

1.0 INTRODUCTION

This Final Supplemental Environmental Impact Report (Final SEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines §15132. The County of Imperial (County) is the lead agency for the environmental review of the Le Conte Battery Energy Storage System (Project) and has the principal responsibility for approving the Project. The County has prepared this Final SEIR to provide the public, responsible and trustee agencies with information about the potential environmental effects of the proposed Project. As set forth in the provisions of CEQA and implementing regulations, public agencies are charged with the duty to consider the environmental impacts of proposed development and to minimize these impacts where feasible while carrying out an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

This Final SEIR is intended to supplement the December 2011 certified the Final Environmental Impact Report (State Clearinghouse Number 2010111056) for the Centinela Solar Energy (CSE) Project (2011 Final EIR). The 2011 FEIR evaluated the construction and operation of a solar photovoltaic electric generation facility on privately owned land [Centinela Solar Energy Facility (CSE facility)] which is under the jurisdiction of Imperial County. The purpose of this Final SEIR is to supplement the 2011 FEIR with information about the Project. The focus of this Final SEIR is to determine if the environmental impacts of the construction and operation of the proposed Project creates any significant new or substantially more severe environmental impact than were identified and analyzed in the 2011 FEIR. Preparation of this Draft SEIR does not “re-open” the previously certified FEIR; the analysis is limited to whether the Project results in new or different incremental impacts.

1.1 Overview of Project

The proposed Project consists of the construction and operation of a Battery Energy Storage System (BESS) with up to 125 MW of electrical storage capacity to receive and store excess energy and to return this electricity to the grid at a later time when needed. The Project will be situated on approximately three to five acres within the fence line of the existing Centinela Solar Energy (CSE) site. Construction activities are expected to take approximately 12 months. Major Project components include the following: one or two buildings totaling 85,000 square feet in size; batteries and enclosures; power conversion systems; substation and overhead electric tie line; and ancillary systems.

The proposed Project represents a complementary use to the CSE project. The Project will allow for efficient storage of energy available on the wholesale power grid, including renewable energy generated

in the County so that it is available when needed most. The Project will use battery energy storage technology to absorb and discharge electrical energy onto the SDG&E owned power grid, which is controlled by the California Independent System Operator (CAISO). The Project's energy storage system will be similar in layout and appearance to a data center or "server farm" with rows of rack-mounted batteries housed inside one or more enclosures and consist of the following general components:

- *Batteries and Enclosures*: Banks of electrochemical batteries connected in series and parallel to provide the total energy storage capacity including associated electronics for monitoring and managing the batteries to ensure safety and the design life of the system.
- *Power Conversion Systems (PCS)*: Each PCS will consist of bi-directional inverters with approximately 480V AC output, and a medium voltage (MV) transformer which steps the voltage up to 34.5kV.
- *Substation*: AC energy from the MV transformers are aggregated at the Project substation and stepped up to 230-kilovolts (kV) by high-voltage transformer(s) and then delivered to the Drew Switchyard.
- *Ancillary Systems*: The plant ancillary systems control, protect and support the Project and its operation. They include fencing; security; lighting; fire protection; and heating, venting, and air conditioning (HVAC).

Centinela Solar Energy, LLC, the owner of the Project site and the existing CSE facility, will lease the Project site to the Applicant. The Applicant will construct, own, and operate only the proposed Project.¹ The Project will utilize certain components of the existing CSE improvements, including: a portion of the CSE Project site, rights of access, drainage features, physical security, as well as obtaining from CSE the right to use a portion of the 230-kV tie line owned by CSE to connect to the SDG&E Drew Switchyard.

1.2 Public and Agency Review and Comment

Imperial County is the lead agency for the proposed Project. In accordance with CEQA Guidelines § 15082, the County prepared and distributed a Notice of Preparation (NOP) of a SEIR on March 14, 2019. This notice was circulated to the public, local, state, federal agencies and other interested parties to solicit comments on the proposed project. The NOP is provided in Appendix A of the Draft SEIR. An Initial

¹ The California Subdivision Map Act is not applicable to the lease. Cal. Gov. Code § 66412.1 (the Subdivision Map Act is not applicable to the "leasing of any parcel of land, or any portion thereof, in conjunction with the construction of commercial or industrial buildings on a single parcel, unless the project is not subject to review under other local agency ordinances regulating design and improvement"). Here, the Project is subject to review and approval by ICPDS.

