the proposed projects, this alternative would require the incorporation of mitigation measures identified for the proposed projects to minimize these impacts related to geology and soils to a less than significant level. Compared to the proposed projects, this alternative would result in similar geology and soil impacts.

Greenhouse Gas Emissions: This alternative would result in the same power production capacity as the proposed projects; hence, the overall benefits of the projects to global climate change through the creation of renewable energy would be the same. This alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Although this alternative would result in construction emissions, this alternative would still require mitigation during construction, similar to the proposed projects, to reduce the identified impact to a less than significant level. Compared to the proposed projects, this alternative would contribute to similar and desirable reductions in GHG emissions and associated contribution to global climate change through the production of renewable energy.

Hazards and Hazardous Materials: Depending on the specific locations and conditions of the various sites that would need to be developed, certain hazards and hazardous materials may be encountered; however, they are less likely to be encountered in the desert areas. Sites needed in order to implement this alternative may need to be remediated before implementation of the alternative. Overall, the degree of impact associated with hazards and hazardous materials would likely be similar to the proposed project.

Hydrology/Water Quality: This alternative would result in modifications to the existing drainage patterns and the volume of storm water runoff, as this alternative would introduce impervious area on-site. The desert area contains many natural drainage features that could be impacted with the development of the proposed projects in otherwise currently undisturbed land. Also, there are generally no existing drainage systems that the projects could connect to; therefore, it is likely that more topographic alteration would be

needed in order to properly control runoff. This is compared to the proposed project, where the topography has been altered over time from farming activity. Water quality impacts under this alternative would require mitigation similar to that proposed for the projects. Compared to the proposed projects, even with implementation of the proposed mitigation measures, potential hydrology impacts under this alternative would be greater to those associated with the proposed projects.

Land Use and Planning: Compared to the proposed projects, this alternative would require a ROW grant from the BLM to construct, operate, maintain, and decommission the proposed projects on BLM lands. The CDCA Plan would also need to be amended to identify the projects as suitable for solar energy development. With an authorized ROW and amendment of the CDCA Plan, this alternative would not result in significant land use and planning impacts. Compared to the proposed projects, this alternative would result in similar impacts related to land use and planning.

Noise: This alternative would be developed on desert lands and construction noise is unlikely to affect any nearby sensitive receptors. As with the proposed projects, operational impacts associated with this alternative would not expose persons or generate noise levels in excess of applicable noise standards, exposure persons to, or generate excessive groundborne vibration, or expose persons to excessive aircraft noise. Compared to the proposed projects, this alternative would result in similar impacts related to noise.

Public Services: This alternative would require increased public services, specifically law enforcement and fire protection services. Similar to the proposed projects, this alternative would be conditioned to provide law enforcement and fire service fees. Compared to the proposed projects, this alternative would result in a similar impact related to public services.

Transportation/Traffic: Similar to the proposed projects, this alternative would temporarily increase the number of vehicles and truck trips on local roadways during construction. However, these construction vehicles and truck trips would be traveling on access roads, which are typically unpaved. Depending on the location of the proposed projects under this alternative, access (including emergency access) to the sites may be more difficult. Compared to the proposed projects, this alternative would result in a greater impact related to transportation/traffic.

Utilities: This alternative would require water service and energy for the operation of the proposed projects. As with the proposed projects, panel washing and other maintenance would be required. Compared to the proposed projects, this alternative would result in similar impacts related to utilities.

Conclusion: Compared to the proposed projects, implementation of Alternative 5: Alternative Location – Desert Land would avoid impacts on agriculture. Overall, this alternative would result in greater impacts related to aesthetics, air quality, biological resources, cultural resources, and transportation/traffic.

Comparison of Alternative 5: Alternative Location – Desert Land to Project Objectives

Alternative 5: Alternative Location – Desert Land would meet most of the basic objectives. However, this alternative would not result in construction and operation of a solar power facility with minimal impacts to the environment because it would result in greater impacts related to aesthetics, air quality, biological resources, cultural resources, and transportation/traffic than the proposed project.

