

I.1 INTRODUCTION AND SUMMARY

This Final Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.), CEQA Guidelines (California Administrative Code Section 15000 et seq.), and the County of Imperial CEQA procedures.

According to CEQA Guidelines §15132, the Final EIR shall consist of the following:

- a) The Draft EIR or a revision of the Draft;
- b) Comments and recommendations received on the Draft EIR, either verbatim or in summary;
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
- d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- e) Any other information added by the Lead Agency.

In accordance with these requirements, the Final Mount Signal and Calexico Solar Farm Projects EIR is comprised of the following:

- Draft Environmental Impact Report, Mount Signal and Calexico Solar Farm Projects (November 2011) (SCH No. 2011071066); and
- This Final EIR document, dated March 2012, that incorporates the information required by §15132.

Format of the Final EIR

This document is organized as follows:

Section I.1 Introduction

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

Section II.1 Corrections and Additions

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

Section III Responses to Comment Letters Received on the Draft EIR

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

Section IV Mitigation Monitoring and Reporting Program

This section includes the Mitigation Monitoring and Reporting Program (MMRP) which identifies the mitigation measures, timing and responsibility for implementation of the measures.

This page intentionally left blank.

II.1 CORRECTIONS AND ADDITIONS

The following Sections II.1.1 and II.1.2 contain revisions to information included in the Draft EIR (November 2011) based upon: (1) additional or revised information required to prepare a response to a specific comment; (2) updated information required due to the passage of time; and/or (3) typographical errors. Given the minor changes associated with the document, the information added to the EIR does not meet the requirements for recirculation pursuant to Section 150885.5 of the State *CEQA Guidelines*.

II.1.1 REVISED AND SUPPLEMENTAL TEXT

Changes to the Draft EIR were made in response to comments received on the Draft EIR. Overall, the new information clarifies information and analysis presented in the Draft EIR, or revises mitigation measures in response to comments on the Draft EIR.

The table below identifies the changed EIR sections as presented in this Final EIR.

Final EIR Section	Description of Revisions
Table of Contents	<ul style="list-style-type: none"> Updated to reflect Final EIR format.
ES. Executive Summary/Introduction	<ul style="list-style-type: none"> Global changes¹: Changed format of headings to reflect Final EIR format Updated mitigation measures to reflect revisions in main body of EIR.
1.0 Introduction	<ul style="list-style-type: none"> Global changes: Minor typographical, formatting edits. Section 1.1.1.1: Modifications to list of required approval to clarify that a Restoration Plan will be required for each project and that the County will conform financial assurances for the projects are in conformance with Imperial County ordinances. Also, Williamson Act Contract Cancellation has been added to the list of required approvals and the requirement for a Development Agreement has been deleted. Section 1.1.1.2.1: Added discussion of Bureau of Land Management (BLM) right-of-way (ROW) grant application for the off-site transmission facility (OTF). Section 1.2: Updated Renewable Portfolio Standard Program to include Senate Bill X1-2 which codified the California Air Resources Board requirement to enact regulations to achieve the goal of 33 percent renewable by 2020. Section 1.4: Updated to reflect Final EIR process. Section 1.4.2, Table 1.0-1: NOP Public Review Period and Scoping Meeting Comments Table was edited for typos. Section 1.4.5 was edited to include Final EIR sections within the Document Organization discussion.
2.0 Environmental Setting	<ul style="list-style-type: none"> Global changes: Minor typographical, formatting edits. Revised Section 2.2.2 description of Agricultural Resources to clarify that the project study areas contain Prime farmland and Farmland of Statewide Importance. Section 2.2.4, Added clarification statement about active agriculture not providing suitable habitat for flat-tailed horned lizard.
3.0 Project Description	<ul style="list-style-type: none"> Global changes: Minor typographical, formatting edits. Figures 3.0-1, 3.0-2b, 3.0-13 were modified to remove the optional transmission corridor. This option is no longer included as part of the project description.

¹ Global Changes refer to general formatting changes and text edits to maintain consistent nomenclature.