Study was prepared for the proposed Project and circulated for public review at the same time as the NOP. The Initial Study is also included in Appendix A in the Draft SEIR. Public and agency comments raised in response to the NOP were considered during the preparation of the Draft SEIR. Public and agency comments raised during the public review of the Draft SEIR have been considered in the preparation of this Final SEIR. All comments and issues raised in response to the NOP are summarized in Table 1-2 (Chapter 1) of the Draft SEIR.

1.3 Project Alternatives Summary

CEQA Guidelines Section 15126.6(e)(1) requires that an environmental impact report describe and analyze a range of reasonable alternatives to a project. These alternatives should feasibly attain most of the basic objectives of the project while avoiding or substantially lessening one or more of the significant environmental impacts of the project. An EIR need not consider every conceivable alternative to a project, nor is it required to consider alternatives that are infeasible. Consistent with CEQA Guidelines Section 15126.6(b), the discussion of alternatives in the Draft SEIR focused on those alternatives which are capable of avoiding or substantially lessening any significant effects of the project.

In accordance with the provisions of CEQA Guidelines Section 15126.6, the Draft SEIR considers three alternatives in addition to the proposed Project. The existing CSE facility allows for flexibility in siting the Project's physical components (enclosure(s), substation and tie line) within the existing CSE site. Accordingly, the following (mutually exclusive) alternatives were considered in the SEIR.

1.3.1 Alternative 1 – No Project Alternative

CEQA Guidelines Section 15126.6(e)(1) requires that a No Project Alternative be analyzed in order to allow the decision-makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed Project. Under this alternative, the proposed BESS will not be constructed nor will a new CUP be requested. The Project site will remain in its existing state as undeveloped land within the CSE project site to the east of the Drew Switchyard.

1.3.2 Alternative 2 – West Alternative

Alternative 2 is located in the area immediately west of the existing CSE Control Building or Operations and Maintenance (O&M) Building, which serves as both an office for the CSE facility and a maintenance shop/warehouse. This location (APN 052-190-010) will accommodate up to two BESS buildings totaling 85,000 square feet within the existing CSE site. If one building is ultimately constructed, the proposed single-story BESS footprint will measure approximately 275 feet by 375 feet. Existing gravel access roads within the CSE site will be used to access the Alternative 2 site. Wiring from the battery energy

storage system will be connected to the existing CSE substation, located immediately south of SR 98, approximately mid-way between Pulliam Road and Brockman Road, via an overhead gen-tie line approximately 350 feet in length.

1.3.3 Alternative 3 – East Alternative

Alternative 3 is located in the area immediately east of the existing CSE O&M Building. This location (APN 052-190-010) will also accommodate up to two BESS buildings totaling 85,000 square feet within the existing CSE site. If one building is ultimately constructed, the proposed single-story BESS footprint will measure approximately 230 feet by 440 feet. Existing gravel access roads within the CSE site will be used to access the Alternative 2 site. Wiring from the battery energy storage system will be connected to the existing CSE substation, via an overhead gen-tie line approximately 1,300 feet in length. The gen-tie line will parallel the existing internal gravel road in route to the substation.

1.4 Summary of Potential Environmental Impacts and Mitigation Measures

Table 1-1 displays a summary of potential impacts and proposed mitigation measures that would avoid or minimize potential impacts. In the table, the level of significance is indicated both before and after the implementation of each mitigation measure. For detailed discussions of all project level mitigation measures, refer to Sections 3.1 through 3.7 in Chapter 3.0 of the Draft SEIR.