8.8 ALTERNATIVE 6: NO UTILITY-SCALE SOLAR DEVELOPMENT – DISTRIBUTED COMMERCIAL AND INDUSTRIAL ROOFTOP SOLAR ONLY ALTERNATIVE

This alternative would involve the development of a number of geographically distributed small to medium solar PV systems (100 kilowatts to 1 MW) within existing developed areas, typically on the rooftops of commercial and industrial facilities throughout Imperial County. Under this alternative, no new land would be developed or altered and agricultural land would not be temporarily converted to non-agricultural uses. Depending on the type of solar modules installed and the type of tracking equipment used, a similar or

greater amount of acreage (i.e., greater than 1,4001,422 acres of total rooftop area) may be required to attain the proposed projects' capacity of 360 MW of solar PV generating capacity. This alternative would involve placement of PV structures, transmission lines, and development of additional supporting facilities, such as switching stations and substations at various locations throughout the County. This alternative assumes that rooftop development would occur primarily on commercial and industrial structures due to the greater availability of large, relatively flat roof areas necessary for efficient solar installations.

This alternative would require thousands of installation locations across Imperial County, many of which would require approval of discretionary actions, such as design review, CUPs, or zone variances depending on local jurisdictional requirements. Similar to the proposed projects, this alternative would be designed to operate year-round using PV panels to convert solar energy directly to electrical power. This alternative would involve the construction of transmission lines and development of additional supporting facilities, such as switching stations and substations at various locations throughout the County to distribute the energy.

Rooftop PV systems exist in small areas throughout California. Larger distributed solar PV installations are becoming more common. An example of a distributed PV system is 1 MW of distributed solar energy installed by Southern California Edison on a 458,000 square-foot industrial building in Chino, California.[1]

Similar to utility-scale PV systems, the acreage of rooftops or other infrastructure required per MW of electricity produced is wide ranging, which is largely due to site-specific conditions (e.g., solar insolation levels, intervening landscape or topography, PV panel technology, etc.). Based SCE's use of 458,000-square feet for 1 MW of energy, approximately 164,880,000 square feet (approximately 3,785 acres) would be required to produce 360 MW.

Environmental Impact of Alternative 6: No Utility-Scale Solar Development – Distributed Commercial and Industrial Rooftop Solar Only Alternative

Aesthetics: This alternative would reduce the overall size of the solar energy fields. However, this alternative would involve placement of PV structures, transmission lines, and development of additional supporting facilities, such as switching stations and substations at various locations throughout the County. There could be significant aesthetic impacts in certain areas depending on the locations of these facilities. Transmission lines would need to be constructed to serve the PV generation sites, all of which would be placed in closer proximity to urban areas, and all of which would be more readily visible to more people as compared to the proposed projects. Compared to the proposed projects, this alternative could result in greater aesthetics impacts.

Agriculture: Under this alternative, the project sites would continue to be used for active agricultural uses. Unlike the proposed projects, this alternative would not include the use of large acreages of Prime Farmland, or Farmland of Statewide Importance for the solar generation facilities. Therefore, this alternative would avoid the proposed projects' impact to agricultural lands. Compared to the proposed projects, this alternative would avoid the significant impacts associated with the agricultural issues.

Air Quality: Under this alternative, air emissions due to project construction could be less than the proposed projects on a localized level; however, PV facilities and supporting infrastructure would still need to be constructed to support this alternative, which would still involve short-term construction emissions. These emissions would likely be spread-out geographically throughout the basin, and would occur over a longer period of time, as this alternative would involve a longer overall timeframe for implementation. Furthermore, the construction efficiencies that can be obtained by mobilizing equipment and crews in one general location over a shorter timeframe would not be realized. By the nature of the alternative, in that solar panels would be constructed on habitable structures throughout the County, this alternative has the potential to expose more people to more localized construction-related emissions.

[1] http://newsroom.edison.com/releases/california-regulators-approve-southern-california-edison-proposal-to-create-nations-largest-solar-panel-installation-program

Compared to the proposed projects, this alternative would develop less renewable energy megawatt generation in the near-future, thereby reducing its ability to provide a long-term source of renewable energy and meeting renewable energy goals, and air quality impacts could be greater under this alternative.

Biological Resources: Under this alternative, potential impacts to burrowing owl locations identified within the project sites and indirect impacts associated with burrowing owls in the adjacent drainage canals would be avoided as compared to the proposed projects. However, this alternative would also require the construction of supporting infrastructure that has the potential to result in biological impacts. As such, while this alternative may avoid the specific impacts associated with the proposed projects, it could also result in greater biological impacts in other areas of the County where supporting infrastructure is required to support Distributed Energy facilities.

