

Source: Base Map ESRI 2010 & 2011; Overlay EMA 2013.

**FIGURE 2.0-8**  
**PROPOSED TRANSMISSION LINE ALIGNMENT**

## 2.0 PROJECT DESCRIPTION

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solar farm complex site, and consultation with a local geotechnical contractor, an engineered septic system is expected to be installed and designed in compliance with standards established by the Imperial County Environmental Health Department.

Alternatively, the septic systems may be designed to direct waste streams to an underground tank for storage until it is pumped out (on a periodic or as-needed basis) and transported for disposal at a licensed waste treatment facility.

During periodic major maintenance events, portable restroom facilities may be provided to accommodate additional maintenance workers.

### **Fire Protection**

Buildings will be designed with fire protection systems based on applicable Imperial County requirements. Systems where pressurized firewater is used will have electric pumps. Portable fire extinguishers of appropriate sizes and types would be placed throughout the buildings. Class C (electrical) rated fire extinguishers will be mounted at each inverter.

The PV modules are typically Class C fire-rated. [Note: No specific rating was available for the CPV modules as the manufacturer has not yet been selected]. The remainder of the equipment on the solar farm complex consists of nonflammable material (aluminum, steel, and glass). Each development lot (1 thru 5) containing an O&M building or other habitable structure would have 10,000 gallons of water in an on-site tank reserved for firefighting.

### **Security**

Six-foot high security fencing would be installed around the perimeter of each development lot at the commencement of construction. Access to each solar energy project site would be limited to authorized construction workers and operations personnel. In addition, a motion detection system and closed-circuit camera system may also be installed. The sites would be monitored 24 hours a day 7 days a week.

### **Site Access**

The principal access to the solar energy projects would be via a new private access road extending south approximately 0.80 mile off of SR 78 approximately one-quarter mile west of the existing Property access road (see **Figure 2.0-4** and **Figure 2.0-5**). The new primary access road would be provided with a minimum of 30-foot double swing gates with a coded entry and “Knox Box” over-ride. Internal to the solar farm complex site, a network of roads would provide operations and maintenance access to all lots and Project components. The existing gated, private road from SR 78 would be used only for emergency access to the solar energy projects.

## **F. SOLAR FARM COMPLEX CONSTRUCTION PROCESS**

Construction of each of the solar energy project lots would likely commence with the construction of the perimeter security fence and any required demolition of existing structures. Depending on the lot being developed, demolition could include removal of existing outbuildings, an above-ground diesel fuel storage tank within a concrete block secondary containment structure, a covered material storage, a truck weigh scale and shed, a concrete-lined irrigation ditch and removal of buried water pipes. Site preparation would include grubbing and removal of the north-south vegetation windbreaks in Lots 4 and 5; the east-west vegetation windbreak in Lots 1, 2, 3 and 4 and removal of large vegetation in each of the lots.

Following demolition, construction of the first project would commence with the building of the new private access road off of SR 78 and portions of the solar farm complex internal road network. The new private access road would be used as the primary construction and permanent access to all of the Project

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lots. The internal road network would provide to access each individual lot being developed during construction as well as during operation and maintenance.

Construction of the IID switch station would commence once construction of the new access road is complete. IID transmission line construction would occur simultaneously with the switch station construction and modifications to the IID Anza Substation. Approximately 0.75 miles of new 92kV transmission line would be constructed on the Allegretti Farms property and 2.25 miles of new overbuilt 92 kV transmission line would be constructed “off property” for the interconnection to the existing IID Anza Substation [Note: The transmission line is discussed in detail under sub-section 2.1.6].

A temporary, portable construction management office would be located at each solar energy site at the beginning of construction and removed at the end of construction. This structure would be installed in compliance with all local regulations.

Each of the lots to be developed as part of the solar energy projects has been previously graded and farmed. Fine grading would be required to establish internal access roads and pads for electrical equipment (inverters and step-up transformers). Additional grading would be required for constructing the on-site storm water retention basin(s) and directing on-site storm water to drain to these basins.

Grading would likely be followed by trenching for installation of the underground electrical collection lines; installation of the support piles, solar frames, PV or CPV panels and inverters; and construction of the aboveground gen-tie lines within each solar energy project lot. Construction of any O&M building, parking area and additional auxiliary facilities (including the construction of any required new well, or any maintenance required to restore the existing on-site water well to service) would follow the completion of grading required for each project.

The electrical substation associated with each project would be built in parallel with the grading and installation of the solar arrays. Each project would build its own substation in the northwest corner of Section 23, immediately south of the new IID switch station. The substations would occupy less than one acre. Construction of each project gen-tie line would also occur simultaneously with construction of the project substation and IID switch station and transmission line.

**Table 2.0-3** estimates the total surface disturbance associated with construction of the Project (solar farm complex, IID transmission line and Anza Substation modifications).

**TABLE 2.0-3  
CONSERVATIVELY CALCULATED PROJECT DISTURBED ACRES**

Property/Project Component	Disturbed Acres
Solar Energy Project Lots (1-5) <sup>1</sup>	1,181.00
Project Gen-Tie Lines (Lot A)	34.00
Common Access Roads (Lot B) <sup>2</sup>	11.00
IID Switch/Project Substations (Lots C and D) <sup>3</sup>	10.00
IID Transmission Line <sup>4</sup>	2.30
Anza Substation Modifications <sup>4</sup>	0.24
<b>Total Project Disturbance</b>	<b>1,238.54</b>
<sup>1</sup> Conservatively assumes all lands within each solar energy project lot are disturbed. <sup>2</sup> Conservatively assumes that a 30-foot wide, 2.95-mile long corridor would be entirely disturbed by access road construction and/or improvements. <sup>3</sup> Conservatively assumes that the disturbed area for each solar energy Project site would be approximately 5 acres in size. <sup>4</sup> Conservatively assumes a 10-foot wide by 0.75-mile long corridor on Property, plus a 5-foot wide by 2.25-mile long corridor “off property,” would be entirely disturbed. <sup>5</sup> Area of expansion is approximately 50 feet by 208 feet.	
Source: Regenerate 2013a; EMA 2014a.	

