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 600 megawatts (MW) of electricity, which would help meet the increasing demand for clean, renewable electrical power.
- 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.

- Interconnect with electrical transmission infrastructure either planned or being constructed by other nearby projects, interconnect to the California Independent System Operator (CAISO) 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 832 (California Global Warming Solutions Act of 2006).

8.3 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION

8.3.1 Alternative Location

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."

With respect to the proposed Mount Signal Solar Farm and Calexico Solar Farms 1 and 2 projects, no significant, unmitigable impacts have been identified. With implementation of proposed mitigation, all significant environmental impacts will be mitigated to a level less than significant. Additionally, the proposed projects would be consistent with applicable plans, such as the County's General Plan and the CDCA Plan for the portion of OTF located within BLM lands.

It is not likely that constructing the proposed projects at an alternative location would avoid the significant, environmental impacts associated with the proposed projects. Impacts associated with the projects include conversion of agricultural land and impacts to biological resources. It is likely that the same type of impacts would be encountered within other private agricultural lands located within the County.

As such, the County considers an alternative location infeasible and rejects further analysis of this alternative due to the following factors:

1. No significant, unmitigated impacts have been identified for the proposed projects. Construction and operation of the proposed projects at an alternative location would likely result in similar, impacts associated with the proposed projects, or additional impacts that are currently not identified for the projects at their currently proposed locations.
2. The proposed projects are consistent with the overall goals and objectives of the County's General Plan and the CDCA for the portion of the OTF located within BLM land.

for the project study area allows for agricultural uses. These uses would be expected to continue. No off-site transmission facilities would be constructed to serve the proposed projects.

Environmental Impact of 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. No significant aesthetic impact associated with the proposed projects has been identified as the projects would not impact scenic resources or result in the degradation of the existing visual character of the study area. As such, this alternative would not avoid or reduce an aesthetic impact. However, the proposed projects would result in additional glare, potentially impacting aircraft operations associated with the Calexico airport, and mitigation is required. This alternative would avoid this potential impact associated with the proposed projects.

Agriculture: Under the No Project/No Development Alternative, the study area would continue to be used for active agricultural uses. No conversion of farmland including land of Statewide Importance and Prime Farmland would occur. Cancellation of Williamson Act contracts would not be required under this alternative. The proposed projects identified a less than significant impact 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 sites 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. More over, this alternative would be consistency 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 study area would largely remain as described under Section 4.4 of the Draft EIR and no impact would be identified. No impacts to wetlands would occur. Also, unlike the proposed projects which requires mitigation for impacts to raptor species such as burrowing owl, this alternative would not require the construction of solar facilities that could otherwise result in significant impacts to these biological resources.

Cultural Resources: No significant cultural resources, including historic and pre-historic resources, have been identified on the project sites with the exception of the OTF on BLM Lands. Therefore, the solar facilities would not result in any significant impacts to significant historic and pre-historic resources. In this context, this alternative would not realize any reductions in potential impacts to cultural resources. However, the proposed OTF on BLM Lands has the potential to result in a direct impact to one significant cultural resources site within BLM's Utility Corridor "N." Additionally, the OTF on BLM Lands has the potential to impact undocumented paleontological resources. Under the No Project/No Development Alternative, because the projects would not be constructed, there would be no project-related contribution to significant impacts to these resources as a consequence of the OTF on BLM Lands. However, due to the need to satisfy peaking power requirements, this alternative would likely facilitate the connection of another local solar project, which too would require the construction of new OTF on BLM Lands as considered in the Imperial Solar Energy Center South Project EIR/EA. Hence, impacts to cultural

resources under this alternative would more than likely delay this impact from occurring, but would not necessarily avoid the impact in the longer term. Notwithstanding this circumstance, when compared to the proposed projects, this alternative would avoid impacts to cultural and paleontological resources for the OTF on BLM Land component of the projects.

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 to the proposed projects as they relate to local geological and soil conditions.

Greenhouse Gas Emissions: Under the No Project/No Development Alternative, there would be no greenhouse gas (GHG) emissions due to project construction or operation. Therefore, no impact to global climate change as a result of GHG emissions, primarily associated with construction activity, would occur. The proposed projects identified less than significant impacts for GHGs after mitigation during construction and overall beneficial impacts to global climate change as the result of creation of renewable energy. 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. Therefore, 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 than the proposed projects would be.

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 to workers as a result of hydrocarbon stains found throughout surface coils at CSF2. Therefore, no impact is identified for this alternative for hazards and hazardous materials. The proposed projects identified less than significant impacts with mitigation incorporated. Development under 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. However, from a drainage perspective, this alternative would avoid changes to existing hydrology when compared to the proposed projects, 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 projects, this alternative would not result in the placement of structures within a 100-year flood zone.

Land Use/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. Unlikely the projects, the No Project/No Development Alternative would not require the issuance of a CUP to maintain project consistency with the County's General Plan. Similarly, consistency issues in relation to the CDCA as it relates to the OTF located within BLM lands, would be

moot under this alternative. This alternative would avoid the potential land use compatibility impact associated with the Calexico International Airport and the facilities constructed within the eastern portion of the study area.

