
5.0 ANALYSIS OF LONG-TERM EFFECTS

5.1 GROWTH INDUCING IMPACTS

In accordance with Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines, an Environmental Impact Report (EIR) must:

“discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth ... Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

Projects promoting direct growth will impose burdens on a community by directly inducing an increase in population, or resulting in the construction of additional developments in the same area. For example, infrastructure projects involving the expansion, modifications, or additions to infrastructure could have the potential to directly promote growth by removing existing physical barriers or allowing for additional development through capacity increases. New roadways leading into a previously undeveloped area directly promote growth by removing previously existing physical barriers to development and a new wastewater treatment plant would allow for further development within a community by increasing infrastructure capacity. Because these types of infrastructure projects directly serve related projects and result in an overall impact to the local community, associated impacts cannot be considered isolated. Indirect growth typically includes substantial new permanent employment opportunities and can result from these aforementioned modifications.

The proposed projects are located within the unincorporated area of Imperial County and do not involve the development of permanent residences that would result in a direct population growth in the area. The proposed projects involve the construction and operation of a solar facilities and an off-site transmission facility (OTF) that would be located within both private and BLM land. According to the applicant, the construction workforce is expected to reach a peak of approximately 300 temporary workers for each phase. The unemployment rate in Imperial County, as of July 2011 (not seasonally adjusted) was 30.8%. The applicant expects to utilize construction workers from the local and regional area. Based on the unemployment rate, and the availability of the local workforce, construction of the proposed projects would not have a growth-inducing effect related to workers moving into the area and increasing the demand for housing and services. After the construction of the proposed projects, no permanent construction workers would be hired. The proposed projects would only require the employment of 20-30 full-time personnel in total to maintain the project facilities seven days a week during normal daylight hours. As such, the proposed projects would not induce substantial population growth in the area. The proposed projects will involve only the extension of electricity-related infrastructure off-site. This would be limited to the extension of the transmission lines from the solar energy facility to the Imperial Valley Substation. These transmission lines would serve regional energy needs, integrating into the grid, and would not be available to directly serve surrounding areas.

While the proposed projects would contribute to energy supply, which indirectly supports population growth, the proposed development of these projects is a response to the State's need for renewable energy to meet its Renewable Portfolio Standard. Unlike a gas-fired power plant, the proposed projects are not being developed as a source of base-load power in response to growth in demand for electricity. The power generated would be added to the State's electricity grid with the intent that it would displace fossil fueled power plants and their associated environmental impacts, consistent with the findings and declarations in Senate Bill 2 (2011) that a benefit of the Renewable Portfolio Standard is displacing fossil

fuel consumption within the state. In addition, the Energy Policy Act of 2005 (Title II, Section 211) helps the Department of Interior (DOI) work towards achieving the goal of approving at least 10,000 megawatts (MW) of renewable energy on public lands by 2015. The projects are being proposed in response to State and Federal policy and legislation promoting development of renewable energy.

The proposed projects would supply energy to accommodate and support existing demand and projected growth, but it would not foster any new growth because (1) the additional energy would be used to ease the burdens of meeting existing statewide energy demands within and beyond the area of the project; (2) the energy would be used to support already-projected growth; or, (3) the factors affecting growth are so diverse that any potential connection between additional energy production and growth would necessarily be too speculative and uncertain to merit further analysis.

Under CEQA, an EIR should consider potentially significant energy implications of a project (see CEQA Guidelines Appendix F(II); Pub. Res. Code Section 21100(b)(3)). However, the relationship between the proposed project's increased electrical capacity and the growth-inducing impacts outside the surrounding area is too speculative and uncertain to warrant further analysis. When a project's growth-inducing impacts are speculative, the lead agency should consider 14 California Code of Regulations §15145, which provides that, if an impact is too speculative for evaluation, the agency should note this conclusion and terminate discussion of the impact. As the court explained in *Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal. App.4th 342, 368: "Nothing in the Guidelines, or in the cases, requires more than a general analysis of projected growth." *Napa Citizens*, 91 CA4th at 369. The problem of uncertainty of the proposed project's growth-inducing effects cannot be resolved by collection of further data due to the diversity of factors affecting growth.

While this document has considered that the proposed projects, as energy projects, might foster regional growth, the particular growth that could be attributed to the proposed projects is unpredictable, given the multitude of variables at play, including uncertainty about the nature, extent, and location of growth and the effect of other contributors to growth besides the proposed projects. No accurate and reliable data is available that could be used to predict the amount of growth outside the area that would result from the proposed project's contribution of additional electrical capacity. Neither the BLM (with respect to the OTF) nor the County of Imperial has adopted a threshold of significance for determining when an energy project is growth-inducing. Further evaluation of this impact is not required under CEQA.

Additionally, the projects would not involve the development of any new roadways, new water systems, or sewer and thus, the projects would not further facilitate additional development into outlying areas. Potable water would be trucked into each of the sites to serve the Operations and Maintenance (O&M) buildings. Sewage treatment for the O&M buildings will be served by a septic system. Therefore, infrastructure improvements to serve each of the projects are limited and would not be available to serve surrounding areas. For these reasons, none of the projects would be growth-inducing.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In accordance with CEQA Guidelines Section 15126.2(c), an EIR must identify any significant irreversible environmental changes that would be caused by implementation of the proposed project being analyzed. Irreversible environmental changes may include current or future commitments to the use of non-renewable resources or secondary growth-inducing impacts that commit future generations to similar uses.

Energy resources needed for the construction of the proposed projects would contribute to the incremental depletion of renewable and non-renewable resources. Resources such as timber used in building construction are generally considered renewable and would ultimately be replenished. Non-renewable resources such as petrochemical construction materials, steel, copper, lead and other metals, gravel, concrete, and other materials are typically considered finite and would not be replenished over the lifetime of each of the project. Thus, the Mount Solar Signal Farm and Calexico Solar Farm projects would irretrievably commit resources over the anticipated 40-year life of the projects. However, after 40 years,

these projects are planned to be decommissioned and the applicant is required to restore land to its pre-project state. Consequently, some of the resources on the sites could potentially be retrieved after the sites have been decommissioned. The applicant anticipates using the best available recycling measures at the time of decommissioning. Additionally, the applicant will implement a reclamation plan which will include a performance standard to assess the success of post-project vegetation.

Implementation and operation of the proposed projects would promote the use of renewable energy and contribute incrementally to the reduction in demand for fossil fuel use for electricity-generating purposes. Therefore, the incremental reduction in fossil fuels would be a positive effect of the commitment of nonrenewable resources. Additionally, the projects are consistent with future buildout plans for the project study area under the General Plan as well as with the State's definition of an "eligible renewable energy resource" in Section 399.12 of the California Public Utilities Code and the definition of "in-state renewable electricity generation facility" in Section 25741 of the California Public Resources Code.

5.3 UNAVOIDABLE ADVERSE IMPACTS

In accordance with CEQA Guidelines Section 15126(b), EIRs must include a discussion of significant environmental effects that cannot be avoided if the proposed project is implemented. The impact analysis, as detailed in Section 4.0 of this Draft EIR, concludes that no unavoidable significant impacts were identified. Where significant impacts have been identified, mitigation measures are proposed, that when implemented, would reduce the impact level to less than significant.

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