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### **Dust Control**

Dust generated during construction would be controlled by watering and, as necessary, the use of other dust suppression methods and materials accepted by the ICAPCD or the California Air Resources Board (CARB). During grading, actively disturbed on-site areas would be watered at least three times a day as necessary to reduce fugitive dust emissions. Actively disturbed onsite, unpaved roads would be watered at least three times a day as necessary to reduce fugitive dust emissions and a 15 mile per hour (mph) speed limit would be enforced.

Depending on the size of each solar project, an estimated 100 to 175 acre-feet (AF) of water could be used for dust control over the construction period of each project. This water would be obtained from either the existing water wells or the new wells to be constructed.

### **Construction Duration**

Construction of the new access road is expected to take approximately two weeks to complete. This would be followed by the concurrent construction of the IID switch station and new transmission line, each of which is expected to require approximately three and a half months to construct.

Construction of each of the solar energy projects is expected to be completed in approximately four to five months (for each of the three smaller lots) and seven to eight months (for each of the two larger lots). Each of the proposed five solar energy projects would be constructed independently, and construction of any one project is not expected to overlap the construction of another. However, solar energy project construction would overlap construction of the IID switch station, new 92 kV transmission line and Anza Substation modifications.

### **Construction Workers**

The number of on-site construction workers is not expected to exceed 150 workers at any one time. On-site parking would be provided for all construction workers.

### **Construction Traffic**

An estimated fourteen trucks would deliver materials to the Project area at staggered times throughout the day during the construction of each of the five solar energy projects. To provide a worst-case scenario, all construction workers are assumed to arrive during the AM peak hour and depart during the PM peak hour. In addition, all workers are assumed to drive separate vehicles to and from the Project area. **Table 2.0-15** summarizes the assumed Project construction vehicle trip generation.

**TABLE 2.0-4  
SEVILLE SOLAR FARM COMPLEX - CONSTRUCTION TRIP GENERATION**

Use	Total Daily Trips	PVE*	Total Daily Trips	AM Peak Inbound Trips	AM Peak Outbound Trips	PM Peak Inbound Trips	PM Peak Outbound Trips
Workers	300	1	300	150	0	0	150
Vendor Trucks	14	3	42	0	0	0	0
Haul Trucks	14	3	42	0	0	0	0
Total	328		384	150	0	0	150

Source: Chen Ryan 2014. \*PVE = passenger vehicle equivalent.

Each development area would be accessed off of SR 78. It is assumed that approximately one-third of the construction worker traffic would travel to and from the west (i.e., in San Diego County and other local residential developments) while the remaining two-thirds would originate from various Imperial Valley cities to the east.

### **Storm Water**

A preliminary on-site hydrology analysis was prepared for the solar farm complex site to determine the peak storm water flows for each of the five solar projects (**Appendix J** of this EIR). The Property currently drains generally to the southeast at a gentle gradient of approximately 0.40 percent. To fully retain the 100-year 24-hour peak flood volume resulting from precipitation, storm water retention basins are proposed on the southeastern corner of each of the five solar energy project lots.

### **Staging Areas**

Staging and construction parking would be located within the solar energy project site being developed (e.g. Lot 1-5). No additional disturbance beyond what is currently anticipated and accounted for in **Table 2.0-3** would result.

### **Waste**

Small amounts of trash would be generated during construction from packaging materials delivered to the Project area. Construction related waste would be transported to a local landfill authorized to accept this waste for disposal or an appropriate recycling center authorized to accept recyclable materials generated during construction from packaging materials delivered to the Project area.

### **Hazardous Materials**

Very little hazardous waste (waste oil and lubricants, spill clean-ups, etc.) is expected to be generated from the projects during construction. Fuel that may be used on site during construction would be stored in secondary containment. The Project will also be required to comply with State laws and County Ordinance restrictions which regulate and control hazardous materials.

### **Water**

An estimated 100 to 175 AF of water could be used for dust control over the construction period of each of the five solar energy projects. This water would be obtained from either the existing water wells or the new wells to be constructed. Potable drinking water will be supplied by a local provider.

### **Sanitation**

Portable toilets would be located on site during construction and sanitary waste would be removed by a local contractor.

### **Off-Site Construction Activities**

Off-site construction activities (those outside of each solar energy project lot) would include improvement or construction of the required access road(s); construction of the aboveground gen-tie line and electrical substation for each project; and construction of the IID switch station and transmission line.

## **G. SOLAR FARM COMPLEX OPERATIONS AND MAINTENANCE**

Once the IID transmission line and switch station, plus any project's substation and gen-tie power line, have been constructed, the solar panels installed for that project will begin delivering power through the IID system and operation of that project will have begun. The Seville Solar Farm Complex will operate 365 days a year and generate power during daylight hours.

Each solar project is expected to have a small, regular, on-site staff consisting of one maintenance personnel as needed. Additional workers may occasionally be required to maintain the common access roads and storm water diversion berms, clean the solar panels, and/or perform specific maintenance activities (e.g. weed abatement). During the Project operations phase, nine worker round trips and one delivery round trip are anticipated daily. Dust would be controlled during operations by the periodic application and maintenance of soil binders to exposed soil surfaces.