Final EIR Section	Description of Revisions
	<ul style="list-style-type: none"> • Figure I-1, which is added to the end of this section, provides an updated site plan for CSF2(A). This figure, titled “Modified CSF2(A) Site Plan Incorporating 125-Buffer from centerline of Private Airstrip” revises a portion of the CSF2(A) site layout shown in EIR Figure 3.0-11. • Section 3.2: The first project objectives was modified to clarify that producing up to 600 MW of renewable electricity would help meet the State-mandated RPS of 33% renewable energy by 2020. Three additional project objectives were added including: <ul style="list-style-type: none"> - Construct a facility at a location near the U.S. border to avoid issues of leapfrog development and dividing up stretches of agricultural land. - 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. • Section 3.3.7: Modified to clarify that a small Point of Entry Water Treatment System may be required for the O&M Buildings. • Section 3.5: Revised to clarify that a restoration plan would be required for each project site. • Section 3.6.1: Modifications to list of required approval to clarify that a Restoration Plan will be required for each project and that the County will conform financial assurances for the projects are in conformance with Imperial County ordinances. Also, Williamson Act Contract Cancellation has been added to the list of required approvals and the requirement for a Development Agreement has been removed. • Section 3.6.2: Added BLM ROW grant application for the off-site transmission facility (OTF) to list of approvals by other agencies.
4.0 Environmental Analysis	<ul style="list-style-type: none"> • Global Edits
4.1 Aesthetics	<ul style="list-style-type: none"> • Global Edits • Section 4.1.2.3: Clarification that the proposed fencing would be chain link with tan slats and would not consist of a block wall. Corrected figure references. Provided further description of proposed lattice towers. • Modified Mitigation Measure 4.1-4 to ensure that the performance standard for glare and glint effects is “less than significant.” • Section 4.1.3: Added a discussion of decommissioning/restoration.
4.2 Agricultural Resources	<ul style="list-style-type: none"> • Global Edits • Section 4.2.1.1: Clarified that no agricultural lands are located in the BLM lands (OTF-BLM Land). Added statement about status of County’s MOU regarding solar projects located on agricultural lands. • Section 4.2.1.2: Added description of current crop types. Clarified why LESA not conducted for BLM lands. • Updated Mitigation Measure 4.2-1 to clarify the three options for agricultural mitigation (agricultural conservation easements, in-lieu fee, or restoration plan) • Deleted Mitigation Measure 4.2-2a as this measure is not applicable to a physical impact on the environment and economic benefits of the project are shown in the Economic Impact Analysis, Employment Impact Analysis, and

Final EIR Section	Description of Revisions
	<p>Fiscal Impact Analysis (Development Management Group, Inc., March 3, 2012) for the projects.</p> <ul style="list-style-type: none"> • Deleted Mitigation Measure 4.2-4 as the requirements of this measure are redundant with Mitigation Measure 4.2-1 (soil restoration, if needed, would be implemented in the restoration plans for the project), and minimal earth movement is required for project implementation. • Added Mitigation Measure 4.2-2 addressing weed abatement and pests. • Section 4.2.3: Added a discussion of decommissioning/restoration.
4.3 Air Quality	<ul style="list-style-type: none"> • Global Edits • Section 4.3.2.3: Added statement that Enhanced Mitigation Measures for Construction Equipment are derived from the ICAPCD Air Quality Handbook, and all the measures are applicable to the projects. • Section 4.3.2.3: Updated discussion regarding cumulative PM10 impacts. • Section 4.3.3: Added a discussion of decommissioning/restoration.
4.4 Biological Resources	<ul style="list-style-type: none"> • Global Edits • Section 4.4.1.2.1: Deleted previously proposed Alternative Transmission Route (ATR) from existing vegetation communities table. • Updated figures to delete ATR. • Section 4.4.1.2.6: Added more to jurisdictional discussion regarding IID drainages and canals, including effects of water use. • Section 4.4.2.3: Removed ATR from impacts to vegetation communities table. Removed ATR from any impacts discussion and mitigation requirements. Provided clarification as to where temporary impacts would occur (within BLM lands). Clarified habitat mitigation requirements, including that needed for flat-tailed horned lizard (FTHL) and burrowing owl. • Updated Burrowing Owl impact analysis to reflect current Burrowing Owl data/occupancy on, and adjacent to, the project sites • Revised Mitigation Measure 4.4-1f regarding Burrowing Owl Compensation to reflect current level of occupancy on, and adjacent to the project sites. • Section 4.4.3: Added a discussion of decommissioning/restoration.
4.5 Cultural Resources	<ul style="list-style-type: none"> • Global Edits • Section 4.5.1.2: Expanded discussion of paleontological setting. • Section 4.5.2.3: Clarified that only one cultural resource site (IMP-3999) would be directly impacted by the project (OTF-BLM Land). • Section 4.5.3: Added a discussion of decommissioning/restoration.
4.6 Geology and Soils	<ul style="list-style-type: none"> • Global Edits • Section 4.6.2.3: Clarified that each project site will have its own leach field to serve the O&M building. • Section 4.6.3: Added a discussion of decommissioning/restoration.
4.7 Greenhouse Gas Emissions	<ul style="list-style-type: none"> • Global Edits • Section 4.7.1.1: Added a discussion of Senate Bill X1-2. • Section 4.7.3: Added a discussion of decommissioning/restoration.
4.8 Hazards and Hazardous Materials	<ul style="list-style-type: none"> • Global Edits • Section 4.8.1.2.3: Added an explanation as to why a hazardous materials survey was not conducted for the OTF-BLM Land.