Table 1-1: Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Impact/Significance Before Mitigation	Mitigation Measure	Level of Impact/Significance After Mitigation
Air Quality/Greenhouse Gases			
Impact 3.1-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	None required	Less than Significant
Impact 3.1-2: Would the project violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation?	Less than Significant	None required	Less than Significant
Impact 3.1-3: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Cumulatively Considerable	None required	Less than Cumulatively Considerable
Impact 3.1-4: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Cumulatively Considerable	None required	Less than Cumulatively Considerable
Biological Resources			

<p>Impact 3.2-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p>	<p>Potentially Significant</p>	<p>MM BIO-1: Noxious, Invasive and Non-Native Weeds</p> <p>To minimize the introduction and spread of weed species the Project shall continue to implement relevant elements of the previously approved CSE facility Weed Management Plan, including a discussion of specific weeds identified on site that will be targeted for eradication or control as well as a variety of measures that will be undertaken during construction and operations and maintenance activities to prevent the introduction and spread of new weed species as a result of the project.</p> <p>MM BIO-2: Nesting Raptors</p> <p>Raptors and active raptor nests are protected under California Fish and Game Code 3503.5, 3503, 3513. To prevent direct and indirect noise impact to nesting raptors such as red-tailed hawk, the following measures should be implemented:</p> <ul style="list-style-type: none"> -To the extent practicable, grading and clearing within the proposed Project site should take place outside the raptors’ breeding season of February 1 to July 15. -If construction occurs between February 1 and July 15, an approved biologist shall conduct a pre-construction clearance survey for nesting raptors in suitable nesting habitat (e.g., tall trees or transmission towers) that occurs within 500 feet of the Project site. If any active raptor nest is located, the nest area will be flagged, and a 500-foot buffer zone delineated, flagged, or otherwise marked. No work activity may occur within this buffer area, until an approved biologist determines that the fledglings are independent of the nest. <p>MM BIO-3: Migratory Birds and Other Sensitive Non-Migratory Bird Species</p> <p><u>Construction Conservation Measures</u></p> <p>>Apply APLIC design guidelines for overhead utilities (APLIC 2006) by incorporating recommended or other</p>	<p>Less than Significant</p>
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		<p>methods that enhance the visibility of the lines to avian species.</p> <p>>All overhead electric lines shall be designed to be raptor-safe in accordance with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (Avian Power Line Interaction Committee [APLIC] 2006).</p> <p><u>Operations and Maintenance Measures</u></p> <p>>Preparation of a Raven Control Plan that avoids introducing water and food resources in the Project site.</p> <p>>Incorporate APLIC guidelines for overhead utilities as appropriate to minimize avian collisions with Gen-tie Line facilities (APLIC 2006).</p> <p>>Minimize noise.</p> <p>>Minimize use of outdoor lighting.</p> <p>>Implement measures of the CSE facility post—construction avian monitoring plan including the Wildlife Mortality Reporting Program.</p> <p>MM BIO-4: Burrowing Owl</p> <p>Burrowing owls are known to occur in and along the active agricultural fields adjacent to the existing CSE facility site. The following measures will avoid, minimize, or mitigate potential impact to burrowing owl during construction activities:</p> <p>1. To the extent practicable, grading and clearing within the project site should take place between September 1 and January 31 to avoid impacts to any breeding burrowing owls. Occupied burrows on the Project site shall not be removed during the nesting season (February 1 through August 31) unless a qualified biologist verifies through non-invasive methods that either (a) the birds have not begun egg-laying and incubation; or (b) that juveniles from the occupied burrows are foraging independently and are capable of</p>	
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		<p>independent survival. If grading and clearing within the project site is to begin during the breeding season (February 1 through August 31), the following measures (#2 through #4 below) will be implemented.</p> <p>2. Within 30-days prior to initiation of grading and clearing, pre-construction clearance surveys for this species shall be conducted by qualified and agency-approved biologists to determine the presence or absence of this species within the grading area. The proposed grading areas shall be clearly demarcated in the field or via GPS by the project engineers and Designated Biologist prior to the commencement of the pre-construction clearance survey. The surveys shall follow the protocols provided in the CSE Burrowing Owl Survey Protocol and Mitigation Guidelines.</p> <p>3. When removal of occupied burrows is unavoidable, the following mitigation measures shall be implemented outside of the breeding season. Passive relocation methods are to be used by the biological monitors to move the owls out of the impact zone. This includes covering or excavating all burrows and installing one-way doors into occupied burrows. This will allow any animals inside to leave the burrow but will exclude any animals from re-entering the burrow. A period of at least one week is required after the relocation effort to allow the birds to leave the impacted area before excavation of the burrow can begin. The burrows should then be excavated and filled in to prevent their reuse. The removal of active burrows on-site requires construction of new burrows or the enhancement of existing unsuitable burrows (i.e., enlargement or clearing of debris) at a mitigation ratio of 2:1 at least 50 meters from the impacted area and must be constructed as part of the above-described relocation efforts.</p> <p>4. As the project construction schedule and details are finalized, an approved biologist shall verify that the Burrowing Owl (BUOW) Mitigation and Monitoring Plan will be updated and detail the approved, site-specific</p>	
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		<p>methodology proposed to minimize and mitigate impacts to this species. Passive relocation, destruction of burrows, and construction of artificial burrows can only be completed upon prior approval by and in cooperation with the CDFW.</p> <p>5. These measures shall be implemented, if passive relocation of some burrows is determined to be an unfavorable alternative for BUOW and occupied burrows are near construction activities. During the BUOW nesting season (February 1 to August 31), the qualified biologist shall establish and mark a 250-foot non-disturbance buffer circle around the burrow. The buffer shall be staked and roped-off prior to initiating any construction activity. No activity shall take place within the avoidance buffer area to ensure that disturbance to nesting birds does not occur. Any disturbance to nesting BUOW would require prior consultation, approval and mitigation in accordance with California Fish and Game requirements.</p> <p>6. Disturbing nesting BUOW that may cause changes of behavior, plugging the burrow entrance or causing the burrow to collapse could effectively destroy the nest, and as such, require a State permit.</p> <p>7. If an active, non-breeding BUOW burrow is detected during preconstruction surveys, prior to onsite construction related activities, the qualified biologist shall establish and flag an avoidance buffer circle around the burrow area at a 160-foot radius.</p> <p><u>Compensation</u></p> <p>>On-site or off-site mitigation will occur as determined in the compensatory mitigation plan during development of the CSE facility and approved 2012 Burrowing Owl Mitigation Plan (Appendix C).</p>	
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Impact	Level of Impact/Significance Before Mitigation	Mitigation Measure	Level of Impact/Significance After Mitigation
<p>Impact 3.2-2: Would the project interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p>	<p>Less than Significant</p>	<p>None required</p>	<p>Less than Significant</p>
<p>Impact 3.2-3: Would the project conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?</p>	<p>Less than Significant</p>	<p>None required</p>	<p>Less than Significant</p>
<p>Cumulative Impacts to Biological Resources: Implementation of the proposed Project is included in the footprint of the existing CSE facility. Cumulative impacts on special status species, sensitive natural communities, and protected waters within the CSE facility site were previously assessed and mitigation measures were identified. No new impacts would occur as a result of the Project.</p>	<p>Less than Cumulatively Considerable</p>	<p>None required</p>	<p>Less than Significant</p>
Cultural Resources			
<p>Impact 3.3-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?</p>	<p>Less than Significant</p>	<p>None required</p>	<p>Less than Significant</p>