## **2.0 PROJECT DESCRIPTION**

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### **Maintenance Activities**

Once construction is completed, each of the solar energy projects are expected to require minimal regular on-site staff, consisting principally of maintenance personnel. Additional workers would occasionally be required to access each individual solar energy project to maintain the common access roads and storm water diversions, clean the solar panels and/or perform specific maintenance, like weed abatement on the property. Access to the solar farm complex site would be off-limits to the public and only authorized personnel would be allowed on site.

#### ***Panel Washing***

Periodic washing of the PV modules could be needed to remove dust in order to maintain power generation efficiency. The amount of water needed for this purpose for each project is conservatively estimated at six to ten acre feet per washing (depending on the project size and water required for dust control during panel washing), with up to five washings per year, or a total of 30 to 50 acre feet per year (AF/Y). This water would be obtained from each project's on-site water wells or the new water wells to be constructed (see **Figure 2.0-4**) or from the Ranch Oasis Mutual Water Company. Each washing is expected to take one to two weeks to complete.

#### ***Weed and Vegetation Management***

Invasive / weedy species would be controlled and any non-invasive vegetation that re-establishes within the solar farm complex site would be controlled within each solar field. Vegetation growing within the Project area would be periodically removed manually and/or treated with herbicides.

#### ***Miscellaneous***

Other maintenance activities that would be conducted within the solar farm complex site would include periodic testing of equipment, inspection and repair of project components, and maintenance of on-site roads and drainage systems.

### **Electricity Consumption**

Each of the three smaller solar projects may consume an estimated 250 kW-hours of electrical energy daily from the IID power system to operate the solar panel trackers, the on-site security system and the solar facility monitoring and control system. Each of the two larger projects may use an estimated 400 kW-hours for the same purposes.

### **Noise**

Operational noise would be generated in association with the transformers, inverters, HSAT, substation and the IID 92 kV transmission line. Vehicle traffic associated with operations and maintenance would also generate some noise on site and on local roads.

### **Air Quality**

Normal operations of the Project would not result in any direct air emissions from the electricity production process as the PV or CPV solar panels convert sunlight directly into DC electricity. No fossil fuels are consumed in the process and no pollutants are emitted during normal operations. Daily air pollutant emission sources are anticipated to be limited to vehicular traffic and small engines associated with operations and maintenance activities.

### **Hazardous Material Handling and Storage**

The Project would not use or store any appreciable quantities of hazardous chemicals within the Project area during normal operations. Fuel that may be used within the solar farm complex site for emergency generators or during maintenance activities would be stored in secondary containment.



**H. DECOMMISSIONING AND RECLAMATION PLANS**

The proposed Project is expected to operate for 20 to 25 years. At the end of its useful life, the Applicant proposes to decommission each solar farm project and reclaim the area associated with surface disturbance of each project. The IID-owned facilities (IID switchyard and 92 kV transmission line on the Property; 92 kV transmission line with underbuilt 12.5 kV distribution line; 12.5 kV distribution line system constructed on the Property; and the IID Anza Substation modifications) would not be decommissioned until IID determined that these improvements were no longer needed and could be retired and removed. The roads constructed on Lot B to access each of the parcels created under the major subdivision and all of the water wells would not be decommissioned or reclaimed.

The sequence for decommissioning would include dismantling and demolition of above-ground structures; concrete removal; removal and dismantling of underground utilities; excavation and removal of soil; and final site contour. As part of decommissioning, all solar equipment and other on-site facilities (chain link fence, gates, posts and concrete footings, solar generation facilities, electrical switchyard and substation facilities, transmission lines, control/warehouse buildings, water tanks, foundations, septic systems) would be removed and salvaged if economically feasible. The on-site groundwater wells would not be removed unless so requested by the landowner. Any materials used for surfacing the access roads internal to each of the solar projects would either be plowed under (if the origin of the road surfacing material is from on site) or taken off site for re-use or disposal (if the origin of the road surfacing material used is from off site). The on-site retention basins would be backfilled and compacted as necessary. The on-site soils would be ripped to the depth necessary to remove all miscellaneous buried solar project equipment.

The Reclamation Plans submitted to the ICPDSD consider decommissioning as part of reclamation. After the solar farm complex site is cleared and contoured, it would be reclaimed to its end state to approximate the existing idle farmland. The Project area would be cleaned and balanced with on-site soils. All of the reclamation activities would implement appropriate fugitive dust control measures consistent with ICAPCD requirements in effect at the time of the closure of the solar farm complex.

**2.1.6 TRANSMISSION LINE CHARACTERISTICS****A. EXISTING USES AND FEATURES**

The Project includes the construction for, and operation by, the IID of approximately 0.75 miles of new 92 kV transmission line on the Property and 2.25 miles of new 92 kV transmission “off-property” for interconnection to the existing IID Anza Substation (**Figure 2.0-8**). Of the 2.25 miles, a 2.0 mile segment is on BLM land. The 0.75 mile portion of the transmission line on the Property extends through approximately 0.5 miles of idle farmland and 0.25 miles of undeveloped, flat-lying land. In addition, the areas along the existing IID distribution line right-of-way adjacent to SR 78 and along the western boundary of the Project site are used by off-road vehicles and the United States-Mexico Border Patrol. The IID 92 kV transmission line is estimated to disturb 2.3 acres and the modifications to the IID Anza Substation would disturb approximately 0.24 acres.

**B. GENERAL PLAN AND ZONING DESIGNATIONS**

The Imperial County Land Use Plan designates all of the private lands crossed by the transmission line as “Agriculture.” No appreciable agricultural production is currently occurring on this land.

The proposed 2.25 miles of new 92 kV transmission line would be “overbuilt” on top of the IID’s existing 12.5 kV distribution line located immediately south of SR 78. The new transmission line would extend east from the Property across approximately two miles of public land managed by the BLM (Sections 13 and 14) to the existing IID Anza Substation located in Section 13. Neither the transmission line nor the

## 2.0 PROJECT DESCRIPTION

substation is located within a designated utility corridor or an Area of Critical Environmental Concern (ACEC) per the California Desert Conservation Area Plan (CDCA) (BLM 1980).