Noise: This alternative would not require the construction or operation of the project facilities as described in Chapter 3 and, therefore, would not result in any increases in 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. When 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 require increased public services to the sites, since the project facilities would not be constructed, which could otherwise require additional police or fire protection services. Therefore, no impact to public services is identified for this alternative. The proposed projects would have less than significant impacts; however, this assumes that the projects would be conditioned to provide law enforcement and fire service fees. Compared to the proposed projects, this alternative would have fewer impacts to public services.

Recreation: The No Project/No Development Alternative would not reduce or avoid an impact to recreation as no significant impact to recreation associated with the proposed projects has been identified. However, this alternative would maintain existing informal recreational uses and open space enjoyment that would be lost under the projects. In this context, this alterative would result in lesser impacts to existing informational recreational opportunities.

Transportation/Traffic: Because there would be no new development under the No Project/No Development Alternative, no increase in vehicular trips due to project construction or project operation are identified for this alternative. For these reasons, no impact would occur. As provided in Chapter 4, the projects would result in less than significant transportation/traffic impacts and, therefore, this alternative would not avoid or reduce any transportation/traffic impact as compared to the proposed projects. However, this alternative would avoid increase in vehicle trips on local as attributable to the projects and any safety related hazards that could occur in conjunction with 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. However, as discussed in Chapter 4, the 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. Unlike the projects, this alternative would not realize the benefits of reduced water demands when compared to the proposed projects.

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 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. Likewise, impacts to cultural resources within BLM's Utility Corridor "N" would be avoided in the interim by this alternative, but would still likely occur in the near future given the need for expanded electrical transmission capacity.

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, No Project/No Development Alternative would not 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).

8.3.2 Reduced Acreage Alternative (Avoid Prime Farmland)

The purpose of this alternative is to avoid the Prime farmlands located within the project site boundaries. The 2008 important farmland maps for Imperial County indicate that a majority of the project study area is 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 410 acres of prime farmland are classified within the study area for the projects. (NOTE: this alternative would not avoid several pockets of Prime farmland as shown on Figure 8.0-1.)

Environmental Impact of Reduced Acreage Alternative (Avoid Prime Farmland)

Aesthetics: This alternative would reduce the overall size of the solar energy fields. However, the OTF would still be required, which would connect through the project study area and ultimately to the Imperial Valley Substation located within BLM lands. No significant 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 area. Additionally, this alternative would result in the same potential glare impact associated with aircraft operations from the Calexico airport, and mitigation would be required. As such this alternative would not avoid or reduce any significant impacts identified for the projects.

Agriculture: Under the Reduced Acreage Alternative (Avoid Prime Farmland), a majority of the project study area that contains Prime farmlands would continue to be used for active agricultural uses. However, since this alternative would continue to include large acreages of Farmland of Local Importance, mitigation would continue to be required to reduce significant farmland impacts to a less than significant level. However, compared to the proposed project, this Alternative would reduce the significant impacts associated with the conversion of Prime agricultural lands to non-agricultural use.

Air Quality: Under the Reduced Acreage Alternative (Avoid Prime Farmland), air emissions due to project construction or operation would be less than the proposed project as a result of the reduced acreage. A less than significant impact with mitigation incorporated has been identified associated with the proposed projects during construction. Because less overall development would occur, this alternative would result in fewer air quality emissions compared to the proposed projects, although the same mitigation measures would be required. 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 projects, thereby reducing its ability to provide a long-term source of renewable energy. Therefore, while the Reduced Acreage Alternative (Avoid Prime Farmland) would result in less of an impact to air quality, it would likely provide less in terms of the desirable benefits to overall regional air quality as attributable to the proposed projects.

Biological Resources: Under the Reduced Acreage Alternative (Avoid Prime Farmland), potential impacts to several of the burrowing owls locations identified within the site and indirect impacts associated with burrowing owls in the adjacent drainage canals, especially along Rockwood 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. The biological impacts associated with the OTF component would be the same as the proposed projects. Impacts to wetlands, migratory corridors, and other wildlife and habitats would be similar to that described for the projects. As such, this alternative would result in a reduction in impacts to biological resources, but would still require mitigation.