<p>Impact 3.3-2: Would the project cause a substantial adverse change in the significance of archaeological resource pursuant to § 15064.5?</p>	<p>Potentially Significant</p>	<p>MM CR-1: To the extent practicable, the Project will be engineered and designed to avoid any cultural resources eligible for listing in the CRHR and NRHP. Such resources will be mitigated as specified in accordance with the approved historic properties treatment plan for the CSE facility site.</p> <p>MM CR-2: Cultural resources sites eligible for listing in the CRHR or NRHP adjacent to Project features but not directly impacted by construction shall be avoided during construction.</p> <p>MM CR-3: The areal limits of construction activities shall be predetermined, with activity confined within those limits.</p> <p>MM CR-4: A cultural monitor shall be present during grading and excavation in areas on the Project site where construction or restoration surface-disturbing activities are required.</p> <p>MM CR-5: If subsurface deposits believed to be cultural in origin are discovered during construction, all work must halt within a 50-foot radius of the discovery. A qualified professional archaeologist shall be retained to evaluate the significance of the find. A Native American monitor, following the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites established by the Native American Heritage Commission, may also be required. Work at the discovery site shall be suspended until the archaeologist conducts sufficient research and data collection to make a determination that the resource is either: 1) not cultural in origin; or 2) not potentially significant or eligible for listing on the NRHP or CRHR. If a potentially eligible resource is encountered, then the archaeologist, lead</p>	<p>Less than Significant</p>
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Impact	Level of Impact/Significance Before Mitigation	Mitigation Measure	Level of Impact/Significance After Mitigation
		agency, and project proponent shall arrange for either 1) total avoidance of the resource, if feasible; or 2) test excavations to evaluate eligibility for the CRHR and, if eligible, data recovery as mitigation.	
<p>Impact 3.3-3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?</p>	<p>Potentially Significant</p>	<p>MM CR-6: In the event that evidence of human remains is discovered, construction activities within 50 feet of the discovery shall be halted or diverted and the Imperial County Coroner will be notified (Section 7050.5 of the Health and Safety Code). If the Coroner determines that the remains are Native American, the Coroner will notify the Native American Heritage Commission which will designate a Most Likely Descendant (MLD) for the Project (Section 5097.98 of the Public Resources Code). The designated MLD then has 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains (AB 2641). If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the Public Resources Code). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a document with the county in which the property is located (AB 2641).</p>	<p>Less than Significant</p>