On November 15, 2002, BLM granted IID right-of-way (ROW) CACA 044554 to construct the overbuilt 92 kV transmission line as part of a larger IID project. The BLM has confirmed that the granted ROW remains valid (BLM 2012) (**Appendix M**). The ROW through BLM land is 50 feet wide and 18,480 feet long and contains approximately 21.21 acres.

**Table 2.0-5** identifies the Township, Range and Sections in which the 2.25 mile overbuilt portion of the 92 kV transmission line is proposed. The transmission line poles are likely to have an average height of 65 feet. No variances are required because the poles do not exceed the maximum 120 foot height limit for the A-2 zone per Title 9 of Zoning Ordinance(Division 5, Chapter 8, §90508.07(C). The transmission line would be supported by single pole structures spaced approximately 220 to 280 feet apart.

**TABLE 2.0-5  
TOWNSHIP, RANGE AND SECTIONS OF TRANSMISSION LINE**

Township & Range	Section	Location
12 South, Range 9 East	13	N½N½S½
	14	N½N½S½
	15	N½NE¼4SE¼

Source: BLM 2002.

### C. FEATURES

#### **Transmission Interconnection**

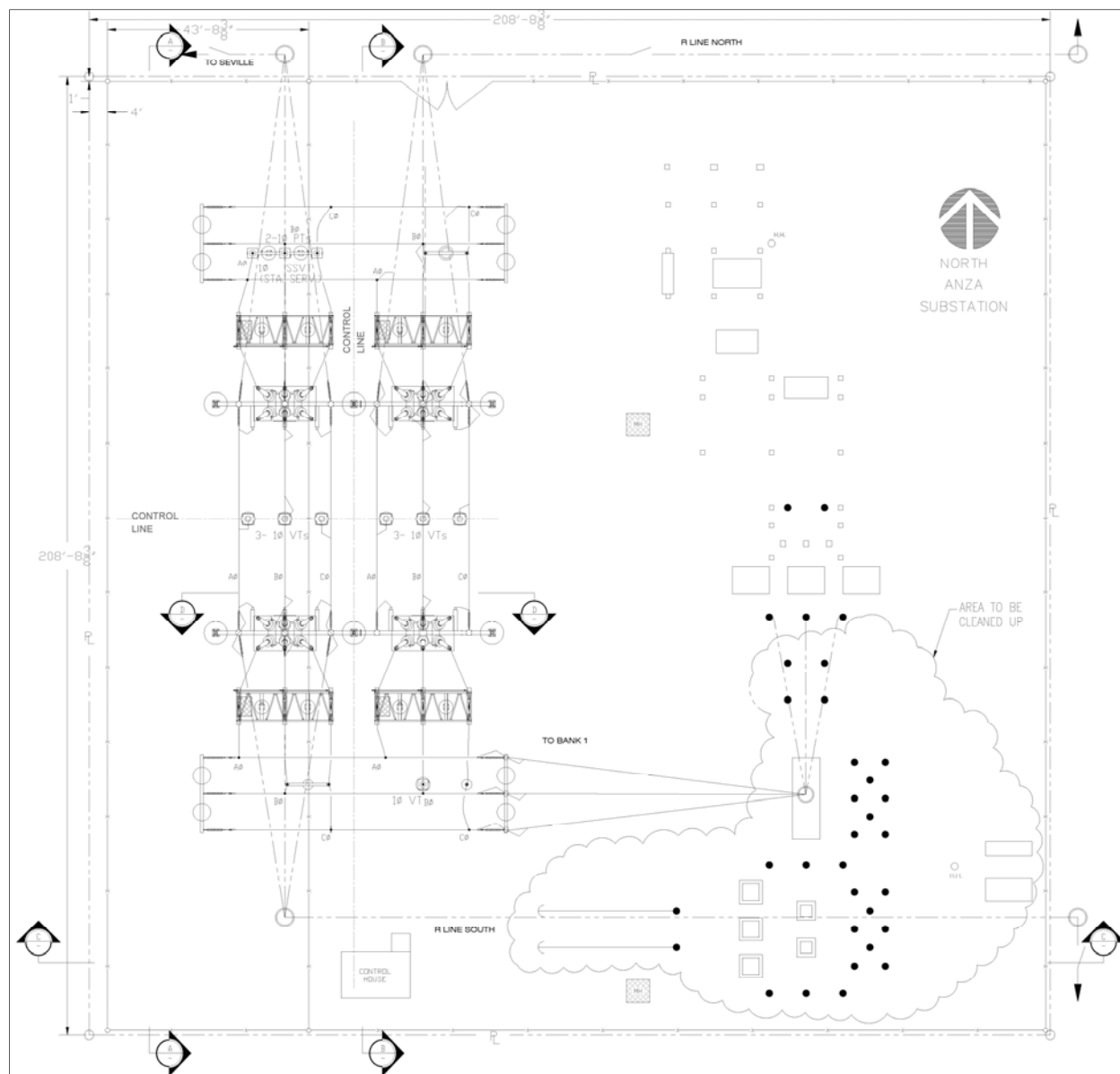
The Project would be interconnected with the IID electric grid at the IID Anza Substation. Transmission line construction would occur concurrently with the first solar project to be built. Several modifications to the Anza Substation area required to accommodate the interconnection with the 92 kV transmission line carrying power from the solar farm complex.