Cultural Resources: This alternative would require the construction of supporting infrastructure that has the potential to result in cultural resources impacts. While this alternative may avoid the specific impacts on the project sites, it could also result in additional cultural resource impacts in other areas of the County where supporting infrastructure is required to support Distributed Energy facilities. Furthermore, if rooftop solar panels were proposed on historic buildings, this alternative could affect the historic character and integrity of the buildings. Implementation of this alternative would require historic surveys and investigations to evaluate the eligibility of potentially historic structures that are over 50 years old, and either avoidance of such buildings, or incorporation of design measures to minimize impacts on historic integrity of historically-significant structures. Compared to the proposed projects, this alternative could result in greater impacts related to cultural resources.

Geology and Soils: Grading and construction of new facilities such as transmission facilities, and solar arrays would still occur. Similar to the projects, this alternative would require the incorporation of mitigation measures identified for the proposed projects to minimize impacts to a less than significant level. Compared to the proposed projects, this alternative would result in similar geological and soil impacts.

Greenhouse Gas Emissions: Under this alternative, the project footprint would be reduced; however, in order to achieve the same megawatt capacity as the proposed projects, this alternative would also involve a surface area similar in size to the project sites. Therefore, while this alternative could reduce or eliminate GHG emissions during project construction at the project sites, an equivalent level of GHG emissions is likely to occur, as a result of constructing solar panels and supporting infrastructure throughout the valley. Furthermore, as a consequence of the reduced PV footprint associated with the utility-scale solar farm, this alternative would result in a reduced power production capacity as compared to the proposed projects; hence, the overall benefits of the projects to global climate change through the creation of renewable energy would also be reduced. As with the proposed project, this alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. This alternative would still require mitigation during construction at individual sites throughout the County, similar to the proposed projects. Compared to the proposed projects, although this alternative would result in reduced construction emissions at the project sites, overall, a similar level of emissions would be expected.

Hazards and Hazardous Materials: Hazards and hazardous materials- related impacts, including the potential for accidental discovery of undocumented hazardous materials during construction would be avoided. However, there are other hazards that could result from implementation of this alternative, depending on the specific locations and conditions of the various sites that would need to be developed. For example, electrical infrastructure would be placed on top of, or in closer proximity to habitable structures, such as office buildings. Electrical transmission systems would still be required in order to connect the various distributed energy systems to the electrical grid; therefore, there would be additional poles and other structures that could interfere with aviation, depending on their locations. Certain sites needed in order to implement this alternative may also contain hazardous materials that would need to be remediated before implementation of the alternative. Overall, the degree of impact associated with hazards and hazardous materials would likely be similar to the proposed projects.

Hydrology/Water Quality: This alternative would likely avoid any impacts associated with modifications to the existing drainage patterns and the volume of storm water runoff, as this alternative would introduce less impervious surface areas (this alternative would involve construction of PV facilities on existing structures and within existing developed areas). Compared to the proposed projects, this alternative would result in fewer impacts related to hydrology/water quality.

Land Use and Planning: Similar to the proposed projects, this alternative would not divide an established community or result in incompatibilities with adjacent agricultural uses. Unlike the projects this alternative could involve multiple planning approvals (e.g., variances, CUPs, rezones) in order to accommodate the solar generating uses within other zones of the County that currently do not allow such uses. Compared to the proposed projects, land use and planning impacts resulting from this alternative would be potentially greater than those identified for the proposed projects.

Noise: As with the proposed projects, this alternative would result in significant, but mitigable noise impacts associated with construction activities. Because this alternative would involve construction of PV facilities in the more developed areas of the County, it is likely that this alternative would result in exposure of sensitive receptors to excessive construction noise levels at various locations (e.g., construction of PV on top of office buildings, or in areas where residential uses are located in proximity). Compared to the proposed projects, this alternative would require the operations of the same facilities required for the projects and, therefore, would not reduce any significant noise impacts nor eliminate the need to incorporate mitigation measures. As with the proposed projects, operational impacts associated with this alternative would not expose persons or generate noise levels in excess of applicable noise standards, exposure persons to, or generate excessive groundborne vibration, or expose persons to excessive aircraft noise. Compared to the proposed projects, significant noise impacts as a result of this alternative could be greater with respect to construction activities, and for operations would be similar to the proposed projects.

