SECTION 4.10

HAZARDS AND HAZARDOUS MATERIALS

This section describes federal, state and local regulations applicable to hazards and hazardous materials. It also describes the environmental setting with regard to potential hazards on the solar farm complex site and potential hazards created as a result of implementing the proposed Project. A Phase I Environmental Site Assessment was prepared for the area encompassed by the solar farm complex only (i.e. the ROW of the transmission line was not included).

This section discusses potential exposure to hazardous materials and/or creation of hazards that could result from implementation of the proposed Seville Solar Farm Complex. It focuses on hazardous materials and hazards requiring remediation or mechanisms to prevent accidental release. Measures are identified to reduce or avoid adverse impacts anticipated from construction and operation of the proposed Project. A discussion of cumulative impacts related to hazards and hazardous materials is also included in this section.

Various other hazards associated with the Project, such as: exposure to electromagnetic fields; interference with radio-frequency communications; hazardous shocks; fire hazards (non-wildland/operational); valley fever; and, interference with airport operations due to the height of transmission lines are briefly discussed. These hazards are acknowledged as potential areas of concern, but no criteria are available for purposes of evaluation or comparison.

This analysis does not address the potential exposure of workers to hazardous materials during construction, operation or reclamation of the Project. Employers must inform employees of hazards associated with their work and provide those employees with special protective equipment and training to reduce the potential for health impacts from the handling of hazardous materials.

Other hazards are addressed in the following sections: compatibility with the Airport Land Use Plan (Section 4.2, Land Use); seismic hazards (Section 4.6, Geology and Soils); exposure to noise (Section 4.8, Noise); and, flood hazards (Section 4.11, Hydrology and Water Quality).

4.10.1 REGULATORY FRAMEWORK

A. FEDERAL

Resource Conservation and Recovery Act of 1976 (42 USC 6901 et seq.)

The Resource Conservation and Recovery Act (RCRA) grants authority to the United States Environmental Protection Agency (EPA) to control hazardous waste from start to finish. This covers the production, transportation, treatment, storage, and disposal of hazardous waste. The RCRA also sets forth a framework for the management of non-hazardous solid waste. The 1986 amendments to the RCRA enabled the EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. The solar farm complex site currently contains a few structures and features that are considered potentially hazardous. Small quantities of hazardous materials will be used and stored on-site during operations and maintenance of the Project.

Federal Water Pollution Control Act (Clean Water Act)

The Federal Water Pollution Control Act, better known as the Clean Water Act (CWA), is a comprehensive statute focused on restoring and maintaining the chemical, physical and biological integrity of the nation's waters. Originally enacted in 1948, the CWA was amended numerous times until it was reorganized and expanded in 1972. It continues to be amended almost on an annual basis.

Primary authority for the implementation and enforcement of the CWA rests with the EPA. The CWA authorizes water quality programs, requires federal effluent limitations and state water quality standards, requires permits for the discharge of pollutants into navigable waters, provides enforcement mechanisms, and authorizes funding for wastewater treatment works construction grants and state revolving loan

programs, as well as funding to states and tribes for their water quality programs. Provisions have also been added to address water quality problems in specific regions and specific waterways. The Project would be subject to the General Permit for Discharges of Storm Water Associated with Construction Activity (NPDES No. CAS000002) (Construction General Permit Order 2010-2014-DWQ, effective February 14, 2011) during construction. Operation of the Project would be covered under Industrial Storm Water General Permit Order 97-03-DWQ (General Industrial Permit) - NPDES permit (No. CAS000001).

Occupational Safety and Health Act (OSHA)

Congress passed the Occupational Safety and Health Act (OSHA) to assure safe and healthful working conditions for working men and women. OSHA authorized enforcement of the standards developed under the OSHA and by assisted States in its efforts to assure safe and healthful working conditions. OSHA also provides for research, information, education, and training in the field of occupational safety and health. The Project would be subject to OSHA requirements during construction, operations and maintenance and reclamation.

Title 14, Part 77 of the Code of Federal Regulation, "Objects Affecting the Navigable Air Space"

Part 77 of the Code of Federal Regulation establishes standards and notification requirements for objects affecting navigable airspace. Part 77 describes the criteria used to determine the need for a Federal Aviation Administration (FAA) "Notice of Proposed Construction or Alteration" in cases of potential obstruction hazards. Notification allows the FAA to identify potential aeronautical hazards in advance, thus preventing or minimizing the adverse impacts to the safe and efficient use of navigable airspace. Any construction or alteration that is more than 200 feet above ground level (AGL) would be subject to review associated with Part 77. The proposed 92 kV transmission line would be overbuilt above an existing IID distribution line. The total height of the transmission line would be approximately 65 feet. No structure (including 92 kV structures) between the solar farm complex and the point of interconnection at Anza Substation would be more than 65 feet AGL.

B. STATE

Title 22 of the California Code of Regulations

Hazardous Materials Defined

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. According to Title 22, Section 66260.10, of the California Code of Regulations (CCR), a hazardous material is defined as:

> *…A substance or combination of substances which because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or, (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed*.

Chemical and physical properties that cause a substance to be considered hazardous include the properties of toxicity, ignitability, corrosivity, and reactivity (Title 22, Sections 66261.20 through 66261.24). Factors that influence the health effects of exposure to hazardous materials include dosage, frequency, the exposure pathway, and individual susceptibility. The proposed Project would require use of small amounts of hazardous materials (such as diesel fuel, oil and grease for heavy equipment) during construction, operation, and reclamation.

