Imperial County Planning & Development Services Department

NOTICE OF PREPARATION OF DRAFT EIR FOR MOUNT SIGNAL SOLAR FARM, AND
CALEXICO I AND II SOLAR FARMS AND
NOTICE OF PUBLIC EIR SCOPING MEETING

The Imperial County Planning & Development Services Department intends to prepare an Environmental Impact Report (EIR) for the proposed Mount Signal Solar Farm (the "Mount Signal Solar Farm Project"), Calexico I and II (the "Calexico Solar Farm Projects") as described below. A public scoping meeting for the proposed EIR will be held by the Imperial County Planning & Development Services Department on July 28, 2011 at 6:00PM. The scoping meeting will be held at the Board of Supervisors Chambers, 2nd Floor, County Administration Center located at 940 Main Street, El Centro, CA 92243. Comments regarding the scope of the EIR will be accepted at this meeting.

SUBJECT: Mount Signal Solar Farm, and Calexico I and II EIR

BOARD OF SUPERVISORS APPROVAL: To Be Determined.

PROJECT LOCATION: The proposed Mount Signal Solar Farm Project and the Calexico Solar Farm Projects are located on privately owned, undeveloped agricultural land encompassing approximately 4,228-acres of land, six miles west of the City of Calexico, California in southern Imperial County. The two projects are generally located between Kubler Road to the north and the US-Mexico border to the south, and between Pulliam Road to the west and Hammers Road to the east.

PROJECT DESCRIPTION: The proposed Mount Signal Solar Farm Project and the Calexico Solar Farm Project involves the construction of a three component Photo Voltaic (PV) solar facilities, composed of three contiguous but independent sites, which would include solar PV panels, inverter modules, a pad mounted transformer, and an onsite substation. Each Project site will have its own O&M building and onsite substation(s).

Mount Signal Solar Farm I: The solar array field will encompass a total of 1,431 acres on ten parcels of land, as shown on Figure 1. This particular project site is anticipated to generate up to 200 megawatts (MW) of energy. The project site includes the following Assessor Parcel Numbers (APNs): 052-210-013; 052-210-016; 052-210-034; 052-210-035; 052-210-036; 059-130-001; 059 130-002; 059-130-005; and 052-190-012. The project site would connect to a shared 230 kilovolt (kV) overhead transmission line which may be shared with one or more neighboring solar project(s).

Calexico Solar Farm I: The solar array field will encompass a total of 1.332 acres within the nine parcels of land identified on Figure 1. This particular project site will be developed in two phases: Phase A and Phase B, each applying for its own Conditional Use Permit (CUP), and each intended to generate up to 100 MW; however, each phase may produce up to 200 MW (total for both phases combined will not exceed 200 MW). Each phase is intended have its own operations and maintenance (O&M) building and onsite substation. The project site includes the following APNs: 052-210-001; 052-210-002; 052-210-015 (Phase A); 052-190-011; 052-210-014; 052-210-037; 052-210-038; 052-210-039; 052-210-018 (Phase B). The project site would connect to a shared 230 kV overhead transmission line with one or more neighboring solar project(s).

Calexico Solar Farm II: The solar array field will encompass a total of 1,465 acres within the ten parcels of land identified on Figure 1. This particular project site will be developed in two phases: Phase A and Phase B, each applying for its own Conditional Use Permit (CUP), and each intended to generate up to 100 MW; however, each phase may produce up to 200 MW (total for both phases combined will not exceed 200 MW). Each phase is intended have its own O&M building and onsite substation. The project site includes the following APNs: 059-110-006; 059-110-008; 059-130-003; 059-110-007; (Phase A); 052-180-044; 052-180-022; 052-180-051; and 052-180-051 (Phase B). The project site would connect to a shared 230 kV overhead transmission line with one or more neighboring solar project(s).

URBAN AREA PLAN: None, located in unincorporated area of County of Imperial

BOARD OF SUPERVISORS DISTRICT: District 2, Supervisor Jack Terrazas

ANTICIPATED SIGNIFICANT EFFECTS: The EIR will analyze potential impacts associated with the following: Aesthetics; Agricultural Resources; Air Quality; Biological Resources; Cultural Resources; Cumulative Impacts; Geology/Soils; Greenhouse Gas Emissions/Climate Change; Growth-inducing Impacts; Hazards/Hazardous Materials; Hydrology and Water Quality; Land Use and Recreation; Public Services; Transportation/Circulation; and Utilities and Service Systems including water supply and energy.

COMMENTS REQUESTED: The Imperial County Planning & Development Services Department would like to know your ideas about the effects this project might have on the environment and your suggestions as to mitigation or ways the project may be revised to reduce or avoid any significant environmental impacts. Your comments will guide the scope and content of environmental issues to be examined in the EIR. Your comments may be submitted in writing to: Angelina Havens, Imperial County Planning & Development Services Department, 801 Main Street, El Centro, CA 92243. Available project information may be reviewed at this location.

NOTICE OF PREPARATION REVIEW PERIOD: July 25, 2011 through August 26, 2011

Initial Study and NOP For:

Mount Signal Solar Farm and Calexico Solar Farms:

Mount Signal Farm I	CUP 10-0031
Calexico Solar Farm I (Phase A)	CUP 11-0009
Calexico Solar Farm I (Phase B)	CUP 11-0010
Calexico Solar Farm II (Phase A)	CUP 11-0011
Calexico Solar Farm II (Phase B)	CUP 11-0012



Prepared By:

HDR Engineering, Inc. 8690 Balboa Avenue, Suite 200 San Diego, CA 92123

and reviewed by

COUNTY OF IMPERIAL

Planning & Development Services Department

801 Main Street El Centro, CA 92243 (760) 482-4236 www.icpds.com

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SECTION 1 INTRODUCTION

A. PURPOSE

This document is a \square policy-level; \boxtimes project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Mount Signal Solar Farm.

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's Guidelines for Implementing CEQA, an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of longterm environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

According to Section 15070(a), a Negative Declaration is deemed appropriate if the proposal would result in any significant effect on the environment.	ton t
According to Section 15070(b), a Mitigated Negative Declaration is deemed appropriate if it is determ that though a proposal could result in a significant effect, mitigation measures are available to reduce the significant effects to insignificant levels.	

This Initial Study has determined that the proposed applications will result in potentially significant environmental impacts and therefore, an Environmental Impact Report is deemed as the appropriate document to provide necessary environmental evaluations and clearance for the proposed project.

This Initial Study and Notice of Preparation are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial <u>Guidelines for Implementing CEQA</u>, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY AND NOTICE OF PREPARATION

This Initial Study and Notice of Preparation are informational documents which are intended to inform County of Imperial decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study and Notice of Preparation, prepared for the project will be circulated for a period of 30 days for public and agency review and comments.

D. CONTENTS OF INITIAL STUDY & NOTICE OF PREPARATION

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed applications.

SECTION 1

I. INTRODUCTION presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a significant impact, potentially significant impact, or no impact.

PROJECT SUMMARY, LOCATION AND ENVIRONMENTAL SETTINGS describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

SECTION 3

III. MANDATORY FINDINGS presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

- 1. **No Impact:** A "No Impact" response is adequately supported if the impact simply does not apply to the proposed applications.
- 2. **Less Than Significant Impact**: The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.
- 3. Less Than Significant With Mitigation Incorporated: This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact".
- 4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study will be conducted under a \square policy-level, \boxtimes project level analysis.

Regarding mitigation measures, it is not the intent of this document to "overlap" or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County's jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

1. <u>Tiered Documents</u>

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. Tiering is defined as follows:

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

"Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

Further, Section 15152(d) of the CEQA Guidelines states:

"Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

- (1) Were not examined as significant effects on the environment in the prior EIR; or
- (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation By Reference

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]).