Mount Signal Solar Farm 1 - MSSF1 (1203 Acres)
Calexico Solar Farm 1 Phase A - CSF1(A) (486 Acres)
Calexico Solar Farm 1 Phase B - CSF1(B) (322 Acres)
Calexico Solar Farm 2 Phase A - CSF2(A) (940 Acres)
Calexico Solar Farm 2 Phase B - CSF2(B) (485 Acres)
Proposed Off-site Transmission Facilities (OTF) - Private Land (120 ft ROW)
National Border

Active Burrowing Owl Burrow

Williamson Act (2010)
115
117
159
160

FMMP Designations (2008)
Farmland of Local Importance
Farmland of Statewide Importance
Not Mapped
Other Land
Prime Farmland
Unique Farmland
Urban and Built-up Land
Water

Central Main Canal
La Brucherie Rd
Willoughby Rd
Eady Rd
Fisher Rd
Pulliam Rd
Rockwood Rd
Corda Rd
Kubler Rd
Weed Rd
New River
Ferrell Rd
Weed Rd
Clark Rd
Brockman Rd
Geeson Wash
Hammers Rd
Anza Rd
Westside Main Canal
Cook Rd
Mandrapa Rd
All American Canal
UNITED STATES OF AMERICA
MEXICO
98

115
115
115
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160
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117
117

Source: State of California Department of Conservation, 2008; Imperial County, 2010

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N W E S

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Alternative 2: Reduced Acreage (Avoid Prime Farmland)

Figure 8.0-1

Imperial County | Mount Signal Solar Farm and Calexico I and II Solar Farms | EIR

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Cultural Resources: No significant cultural resources have been identified on the solar energy field portion of the project sites, and therefore, no impact to historic or prehistoric resources would occur under this alternative. This alternative would still require the placement of the proposed OTF of BLM Lands, which has the potential to result in a direct impact to one significant cultural resource site. Additionally, the OTF on BLM Lands has the potential for impacts to paleontological resources. Compared to the proposed projects, this alternative would incur similar impacts to cultural and paleontological resources by virtue that the OTF component on BLM Lands would be the same as the proposed projects.

Geology and Soils: While the overall project footprint would be reduced under this alternative, 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 of 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. In this context and when compared to the proposed projects, this alternative would result in similar geological and soil impacts.

Greenhouse Gas Emissions: Under the Reduced Acreage Alternative (Avoid Prime Farmland), the projects' footprint would be reduced thereby contributing to reductions in GHG emissions during project construction. However, as a consequence of the reduced footprint, this alternative would result in a reduced power production capacity as compared to the project; hence, the overall benefits of the projects to global climate change through the creation of renewable energy would also be reduced. 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. Likewise and similar to the projects, this alternative would contribute to desirable benefits to reductions in global climate change through the production of renewable energy, although to a lesser degree when compared to the projects.

Hazards and Hazardous Materials: The Reduced Acreage Alternative (Avoid Prime Farmland) would have the potential for exposure of construction workers to hazardous materials based on the presence of hydrocarbon stains found throughout surface coils at CSF2. Therefore, development under this alternative would have a similar impact related to known hazards and hazardous materials within the study area as the proposed projects. Other hazards and hazardous materials-related impacts resulting from this alternative would be similar to those identified for the projects, including the potential for accidental discovery of undocumented hazardous materials and wildfire hazards during construction. Issues related to airport safety and the proximity of schools to the projects would be the same under this alternative as the projects with no significant impact is identified.

Hydrology/Water Quality: The 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. With implementation of the proposed mitigation measures, potential hydrology impacts under this alternative would be similar to those associated with the proposed projects. However, because the overall development footprint would be reduced under this alternative when compared to the proposed projects, this alternative would realize a minor reduction in the corresponding impacts to hydrology and on-site drainage. Water quality impacts under this alternative would require mitigation similar to that proposed for the projects. Impacts related to flooding and the placement of facilities within floodplains would be the same under this alternative as for the projects with no impact identified.

Land Use/Planning: The Reduced Acreage Alternative (Avoid Prime Farmland) would not avoid or reduce the significant land use compatibility impact associated with the proposed projects with respect to the Calexico International Airport. Similar to the proposed projects, the Reduced Acreage Alternative (Avoid Prime Farmland) would not divide an established community or result in incompatibilities with adjacent agricultural uses. Similar to the projects, the Reduced Acreage Alternative (Avoid Prime

Farmland) would require the issuance of a CUP to maintain consistency with the County's General Plan. Likewise, this alternative would require the placement of the OTF on BLM Lands. As proposed, these facilities would be constructed within BLM's Utility corridor "N," and this would be generally consistent with the CDCA. Based on these considerations, land use/planning impacts resulting from this alternative would be similar to those identified for the proposed projects.

Noise: As with the proposed projects, the 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. In this context, significant noise impacts as a result of this alternative would be similar to the proposed projects.

Public Services: The Reduced Acreage Alternative (Avoid Prime Farmland) would require increased public services to the sites, specifically in relation to law enforcement and fire protection services. While the overall footprint would be slightly less, the impacts of this alternative to public services and associated service ratios would be similar. Like the projects, this alternative would be conditioned to provide law enforcement and fire service fees. In this context, this alternative would result in a similar impact to public services when compared to the proposed projects.

Recreation: The Reduced Acreage Alternative (Avoid Prime Farmland) would not reduce or avoid impacts to recreation when compared to the projects. As provided in Chapter 4, no significant impact to recreation has been identified for the proposed projects given that no formal recreational opportunities exist within the study area. Although informal recreational opportunities would no longer exist, these impacts are considered less than significant, similar to the proposed projects.