The IID Anza Substation currently consists of a 92 kV switch and breaker bank (which are oriented in an east-west alignment), a control house, a 92 kV transformer and 13.8 kV/7.4 kV distribution facilities. These facilities are installed within a fenced area of approximately 0.76 acres (approximately 160 feet east-west by 207 feet north-south) on lands owned by the IID. **Figure 2.0-9** is a preliminary layout of the facility provided by the Applicant. Immediately outside of the fenced area to the north and east are wooden poles approximately 65 feet in height which connect the Anza Substation with the existing north-south aligned 92 kV IID transmission line ("R" Line) located east of the Anza Substation and the existing east-west aligned 12.5 kV distribution line located north of the Anza Substation. The existing control house, 92 kV transformer and 13.8 kV/7.4 kV distribution facilities are currently proposed to remain as currently installed.

The proposed modifications to the Anza Substation would include the following:

- Extending the substation fence line approximately 44 feet to the west to create a fenced area of approximately 0.97 acres (approximately 204 feet east-west by 207 feet north-south). This expansion area would be located entirely on lands owned by the IID.
  - Relocating the existing 92 kV switch and breaker bank into the expanded substation area. The switch and breaker bank would also be reoriented in a north/south alignment.
- Adding a new 92 kV switch and breaker bank to accommodate the incoming generation from the Project for transmission through the IID's electric transmission system to the off-taker/end users.





Source: EMA 2014a.

**FIGURE 2.0-9**  
**PRELIMINARY ANZA SUBSTATION MODIFICATIONS**

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The new 92 kV switch and breaker bank would be added immediately inside the new fenced area, west of the reconfigured existing 92 kV switch and breaker bank. The new switch and breaker bank would be physically tied to the reconfigured 92 kV switch and breaker bank by a bus bar.

- Constructing up to five new steel and/or concrete poles. One new pole (approximately 40 feet in height) would be installed immediately northwest of the control house. This pole would replace an existing wooden pole to accommodate a split of the existing 92 kV circuit into the new buss bar connection between the reconfigured 92 kV switch and breaker bank and the new 92 kV switch and breaker bank. Two additional new poles (each approximately 70 feet in height) would be installed immediately north of each of the 92 kV switches and breaker banks, immediately outside of the fenced area on lands owned by Caltrans. The new pole installed north of the reconfigured 92 kV switch and breaker bank would route the line circuit to the east. The new pole installed north of the new 92 kV switch and breaker bank would route the line circuit to the west, which will be the new 92 kV IID transmission line that interconnects with the Seville Solar Farm Complex projects at the new IID switching station located within the Project area.
- Installing two new poles (each approximately 70 feet in height) east of the Anza Substation to replace existing wooden poles. The northern new pole could be installed on lands owned by Caltrans to connect the line circuit to the northern circuit of the existing 92 kV transmission line ("R" Line) located east of the Anza Substation. The southern new pole could be installed on lands owned by the IID to connect the line circuit to the southern circuit of the existing 92 kV transmission line ("R" Line) located east of the Anza Substation.

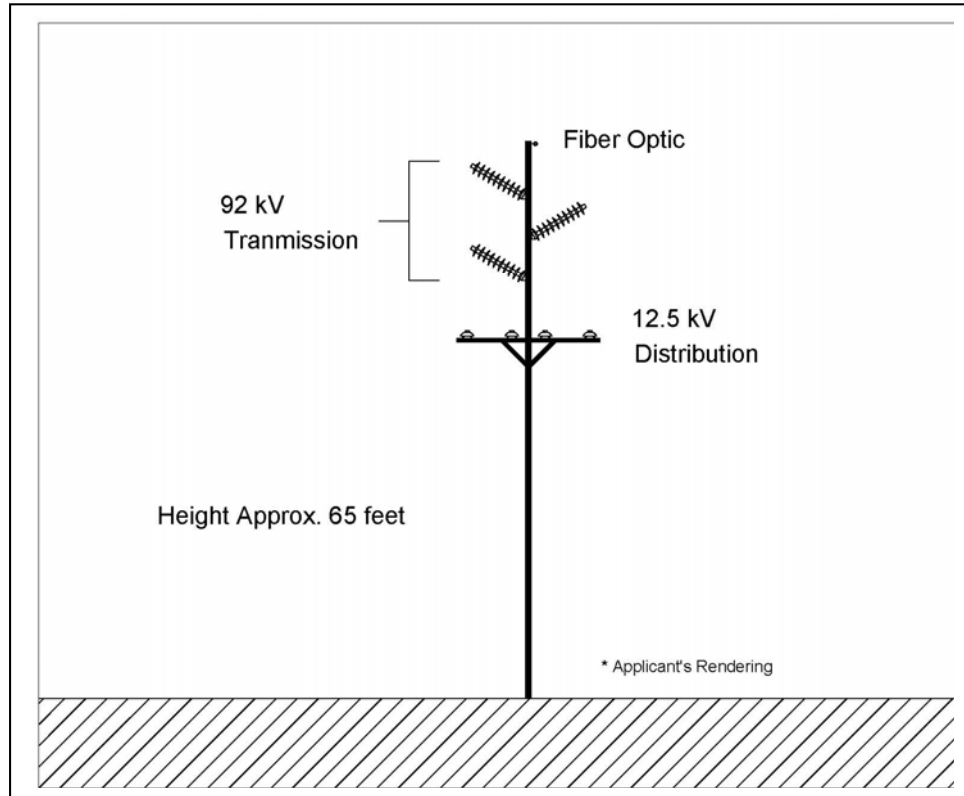
### **Structures**

The proposed 92 kV transmission line would include three conductors and static grounding/communication lines[s]. **Figure 2.0-10** is the Applicant's rendering of the proposed transmission structure.