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR is available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (760) 482-4236.
- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (760) 482-4236.
- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.
- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the 'County of Imperial General Plan EIR is SCH #93011023.
- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]).

SECTION II. ENVIRONMENTAL CHECKLIST

- Project Title: Mount Signal Solar Farm and Calexico Solar Farms EIR
- 2. **Lead Agency**: Imperial County Planning & Development Services Department
- Contact person and phone number: Angelina Havens, Planner III, (760) 482-4236, ext. 4984
- 4. Address: 801 Main Street, El Centro CA, 92243
- 5. **E-mail**: angelinahavens@co.imperial.ca.us
- 6. **Project location**: The proposed Mount Signal Solar Farm Project and the Calexico Solar Farm Projects (collectively, the "Projects") are located on privately owned, undeveloped agricultural land encompassing approximately 4,228-acres of land, six miles west of the City of Calexico, California in southern Imperial County. The Projects are generally located between Kubler Road to the north and the US-Mexico border to the south, and between Pulliam Road to the west and Hammers Road to the east.
- 7. **Project sponsor's name and address**: 82LV 8ME, LLC, 88FT 8ME, LLC, 89MA 8ME, LLC, 10100 Santa Monica Blvd, Suite 300, Los Angeles, CA 90067
- 8. General Plan designation: Agriculture
- 9. **Zoning**: A-2 (General Agriculture), A-2-R (General Agricultural Rural Zone), A-3 (Heavy Agriculture)
- 10. **Description of project**: The proposed Mount Signal Solar Farm Project and the Calexico Solar Farm Projects involve the construction of a three Photo Voltaic (PV) solar facilities, composed of three contiguous but independent sites, which would include solar PV panels, inverter modules, pad mounted transformers, and an on-site substation(s). Each Project site will have its own O&M building and onsite substation(s).

Mount Signal Solar Farm I: The solar array field will encompass a total of 1,431 acres on ten parcels of land, as shown on Figure 1. This particular project site is anticipated to generate up to 200 megawatts (MW) of energy. The project site includes the following Assessor Parcel Numbers (APNs): 052-210-013; 052-210-016; 052-210-034; 052-210-035; 052-210-036; 059-130-001; 059-130-002; 059-130-004; 059-130-005; and 052-190-012. The project site would connect to a shared 230 kilovolt (kV) overhead transmission line which may be shared with one or more neighboring solar project(s).

Calexico Solar Farm I: The solar array field will encompass a total of 1,332 acres within the nine parcels of land identified on Figure 1. This particular project site will be developed in two phases: Phase A and Phase B, each applying for its own Conditional Use Permit (CUP), and each intended to generate up to 100 MW; however, each phase may produce up to 200 MW (total for both phases combined will not exceed 200 MW). Each phase is intended have its own operations and maintenance (O&M) building and onsite substation. The project site includes the following APNs: 052-210-001; 052-210-002; 052-210-015 (Phase A); 052-190-011; 052-210-014; 052-210-037; 052-210-038; 052-210-039; 052-210-018 (Phase B). The project site would connect to a shared 230 kV overhead transmission line with one or more neighboring solar project(s).

Calexico Solar Farm II: The solar array field will encompass a total of 1,465 acres within the ten parcels of land identified on Figure 1. This particular project site will be developed in two phases: Phase A and Phase B, each applying for its own Conditional Use Permit (CUP), and each intended to generate up to 100 MW; however, each phase may produce up to 200 MW (total for both phases combined will not exceed 200 MW). Each phase is intended

have its own O&M building and onsite substation. The project site includes the following APNs: 059-110-006; 059-110-008; 059-130-003; 059-110-003; 059-110-007; (Phase A); 052-180-043; 052-180-044; 052-180-022; 052-180-050; and 052-180-051 (Phase B). The project site would connect to a shared 230 kV overhead transmission line with one or more neighboring solar project(s)

11. **Surrounding land uses and setting**: Briefly describe the project's surroundings:

The project site is adjacent to agricultural land to the north, south, east and west with the US-Mexico border is located directly to the south.

- 12. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):
 - Bureau of Land Management Authorization of Right-of-Way Grant
 - Caltrans Encroachment Permit
 - Imperial Irrigation District Right of Way Permit

	E	NVIR	ONMENTAL FACTO	ors po	TENT	IALLY AFFECTED:
	environmental factors che s a "Potentially Significar		•	,		ed by this project, involving at least one impact on the following pages.
\boxtimes	Aesthetics	\boxtimes	Agriculture and Forestry Resources	1	\boxtimes	Air Quality
\boxtimes	Biological Resources	\boxtimes	Cultural Resources		\boxtimes	Geology /Soils
\boxtimes	Greenhouse Gas Emissions	\boxtimes	Hazards & Hazardous M	/laterials	\boxtimes	Hydrology / Water Quality
\boxtimes	Land Use / Planning		Mineral Resources			Noise
	Population / Housing	\boxtimes	Public Services		\boxtimes	Recreation
	Transportation/Traffic	\boxtimes	Utilities / Service System	ms		Mandatory Findings of Significance
						TEE (EEC) DETERMINATION
	Review of the Initial Stud	•				
	-ound that the proposed <u>LARATION</u> will be prepai		ct could not hav	ve a sigi	nificar	nt effect on the environment, and a <u>NEGATIVE</u>
signif		beca	ause revisions in the	e projec	ct hav	nt effect on the environment, there will not be a re been made by or agreed to by the projected.
	Found that the proposed NCT REPORT is required		ct MAY have a sign	ificant e	ffect o	on the environment, and an <u>ENVIRONMENTAL</u>
mitigation	ated" impact on the enviruant to applicable legal	onme standa ched	nt, but at least one e ards, and 2) has be sheets. An ENVIROI	effect 1) i en addr	has bo	ificant impact" or "potentially significant unless een adequately analyzed in an earlier documen If by mitigation measures based on the earlie PACT REPORT is required, but it must analyze
poter pursu DEC	ntially significant effects uant to applicable standa	(a) ha rds, a	ave been analyzed a nd (b) have been av	adequat oided o	ely in r mitig	ificant effect on the environment, because al an earlier EIR or NEGATIVE DECLARATION gated pursuant to that earlier EIR or NEGATIVE e imposed upon the proposed project, nothing
CALI	FORNIA DEPARTMENT	OF F	ISH AND GAME DE	MINIMI	S IMF	PACT FINDING: Yes No
	EEC VOTES PUBLIC WORKS ENVIRONMENTA OFFICE EMERGI APCD AG SHERIFF DEPAR ICPDS	ENCY	SERVICES [ABSENT

Date:

Armando G. Villa, Director of Planning/EEC Chairman

PROJECT SUMMARY

A. Project Location:

The Mount Signal Solar Farm Project and the Calexico Solar Farm Projects are located on privately owned, undeveloped agricultural land encompassing 4,228-acres approximately six miles west of Calexico, California in southern Imperial County. The project includes three facilities: Mount Signal Solar Farm I, Calexico Solar Farm I and Calexico Solar Farm II.

Mount Signal Solar Farm I: The Mount Signal Solar I site consists of ten parcels totaling approximately 1,431-acres. As shown on Figure 1, the project site is generally located between State Route (SR) 98 to the north and the US-Mexico border to the south, and between Pulliam Road to the west and Weed Road to the east. Primary access to the project site can be obtained via SR-98 and Ferrell Road. The project site includes the following Assessor Parcel Numbers (APNs): 052-210-013; 052-210-016; 052-210-034; 052-210-035; 052-210-036; 059-130-001; 059-130-002; 059-130-004; 059-130-005; and 052-190-012.