Transportation/Traffic: This alternative would result in increased vehicle and truck trips within the study area similar to the projects. However, these increases are identified as less than significant for the projects. In this context, the Reduced Acreage Alternative (Avoid Prime Farmland) would not reduce or avoid an impact to transportation/traffic and would result in less than significant impacts similar to the proposed projects.

Utilities: The Reduced Acreage Alternative (Avoid Prime Farmland) would require water service and energy for the operation of the projects. While this alternative would reduce water consumption associated with operation of the project, it would also allow agricultural operations to continue for a portion of the site, which utilizes more water than solar farm activities. As a consequence, this alternative would have increased water demands when compared to the projects, but would continue to experience desirable benefits related to the reductions in agricultural water demands, similar the proposed projects.

Conclusion: Implementation of the 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/drainage. This alternative would not result in any greater environmental impacts when compared to the proposed projects.

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

The Reduced Acreage Alternative (Avoid Prime Farmland) would meet most of the basic objectives of the proposed project and should remain under consideration. However, this alternative would make it more difficult to achieve the overall objective of providing a total of 600 megawatts of renewable solar energy, as there would be less area available for the placement of PV structures.

8.3.3 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. Figure 8.0-2 depicts the configuration of this alternative. This alternative would reduce the size of the solar farm by approximately 825 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 four active Williamson Act Contracts within the project study area, which are illustrated in Figure 8.0-2. Agricultural Preserve 115 includes northern portions of CSF1(A)(Assessors Parcel Numbers (APN) 052-210-001 and 002). Agricultural Preserve 117 includes the southern portions of CSF1(B)(APNs 052-210-038 and 039). Agricultural Preserve 160 includes the southern portions of CSF2(B)(APNs 052-180-022, 050, and 052). Agricultural Preserve 159 includes northern-eastern portion of CSF2(A)(APN 059-110-007).

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 recent vote by the Board of Supervisors to discontinue funding for the program for 2012. This decision will essentially result in the non-renewal of all active Williamson Act contracts within the County starting January 1, 2012. Although, landowners have the option of filing a protest against non-renewal, this option only allows them to keep their Williamson Act value until there is less than six years remaining in the non-renewal phase-out. Beyond four years, current tax incentives would no longer apply. This issue is discussed further in the impact analysis.

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

Aesthetics: This alternative would reduce the overall size of the solar energy fields. However, the OTF would still be required, which would connect through the study area and ultimately to the Imperial Valley Substation located within BLM lands. Similar to the 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. Similar to the projects, this alternative would result in changes to the existing visual character of the study area; however, in the context of existing conditions, these changes would be less than significant. Similar to the projects, this alternative would result in the same potential glare impact associated with aircraft operations from the Calexico International Airport, and mitigation would be required. In this context, 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 the Reduced Acreage Alternative (Avoid Williamson Act Land), a majority of the study area that contains 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 agricultural lands and avoid impacts to Williamson Act contracted lands. However, these reductions would be insufficient in removing the remaining portions of the study area that 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 study area following site restoration. Nevertheless, by virtue that this alternative reduces the amount of important farmland impacted by the projects, this

alternative would result in reduced impacts to agricultural resources when compared to the proposed projects.

Air Quality: Under the Reduced Acreage Alternative (Avoid Williamson Act Land), air emissions due to project construction would be less than the proposed projects as a result of the reduced land area subject to grading and construction activities. Because less overall development would occur, this alternative would result in fewer air quality emissions compared to the proposed projects, although the same mitigation measures would be required. 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 projects, thereby reducing the project's ability to provide a long-term source of renewable energy. Therefore, while this alternative would result in less of an impact to air quality, it would likely provide less in terms of the desirable benefits to overall regional air quality as attributable to the proposed projects.

Biological Resources: Under the Reduced Acreage Alternative (Avoid Williamson Act Land), potential direct and indirect impacts to several of the burrowing owls locations identified on the project sites and within adjacent drainage canals, especially along Rockwood 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. The biological impacts associated with the OTF on BLM lands would continue to be the same as the proposed projects. Impacts to wetlands, migratory corridors, and other wildlife and associated habitats would be similar to that described for the projects. As such, this alternative would result in a reduction in impacts to biological resources, but would still require mitigation.

Cultural Resources: No significant cultural resources have been identified on the solar energy field portion of the project sites, and therefore, no impacts to historic and prehistoric resources would be associated with this component of the projects. Similar to the projects, this alternative would require the placement of the OTF on BLM Lands, which carries the potential to result direct impacts to one significant cultural resource site. Additionally, the OTF on BLM Lands has the potential to impact paleontological resources. In this context and when compared to the proposed projects, this alternative would result in similar impacts to cultural and paleontological resources as the proposed projects.

Geology and Soils: While the overall project footprint would be reduced under this alternative, grading and construction of new facilities such as 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 projects. Likewise, this alternative would require on-site wastewater facilities which could be constructed on poorly suited soils. For these reasons, 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 the Reduced Acreage Alternative (Avoid Williamson Act Land), the projects' footprint would be reduced thereby contributing to reductions in GHG emissions during project construction. However, as a consequence of the reduced footprint, this alternative would result in a reduced power production capacity as compared to the project; hence, the overall benefits of the projects to global climate change through the creation of renewable energy would also be reduced. 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. Likewise and similar to the projects, this alternative would contribute to desirable benefits to reductions in global climate change through the production of renewable energy, although to a lesser degree when compared to the projects.