### **D. CONSTRUCTION PROCESS**

The proposed 92 kV transmission line would be constructed within the 50-foot wide ROW granted to IID by the BLM and the easement granted to IID for the existing distribution line. Construction within the ROW would be subject to the terms and conditions of the ROW grant (HELIX 2014b, p. 1). Construction would include building out the 92 kV and 12.5 kV cross-arms and other appurtenances on the new pole. A hole for the new pole would be augered and the existing pole would be bent out of the alignment. The new pole would be placed in the new hole and the hole would be backfilled prior to stringing the transmission line. The new 92 kV transmission line and existing distribution lines would be strung or re-strung as necessary below the new conductors. As a last step, the old poles would be removed. No ground disturbance (other than use of the ROW by vehicles) would occur in association with the overbuild construction. The proposed Project is expected to start construction when all required permits are obtained.

Typically, a wire-pulling operation would require the use of an area of approximately 25 feet wide by 60 feet long (1,500 square feet), the total length of a typical bucket truck and wire-pulling trailer. Given the proposed spans (220 feet to 280 feet), the wire pulling would likely occur about every fifth span or every 1,000 feet to 1,200 feet. Wire pulling typically occurs from within the ROW of the pole line (the wire is pulled from centerline of the pole line so as to keep it aligned with the cross arms and conductors on the poles). At the corner poles (two on this span), the same area would be used, but the wire-pulling operation will likely be oriented at a 45° angle from the corner poles. Once the corner poles are strung, the wire-pulling operation would return to the pole line alignment to continue.



Source: ZGlobal 2013.

**FIGURE 2.0-10**  
**APPLICANT'S RENDERING OF 92 kV STRUCTURE**

### **Access**

The overbuilt IID transmission line on both the Property and BLM land would be accessed directly from SR 78.

### **Staging Areas**

The Border Patrol regularly drags (using four tires in parallel pulled behind a truck) the entire 35 feet of land between SR 78 and the transmission line alignment). This 35 foot area provides cleared space for IID to lay poles and set vehicles without the need to disturb more land or clear vegetation. Typically, the IID no longer "stages" construction. This is especially the case for shorter construction alignments such as the proposed transmission line. Instead, IID would only bring poles to the construction site that are to be installed on a given day. The existing poles are located about 35 feet south of the southern edge of the pavement. The new poles would be placed in the same alignment per the ROW application.

### **Clean-up of Temporarily Disturbed Areas**

The majority of the transmission line ROW has been previously disturbed by off-road vehicles and frequent "dragging" by the Border Patrol. The Project would limit laying of poles to these existing disturbed areas with no further disturbance of vegetation other than use of the ROW by construction and maintenance vehicles. All lands used or disturbed by IID during construction of the 92 kV transmission line would be cleared of all trash. No re-grading or revegetation of these temporarily disturbed lands is anticipated to be necessary.

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### **E. CONSTRUCTION SCHEDULE**

The IID 92 kV transmission line would be constructed during the same timeframe as the first solar energy project to allow connection of the first arrays when completed.

### **F. OPERATIONS AND MAINTENANCE**

The proposed 92 kV transmission line will be operated by the IID. As such, operations are mostly conducted from a remote control center (switching, outages, etc.) Very little regular maintenance is required and would be limited to occasional inspections and repair of any major damage.

#### **Noise**

The only substantial source of noise during operation of the transmission line would be from the vehicles used to occasionally access the line for operations and maintenance. Given the low background noise levels, Corona discharge may be somewhat detectable in the immediate vicinity of the lines and only during high humidity conditions, but not at levels that would be of concern. This is discussed further in Section 4.8, Noise.

#### **Fire**

All applicable fire laws and regulations will be observed during the transmission line operation and maintenance period. All on-site personnel would be advised of their responsibilities under the applicable fire laws and regulations, including taking practical measures to report and suppress fires.

BLM fire safety standards will be followed on BLM land. Requirements for fire tool availability, spark arresters/mufflers on equipment, and communication during extreme fire conditions will be coordinated with BLM representatives.

#### **Air Quality**

Operations of the transmission line would not generate air emissions. Some vehicle and power equipment emissions would be generated during inspection and maintenance activities that could occur up to once a year.

#### **Weed and Vegetation Management**

No weed management is anticipated for the IID overbuilt line. However, invasive / weedy species would be controlled for the portion of the 92 kV line that is not overbuilt.

#### **Waste Management**

Minimal waste is expected to be generated during operation of the transmission line. All waste, including trash and litter, garbage, and other solid waste would be removed to a disposal facility authorized to accept such materials.

#### **Hazardous Material Handling and Storage**

No hazardous materials would be used or stored within the transmission line alignment during operations. Any materials, if needed during maintenance activities, will be used in accordance with required practices.

### **G. DECOMMISSIONING**

Decommissioning of the transmission line would only occur upon termination of the ROW. Because the construction and operation of the 92 kV line is already authorized by the BLM as an IID system upgrade project, the overbuilt portion of the 92 kV line will not be removed when all of the solar projects are decommissioned. Likewise the modifications to the Anza Substation would also remain in place.

## H. SITE RECLAMATION

The ROW requires that the IID implement an "acceptable" rehabilitation plan upon termination of the ROW. Because construction and operation of the 92 kV line has been authorized by the BLM for a system upgrade project, the 92 kV line will remain in place after all of the solar projects are closed.

## I. DESIGN FEATURES AND BEST MANAGEMENT PRACTICES

**Table 2.0-6** identifies draft Applicant proposed measures that would be incorporated into the proposed Project to reduce impacts to resources.