Calexico Solar Farm I: The Calexico Solar Farm I project site consists of nine parcels totaling 1,332-acres. As shown on Figure 1, the project site is generally located between State Route (SR) 98 to the north and the US-Mexico border to the south, and between a private road to the west (just east of Pulliam Road) and a private road to the east (just west of Ferrell Road). Agricultural lands lie to the immediate north, south, east, and west of the project site, with the exception of isolated residential and/or commercial structures. Primary access to both phases of the project site can be obtained via SR-98 and Brockman Road. The project site includes the following APNs: 052-210-001; 052-210-002; 052-210-014; 052-210-015 (Phase A); 052-190-011; 052-210-037; 052-210-038; 052-210-039; 052-210-018 (Phase B).

Calexico Solar Farm II: The Calexico Solar Farm II project site consists of ten parcels totaling 1,465-acres. As shown on Figure 1, the project site is generally located between Kubler Road to the north and the US-Mexico border to the south, and between Hammers Road to the east and a private road to the west (just west of Corda Road). Agricultural lands lie to the immediate north, south, east, and west of the project site, with the exception of isolated residential and/or commercial structures and a small crop duster airstrip that transects a portion of Calexico Solar Farm-II Phases A and B. Primary access is via SR-98 and Weed Road for Phase A, and via SR-98 and Ferrell Road for Phase B. The project site includes the following APNs: 059-110-006; 059-110-008; 059-130-003; 059-110-003; 059-110-007; (Phase A); 052-180-044; 052-180-022; 052-180-050; and 052-180-051 (Phase B).

B. Project Summary:

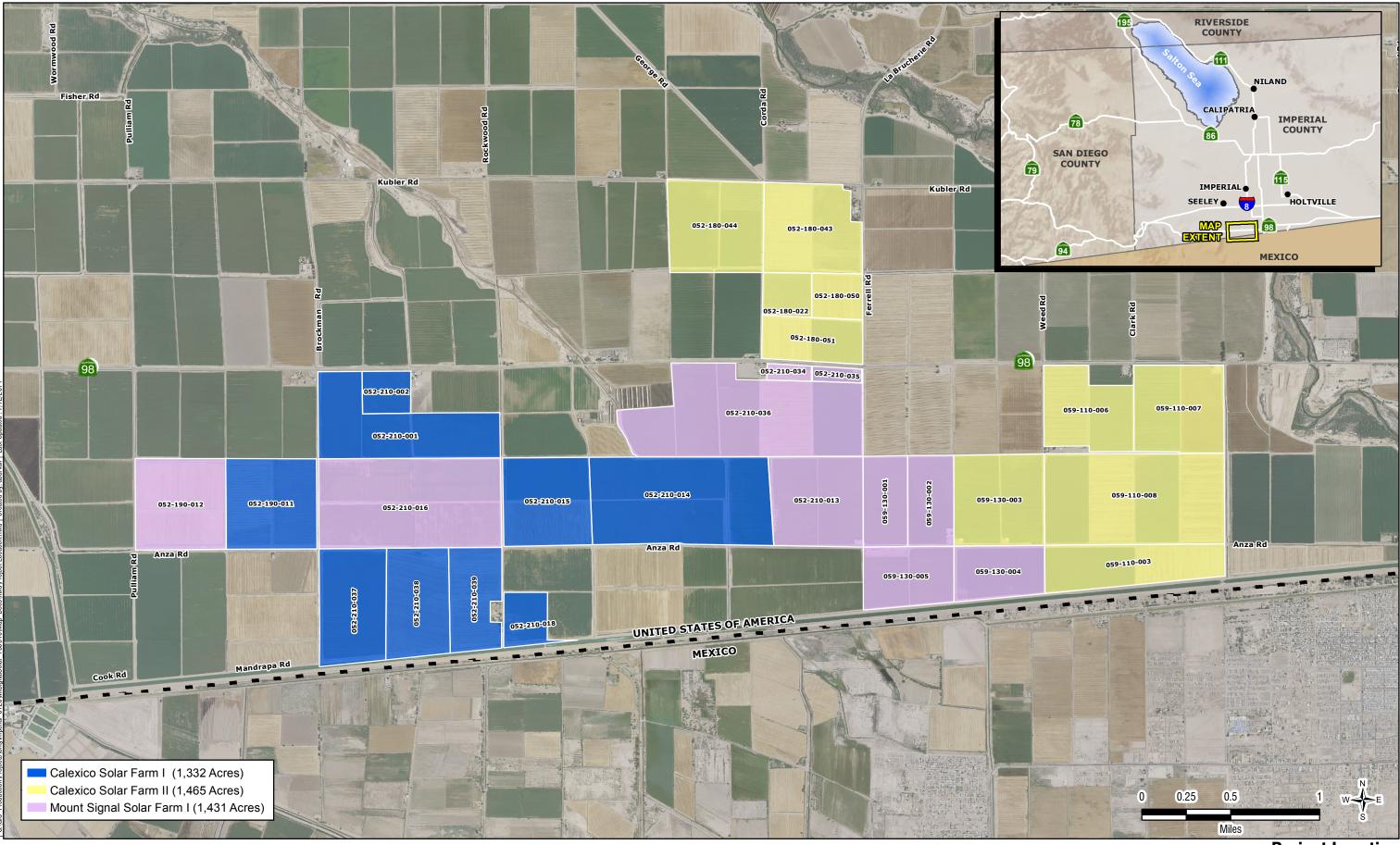
The Mount Signal Solar Farm Project and the Calexico Solar Farm Projects (collectively the "Projects") are the development of multiple solar energy farms on approximately 4,228-acres of agricultural land. The Projects would include a facility consisting of ground mounted photovoltaic solar power generating system, supporting structures, up to five O&M buildings, up to five onsite substations, water treatment systems, plant control systems, access roads and fencing. The Projects would connect to the existing Imperial Valley Substation via a shared overhead 230kV transmission line, which may also be shared with on or more neighboring solar project(s). The EIR will address the potential environmental effects associated with the proposed Projects. Although this Initial Study evaluates the significance of environmental issue areas for the Projects as a whole, the three facilities (Mount Signal Solar Farm I, and Calexico Solar Farm II) as described above may be evaluated separately within each section of the EIR depending on the environmental issue area and potential impacts. Project phasing within the Projects will also be discussed in the EIR.

C. Environmental Setting:

The Projects are located in a rural part of southern Imperial County. The surrounding land uses include agricultural land to the north, south, east and west with the US-Mexico border located directly to the south. There are no established residential neighborhoods within the general vicinity of the Projects; however, there are rural residences adjacent to the boundary of the Projects.

D. General Plan Consistency:

The proposed Projects are located within an unincorporated area of the County. The existing General Plan land use designation is "Agriculture." The project sites are currently zoned A-2 (General Agriculture), A-2-R (General Agricultural Rural Zone), and A-3 (Heavy Agriculture). Construction of a solar facility would be allowed within the existing zoning under a Conditional Use Permit.