Public Services: This alternative would require increased public services, specifically law enforcement and fire protection services. It is anticipated that public services and associated service ratios would, at a minimum, be similar to the proposed projects as the facilities would require fire and law enforcement protection, and this alternative could result in a greater impact as the facilities would be distributed over a much larger geographical area. Similar to the proposed projects, this alternative would be conditioned to provide law enforcement and fire service fees. Compared to the proposed projects, this alternative would result in a similar impact related to public services.

Transportation/Traffic: This alternative would not reduce or avoid an impact to transportation/traffic and would result in less than significant impacts similar to the proposed projects. As with the proposed projects, this alternative would not impact any applicable plan, ordinance, or policy addressing the performance of the circulation system, conflict with an applicable congestion management program, change air traffic patterns, substantially increase hazards due to a design feature, result in inadequate emergency access, or conflict with public transit, bicycle, or pedestrian facilities. Compared to the proposed projects, this alternative would result in a similar impact related to transportation/traffic.

Utilities: This alternative would require water service and energy for the operation of the projects. As with the proposed projects, panel washing and other maintenance would be required. This alternative would also allow agricultural operations to continue at the project study areas, which utilizes more water than solar farm activities. Compared to the proposed projects, this alternative would have increased water demands and therefore, greater impacts related to utilities.

Conclusion: Implementation of Alternative 6: No Utility-Scale Solar Development – Distributed Commercial and Industrial Rooftop Solar Only Alternative would result in reduced impacts for the following environmental issue areas as compared to the proposed projects: agriculture and hydrology/water quality. Overall, this alternative would result in greater impacts related to aesthetics, air quality, biological resources, cultural resources, land use and planning, noise, and utilities.

Comparison of Alternative 6: No Utility-Scale Solar Development – Distributed Commercial and Industrial Rooftop Solar Only Alternative to Project Objectives

Alternative 6: No Utility-Scale Solar Development – Distributed Commercial and Industrial Rooftop Solar Only Alternative would achieve most of the basic objectives of the proposed projects. However, this alternative would have a number of drawbacks, including, but not limited to the following:

- Difficulties with respect to buildout of the system within a timeframe that would be similar to that of the proposed projects;
- Given the distributed nature of such a network of facilities, management and maintenance would not be as efficient, and total capital costs would likely be higher;
- The requirement to negotiate with a large number of individual property owners to permit placement of solar panels on rooftops;
- The difficulty of ensuring proper maintenance of a large number of smaller solar installations; and
- The lack of an effective electricity distribution system for large numbers of small electricity producers.

8.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 8.4-1 provides a qualitative comparison of the impacts for each alternative compared to the proposed projects. As noted in Table 8.4-1, the No Project/No Development Alternative would be considered the environmentally superior alternative, since it would eliminate all of the significant impacts identified for the projects. However, CEQA Guidelines Section 15126.6(e)(2) states that "if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." The environmentally superior alternative would be Alternative 3: Reduced Acreage Alternative (Avoid Williamson Act Land) because it would reduce impacts for the following environmental issues areas as compared to the proposed projects: agriculture, air quality, biological resources, greenhouse gas emissions (construction phase only), and hydrology/water quality.

TABLE 8.4-1. COMPARISON OF ALTERNATIVE IMPACTS TO PROPOSED PROJECT

Environmental Issue Area	Proposed Project	Alternative 1 No Project/ No Development	Alternative 2 Reduced Acreage Alternative (Avoid Prime Farmland)	Alternative 3 Reduced Acreage Alternative (Avoid Williamson Act Land)	Alternative 4 Alternative Location – Private Land	Alternative 5 Alternative Location – Desert Land	Alternative 6 No Utility-Scale Solar Development – Distributed Commercial and Industrial Rooftop Solar Only
Aesthetics	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Projects: Less impact (avoid)	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Potentially significant Comparison to Projects: Greater impact	CEQA Significance: Potentially significant Comparison to Projects: Greater impact	CEQA Significance: Potentially Significant Comparison to Projects: Greater impact
Agriculture	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Projects: Less impact (avoid)	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Less impact	CEQA Significance: No impact Comparison to Projects: Less impact (avoid)	CEQA Significance: No impact Comparison to Projects: Less impact (avoid)	CEQA Significance: No impact Comparison to Projects: Less impact (avoid)
Air Quality	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Projects: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Greater impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Greater impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Greater impact
Biological Resources	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Projects: Less impact (avoid)	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Less impact	CEQA Significance: Potentially significant Comparison to Projects: Greater impact	CEQA Significance: Potentially significant Comparison to Projects: Greater impact	CEQA Significance: Potentially Significant Comparison to Projects: Greater impact