Impact	Level of Impact/Significance Before Mitigation	Mitigation Measure	Level of Impact/Significance After Mitigation
<p>Cumulative Impacts to Archaeological Resources: Implementation of the proposed Project, in combination with past, present and probable large-scale projects in the vicinity of the Project location, has the potential to result in impacts to archaeological and historic resources. However, impacts are addressed on a project-by-project basis.</p>	Less than Significant	None Required	Less than Significant
Geology and Soils			
<p>Impact 3.4-1: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:</p> <p>i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?</p>	Less than Significant	None required	Less than Significant
<p>ii) Strong seismic ground shaking?</p>	Potentially Significant	<p>MM GEO-1: The Project shall be designed in accordance with seismic considerations in the then current California Building Code, Uniform Building Code or the standards of care established by the Structural Engineers Association of California and the County of Imperial building requirements.</p>	Less than Significant

<p>iii) Seismic-related ground failure including liquefaction?</p>		<p>MM GEO-2: The Project civil contractor shall implement ground improvement measures during construction, such as deep soil mixing (cement), vibro-compaction, vibro-replacement, geopiers, stone columns, compaction grouting, or deep dynamic compaction, as recommended by geotech engineer.</p> <p>MM GEO-3: Concrete mixes shall have a maximum water cement ratio of 0.45 and a minimum compressive strength of 4,500 psi (minimum of 6.0 sacks per cubic yard of concrete).</p> <p>MM GEO-4: All concrete placement and curing operations shall follow the American Concrete Institute manual recommendations. Improper curing techniques and/or high slump (high water-cement ratio) could cause excessive shrinkage, cracking or curling. Concrete slabs shall be allowed to cure adequately before placing vinyl or other moisture sensitive floor covering.</p> <p>MM GEO-5: The final design of the Project foundation shall include proper drainage to inhibit water infiltration into foundation soils. Drainage shall also be properly managed during construction to avoid water infiltration from any source.</p> <p>MM GEO-6: Foundations shall be designed to withstand liquefaction during a seismic event, including foundations that use grade-beam footings to tie floor slabs and isolated columns to continuous footings (conventional or post-tensioned) or structural flat-plate mats, either conventionally reinforced or tied with post tensioned tendons.</p>	<p>Less than Significant</p>
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Impact	Level of Impact/Significance Before Mitigation	Mitigation Measure	Level of Impact/Significance After Mitigation
		<p>MM GEO-7: Designs for thin slabs-on-grade shall mitigate expansive soil conditions by removal and replacement of upper 3.0 feet of clay soils with non-expansive sands or by special foundation designs (waffle-style slabs).</p> <p>MM GEO-8: All reinforcing bars, anchor bolts and hold down bolts shall have a minimum concrete cover of 3.0 inches unless epoxy coated (ASTM D3963/A934).</p> <p>MM GEO-9: All footings shall be reinforced to reduce the potential for distress caused by differential foundation movements.</p> <p>MM GEO-10: In areas where sidewalks or paving do not immediately adjoin the structures of the proposed Project, protective slopes shall be provided with an outfall of 5 percent for at least 10 feet from perimeter walls. Backfill against footings, exterior walls, and in utility trenches shall be well-compacted and free of all construction debris to minimize the possibility of moisture infiltration.</p> <p>MM GEO-11: The geotechnical engineer or geotechnical engineer’s representative shall observe the footing excavations prior to placing reinforcing steel and pouring concrete foundations to assess whether the soils exposed are similar to those anticipated for support of the footings. Any soft, loose, or unacceptable soils shall be undercut to suitable materials and backfilled with approved fill materials or lean concrete. Soil backfill shall be properly compacted.</p>	