Mount Signal Solar Farm 1 - MSSF1 (1431 Acres)
Calexico Solar Farm 1 Phase A - CSF1(A) (474 Acres)
Calexico Solar Farm 1 Phase B - CSF1(B) (369 Acres)
Calexico Solar Farm 2 Phase A - CSF2(A) (780 Acres)
Calexico Solar Farm 2 Phase B - CSF2(B) (345 Acres)
Proposed Off-site Transmission Facilities (OTF) - Private Land (120 ft ROW)
National Border

Active Burrowing Owl Burrow

Williamson Act (2010)
115
117
159
160

FMMP Designations (2008)
Farmland of Local Importance
Farmland of Statewide Importance
Not Mapped
Other Land
Prime Farmland
Unique Farmland
Urban and Built-up Land
Water

Central Main Canal
La Brucherie Rd
Willoughby Rd
Corda Rd
Rockwood Rd
Pulliam
Kubler Rd
Weed Rd
New River
Ferrell Rd
Weed Rd
Clark Rd
Geeson Wash
Brockman Rd
Hammers Rd
Anza Rd
Pulliam Rd
Westside Main Canal
Mandrapa Rd
UNITED STATES OF AMERICA
MEXICO
All American Canal
98

Source: State of California Department of Conservation, 2008; Imperial County, 2010

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Alternative 3: Reduced Acreage (Avoid Williamson Act Land)

Figure 8.0-2

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Hazards and Hazardous Materials: The Reduced Acreage Alternative (Avoid Williamson Act Land) could also result in the potential for exposure of construction workers to hazardous materials based on the presence of hydrocarbon stains found throughout surface coils at CSF2. Therefore, development under this alternative would have a similar impact related to known hazards and hazardous materials within the study area as the proposed projects. Other hazards and hazardous materials-related impacts resulting from this alternative would be similar to those identified for the projects, including the potential for accidental discovery of undocumented hazardous materials and wildfire hazards during construction. Issues related to airport safety and the proximity of schools to the projects would be the same under this alternative as the projects with no significant impact is identified.

Hydrology/Water Quality: The 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. With implementation of the proposed mitigation measures, potential hydrology impacts under this alternative would be similar to those associated with the proposed projects. However, because the overall development footprint would be reduced under this alternative when compared to the proposed projects, this alternative would realize a minor reduction in the corresponding impacts to hydrology and on-site drainage. Water quality impacts under this alternative would require mitigation similar to that proposed for the projects. Impacts related to flooding and the placement of facilities within floodplains would be the same under this alternative as for the projects with no impact identified.

Land Use/Planning: The Reduced Acreage Alternative (Avoid Williamson Act Land) would not avoid or reduce the significant land use compatibility impact associated with the proposed projects with respect to the Calexico International Airport and would require corresponding mitigation. Similar to the proposed projects, the Reduced Acreage Alternative (Avoid Williamson Act Land) would not divide an established community or result in incompatibilities with adjacent agricultural uses. Similar to the projects, the Reduced Acreage Alternative (Avoid Prime Farmland) would require the issuance of a CUP to maintain consistency with the County's General Plan. Likewise, this alternative would require the placement of the OTF on BLM Lands. As proposed, these facilities would be constructed within BLM's Utility Corridor "N," and this would be generally consistent with the CDCA. Based on these considerations, land use/planning impacts resulting from this alternative would be similar to those identified for the proposed projects.

Noise: As with the proposed projects, the Reduced Acreage Alternative (Avoid Williamson Act Land) would result in significant, but mitigable noise impacts associated with construction activities. With the operation and placement of facilities to the projects, operational noise impact under this alternative could still occur and would require supporting mitigation. Compared to the proposed projects, this alternative would not reduce any potentially significant impacts to noise nor eliminate the need to incorporate mitigation measures. Hence, operational and construction-related noise impacts under this alternative would be similar to the proposed projects.

Public Services: The Reduced Acreage Alternative (Avoid Williamson Act Land) would require increased public services to the site, specifically, law enforcement and fire protection services. While the overall footprint would be less, the impact to public services would be similar, and the 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.

Recreation: The Reduced Acreage Alternative (Avoid Williamson Act Land) would not reduce or avoid an impact to recreation that is otherwise identified for the projects. Similar to the projects, this alternative would result in as no significant impact to recreation.

Transportation/Traffic: The 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 this projects, this findings would also be applicable to this alternative.

Utilities: The Reduced Acreage Alternative (Avoid Williamson Act Land) would require water service and energy for the operation of the projects. While this alternative would reduce water consumption similar to reductions identified for the projects, it would also allow agricultural operations to continue for a portion of the site, which utilizes more water than solar farm activities. In this context, although this alternative would result in reductions in water use, these reductions would be less as compared to the proposed projects.