Environmental Issue Area	Proposed Project	Alternative 1 No Project/ No Development	Alternative 2 Reduced Acreage Alternative (Avoid Prime Farmland)	Alternative 3 Reduced Acreage Alternative (Avoid Williamson Act Land)	Alternative 4 Alternative Location – Private Land	Alternative 5 Alternative Location – Desert Land	Alternative 6 No Utility-Scale Solar Development – Distributed Commercial and Industrial Rooftop Solar Only
Cultural Resources	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Projects: Less impact (avoid)	CEQA Significance: Mitigated to below a level of significance Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level of significance Comparison to Projects: Similar impact	CEQA Significance: Potentially significant Comparison to Projects: Greater impact	CEQA Significance: Mitigated to below a level of significance Comparison to Projects: Greater impact	CEQA Significance: Potentially Significant Comparison to Projects: Greater impact
Geology and Soils	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Projects: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Greater impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact
Greenhouse Gas Emissions	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Projects: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Less impact during construction. Would not achieve GHG emission reductions to the extent of the proposed project as less renewable energy would be produced	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Less impact during construction. Would not achieve GHG emission reductions to the extent of the proposed project as less renewable energy would be produced	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact

Environmental Issue Area	Proposed Project	Alternative 1 No Project/ No Development	Alternative 2 Reduced Acreage Alternative (Avoid Prime Farmland)	Alternative 3 Reduced Acreage Alternative (Avoid Williamson Act Land)	Alternative 4 Alternative Location – Private Land	Alternative 5 Alternative Location – Desert Land	Alternative 6 No Utility-Scale Solar Development – Distributed Commercial and Industrial Rooftop Solar Only
Hazards and Hazardous Materials	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Projects: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact
Hydrology/ Water Quality	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Projects Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Greater impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Greater impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Less impact
Land Use/Planning	Less than significant	CEQA Significance: No impact Comparison to Projects: Less impact	CEQA Significance: Less than significant Comparison to Projects: Similar impact	CEQA Significance: Less than significant Comparison to Projects: Similar impact	CEQA Significance: Less than significant Comparison to Projects: Similar impact	CEQA Significance: Less than significant Comparison to Projects: Similar impact	CEQA Significance: Less than significant Comparison to Projects: Greater impact
Noise	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Projects: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Greater impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Projects: Greater impact

Environmental Issue Area	Proposed Project	Alternative 1 No Project/ No Development	Alternative 2 Reduced Acreage Alternative (Avoid Prime Farmland)	Alternative 3 Reduced Acreage Alternative (Avoid Williamson Act Land)	Alternative 4 Alternative Location – Private Land	Alternative 5 Alternative Location – Desert Land	Alternative 6 No Utility-Scale Solar Development – Distributed Commercial and Industrial Rooftop Solar Only
Public Services	Less than Significant	CEQA Significance: No impact Comparison to Projects: Less impact	CEQA Significance: Less than significant Comparison to Projects: Similar Impact	CEQA Significance: Less than significant Comparison to Projects: Similar Impact	CEQA Significance: Less than significant Comparison to Projects: Similar Impact	CEQA Significance: Less than significant Comparison to Projects: Similar Impact	CEQA Significance: Less than significant Comparison to Projects: Similar impact
Transportation/ Traffic	Less than significant	CEQA Significance: No impact Comparison to Projects: Similar	CEQA Significance: Less than significant Comparison to Projects: Similar Impact	CEQA Significance: Less than significant Comparison to Projects: Similar Impact	CEQA Significance: Less than significant Comparison to Projects: Similar Impact	CEQA Significance: Less than significant Comparison to Projects: Greater Impact	CEQA Significance: Less than significant Comparison to Projects: Similar
Utilities	Less than Significant	CEQA Significance: No impact Comparison to Projects: Greater impact (water use)	CEQA Significance: Less than significant Comparison to Projects Similar Impact	CEQA Significance: Less than significant Comparison to Projects: Similar Impact	CEQA Significance: Less than significant Comparison to Projects: Similar Impact	CEQA Significance: Less than significant Comparison to Projects: Similar Impact	CEQA Significance: Less than significant Comparison to Projects: Greater impact (water use)