Project Location
Figure 1

Imperial County | Mount Signal Solar | IS\NOP

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

			Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
I.	A	ESTHETICS				
Would	d the p	project:				
a)		e a substantial adverse effect on a scenic or scenic highway?				
b)	but I	stantially damage scenic resources, including, imited to, trees, rock outcroppings, and historical dings within a state scenic highway?				
c)		stantially degrade the existing visual character uality of the site and its surroundings?				
d)	whic	ate a new source of substantial light or glare the would adversely affect day or nighttime views area?	S			
	c)	contiguous but independent project sit modules, pad mounted transformers, and own O&M building and it may include an located near any scenic vista or scenic hig scenic resources. Thus, no impact is ident Although the Projects are not located near vista, and the proposed Projects are not expected.	d on-site subsite onsite substance on the substance of th	tation(s). Each Pation(s). The propuld it damage or one or or one or	roject site will posed Projects degrade any de designated as d rural charac	I have its are no esignated a scenic ter of the
	d)	area. This issue nevertheless will be furth significant impact is identified for this issue. Lighting would be installed on the O&M I would be directed downward or at a narrodesired areas. The solar panels will not be anticipated that they would result in cragricultural area of Imperial County. Therefore, although the proposed Projects light or glare affecting day or nighttime Therefore, a potentially significant impact	e area and will cuildings for s ow beam angle constructed of cating a glard e are no estable are rural res are not expect views, this iss	be addressed in afety and securite, in order to food reflective mate. The Projects blished residential idences adjacent ted to create a nesue will be analy	the EIR. y. However, a cus all light on rials; therefore are located in I neighborhood to the bound w source of si	II lighting ally on the e, it is no n a rura ds withir ary of the ubstantia
II.	A	GRICULTURE AND FOREST RESOURC	ES			
refer Depa deteri agend the si Asses Califo	to the rtmen mining cies mate's ssmen ornia A	ning whether impacts to agricultural resources e California Agricultural Land Evaluation and state of Conservation as an optional model to use whether impacts to forest resources, including refer to information compiled by the Californiventory of forest land, including the Forest project; and forest carbon measurement making Resources BoardWould the project:	Site Assessmer se in assessing ing timberland, irnia Departmer t and Range A	nt Model (1997) pag g impacts on agri are significant en nt of Forestry and ssessment Projec	repared by the culture and far vironmental eff Fire Protection t and the Fore	California rmland. Ir ects, lead regarding st Legacy
a)	Farm shov Farm	vert Prime Farmland, Unique Farmland, or nland of Statewide Importance (Farmland), as wn on the maps prepared pursuant to the nland Mapping and Monitoring Program of the fornia Resources Agency, to non-agriculturals		Ц	Ш	

			Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b)		lict with existing zoning for agricultural use, or liamson Act contract?	\boxtimes			
c)	of, for secti Reso Timb	flict with existing zoning for, or cause rezoning prest land (as defined in Public Resources Cod on 12220(g)), timberland (as defined by Public purces Code section 4526), or timberland zone perland Production (as defined by Government e section 51104(g))?	c d			
d)		ult in the loss of forest land or conversion of st land to non-forest use?				
e)	whic conv	ve other changes in the existing environment h, due to their location or nature, could result in ersion of Farmland, to non-agricultural use or ersion of forest land to non-forest use?				
		According to the farmland maps prepared the project site contains prime farmland potentially significant impact would result statewide Importance to non-agricultural Evaluation Site Assessment (LESA) shall be Williamson Act Contract and this issue will	and farmland from the convoluse, as pro- pe prepared fo be addressed	I of statewide imersion of Prime Fosed on the Proposed Pin the EIR.	nportance. The armland or Fa rojects sites. rojects that ar	erefore, a rmland o A Land e under a
	b)	The land is currently zoned A-2 (General and A-3 (Heavy Agriculture) and designate facilities are allowed within these zones parcels of land within the Calexico Solar and four parcels of land within the Calexico 180-050; 052-180-051) are under Williamso with the agricultural preservation intendicancellation of the contracts will be recidentified. As mentioned above, a LESA resissue will be addressed in the EIR.	ed by the Gen subject to a (Farm I site (A o Solar Farm I n Act contract ed under the quired; therefo	eral Plan as "Agi Conditional Use PNs 052-210-01; I site (APN 059-11 ts. The proposed Williamson Act ore, a potentially	riculture." Sol Permit. Howe 052-210-38; 05 10-007; 052-18 Projects woul t for these p significant i	ar energy ver, three 52-210-39 0-02; 052 d conflic arcels. <i>A</i> impact is
	c)	There are no existing forest lands, timbe either on-site or in the immediate vicinit rezoning. Therefore, no impact is identified	y that would	conflict with ex		
	d)	There are no existing forest lands either proposed Projects would not result in the forest use. Therefore, no impact is identifie	oss of forest	land or conversion		
III.	A	IR QUALITY				
		lable, the significance criteria established by the be relied upon to the following determinations.			ent or air pollutio	on control
a)		lict with or obstruct implementation of the cable air quality plan?	\boxtimes			
b)	subs	ate any air quality standard or contribute tantially to an existing or projected air quality tion?				

			Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c)	of a is i stat rele	sult in a cumulatively considerable net increase any criteria pollutant for which the project region non-attainment under an applicable federal or the ambient air quality standard (including easing emissions which exceed quantitative esholds for ozone precursors)?	I			
d)		pose sensitive receptors to substantial pollutants ocentrations?				
e)		eate objectionable odors affecting a substantial nber of people?				
	a)	The Projects are located within the jurisdic (ICAPCD) in the Salton Sea Air Basin (SSA temporary emissions of dust, fumes, equi conflict with the ICAPCD Rules and Regul from the project; however, temporary consignificant air quality impact.	B). Constructi pment exhaus ations. No sta	on of the propose st, and other air ationary source e	ed project wou contaminants missions are	ild create that may proposed
	b)	Currently, the SSAB is either in attainment standards with the exception of O ₃ (8-hour) 10 microns in diameter). Air pollutants trans Air Basin (Los Angeles, San Bernardino Comexicali (Mexico) substantially contribute potentially significant impact is identified for will address the proposed project's potentially diameter.	and PM ₁₀ (tota sported into t unty, Orange to the non- or this issue a	al suspended part the SSAB from the County, and Rive attainment condi rea. An air qualit	iculate matter e adjacent Sourside County) tions in the ry impacts ana	less than ath Coast and from SSAB. A lysis that
	c)	The proposed construction phases of the lincrease of one or more criteria pollutants for which the project region is in non-attaiquality standards. Thus, a potentially significant control of the line in the proposed construction of the line in th	as a result of nment under	point, and non-papelicable federa	oint source e	missions,
		An air quality impacts analysis that will impacts is being prepared and will be include			s' potential a	ir quality
	d)	The Projects are located in a rural agricultive residential neighborhoods within the project adjacent to the project boundaries. There adjacent to the project site. Although the prof sensitive receptors to substantial pollutaric quality impacts analysis and EIR.	ct area or vicion are no schoo oposed projec	nity; however, the ols, hospitals or s ot would not expo	ere are rural re senior homes se a significan	sidences within or t number
	e)	The proposed Projects include the installa generate objectionable odors. No impact is			It is not antic	ipated to
IV.	E	BIOLOGICAL RESOURCES				
Voul	d the	project:				
a)	thro ide stat reg	we a substantial adverse effect, either directly or bugh habitat modifications, on any species ntified as a candidate, sensitive, or specia tus species in local or regional plans, policies, or ulations, or by the California Department of Fish Game or U.S. Fish and Wildlife Service?	l •			

			Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)	
b)	habita identif regula	a substantial adverse effect on any riparian it or other sensitive natural community ied in local or regional plans, policies itions, or by the California Department of Fish tame or U.S. Fish and Wildlife Service?	,				
c)	proted Clean marsh	a substantial adverse effect on federally cted wetlands as defined by Section 404 of the Water Act (including, but not limited to, a, vernal pool, coastal, etc.) through directral, filling, hydrological interruption, or others?	t				
d)	reside establ corride	ere substantially with the movement of any ent or migratory fish or wildlife species or with ished native resident or migratory wildlife ors, or impede the use of native wildlife ry sites?	•				
e)	Confli	ct with any local polices or ordinances	\boxtimes				
Prote	ecting	biological resource, such as a tree pre	eservation po	olicy or ordinanc	e?		
f)	Conse	ct with the provisions of an adopted Habitat ervation Plan, Natural Community ervation Plan, or other approved local, aal, or state habitat conservation plan?					
	 a,d,e) A California Department of Fish and Game (CDFG) Natural Diversity Database (CNDDB) search was conducted to identify federally and state endangered, threatened species and CDFG species of special concern with the potential to occur within the project area. No federally listed species were identified on the project site; however, one state-listed bird was evaluated based on known occurrences in Imperial County and habitat availability in the project area: Greater sandhill crane. The Greater sandhill crane is state listed as threatened and is also on the Migratory Bird Treaty Act list of sensitive birds. The Greater sandhill crane could be found foraging in alfalfa or bermuda fields found on site. The Projects sites also may have the potential to be used as burrowing owl foraging habitat as agricultural fields on site support prey for owls. Burrowing owls and burrows are commonly found along canals and drains. Although there are no IID canals or drainage structures located within the Projects sites, IID Right-of-Way, access roads, canal and other drainages are located immediately adjacent to the Projects sites. Thus, a potentially significant impact is identified for this issue area. A biological resources technical study that will address the proposed project's potential impacts on biological resources is being prepared and will be included in the EIR analysis. b,c) The Projects are in an agricultural vegetative community. No Imperial Irrigation District (IID) canal or drain structures will be removed; therefore, there will be no impact to riparian habitat or 						
	f)	sensitive natural communities. No IID di washes are found within the project; the Regional Water Quality Control Boar (RWG The Projects are not located in a Ha	erefore, no Ari QCB) resource bitat Conserv	my Corps of Engi es will be affected. vation Plan (HCP	neers (USACE), Natural Co	E), CDFG,	
		Conservation Plan (NCCP), or other approved No impact is identified.	oved local, reg	jional, or state hal	oitat conserva	tion plan.	

		Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
V.	CULTURAL RESOURCES				
Woul	d the project:				
a)	Cause a substantial adverse change in the significance of a historical resource as defined §15064.5?	in			
b)	Cause a substantial adverse change in the significance of an archaeological resource pursua to §15064.5?	nt			
c)	Directly or indirectly destroy a unique paleontologic resource or site or unique geologic feature?	cal 🛚			
d)	Disturb any human remains, including those interred outside of formal cemeteries?				
	of the proposed project area. In additing Imperial County and have been disconserved by the project of the proj	overed during earthwork active buried fossils. The control of the	construction act vities such as ma It is not known sources report is paleontological, he ial for unknown	ivities. Paleor ass excavation if any paleor under prepara sistoric and pa human remai	ntological n cut into ntological nation and rehistoric ns to be
VI.	GEOLOGY AND SOILS				
Woul	d the project:				
a)	Expose people or structures to potential substantia adverse effects, including risk of loss, injury, death involving:				
	 Rupture of a known earthquake fault, as delineated on the most recent Alquist-Prio Earthquake Fault Zoning Map issued by th State Geologist for the area or based on othe substantial evidence of a known fault? Refer Division of Mines and Geology Speci Publication 42? 	ne er to			\boxtimes
	2) Strong Seismic ground shaking?				
		\boxtimes			
	3) Seismic-related ground failure, including liquefaction and seiche/tsunami?	\boxtimes			
		_			

		Potentially Significant Impact (PSI)	Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c)	Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?	— :			
d)	Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantiarisk to life or property?	⊠ al			
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				

Potentially

- a1) The Projects do not lie within a State of California, Alquist-Priolo Earthquake Fault Zone. Surface fault rupture at the Project is considered to be low. No impact is identified.
- a2) The primary seismic hazard at the project site is the potential for strong ground shaking during earthquakes along the Imperial, Brawley, Laguna Salada, Cerro Prieto, and Superstition Hills Faults. This is identified as potentially significant and will be evaluated in the EIR.
- a3,c) Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as produced by earthquakes. With strong ground shaking, an increase in pore water pressure develops as the soil tends to reduce in volume. If the increase in pore water pressure is sufficient to reduce the vertical effective stress (suspending the soil particles in water), the soil strength decreases and the soil behaves as a liquid (similar to quicksand). Liquefaction can produce excessive settlement, ground rupture, lateral spreading, or failure of shallow bearing foundations.

Four conditions are generally required for liquefaction to occur:

- (1) The soil must be saturated (relatively shallow groundwater);
- (2) The soil must be loosely packed (low to medium relative density);
- (3) The soil must be relatively cohesionless (not clayey); and
- (4) Groundshaking of sufficient intensity must occur to function as a trigger mechanism.

All of these conditions may exist to some degree at the sites. Thus, the impact is identified as potentially significant. This issue will be evaluated in the EIR.

However, the sites do not lie near any large bodies of water, so the threat of tsunami, seiches, or other seismically-induced flooding is considered unlikely. No impact is identified for these issue areas.

- a4) The hazard of landsliding is unlikely due to the relatively planar topography of the Projects sites. No ancient landslides are shown on geologic maps of the region and no indications of landslides were observed during our site investigation. No impact is identified.
- Soil erosion can result during construction as grading and construction can loosen surface soils and make soils susceptible to wind and water movement across the surface. Impacts are not considered significant since erosion would be controlled on-site in accordance with County standards including preparation, review and approval of a grading plan by the County Engineer. Implementation of County standards would reduce the potential impacts to below a level of significance.

Potentially Significant Unless Potentially Less Than Significant Significant Mitigation No Impact Incorporated Impact Impact (PSI) (PSUMI) (LTSI) (NI)

- In general, much of the near surface soils within the Projects sites consist of silty clays and d) clays having a high to very high expansion potential. The clay is expansive when wetted and can shrink with moisture loss (drying). This is a potentially significant impact. This issue will be analyzed in the EIR.
- e) The near surface soils at the Projects sites generally consist of silty clays and clays having a very low to low infiltration rate. The near surface soils are considered poor in supporting onsite septic systems and leach fields for wastewater disposal. Therefore, a potentially significant impact has been identified for this issue area, and this issue will be addressed in the EIR.

VII.	GREENHOUSE GAS EMISSIONS				
Would	d the project:				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
b)	Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				
	a,b) The proposed project has the potential construction of the proposed project, in ac project site. A potentially significant impact long-term, the project is expected to provid gas emissions. A Greenhouse Gas Emicompleted for the proposed project.	Idition to construct is identified and le a benefit with	uction worker tr I will be evaluate respect to reduc	ips to and fro ed in the EIR. ction of greer	om the In the
VIII.	HAZARDS AND HAZARDOUS MATERIALS				
Would	d the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b)	Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d)	Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				

		Potentially Significant Impact (PSI)	Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, withit wo miles of a public airport or public use airport would the project result in a safety hazard for people residing or working in the project area?	t,			
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for peoplesiding or working in the project area?	e			
g)	Impair implementation of or physically interfere with an adopted emergency response plan cemergency evacuation plan?	or			
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas of where residences are intermixed with wildlands?	•			

Potentially

- a,b) Operation of the proposed Projects may result in the potential to handle hazardous materials. The hazardous materials handled on-site would be limited to small amounts of everyday use cleaners and common chemicals used for maintenance. Handling of these materials could result in the potential release of these materials during accidental or unforeseen conditions. The applicant will be required to comply with State laws and County Ordinance restrictions, which regulate and control hazardous materials handled on-site. Such hazardous wastes would be transported off-site for disposal according to applicable State and County restrictions and laws governing the disposal of hazardous waste during construction and operation of the project. Disposal of hazardous wastes on the project site is not part of the proposed project. However, a potentially significant impact remains and will be addressed in the EIR.
- c) The Projects are not located within one-quarter mile of an existing or proposed school. No impact is identified for this issue area.
- d) The Projects sites are not listed as a hazardous materials site pursuant to Government Code, Section 65962.5. No impact is identified for this issue area.
- e,f) The Projects are located within two miles of a public airport or a private airstrip. However, no impacts are anticipated for these issue areas.
- g) The Projects are not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The applicant will be required to prepare a street improvement plan for the project site that will include emergency access points and safe vehicular travel. In addition, local building codes would be followed to minimize flood, seismic, and fire hazard. A street improvement plan will be prepared and will include emergency access and vehicular travel. Therefore, no impact is identified for this issue area.
- h) According to the Imperial County Natural Hazard Disclosure (Fire) Map prepared by the California Department of Forestry and Fire Protection (2000), the project site is not in a hazard area for wildland. However, construction and operation activities may result in an increased need for fire-fighting personnel and facilities in the area. This impact will be evaluated in the EIR under Public Services for Fire.