Impact	Level of Impact/Significance Before Mitigation	Mitigation Measure	Level of Impact/Significance After Mitigation
Impact 3.4-2: Would the Project result in substantial soil erosion or the loss of topsoil?	Less than Significant	None required	Less than Significant
Impact 3.4-3: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than Significant	None required	Less than Significant
Impact 3.4-4: Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than Significant	None required	Less than Significant
Impact 3.4-5: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than Significant	None required	Less than Significant
Cumulative Impacts to Geology and Soils: Implementation of the proposed Project, in combination with past, present and probable large-scale projects in the Imperial Valley portion of the Salton Trough physiographic province of Southern California are somewhat limited because geologic and seismic hazards can vary considerably from site to site and tend to be more site specific. Impacts are addressed on a site-specific basis.	Less than Cumulatively Considerable	None Required	Less than Significant

Impact	Level of Impact/Significance Before Mitigation	Mitigation Measure	Level of Impact/Significance After Mitigation
Hazards and Hazardous Materials			
Impact 3.5-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	None required	Less than Significant
Impact 3.5-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Potentially Significant	None required	Less than Significant
<p>Cumulative Hazards and Hazardous Materials Impact: The proposed Project, in combination with other Past, Present and Probable Large-Scale Projects in the vicinity of the Project site, would not increase the density of development in the area because no other cumulative projects are within the cumulative geographic scope.</p>	Less than Cumulatively Considerable	None Required	Less than Significant
Noise			
Impact 3.6-1: Would the Project cause a generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than Significant	None required	Less than Significant

Impact	Level of Impact/Significance Before Mitigation	Mitigation Measure	Level of Impact/Significance After Mitigation
Impact 3.6-2: Would the Project cause a generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant	None required	Less than Significant
<p>Cumulative Project-Related Noise Impacts: Construction of the Project would contribute short-term construction traffic to area roadways. However, the increase in traffic noise would be less than cumulatively considerable. The Project would generate be less than cumulatively considerable operational noise, traffic noise and groundborne vibration noise. Decommissioning noise impacts would be similar to those of Project construction.</p>	Less than Cumulatively Considerable	None Required	Less than Significant
Transportation			
Impact 3.7-1: Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant	None required	Less than Significant
Impact 3.7-2: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	Less than Significant	None required	Less than Significant
Impact 3.7-3: Would the Project result in inadequate emergency access?	Less than Significant	None required	Less than Significant

Impact	Level of Impact/Significance Before Mitigation	Mitigation Measure	Level of Impact/Significance After Mitigation
Opening Year with Project Plus Cumulative Conditions Impacts to Intersection and Segment LOS: The proposed Project's construction traffic plus cumulative projects onto year 2021 conditions are currently and will continue to operate at acceptable LOS with the addition of cumulative traffic.	Less than Cumulatively Considerable	None Required	Less than Significant

1.5 Environmental Review Chronology

The following is an overview of the review process for the Project:

1.5.1 Initial Study and Notice of Preparation

In accordance with §15082 of the CEQA Guidelines, Imperial County prepared a Notice of Preparation (NOP) of an EIR on March 14, 2019. The County was identified as the lead agency for the proposed Project. The purpose of the notice was to solicit comments on the proposed project; therefore, it was circulated to interested parties as well as to the public, local, state, and federal agencies. The March 14, 2019 NOP, and comments responding to the NOP, are presented in Appendix A of the Draft SEIR.