Final EIR Section	Description of Revisions
	<ul style="list-style-type: none"> • Section 4.8.2.3: Clarified potential impacts to aircraft operations. • Section 4.8.2.3: Expanded discussion of potential impact to Johnson Brothers private airstrip and added additional reflectivity analysis to technical appendix and discussion of the revised site plan for CSF2(A) that incorporates the 125-foot buffer from the centerline of the airstrip. • Section 4.8.3: Added a discussion of decommissioning/restoration.
4.9 Hydrology/Water Quality	<ul style="list-style-type: none"> • Global Edits • Section 4.9.1: Clarified that OTF- BLM Lands would not experience a significant change in drainage patterns due to the nature of facilities proposed to be constructed in that area. • Section 4.9.1.2: Added additional description of existing surface water quality with respect to salinity. • Section 4.9.3: Added a discussion of decommissioning/restoration.
4.10 Land Use and Planning	<ul style="list-style-type: none"> • Global Edits • Section 4.10.1: Added explanation that the OTF-BLM Land is not subject to any particular County zoning designation. • Section 4.10.1.1: Clarified in Table 4.10-1 that the proposed solar facilities are not located on BLM lands; however, the OTF-BLM Land is. Added a discussion of Geothermal/Alternative energy goals (Table 4.10-1). Added a discussion of the County's Right to Farm Ordinance. • Section 4.10.3: Added a discussion of decommissioning/restoration.
4.11 Noise	<ul style="list-style-type: none"> • Global Edits • Section 4.11.2.3: Added clarification as to number of residences located within the general project area. • Section 4.11-3: Added a discussion of decommissioning/restoration.
4.12 Public Services	<ul style="list-style-type: none"> • Global Edits • Section 4.12.3: Added a discussion of decommissioning/restoration.
4.13 Recreation	<ul style="list-style-type: none"> • Global Edits • Section 4.13.3: Added a discussion of decommissioning/restoration.
4.14 Transportation/Circulation	<ul style="list-style-type: none"> • Global Edits • Section 4.14.3: Added a discussion of decommissioning/restoration.
4.15 Utilities/Service Systems	<ul style="list-style-type: none"> • Global Edits • Section 4.15.1.2: Added clarification that water would not be used for operation of the OTF. • Section 4.15.3: Added a discussion of decommissioning/restoration.
5.0 Analysis of Long-Term Effects	<ul style="list-style-type: none"> • Global Edits
6.0 Cumulative Impacts	<ul style="list-style-type: none"> • Global Edits • Section 6.3.3: Expanded discussion of cumulative PM10 impacts • Section 6.3.4: Expanded discussion of potential impacts to IID drainages, canals, and the Salton Sea as a result of decreased water use. • Section 6.3.12: Clarification that service impacts to police and fire are addressed through payment of impact fees as part of Conditions of Approval for the project.

Final EIR Section	Description of Revisions
7.0 Effects Found Not To Be Significant	<ul style="list-style-type: none"> Global Edits Section 7.5: Added a discussion of decommissioning to the solid waste discussion.
8.0 Alternatives	<ul style="list-style-type: none"> Global Edits Section 8.2: Update project objectives.
9.0 References	<ul style="list-style-type: none"> Updated to include new technical reports added to EIR appendices
10.0 EIR Preparers and Persons and Organizations Contacted	No change

II.1.2 REVISED AND SUPPLEMENTAL MITIGATION MEASURES

The following Mitigation Measure have been revised or added the Final EIR:

Mitigation Measure 4.1-4 has been revised as follows:

- 4.1-4** Coordinate Final Design Plans for CSF2(A) with Imperial County Airport Land Use Commission (ALUC) to Minimize Glare and Glint Effects on Airport Operations. The project applicant shall coordinate the final design of CSF2(A) with the Imperial County ALUC to ensure that glare and glint effects from the proposed solar arrays are minimized to less than significant levels the maximum extent practicable. The project applicant shall incorporate design recommendations prescribed by the ALUC for CSF2(A), including the use of tracker mounting systems as opposed to fixed-tilt systems. To ensure that recommendations are integrated into the final design plans for CSF2(A), Imperial County shall coordinate the final design plans for CSF2(A) with the ALUC prior to final approval.