			Potentially ignificant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
IX.	HYE	PROLOGY AND WATER QUALITY				
Would	the pr	oject:				
a)		e any water quality standards or waste arge requirements?	\boxtimes			
b)	substa there lowering product to a le	antially deplete groundwater supplies or interferentially with groundwater recharge such the would be a net deficit in aquifer volume or any of the local groundwater table level (e.g., the ction rate of pre-existing nearby wells would drow vel which would not support existing land uses and uses for which permits have been granted)?	at a ne op			
c)	the sit	antially alter the existing drainage pattern of the or area, including through the alteration of the or a stream or river, in a manner which result in substantial erosion or siltation on- or ear.				
d)	the sit the co increa	antially alter the existing drainage patterns of e or area, including through the alteration of burse of a stream or river, or substantially se the rate or amount of surface runoff in a er which would result in flooding on- or off-				
e)	excee	e or contribute runoff water, which would d the capacity of existing or planned water drainage systems or provide substantial onal sources of polluted runoff?				
f)	Other	wise substantially degrade water quality?			\boxtimes	
g)	as ma Insura	housing within a 100-year flood hazard area apped on a Flood Hazard Boundary or Flood nce Rate Map or other flood hazard ation map?				
h)		within a 100-year flood hazard area structures would impede or redirect the flood flows?				
i)	loss i	e people or structures to a significant risk of njury or death involving flooding, including as a result of the failure of a levee or dam?				
j)	Inunda	ation by seiche, tsunami, or mudflow?				
	a,f)	The proposed Projects have the potential synthetic/organic chemicals). No waste of proposed site or proposed project. Potential quality technical report is being prepared discharge requirements will be addressed in	discharge re ally significat for the pro	equirements have nt impacts have b	been issued een identified	for the A water

Potentially Significant Potentially Unless Less Than Significant Mitigation Significant No Impact Incorporated Impact Impact (PSI) (PSUMI) (NI) (LTSI)

- b) During construction, potable water would be brought to the site for drinking and domestic needs, while construction water would be brought to the site for soil conditioning and dust suppression. Depending on whether municipal water is available for use, water for operational use may also be trucked to the site. Because the solar panels will be mounted approximately up to 15 feet above ground, they are not considered "hardscape", such as roads, building foundations, or parking areas, as they do not require a substantial amount of impervious material. The panels and their mounting foundation would not impede groundwater recharge. Impacts would be less than significant.
- c,d,e) The proposed Projects are not anticipated to generate a significant increase in the amount of runoff water from water use involving solar panel washing. Water will continue to percolate through the ground, as a majority of the surfaces on the project site will remain pervious. The proposed Projects would not substantially alter the existing drainage pattern of the site, substantially increase the rate of runoff, or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. No IID drains or canals will be removed or relocated and no washes were found within the project; therefore, the proposed Projects would not alter the course of a stream or river. A less than significant impact is identified for these issue areas.
- g,h,i) According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the Projects sites are located in Zone C which is an area determined to be of minimal flood hazard, usually depicted on FIRMs as above the 500-year flood level. Zone C may have ponding and local drainage problems that do not warrant a detailed study or designation as base floodplain. A less than significant impact is identified for floodplains. The sites' potential drainage issues will be addressed through a drainage report and discussed in the EIR.
- j) The Projects do not lie near any large bodies of water, so the threat of tsunami or seiches is unlikely. The project site and surrounding area is relatively flat; therefore, the threat of mudflow is less than significant.

X. LAND USE AND PLANNING

Would the project:

	· · · · · · · · · · · · · · · · · · ·		
a)	Physically divide an established community?		\boxtimes
b)	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (include, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?		
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?		\boxtimes

- a) The proposed project is located in a rural area within Imperial County. Although the site does not contain housing and is surrounded on all sides by agricultural lands, the removal of the project site from agricultural production may be perceived as dividing a community since the site is entirely surrounded by agricultural uses. Therefore, a potentially significant impact is identified. This issue area will be evaluated in the EIR.
- b) The project site is currently designated by the General Plan as "Agriculture." The County identifies agricultural land as a form of open space that could be used as passive recreation. The land is currently zoned A-2 (General Agriculture), A-2-R (General Agricultural Rural Zone), and A-3 (Heavy Agriculture). Solar energy facilities are allowed within these zones subject to a

Potentially Significant Potentially Unless Less Than Significant Mitigation Significant No Impact Incorporated Impact Impact (PSI) (PSUMI) (NI) (LTSI)

Conditional Use Permit. Although the proposed project is allowed under the zoning, the proposed project would remove the land from public use as passive recreation. This may result in a potentially significant impact. Land use will be addressed in the EIR.

c) The proposed project site is not located in a HCP or NCCP. Thus no impact is identified.

XI.	MINERAL RESOURCES				
Woul	d the project:				
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	i			
b)	Result in the loss of availability of a locally-importan mineral resource recovery site delineated on a loca general plan, specific plan or other land use plan?	t 🗌 I			
	a,b) The Projects sites are not used for mineral and Open Space Element of the County occur within the project site nor does the such, the proposed Projects would not a resources within the Projects sites. No important to the projects of	of Imperial Go e project site adversely affo	eneral Plan, no kr contain mapped ect the availability	nown mineral mineral mineral resou	resources irces. As
XII.	NOISE				
Woul	d the project result in:				
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			\boxtimes	
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			\boxtimes	
e)	For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?	 , r			
f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	-			

Potentially Significant Potentially Unless Less Than Significant Mitigation Significant No Impact Incorporated Impact Impact (PSI) (PSUMI) (NI) (LTSI)

a,c,d)

The Imperial County Code of Ordinances, Chapter 2, Section 90702.00 - Sound level limits, establishes one-hour average sound level limits for the County's land use zones. Agricultural/industrial operations are required to comply with the noise levels prescribed under the general industrial zones. Therefore, the project is required to maintain noise levels below 75 decibels (dB) (averaged over one hour) during any time of day. The Noise Element of the General Plan states that Construction noise, from a single piece of equipment or a combination of equipment, shall not exceed 75 dB, when averaged over an eight hour period, and measured at the nearest sensitive receptor. Construction equipment operation is also limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. Saturday. A less than significant impact is identified for this issue area. No further analysis is warranted.

- b) Groundborne vibration and groundborne noise could originate from earth movement during the construction phase of the proposed project. However, significant vibration is typically associated with activities such as blasting or the use of pile drivers, neither of which would be required during project construction. The Projects would be expected to comply with all applicable requirements for long-term operation, as well as with measures to reduce excessive groundborne vibration and noise to ensure that the Projects would not expose persons or structures to excessive groundborne vibration. No further analysis is warranted.
- e,f) The Projects are located within two miles of a public airport or a private airstrip. The potential Projects' impacts will be further analyzed under the EIR.;

XIII. POPULATION AND HOUSING

Would the project:

a)	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example through extension of roads or other infrastructure)?		
၁)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?		
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?		

a,b,c) The Projects sites are currently used for agricultural production. Development of housing is not proposed as part of the project. Mount Signal Solar Farm I will be staffed with up to six full time employees to maintain the facility seven days a week during normal daylight hours. Typically, up to three staff will work during the day shift (sunrise to sunset), and the remainder during the night shifts and weekend.

Calexico Solar Farm I & II will be staffed with up to twelve full-time employees for both phases combined (split roughly evenly between phases). The facilities will operate seven days per week, generating electricity during normal daylight hours when the solar energy is available. To ensure optimal PV output, the solar panels will be maintained 24-hours a day/seven days a week. The proposed projects would not result in a substantial population growth, as the number of employees required to operate and maintain the facilities is minimal. Therefore, no impact is identified for population and housing.