1.5.2 Draft SEIR

The Draft SEIR was made available for review to the public and public agencies for 50 days which extended from July 15, 2019 to September 2, 2019 to provide comments on the “sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (Section 15204 of the State CEQA Guidelines). The Draft SEIR was made available to the public for review at the Imperial County Planning and Development Services Department, the Imperial County Website, and local libraries. Written comments were received on or before September 2, 2019. A total of three (3) comment letters were received from agencies and the public. Copies of the comment letters submitted in response to the Draft SEIR are presented in Appendix A of this document. These comments were reviewed and incorporated into the EIR where appropriate.

1.5.3 Final Supplemental EIR

The Final SEIR assesses the expected environmental impacts resulting from approval of the project and responds to comments received on the Draft SEIR. This document constitutes the *Response to Comments* that were received during the public review period for the Final SEIR for the Project. This Response to Comments document, in conjunction with the Draft SEIR, constitutes the Final SEIR for the Project. Purpose of the Final SEIR.

Requirements for the preparation and disposition of the Response to Comments are provided for in PRC, Division 13, Section 21092.5 and Section 15088 of the CEQA Guidelines. Section 15088 of the CEQA Guidelines it states:

- (a) *The lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The Lead Agency shall respond*

- to comments received during the noticed comment period and any extensions and may respond to late comments.*
- (b) *The lead agency shall provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.*
- (c) *The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.*
- (d) *The response to comments may take the form of a revision to the Draft EIR or may be a separate section in the Final EIR. Where the response to comments makes important changes in the information contained in the text of the Draft EIR, the Lead Agency should either: (1) Revise the text in the body of the EIR, or (2) Include marginal notes showing that the information is revised in the response to comments.*

1.5.3.1 Organization

The Final SEIR document has been organized as follows:

- **Chapter 1** (Introduction) includes a summary of the public circulation periods for the Draft SEIR, Project overview, summary of environmental impacts and mitigation measures, as well as a summary of relevant State CEQA Guidelines.
- **Chapter 2** (Errata) consists of a summary of revisions and edits in response to additional information that became known subsequent to publication of the Draft SEIR. These minor modifications to the text detailed in Chapter 2 reflect clarifications that do not:
 - constitute significant new information;
 - change any of the conclusions of the document;
 - constitute changes to the Project or environmental setting;
 - result in new significant environmental impacts; or
 - cause a substantial increase in the severity of an environmental impact.

- **Chapter 3** (Response to Comments) consists of direct responses to comments on the Draft SEIR received during the public review period.
- **Appendix A** – Copies of the comment letters submitted in response to the Draft SEIR can be found in Appendix A of this document. These comments were reviewed and incorporated into the Draft SEIR where appropriate.
- **Appendix B** – (Final Mitigation Monitoring and Reporting Program) consists of a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.

1.6 Certification Process of the Final SEIR

The following is an overview of the certification process for the Project:

The County will review and consider the Final SEIR. If the County finds that the Final SEIR is “adequate and complete,” the County may certify the Final SEIR. Upon review and consideration of the Final SEIR, the County may act upon the proposed Project. A decision to approve the project would be accompanied by written findings in accordance with State CEQA Guidelines Section 15091 and, if applicable, Section 15093. The County would also adopt a Mitigation Monitoring and Reporting Program for mitigation measures that have been incorporated into or imposed upon the Project to reduce or avoid significant effects on the environment. The Mitigation Monitoring and Reporting Program will be designed to ensure that these measures are carried out during project implementation.

1.6.1 Use of Final SEIR Document

As previously described, the County has prepared this Final SEIR to provide the public, responsible and trustee agencies with information about the potential environmental effects of the proposed Project. This EIR, in accordance with CEQA Guidelines §15126, should be used as the primary environmental document to evaluate all planning and permitting actions associated with the Project. These actions include, but are not limited to, the following:

1.6.1.1 County Discretionary Actions

1.6.1.1.1 Certification of the Final SEIR

After the required public review for the Draft SEIR, Imperial County shall respond to written comments, edit the document, and produce a Final SEIR to be considered for certification by the Planning Commission and/or Board of Supervisors prior to making a decision on the Project.