**TABLE 2.0-6  
APPLICANT PROPOSED MEASURES INCLUDED AS PART OF THE PROPOSED  
SEVILLE SOLAR FARM COMPLEX PROJECT**

<b>AESTHETICS</b>
<b><i>Visibility</i></b>
Project lighting would be directed on site and would incorporate shielding as necessary to minimize illumination of the night sky and potential impacts to surrounding viewers. The solar panels would be constructed to absorb light and minimize any potential glare.
<b><i>Glint and Glare</i></b>
The Project PV and CPV modules are specifically designed to absorb light, rather than reflect it. PV modules are dark in color and have a coating that enables the panel to absorb as much of the available light as possible.
<b>AIR QUALITY</b>
Fugitive dust would be controlled during construction and operations as required by Imperial County Air Pollution Control District (ICAPCD) Regulation VIII. A Dust Control Plan would be prepared in conformance with ICAPCD requirements to address construction and earthmoving activities, track-out, open areas and unpaved roads. It would include information on the dust suppressants to be applied and the specific surface treatment(s) and/or control measures to be utilized to control track-out where unpaved and/or access points join paved public access roads. During operations, dust would be controlled by the periodic application of chemical stabilization agents (soil binders) to exposed soil surfaces.
<b>BIOLOGICAL RESOURCES</b>
<b><i>Burrowing Owl</i></b>
If burrowing owl are identified within the development areas during pre-construction burrowing owl/migratory bird surveys, potential impacts to the burrowing owl would be reduced to a level below significance by implementation of mitigation measures to avoid occupied owl burrows and bird nests, passively relocate owls/burrows (if avoidance is not possible), cover or cap construction piping/materials greater than three inches in diameter, and acquire and protect burrowing owl foraging habitat.
The California Department of Fish and Wildlife (CDFW) requires a Streambed Alteration Agreement (SAA) for projects that will divert or obstruct the natural flow of water; change the bed, channel, or bank of any stream; or use any material from a streambed. A SAA may be necessary for activities along the transmission line if in the very unlikely event that the identified channels cannot be avoided.
<b>HAZARDS AND HAZARDOUS MATERIALS</b>
Fuel that may be used on site during construction would be stored in secondary containment.

## 2.0 PROJECT DESCRIPTION

**TABLE 2.0-6**  
**APPLICANT PROPOSED MEASURES INCLUDED AS PART OF THE PROPOSED**  
**SEVILLE SOLAR FARM COMPLEX PROJECT**

<b>HYDROLOGY AND WATER QUALITY</b>
<b><i>Flood Hazard</i></b>
To minimize flood hazards and risk, all habitable structures will be located outside the FEMA 100-year flood zone and all habitable structures and inverters, transformers, and switch gear will be placed on foundations raised above the projected maximum flood levels.
The existing berms on the west and north sides of the Property which currently divert off-site flow around the Property will be maintained, but any flows which breach the berm(s) will be allowed to flow unimpeded across the solar farm complex site and under the solar panels.
<b><i>Construction Activities</i></b>
A Notice of Intent (NOI) to comply with the general permit for construction activities would be filed with the State Water Resources Control Board (SWRCB), and the required Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented consistent with the requirements of the State Water Resources Control Board.
<b>GEOLOGY AND SOILS</b>
<b><i>Geologic Hazards</i></b>
On-site buildings and other structures would be designed to meet seismic design requirements.
<b>TRANSPORTATION AND CIRCULATION</b>
Traffic control crews would be used as needed to ensure that people are aware of the presence of crossing or slow-moving construction vehicles.
Following construction, or during construction as necessary to maintain safe driving conditions, any damage to existing roadways caused by construction vehicles would be repaired.
<b>PUBLIC HEALTH AND SAFETY</b>
<b><i>Fire Prevention</i></b>
The construction site and access roads would be cleared of all vegetation. The cleared areas would be maintained throughout construction and operation of the solar energy projects. Fire extinguishers would be available around the construction sites. Water that is used for construction would also be available for fire-fighting. Personnel would be allowed to smoke only in designated areas.
<b><i>Emergency Services</i></b>
The Project preliminary site and grading plan has been prepared to accommodate the requirements of emergency services which may need to respond to an emergency at the Project. The solar farm complex site includes both primary and secondary access roads. These driveways would each be provided with a minimum of 30-foot double swing gates with "Knox Box"® for keyed entry onto the roads. Nominal 20-foot wide roads would be provided between the PV arrays, consistent with agency emergency access requirements, as well as around the perimeter of each project inside the perimeter security fence. Turn-around areas for operational and emergency vehicles would also be provided around each of the inverters.
<b><i>Security</i></b>
The entire solar farm complex site would be enclosed within a gated security fence. The solar farm complex site may also be monitored by a motion detection system and closed circuit camera system.

Source: Regenerate 2013a.

**2.2 ALTERNATIVES****2.2.1 ALTERNATIVE 1 – RELOCATED PRIMARY ACCESS ROAD AND TRANSMISSION LINE ALTERNATIVE**

This alternative includes the same solar farm complex as the proposed Project, but would relocate the proposed primary access road and the adjacent proposed 92 kV transmission line from State Route 78 approximately 1,000 feet east of the locations in the proposed Project. This alternative would reduce the length of the primary access road by approximately 1,000 feet and the length of the new transmission line by approximately 2,000 feet. The purpose of analyzing this alternative is to reduce the Project's surface disturbance, reduce the fugitive dust generated during solar project construction and operation, and increase the distance between the access road and the identified prehistoric cultural resource site which could potentially be eligible for the California Register of Historical Resources.

**2.2.2 ALTERNATIVE 2 – LOWER PROFILE SOLAR TECHNOLOGY NEAREST RESIDENCES**

This alternative includes the same solar farm complex as the proposed Project; except that concentrating photovoltaic (CPV) systems mounted on a dual-axis tracking system would not be used in Lot 1. The purpose of analyzing this alternative is to reduce potential visual impacts to the nearby residences located west of the Project.