·			Potentially Significant Impact (PSI)	Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)		
XIV.	PI	IBLIC SERVICES						
a)	Would physionew need facilit	d the project result in substantial adverse cal impacts associated with the provision of or physically altered governmental facilities, for new or physically altered governmental ies, the construction of which could cause icant environmental impacts, in order to						
	or ot	tain acceptable service ratios, response times ther performance objectives for any of the c services:						
	1)	Fire protection?	\boxtimes					
	2)	Police protection?	\boxtimes					
	3)	Schools?				\boxtimes		
	4)	Parks?				\boxtimes		
	5)	Other public facilities?				\boxtimes		
	a1)	Fire protection and emergency medical services in the area are provided by the Imperial County Fire Department. The proposed Projects would be required to comply with all existing regulations and requirements of the Imperial County Fire Department and would be reviewed for adherence to prevention measures for wildland fires. According to the Imperial County Natural Hazard Disclosure (Fire) Map prepared by the California Department of Forestry and Fire Protection (2000), the project site is not in a hazard area for wildland. However, construction and operation activities may result in an increased need for fire-fighting personnel and facilities in the area. Therefore, the potential impact on fire services from construction and operation of the proposed Projects will be further evaluated in the EIR.						
	a2)	Police protection services in the proposed Projects' area are provided by the Imperial County Sheriff's Department. Although the potential is low, the proposed Projects may attract vandals or other security risks. The increase in construction related traffic could increase demand on law enforcement services. On-site security would be provided and access would be limited to the areas surrounding the Projects sites during construction and operation, thereby minimizing the need for police surveillance. However, the Projects' impacts on sheriff services will be further evaluated in the EIR.						
	a3)	The proposed Projects do not include the development of residential land uses that would result in an increase in population or student generation. Construction of the proposed Projects would not result in an increase in student population within the Imperial County's School District since it is anticipated that construction workers would commute in during construction operations. The proposed Projects would have no impact on Imperial County schools. No further analysis is warranted.						
	a4)	Parks/Libraries/Other Public Facilities: minimal full-time staff (for security, mincreases in population that would adviacilities (such as post offices) are not impact on public services such as post of these issue areas is warranted.	aintenance, e ersely affect expected. The	etc.). Therefore, local parks, libr e Projects are no	substantial p aries and oth ot expected to	ermanent er public have an		

Potentially

a5)

The Projects are not anticipated to have an adverse effect on local parks. Therefore no further analysis of these issue areas is warranted.

		Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
VV	DECDE ATION				
XV.	RECREATION				
a)	Would the project increase the use of the existing neighborhood and regional parks or othe recreational facilities such that substantial physica deterioration of the facility would occur or be accelerated?	ıl	Ш	Ш	
b)	Does the project include recreational facilities or require the construction or expansion or recreational facilities which might have an adverse effect on the environment?				
	a and b) The proposed Projects would employ a to not significantly increase the use or ac recreational facilities. The temporary inc caused by an influx of workers would be of parks. Additionally, the Projects do facilities. No impact will occur and no furt	ccelerate the c rease of popul minimal and no not include or	deterioration of relation during con ot cause a detectar require the exp	egional parks struction that able increase i	or other might be n the use
XVI.	TRANSPORTATION / TRAFFIC				
Would	d the project:				
a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevan components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	e o s t t			
b)	Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or othe standards established by the county congestion/management agency for designated roads or highways?	e r y			
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change ir location that results in substantial safety risks?	n 🗆			
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
e)	Result in inadequate emergency access				\boxtimes
f)	Conflicts with adopted policies, plans, programs, regarding public transit, bicycle, or pedestriar facilities, or otherwise decrease the performance of safety of such facilities?				

Potentially Significant Potentially Unless Less Than Significant Mitigation Significant No Impact Incorporated **Impact** Impact (PSI) (PSUMI) (LTSI) (NI)

- a,b) The construction phases of the proposed Projects would result in an increase of traffic to the area, which may result in a potentially significant impact. A traffic impact study is being prepared. Thus a potentially significant impact is identified for this issue area. This issue will be addressed in the EIR.
- c,d) The proposed Projects include solar panels that may be elevated up to 15 feet above ground, but would not be at a height that would interfere with air traffic patterns. Additionally, the proposed Projects do not include changes to the existing roadways. The proposed solar PV panels will be arranged in continuous rows of up to approximately 500-feet in length and arrays will be grouped together to form 500-feet by 500-feet grids. An additional 20-foot wide, all weather access roads will be implemented into the project design and located within each 500-foot "grids" to provide emergency units vehicle access and to allow access to the inverter modules. Additionally, a 20-foot wide all weather gravel road with additional clearance area in the corners of the project sites will exist between the perimeter fence and solar panels allowing easy facility access and maneuverability for emergency unit vehicles. These access roads would not increase hazards due to design features or incompatible uses. No impact is identified.
- e) The proposed street improvement plan for the Projects sites will be required to provide emergency access points and safe vehicular travel. Thus, no impact is identified for this issue area.
- f) The proposed Projects are solar array farms. There are currently no pedestrian or bicycle rightof-ways within the Projects areas that the project would interfere with. There are currently no bus stops located within the Projects boundaries or surrounding area and the proposed Projects do not include changes to the existing county roadway network. The proposed Projects would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Thus, no impact is identified for this issue area.

XVII. UTILITIES AND SERVICE SYSTEMS

Would the project: \boxtimes Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? \boxtimes Require or result in the construction of new water or water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? \boxtimes Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? \boxtimes Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? \boxtimes Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? Be served by a landfill with sufficient permitted \boxtimes

capacity to accommodate the project's solid waste

disposal needs?

		Potentially Significant Impact (PSI)	Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
g)	Comply with federal, state, and local statutes and regulations related to solid waste?			\boxtimes	

Potentially

- a,e) The Projects would generate a minimal volume of wastewater during construction. During construction activities, wastewater would be contained within portable toilet facilities and disposed of at an approved site. Operation of the proposed Projects would require a total of up to 18 on-site full time employees and could include up to five O&M buildings. Wastewater generation would be minimal. The Projects' wastewater will be treated via on-site septic systems. The proposed Projects would not exceed wastewater treatment requirements of the Regional Water Quality Control Board. A less than significant impact is identified for this issue area.
- b,d) The Projects are not anticipated to result in a significant increase in water demand/use; however, water will be needed for domestic use within the O&M buildings, solar panel washing and fire protection once the project facilities are fully operational. An onsite water treatment facility is proposed for each component of the Projects. . Mount Signal Solar Farm I would potentially draw water from IID controlled Wistaria and Woodbine canals. Calexico Solar Farm I would potentially draw water from the Woodbine Main canal and Calexico Solar Farm II would potentially draw water from Wistaria Canal. The Projects sites are currently used for agricultural production. The onsite water treatment facilities will be evaluated in the EIR. A Water Supply Assessment is being prepared for the proposed Projects and will be included in the EIR.
- c) The Projects do not include the construction of a storm drainage system or the alteration of the existing system. No impact is identified for this issue area. However, site drainage will be discussed in the Hydrology and Water Quality section of the EIR.
- f, g) During construction and operation of the Projects, waste generation will be minor. Solid waste will be disposed of using a locally-licensed waste hauling service, most likely Allied Waste. There are over 40 solid waste facilities listed in Imperial County in the CalRecycle database. Trash would likely be hauled to the Calexico Solid Waste Site located in Calexico or the CR&R Material Recovery Transfer Station located in El Centro. The Calexico Solid Waste site has approximately 2 million cubic yards of capacity (reporting date July 2009) and is estimated to remain in operation through 2071. The CR&R Material Recovery and Transfer station has a maximum permitted throughput of 15 tons/day. No closure date has been reported for this facility (http://www.calrecycle.ca.gov/SWFacilities/Directory/13-AA-0004/Detail/). Therefore, there is ample landfill capacity throughout the County to receive the project's minor amount of solid waste generated by project construction and operation.