Mitigation Measure 4.2-1 has been revised as follows:

- 4.2-1a Minimize Impacts to Important Farmlands.** The applicant shall mitigate for short- and long-term impacts to Prime Farmland and Farmland of Statewide Importance through the implementation of one of the three optional mitigation requirements as prescribed in the County’s MOU regarding solar generation projects on agricultural lands.

Option 1: The applicant shall provide agricultural conservation easements on a “2 to 1” basis on land of equal size, of equal farmland quality, and outside the path of development. The conservation easement shall meet DOC standards and shall be recorded prior to issuance of any grading or building permits.

Option 2: The applicant shall pay an “Agricultural In-Lieu Mitigation Fee” in the amount of 20 percent of the fair market value per acre for the total based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee will be placed in a trust account administered by the Imperial County Agricultural Commissioner’s office and will be used for such purposes as the acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County.

Option 3: The applicant shall submit to Imperial County a site-specific restoration plan capable of restoring on-site soils back to current agricultural conditions prior to the issuance of grading or building permits. The restoration plan shall include a site restoration cost estimate prepared by a California-licensed general contractor or civil engineer. The applicant shall provide financial assurances/bonding in the amount equal

to the site restoration cost estimate to return the land back to its agricultural conditions after the solar facility ceases operations and closes.

Mitigation Measure 4.2-2 has been added as follows:

4.2-2 Prior to the issuance of a grading permit or building permit (whichever occurs first), a Weed and Pest Control Plan shall be developed by the Project Applicant and approved by the County of Imperial Agricultural Commissioner. The plan shall provide the following:

1. Monitoring, preventative, and management strategies for weed and pest control during construction activities at any portion of the project (e.g., transmission line) that are adjacent agricultural lands;
2. Control and management of weeds and pests in areas temporarily disturbed during construction where native seed will aid in site revegetation; and,
3. A long-term strategy for weed and pest control and management during the operation of the proposed project. Such strategies may include, but are not limited to:
 - a. Use of specific types of ground cover and maintenance (mowing, replacement, etc.) of such ground cover;
 - b. Use of specific types of herbicides and pesticides on a scheduled basis; and
 - c. Maintenance and management of project site conditions to reduce the potential for a significant increase in pest-related nuisance conditions on adjacent agricultural lands.

Mitigation Measure 4.4-1a has been revised to clarify this as follows:

4.4-1a Sensitive Vegetation Communities Mitigation Ratios. Mitigation for the permanent and temporary impacts to creosote bush-white burr sage scrub, and desert wash shall be accomplished through the provision of required mitigation acres prior to issuance of a grading permit. Table 4.4-7 identifies the mitigation ratio/requirement and required mitigation for each vegetation community. Mitigation ratios are in accordance with the Flat-tailed Horned Lizard Rangeland Management Strategy.

Mitigation Measure 4.4-1f has been replaced as follows:

~~**4.4-1f Burrowing Owl Compensation.** The project applicant shall compensate for impacts to burrowing owl habitat through the following measures:~~

- ~~1. CDFG's mitigation guidelines for burrowing owl (1995) require a minimum of 6.5 acres of foraging habitat per pair or unpaired resident bird to be acquired and protected to offset the loss of foraging and burrow habitat on the project sites. As discussed in Section 4.1.2.2.1, impact to habitat surrounding the 11 active burrows within the limits of grading is estimated at up to 71.5 acres, based on a calculation of 6.5 acres of foraging habitat per active burrow. This includes 6.5 acres for the MSSF1 project (one active burrow), 13 acres for the two active burrows on the CSF1(A) project, 19.5 acres for the three active burrows on CSF2(A), and 32.5 acres for the five active burrows on the CSF2(B) project.~~

~~In order to mitigate for this acreage and provide foraging habitat for burrowing owls, the project applicant(s) shall landscape small pockets of land along the perimeter of the solar fields, and/or within the solar fields themselves, with~~