Conclusion: Implementation of the Reduced Acreage Alternative (Avoid Williamson Act Land) would result in reduced impacts for the following environmental issues areas as compared to the proposed project: agriculture, air quality, biological resources, greenhouse gas emissions (construction phase only), and hydrology/water quality.

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

The 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 600 megawatts of renewable solar energy, as there would be less area available for the placement of PV structures.

8.3.4 Alternative 4: Reduced CSF2(A)

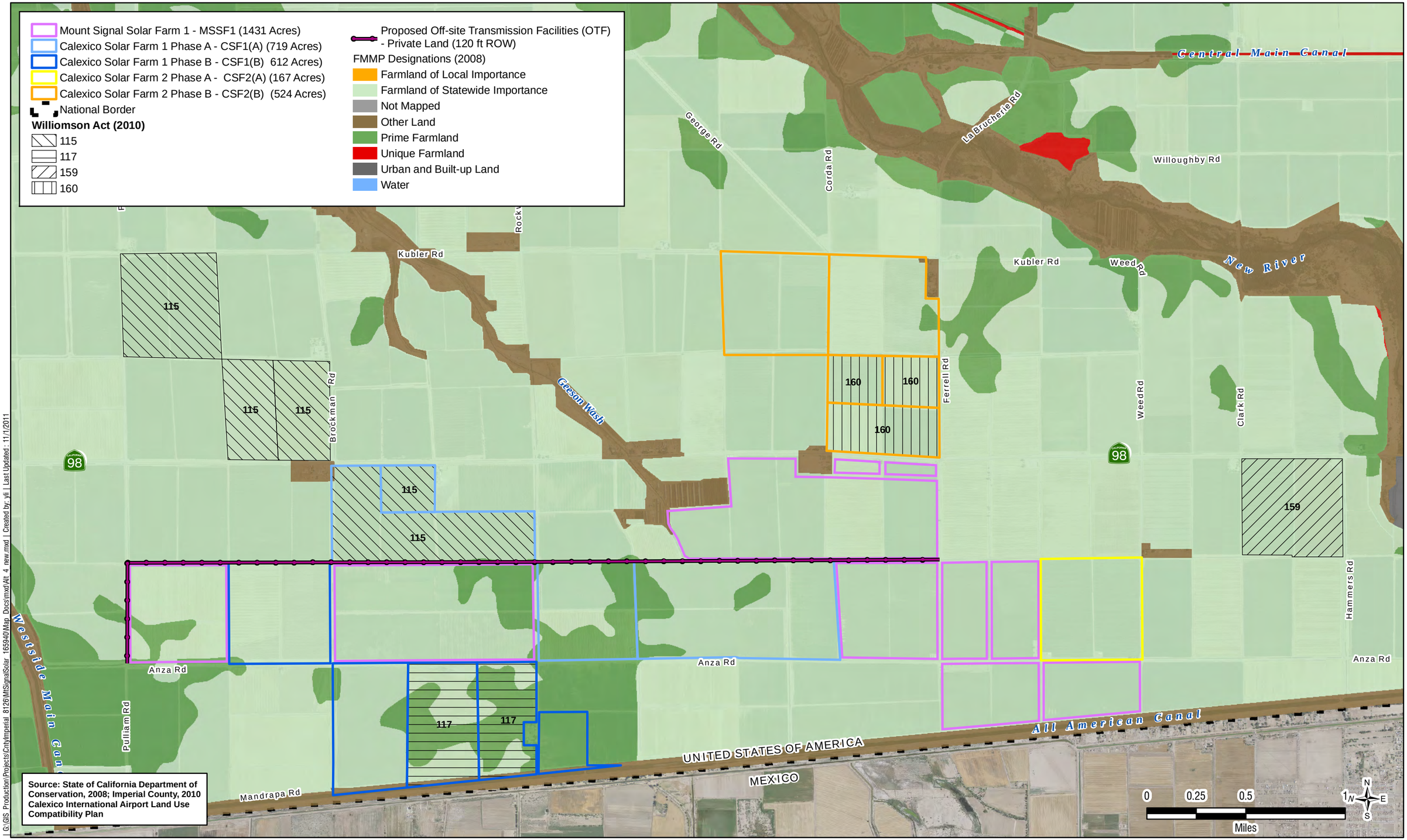
The purpose of this alternative would be to reduce the project size to provide a buffer between the eastern project boundary and the Calexico International Airport further east, reducing the potential for glare impacts to aircraft. Figure 8.0-3 depicts the boundaries of this alternative. This alternative would be approximately 773 acres less in size than the proposed projects.

Environmental Impact of Reduced CSF2(A) Alternative

Aesthetics: This alternative would reduce the overall size of the solar energy fields. However, the OTF would still be required, which would connect through the study area and ultimately to the Imperial Valley Substation located within BLM lands. Similar to the projects, this alternative would not result in significant impacts to scenic vista or highways. Likewise, similar to the projects, this alternative would result in changes to the existing visual character of the study area; however, in the context of existing conditions, these changes would be less than significant. Based on these circumstances, this alternative would result in similar impacts to visual resources and aesthetics, but these impacts would be less than significant.