**2.2.3 ALTERNATIVE 3 - NO PROJECT ALTERNATIVE**

CEQA Guidelines Section 15126.6(e)(1) requires that a No Project Alternative be analyzed in order to allow the decision-makers to compare the impacts of approving a proposed Project with the impacts of not approving the proposed Project. Under the No Project Alternative, the proposed Seville Solar Farm Complex would not be developed. No Major Subdivision/Tract Map application, CUP applications (for the five proposed solar farm projects and nine water wells), or floodplain development permit applications would be approved. The Project site could remain in its existing condition as idle farmland reverting to open desert, or could be reestablished as active agriculture to the extent that sufficient groundwater could be pumped from the aquifer.

These are discussed in detail in Chapter 6.0, Alternatives.

**2.3 INTENDED USES OF THE EIR/AUTHORIZING ACTIONS**

The County will serve as the Lead Agency regarding CEQA and the Applicant's request for CUPs and other required County and state approvals.

**2.3.1 DISCRETIONARY ACTIONS AND APPROVALS****A. COUNTY OF IMPERIAL**

In conformance with Sections 15050 and 15367 of the CEQA Guidelines, the County of Imperial has been designated the "lead agency," defined as, "the public agency which has the principal responsibility for carrying out or approving a project." Discretionary actions and approvals by the Imperial County Planning Commission and/or Board of Supervisors for the proposed Project or its alternatives may include, but are not limited to:

**Certification of the Final EIR**

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



## **2.0 PROJECT DESCRIPTION**

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### **Mitigation Monitoring and Reporting Program**

A Mitigation Monitoring and Reporting Program (MMRP) will be adopted as required by CEQA Guidelines Section 15097 to ensure that mitigation measures identified in the EIR are implemented as appropriate.

### **Conditional Use Permits**

The proposed Project will require approval of five CUPs (CUP 13-0011, 13-0012, 13-0013, 13-0014, and 13-0015) by Imperial County to allow construction and operation of each of the five solar energy projects in the proposed solar farm complex. In addition, nine CUPs (13-0016, 13-0017, 13-0018, 13-0019, 13-0020, 13-0021, 13-0022, 13-0023, and 13-0024) are required for the water wells within the Property.

### **Development Agreement/Public Benefit Agreement**

Regenerate anticipates entering into a Development Agreement with Imperial County in connection with development of the Project. The Development Agreement, among other terms, would extend the time allowed for initiating construction under each of the five solar conditional use permits (CUPs), nine water well CUPs and five floodplain development permits beyond the typical two years. In consideration for the extended construction initiation terms, Regenerate would also agree to compensate Imperial County for certain non-physical effects of the projects to Imperial County and its citizens. The Development Agreement would be formed pursuant to and consistent with the requirements of Division 23 (Development Ordinance for Non-Residential and Residential Projects) of Title 9 of the Imperial County Code (Land Use Ordinance). Alternatively, Regenerate may enter into a Public Benefit Agreement with Imperial County in connection with development of the Project to address certain non-physical effects of the solar energy projects to Imperial County and its citizens. Any such Public Benefit Agreement would not provide for an extended construction initiation term for any of the Project's CUP's. Execution of a Development Agreement/Public Benefit requires approval by the Board of Supervisors.

### **Major Subdivision/Tract Map Approvals**

A major subdivision/tract map is proposed which would reconfigure the seven existing legal property parcels (Assessor Parcel Numbers: 018-010-025, [018-170-004, 018-170-005, 018-170-006, 018-170-007 Note: These four APN #'s comprise one legal parcel], 018-170-008, 018-170-010, 018-170-011, 018-170-012 and 018-170-013) into eight new individual lots and four common development interest lots.

### **Floodplain Development Permits**

The Project will require floodplain development permits from the ICPDSD for each of the five proposed solar energy projects.

### **B. BUREAU OF LAND MANAGEMENT (BLM)**

#### **BLM Grant of Right-of-Way (BLM Right-of-Way Application Serial No. CACA 44554)**

The segment of the transmission line located on federal land has received ROW approval by the BLM to allow construction and operation of the proposed 92 kV transmission line. No further discretionary action is required by the BLM.

## **2.3.2 SUBSEQUENT/CONCURRENT ENTITLEMENTS TO IMPLEMENT THE PROPOSED PROJECT**

A variety of entitlement actions and permits may be required from Imperial County to implement the individual components of the proposed Project:

- Grading Plan for each solar energy project and the common lots.
- Construction Traffic Control Plans for each solar energy project.
- Building Permits for each solar energy project.
- Occupancy Permits for each solar energy project.

### **Public Water System Permit**

If the Project treats water on site for drinking water purposes, the Applicant will be required to obtain a permit from the Imperial County Public Health Department, Division of Environmental Health to operate a public water system.

### **Private Sewage Disposal Permit**

If the Project treats wastewater on-site, the Applicant will be required to obtain a permit from the Imperial County Public Health Department, Division of Environmental Health to construct and operate a septic system and leach field for the O&M building(s).

### **C. SITE PLAN**

Site Plan and Architectural Review is required for all non-residential projects and will be conducted for the proposed Project.

### **2.3.3 ACTIONS AND APPROVALS BY OTHER AGENCIES**

Responsible Agencies are those agencies that have approval over one or more actions involved with development of the proposed Project. Trustee Agencies are state agencies that have approval or jurisdiction by law over natural resources affected by a project. These agencies may include, but are not limited to the following:

- Imperial County Air Pollution Control District - Permits
- California Department of Transportation - Encroachment Permits and Construction Traffic Control Plans for each solar project.
- California State Water Resource Control Board - General Construction Storm Water Permit Notice of Intent/Storm Water Pollution Prevention Plans
- California Department of Fish and Wildlife - Consultation for Sensitive Species
- U.S. Army Corps of Engineers - Nationwide Permit (No. 12)
- California Department of Fish and Wildlife - Stream and Lakebed Agreement
- Imperial County Agricultural Commissioner's Office – Agree to a Pest Management Plan

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