~~saltgrass or other native vegetation that will provide suitable foraging habitat for burrowing owls. Although the site plans show almost 100% coverage of solar panels, it is anticipated that due to the nature of solar panel configuration, there will be spaces at various locations, such as between the edges of the agricultural fields (i.e., outside of IID easements) and the solar field perimeter fencing. A minimum of 71.2 acres of these open areas shall be set aside for burrowing owl habitat and burrow relocation for the lifespan of the solar projects. Due to County of Imperial requirements that the solar fields be returned to active agriculture after the life of the solar projects, the land cannot be set aside in perpetuity; however, it is assumed that if the land is returned to active agricultural crops, it will continue to provide habitat for burrowing owl. If the vegetation that is planted does not succeed or planting is not feasible, the 71.5 acres of foraging habitat shall be mitigated through off-site preservation or in-lieu fee and must be approved by CDFG.~~

4.4-1f Burrowing Owl Compensation. The project applicant shall compensate for impacts to burrowing owl habitat through the following measures:

1. CDFG's mitigation guidelines for burrowing owl (1995) require the acquisition and protection of replacement foraging habitat per pair or unpaired resident bird to offset the loss of foraging and burrow habitat on the project sites.

The project applicant(s) shall landscape small pockets of land along the perimeter of the solar fields, and/or within the solar fields themselves, with saltgrass or other native vegetation that will provide suitable foraging habitat for burrowing owls, pursuant to a Mitigation and Monitoring Plan that is reviewed and approved by CDFG prior to the commencement of construction. Although the site plans show almost 100 percent coverage of solar panels, it is anticipated that due to the nature of solar panel configuration, there will be spaces at various locations, such as between the edges of the agricultural fields (i.e., outside of IID easements) and the solar project footprints. Sufficient open areas shall be set aside for burrowing owl habitat and burrow relocation for the lifespan of the solar projects. Due to County of Imperial requirements that the solar fields be returned to active agriculture after the life of the solar projects, it is assumed that when the land is returned to active agricultural crops, it will continue to provide habitat for burrowing owl. If the vegetation that is planted does not succeed, sufficient areas cannot be provided onsite, or planting is not feasible, alternative mitigation shall be provided, which CDFG determines provides equivalently effective mitigation. Such alternative mitigation may include off-site preservation of the required amount of foraging habitat through a CDFG-approved conservation easement, or an in-lieu fee in an amount approved by CDFG that is sufficient to acquire such conservation easements, or some combination of the two.

Mitigation Measure 4.5-2a has been revised as follows:

4.5-2a Archaeological Resource Evaluation. For those sites subject to the preliminary surveys and which would be directly impacted due to the construction of access roads, towers, pull sites, or solar fields, a formal testing and evaluation program is required. The evaluation program for such sites shall document the presence or absence of subsurface deposits and the specific research potential for each site. In addition, the evaluation program shall be consistent with the *Secretary of Interior Standards for the Treatment of Historic Properties and the Secretary of Interior Standards and Guidelines for Archaeology and Historic Preservation*. Should these sites be determined eligible for listing on the NRHP, CRHR, and/or local register, best management practices consistent with the *Secretary of Interior Standards for the Treatment of Historic Properties and the*

Secretary of Interior Standards and Guidelines for Archaeology and Historic Preservation shall be required including:

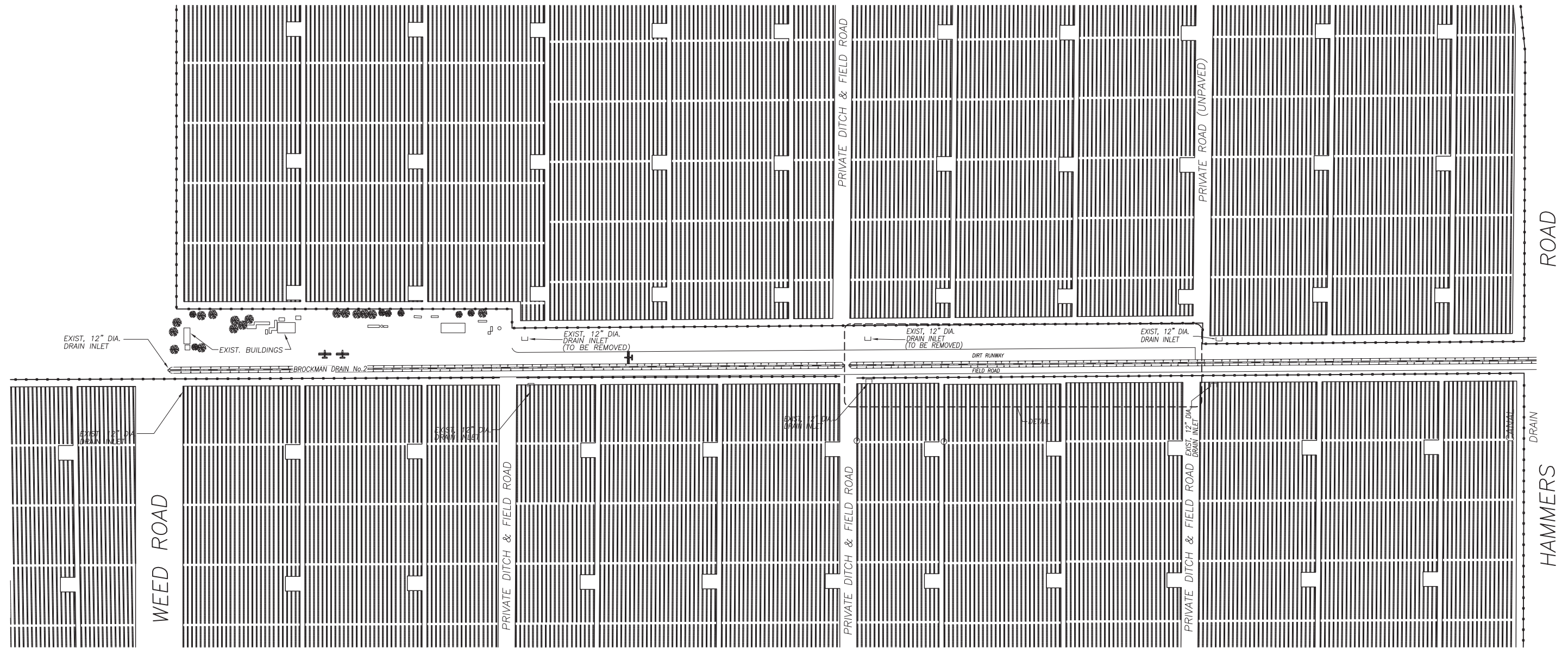
- a) Preservation in Place:
 - (1) Avoidance of the resource through project redesign in a manner that is technically possible, operationally possible, does not cause a new significant environmental impact or increase the severity of a significant environmental impact, and does not cause the loss or more than 1 MW of production.
 - (2) Covering the archaeological sites with a layer of chemically stable soil before constructing facilities on site so long as covering can be done in a manner that is technically possible, does not cause a new significant environmental impact or increase the severity of a significant environmental impact. ~~and does not cause the loss or more than 1 MW of production.~~
- b) Minimizing impacts by limiting the degree of impacts or reducing the impact through best management practices identified in a data recovery, excavation and/or construction monitoring plan. The content of this plan must be consistent with the Secretary of Interior's Standards for the Treatment of Historic Properties and Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation and include a description of areas to be monitored during construction, a discovery plan that will address unanticipated cultural resources, and provisions for the education of construction workers.

Mitigation Measure 4.5-2d has been revised to correct this typographical error as follows:

4.5-2d Discovery of Archaeological Materials. ~~In the event of the discovery of historical and archaeological materials, the contractor shall immediately~~ In the event of the discovery of historical and archaeological materials, the contractor shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. After cessation of excavation, the contractor shall immediately contact the Imperial County Department of Planning and Development Services. The contractor shall not resume work until authorization is received from the County.

In the event of an unanticipated discovery of archaeological materials during construction, the applicant shall retain the services of a qualified professional archaeologist, meeting the Secretary of the Interior's Standards for a Qualified Archaeologist, to evaluate the significance of the materials prior to resuming any construction-related activities in the vicinity of the find. If the qualified archaeologist determines that the discovery constitutes a significant resource under CEQA and it cannot be avoided, the applicant shall implement an archaeological data recovery program.

Z:\GIS Production\Projects\Cnty\Imperial_8126\MtSignalSolar_165940\Graphics\docs\TB_Tab_Ltrdiscp_Master.dwg | Last Updated: 03-05-2012



SITE PLAN

Modified CSF2(A) Site Plan Incorporating 125-Buffer from Private Airstrip
FIGURE I-1