This alternative does have the ability to reduce, or avoid the potential for the creation of glare to aircraft associated with these aircraft utilizing the Calexico International Airport, especially in relations to takeoffs and landing from the west. Under this alternative, the proposed solar arrays would be located at an increased distance from Calexico International Airport and well beyond the airport safety zones indentified in the ALUCP. However, it should be noted that no significant impact associated with this issue has been identified based on glare studies conducted for the projects. Nevertheless, the County Airport Land Use Commission would need to review the projects and render a consistency determination with respect to the compatibility of the projects with operations at Calexico International Airport. This evaluation would include a review of potential issues such as glare. In this context, no significant impact associated with glare has been identified and, therefore, this alternative would neither reduce or avoid an impact related to this issue. In conclusion, this alternative would result in similar aesthetic impacts when compared to the proposed project, but may be capable of further minimize glare impacts to airport operations.

Agriculture: Under the CSF2(A) Alternative, a majority of the study area that contains Prime farmlands and land under Williamson Act Contracts would continue to be used for active agricultural uses. A less than significant impact with mitigation incorporated as a result of the projects has been identified to agricultural resources. However, compared to the proposed projects, this alternative would reduce the significant impact associated with the conversion of Prime agricultural lands.



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Alternative 4: Reduced CSF2(A)

Figure 8.0-3

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Air Quality: Under the CSF2(A) Alternative, air emissions due to project construction or operation would be less than the proposed projects. A less than significant impact with mitigation incorporated has been identified associated with the proposed project during construction. Because less overall development would occur, this alternative would result in less air quality emissions compared to the proposed projects, although the same mitigation measures would be required. 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 projects, reducing the ability to provide for the long-term need for renewable energy. Therefore, while the CSF2(A) Alternative would result in less of an impact to air quality, it would entail less benefit to overall regional air quality when compared to the proposed projects.

Biological Resources: Under the CSF2(A) Alternative potential indirect impacts to many of the burrowing owls locations identified within adjacent drainage canals, especially along Rockwood 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 likely be less. The biological impacts associated with the OTF component on BLM lands would be the same as the proposed projects. As such, this alternative would result in less of an impact to biological resources, but would still require the incorporation of mitigation.

Cultural Resources: No significant cultural resources have been identified on the solar energy field portion of the project sites, and therefore, no impact to historic or prehistoric resources is associated with this component of the project would result. The proposed OTF on BLM Lands has the potential to result in a direct impact to one significant cultural resource site. Additionally, the OTF on BLM Lands has the potential to impact paleontological resources. Compared to the proposed projects, this alternative would have a similar impact to cultural and paleontological resources as the proposed projects as the OTF component would be the same as the proposed projects.

Geology and Soils: While the overall project footprint would be reduced under this alternative, grading and construction of new facilities such as operations and maintenance buildings would still occur. Therefore, there would still be an impact related to seismic or liquefaction hazards, unstable or expansive soils, or suitability of soils for supporting septic tanks. Less than significant impacts were identified for the proposed project with incorporation of mitigation measures, which would apply to this alternative as well. Compared to the proposed project, this alternative would have a similar impact to geology and soils.

Greenhouse Gas Emissions: Under the CSF2(A) Alternative there would be greenhouse gas (GHG) emissions due to project construction or operation; however, less than the project because a smaller footprint would be developed. The proposed projects identified a less than significant impact related to GHG emissions after mitigation during construction and overall beneficial impacts to global climate change as the result of creation of renewable energy. This alternative would create less GHG emissions, and would also provide a long-term beneficial impact to global climate change, although to a lesser degree than the projects.

Hazards and Hazardous Materials: The CSF2(A) Alternative would have the potential for exposure to hazardous materials to occur to workers as a result of hydrocarbon stains found throughout surface coils at CSF2. Therefore, development under this alternative would have a similar impact related to hazards and hazardous materials as the proposed projects. All other impacts, including those related to the discovery of undocumented hazards during construction, would be the same as the projects.

Hydrology/Water Quality: The CSF2(A) 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, although to a lesser degree than the proposed projects. With implementation of the proposed mitigation measures, potential hydrology impacts under this alternative would be similar to those associated with the proposed projects. However, because the overall development footprint would be reduced under this alternative when compared to the proposed projects, this alternative would realize a minor reduction in

the corresponding impacts to hydrology and on-site drainage. Water quality impacts under this alternative would require mitigation similar to that proposed for the projects. Impacts related to flooding and the placement of facilities within floodplains would be the same under this alternative as for the projects with no impact identified.