Additionally, because the proposed Projects would generate solid waste during construction and operation of the project, it will be required to comply with waste reduction and recycling measures. The 1989 California Integrated Waste Management Act (AB 939) requires Imperial County to attain specific waste diversion goals. In addition, the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires expanded or new development projects to incorporate storage areas for recycling bins into the proposed project design. The Projects would be required to comply with the 1989 California Integrated Waste Management Act and the 1991 California Solid Waste Reuse and Recycling Access Act of 1991. Also, conditions of the CUP will require recycling and diversion of construction waste per policies of the County. A less than significant impact is identified for this issue.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083.9, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino, (1988) 202 Cal. App. 3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal. App. 3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal. App. 4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal. App. 4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal. App. 4th 656.

Revised 2009- CEQA Revised 2011- ICPDS

Potentially Significant Unless Potentially Less Than Significant Significant Mitigation No Impact Incorporated Impact Impact (PSI) (PSUMI) (NI) (LTSI)

III. MANDATORY FINDINGS OF SIGNIFICANCE

••••	mandation in the modern form for mode				
The	e following are Mandatory Findings of Significance in ac	cordance with	Section 15065 of the	e CEQA Guide	lines.
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)				
c)	Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?				
	a,b,c) The Projects have the potential to res	_			

a,b,c) The Projects have the potential to result in significant environmental effects, which could directly or indirectly cause adverse effects on human beings and or the environment. Implementation of the proposed Projects has the potential to result in aesthetics, agricultural resources, air quality, sensitive biological resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology and water quality; land use and recreation, public services, transportation/circulation impacts, and water supply. These issues will be further evaluated in the EIR. In addition, the proposed Projects have the potential to result in cumulative impacts with regards to the identified issue areas. Cumulative impacts will be discussed and further analyzed in the EIR.

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING 4050 TAYLOR ST, M.S. 240 SAN DIEGO, CA 92110 PHONE (619) 688-6960 FAX (619) 688-4299 TTY 711



Flex your power! Be energy efficient!

July 28, 2011

11-IMP-98 PM 23.09 Mount Signal Solar Energy project NOP for DEIR – SCH #2011071066

Angelina Havens Imperial County Planning and Development Services 801 Main Street El Centro, CA 92243

Dear Ms. Havens:

The California Department of Transportation (Caltrans) received a copy of the Notice of Preparation (NOP) of a Draft Environmental Impact Report (Draft EIR) for the proposed Mount Signal Solar Energy project (SCH #2011071066) located near Highway 98 (SR-98). Caltrans has the following comments:

Depending on proximity to SR-98, visual aspects of the project including glint and glare should be documented not to have any potential impacts to motorists driving on SR-98.

It is also understood that the project will access SR-98. Access to SR-98 should be from existing county roads or a permitted highway access location.

Please provide Caltrans a copy of any traffic analysis related to SR-98 or state facilities. The study should use as a guideline the *Caltrans Guide for the Preparation of Traffic Impact Studies* (TIS guide enclosed). Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide.

The NOP identifies that the project is proposing a transmission line that will connect to an existing substation. Any new utility encroachments into Caltrans right of way will require an encroachment permit. Please refer to Caltrans Encroachment Permits Manual (http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment_permits_manual/index.html) for guidance on utility encroachment.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

Ms Havens, Imperial County July 28, 2011 Page 2

If you have any questions on the comments Caltrans has provided, please contact Marisa Hampton of the Development Review Branch at (619) 688-6954.

Sincerely,

JACOB M. ARMSTRONG, Chief Development Review Branch

c: Armando G. Villa, Imperial County

Parsons, Terri L.

From: Sheeran, Melyssa L.

Sent: Friday, September 16, 2011 11:01 AM

To: Noir, Yvette

Subject: FW: Mount Signal Solar Farm question

From: Angelina Havens [mailto:AngelinaHavens@co.imperial.ca.us]

Sent: Wednesday, August 17, 2011 3:36 PM

To: damorita@earthlink.net; Gnibus, Tim; Sheeran, Melyssa L.; ssalazar@8minutenergy.com

Subject: FW: Mount Signal Solar Farm question

Please see attached comments from the Division of Oil, Gas & Geothermal Resources.

Angelina Havens

Planner III

From: Minx, Benjamin [mailto:Benjamin.Minx@conservation.ca.gov]

Sent: Wednesday, August 17, 2011 3:31 PM

To: Angelina Havens

Subject: RE: Mount Signal Solar Farm question

Angelina,

Thanks again for the information in regards to this project. My supervisor, Clifford Parli, asked me to write you a letter informing you of what we have found.

The Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the Mount Signal Solar Farm, Calexico Solar Farm 1, and Calexico Solar Farm 2. The Division supervises the drilling, maintenance, plugging and abandonment of oil, gas, and geothermal wells in California. The Division offers the following comments for your consideration.

There may be a potential risk of construction near plugged and abandoned wells. According the Division's database, three abandoned shallow temperature gradient wells are located in the area of the proposed projects that may require abandonment to present standards if the wells are exposed or the present abandonment plugs are altered. This office must be contacted to obtain information on the requirements for approval to perform any remedial operations on these wells.

Thank you for the opportunity to comment on these projects. If you have any questions, please contact Cliff Parli at 760-353-9900 or his cell at 760-996-3127.

Sincerely,

Benjamin Minx Geothermal Engineer Division of Oil, Gas, and Geothermal Resources 605 Wake Avenue, Suite 7 El Centro, CA 92243 Office (760) 353-9900 Cell (760) 718-8310

Parsons, Terri L.

From: Sheeran, Melyssa L.

Sent: Wednesday, August 10, 2011 2:40 PM

To: Noir, Yvette
Cc: Bird, Hilary
Subject: FW: Solar Farms

Yvette, can you save this under NOP comments also?

From: Angelina Havens [mailto:AngelinaHavens@co.imperial.ca.us]

Sent: Wednesday, August 10, 2011 2:36 PM

To: <u>damorita@earthlink.net</u>; Gnibus, Tim; Sheeran, Melyssa L. **Cc:** <u>ssalazar@8minutenergy.com</u>; <u>asundquist@8minutenergy.com</u>

Subject: FW: Solar Farms

Comment letter attached.

Angelina Havens

Planner III

From: Byron or Kathy [mailto:frontierag401@hotmail.com]

Sent: Wednesday, August 10, 2011 2:26 PM

To: Angelina Havens **Subject:** Solar Farms

To: Planning Commission

In order for Frontier Agricultural Service, Inc. to continue to operate in a safe manner in regards to our pilots and the surrounding community, there are some unique concerns that the Solar Farms project presents.

- The angle of panels, at any given time, day or night, presents a very serious glare concern regarding there reflective and/or refractive properties and intensities (both from the sun and high intensity aircraft landing lights) to safely land without being temporarely blinded by said glare. Forty percent (40%) or our landings are made at night.
- Any guy-wires, lights on poles and/or any use of cranes during the construction of or the maintenance of panels in the future.
- Any disturbance or turbulance of air currents from different angulation of panels at ground (airstrip) level.
- The maximum height at any given time of day or night in regards to both ends of the airstrip. Our Air Tractors, fully loaded, are just that, tractors, not Porsches.
- Minimum distance from both ends of runway.

Concerns for Solar Farms are not that of safety but rather service or maintenance issues.

We operate on natural surface airstrips. A fair amount of dust is created during staging for take-off as well as take-off.

At any given time maintenance or repairs to our Air Tractors requires static plane engine

revings which can also create an amount of dust for sustained periods of time. A paved airstrip could eliminate those concerns.

We feel that solar in general is a good business venture for all but only in areas where agricultural production is not taken out.

A continued open discourse of all parties is of the highest priority in order to continue operating safely for another thirty years as we have.

I appreciate your consideration in this matter.

Sincerely, Byron D. Nelson, Frontier Ag. Service, Inc.