1.6.1.1.2 Mitigation Monitoring and Reporting Program

A Mitigation Monitoring and Reporting Program (MMRP) shall be adopted as required by CEQA Guidelines Section 15097.

1.6.1.1.3 Conditional Use Permit (CUP # 18-00018)

On June 22, 2018, the Applicant submitted an application for a CUP (CUP # 18-0018) to Imperial County Planning and Development Services (ICPDS). The CUP application was submitted to allow installation and operation of: one or more buildings, totaling approximately 85,000 square feet, to contain electrochemical batteries, racks and related building and electrical control systems; inverters, an on-site substation and an overhead 230 kilovolt (kV) electric line; all located within the existing CSE site. The proposed Project will require approval of CUP # 18-0018 by Imperial County to all construction and operation of the proposed Battery Energy Storage System at the proposed site.

1.6.1.1.4 Site Plan

A site plan review will be required during building permit approval process.

1.6.1.2 Subsequent Entitlements to Implement the Proposed Project

In addition to the CUP, additional entitlement actions and permits may be required from the County to implement the proposed Project. They are summarized below in Table 1-2:

Table 1-2: List of Potential Additional Non-Discretionary Entitlement Actions & Permits

Imperial County Planning & Development Services Department
• Grading Permit/Civil Engineering Plans
• Mechanical Engineering Documents and Plans
• Electrical Engineering Documents and Plans
• Generators (Permitted or Documented)
• Structural Engineering Documents and Plans (Foundations – Permit)
• Pre-Fabricated CA Certifications
• Architectural Plans
• Move-On Plan Permit
• Transportation Permit(s)
• Fire Suppression System Permit
• Haul Route Plan
• Fencing (Temporary Fencing to Protect While Under Construction, Security)
Imperial County Air Pollution Control District

• Haul Route Plan
• Rule 310 Compliance
• Construction Dust Control Plan
• Operational Specialty Dust Control Plan
• List of Construction Equipment
Environmental Health & Safety
• Project Review Building Plan Review (Applicant)
• Purchase Order for Potable Water – Dependent on water supply. Hauled or Point of Entry
• Purchase Order Septic Waste Removal
• Purchase Order Port-a-Potties
• Purchase Order for Above-Ground Septic System
Regional Water Quality Control Board
• SWPPP & all Associated Documents and Reports
• Construction NPDES Waiver

1.6.1.3 Discretionary Actions and Approvals by Other Agencies

Projects or actions undertaken by the lead agency, in this case Imperial County, may require subsequent oversight, approvals, or permits from other public agencies in order to be implemented. Other such agencies are referred to as responsible agencies and trustee agencies. Pursuant to §15381 and §15386 of the CEQA Guidelines, as amended, responsible agencies and trustee agencies are defined as follows:

- A *responsible agency* is a public agency that proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term responsible agency includes all public agencies other than the lead agency that have discretionary approval power over the project (§15381).
- A *trustee agency* is a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California (§15386).

The various public, private, and political agencies and jurisdictions that may have a particular interest in the proposed Project include but are not limited to the following:

1.6.1.3.1 State Agencies

- California Department of Conservation (DOC);
- California Department of Fish and Wildlife (CDFW);
- California Department of Parks and Recreation;

- California Department of Resources, Recycling and Recovery;
- California Department of Toxic Substances Control (DTSC);
- California Department of Transportation (Caltrans), District 11;
- California Division of Aeronautics;
- California Energy Commission (CEC);
- California Highway Patrol (CHP);
- California Native American Heritage Commission (NAHC);
- California Office of Historic Preservation (OHP);
- California Public Utilities Commission (CPUC);
- California Regional Water Quality Control Board (RWQCB);
- Governor's Office of Planning and Research (OPR);

1.6.1.3.2 Local Agencies

- Imperial County Air Pollution Control District (ICAPCD);
- Imperial County Fire Department (ICFD);
- Imperial County Department of Public Works (ICDPW);
- Ilpay Nation of Santa Ysabel;
- Imperial Irrigation District (IID);
- City of Calexico;
- South Coastal Information Center;
- Certified Unified Program Agency (CUPA);
- Naval Air Facility – El Centro; and
- Southern California Association of Governments (SCAG).