Land Use/Planning: The CSF2(A) Alternative would avoid or reduce the significant land use compatibility impact associated with the proposed projects with respect to the Calexico International Airport. Similar to the proposed projects, this alternative would not divide an established community or result in incompatibilities with adjacent agricultural uses. Similar to the projects, this alternative would require the issuance of a CUP to maintain consistency with the County's General Plan. Likewise, this alternative would require the placement of the OTF on BLM Lands. As proposed, these facilities would be constructed within BLM's Utility Corridor "N," and this would be generally consistent with the CDCA. Based on these considerations and with the exception of compatibility with the Calexico ALUCP, land use/planning impacts resulting from this alternative would be similar to those identified for the proposed projects.

Noise: Similar to the proposed projects, the CSF2(A) Alternative would result in significant, but mitigable noise impacts associated with construction activities. Compared to the proposed project, this alternative would not reduce any potentially significant impacts to noise nor eliminate the need to incorporate mitigation measures. The noise impact would be similar to the proposed projects.

Public Services: The CSF2(A) Alternative would require increased public services to the project sites, specifically, law enforcement and fire protection services. While the overall footprint would be less, the impact to public services would be similar, and the 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.

Recreation: The CSF2(A) Alternative would not reduce or avoid an impact to recreation as no significant impact to recreation associated with the proposed projects has been identified.

Transportation/Traffic: The CSF2(A) Alternative would not reduce or avoid an impact to transportation/traffic as no significant impact to this issue area associated with the proposed projects has been identified.

Utilities: The CSF2(A) Alternative would require water service and energy for the operation of the project. While this alternative would reduce water consumption associated with operation of the projects, it would also allow agricultural operations to continue for a portion of the site, which utilizes more water than solar farm activities. This alternative would result in a similar impact to utilities as compared to the proposed projects; although, benefits in terms of reductions in water demands would be slightly less.

Conclusion: Implementation of the CSF2(A) Alternative would result in reduced impacts for the following environmental issues areas as compared to the proposed projects: aesthetics, agriculture, air quality, biological resources, greenhouse gas emissions (construction phase only), hazards and hazardous materials, and hydrology/water quality.

Comparison of the CSF2(A) Alternative to Project Objectives

The CSF2(A) Alternative would meet most of the basic objectives of the proposed project and should remain under consideration. However, this alternative would make it more difficult to achieve the overall objective of providing a total of 600 megawatts of renewable solar energy, as there would be less area available for the placement of PV structures.

8.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 8.4-1 provides a qualitative comparison of the impacts for each alternative compared to the proposed project. 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 project. 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 CSF2(A) as it would reduce impacts to aesthetics, agriculture, air quality, biological resources, greenhouse gas emissions (construction phase only), hazards and hazardous materials, and hydrology/water quality as compared to the proposed projects. The Reduced CSF2(A) Alternative would also continue to realize many of the desirable benefits that are attributable to the proposed projects in terms of providing a new source of renewable energy consistent with the goals of AB 32 and contributing to reductions in water demands within the Imperial Valley.

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 Reduced CSF2(A)
Aesthetics	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Less than significant Comparison to Project: Similar impact	CEQA Significance: Less than significant Comparison to Project: Similar impact	CEQA Significance: Less than significant Comparison to Project: Similar impact
Agriculture	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact
Air Quality	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less 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 Reduced CSF2(A)
Biological Resources	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact
Cultural Resources	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level of significance Comparison to Project: Similar impact	CEQA Significance: Mitigated to below a level of significance Comparison to Project: Similar impact	CEQA Significance: Mitigated to below a level of significance Comparison to Project: Similar impact
Geology and Soils	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Similar impact
Greenhouse Gas Emissions	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: 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 Project: 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 Project: Less impact during construction. Would not achieve GHG emission reductions to the extent of the proposed project as less renewable energy would be produced

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 Reduced CSF2(A)
Hazards and Hazardous Materials	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact
Hydrology/ Water Quality	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact
Land Use/Planning	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Less impact
Noise	Mitigated to below a level less than significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Similar impact	CEQA Significance: Mitigated to below a level less than significant Comparison to Project: Similar impact
Public Services	Less than Significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Less than significant Comparison to Project: Similar Impact	CEQA Significance: Less than significant Comparison to Project: Similar Impact	CEQA Significance: Less than significant Comparison to Project: 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 Reduced CSF2(A)
Recreation	Less than Significant	CEQA Significance: No impact Comparison to Project: Less impact	CEQA Significance: Less than significant Comparison to Project: Similar Impact	CEQA Significance: Less than significant Comparison to Project: Similar Impact	CEQA Significance: Less than significant Comparison to Project: Similar Impact
Transportation/ Traffic	Less than significant	CEQA Significance: No impact Comparison to Project: Similar	CEQA Significance: Less than significant Comparison to Project: Similar Impact	CEQA Significance: Less than significant Comparison to Project: Similar Impact	CEQA Significance: Less than significant Comparison to Project: Similar Impact
Utilities	Less than Significant	CEQA Significance: No impact Comparison to Project: Greater impact (water use)	CEQA Significance: Less than significant Comparison to Project: Similar Impact	CEQA Significance: Less than significant Comparison to Project: Similar Impact	CEQA Significance: Less than significant Comparison to Project: Similar Impact