California Environmental Protection Agency

The California Environmental Protection Agency (Cal EPA) and the State Water Resources Control Board establish rules governing the use of hazardous materials and the management of hazardous waste. Applicable state and local laws include the following:

- Public Safety/Fire Regulations/Building Codes
- Hazardous Waste Control Law
- Hazardous Substances Information and Training Act
- Air Toxics Hot Spots and Emissions Inventory Law
- Underground Storage of Hazardous Substances Act
- Porter-Cologne Water Quality Control Act

Small quantities of hazardous materials will be used and stored on-site for miscellaneous, general maintenance activities that would be subject to state and local laws.

Department of Toxic Substances Control

The Department of Toxic Substances Control (DTSC) has primary regulatory responsibility for the management of hazardous materials and the generation, transport, and disposal of hazardous waste under the authority of the Hazardous Waste Control Law (HWCL). Enforcement is delegated to local jurisdictions that enter into agreements with DTSC.

California's Secretary of Environmental Protection established a unified hazardous waste and hazardous materials management regulatory program as required by Health and Safety Code Chapter 6.11. The unified program consolidates, coordinates, and makes consistent portions of the following six existing programs:

- Hazardous Waste Generations and Hazardous Waste On-site Treatment
- Underground Storage Tanks
- Hazardous Material Release Response Plans and Inventories
- California Accidental Release Prevention Program
- Aboveground Storage Tanks (spill control and countermeasure plan only)
- Uniform Fire Code Hazardous Material Management Plans and Inventories

The statute requires all counties to apply to the Cal EPA Secretary for the certification of a local unified program agency. Qualified cities are also permitted to apply for certification. The local Certified Unified Program Agency (CUPA) is required to consolidate, coordinate, and make consistent the administrative requirements, permits, fee structures, and inspection and enforcement activities for these six program elements within the county. Most CUPAs have been established as a function of a local environmental health or fire department.

The Office of the State Fire Marshal participates in all levels of the CUPA program including regulatory oversight, CUPA certifications, evaluations of the approved CUPAs, training, and education. The DTSC serves as the CUPA in Imperial County.

Small quantities of hazardous materials will be transported to and from the Project area and used and stored on-site for miscellaneous, general operations and maintenance activities.

California Public Utilities Commission (CPUC), General Order 95 (GO-95), "Rules for Overhead Electric Line Construction"

GO-95 governs clearance requirements to prevent hazardous shocks, grounding techniques to minimize nuisance shocks, and maintenance and inspection requirements. These standards ensure that the appropriate clearances would be reliably maintained between the transmission line and any existing electric line installations. The proposed Project will be designed to National Electric Safety Code (NESC) standards. However if the Project were to cross GO-95 jurisdictional facilities, then GO-95 would apply. A Report of Facility Information (RFI) has been submitted to IID requesting clearances.

California Public Utilities Commission, General Order 52 (GO-52)

GO-52 governs the construction and operation of power and communications lines to prevent or mitigate interference resulting from such lines.

California Public Utilities Commission, General Order 131-D, "Rules for Planning and Construction of Electric Generation Line and Substation Facilities in California"

GO-131-D specifies application and noticing requirements for new line construction including electromagnetic field (EMF) reduction. The proposed Project would be subject to this order.

Title 8, California Code of Regulations (CCR) section 2700 et seq. "High Voltage Safety Orders"

Title 8 of the California Code of Regulations specifies requirements and minimum standards for safety when installing, operating, working around, and maintaining electrical installations and equipment. The proposed Project would be subject to Title 8.

National Electrical Safety Code

The National Electrical Safety Code specifies grounding procedures to limit nuisance shocks and specifies minimum conductor ground clearances. The proposed Project would be subject to this code and would be designed with a grounding system providing an adequate path-to-ground to permit the dissipation of current created by lightning and ground faults.

14 California Code of Regulations (CCR), Sections 1250 – 1258, "Fire Prevention Standards for Electric Utilities"

14 CCR provides specific exemptions from electric pole and tower firebreak. 14 CCR also provides conductor clearance standards and specifies when and where standards apply. These standards address hazards that could be caused by sparks from conductors of overhead lines, or that could result from direct contact between the line and combustible objects. The proposed Project would be subject to these standards.

C. LOCAL

County of Imperial General Plan

Both natural and man-made hazards are addressed in the County of Imperial General Plan. The Seismic and Public Safety Element also contains a set of goals and objectives for land use planning and safety, emergency preparedness, and the control of hazardous materials. The goals and objectives, together with the implementation programs and policies, provide direction for development. **Table 4.10-1** analyzes the consistency of the proposed Project with the applicable goal and objectives of the County of Imperial General Plan Seismic and Public Safety Element. While this EIR analyzes the Project's consistency with the General Plan pursuant to CEQA Guidelines Section 151250, the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

TABLE 4.10-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goal and Objectives	Consistent with General Plan?	Analysis
SEISMIC AND PUBLIC SAFETY ELEMENT		
Control Hazardous Materials		
Goal 3: Protect the public from exposure to hazardous materials and wastes.	Yes	The proposed Project does not involve exposure of the public to hazardous materials and wastes. The Project would not use nor store any appreciable quantities of hazardous chemicals on site during normal operations. Fuel that may be used on site during construction would be stored in secondary containment. In addition, each O&M building could also include its own fire and hazardous materials safety systems, chemical safety systems and emergency response facilities. Thus, the proposed Project is consistent with this goal.
Objective 3.1 Discourage the transporting of hazardous materials/waste near or through residential areas and critical facilities.	Yes	Two residential structures are located on the north side of Lot 5 of the solar farm complex site. These residential structures would be owned by the owner of the solar project. No other critical facilities such as a hospital or fire station are on or in the vicinity of the Project area. Large quantities of hazardous materials are not required as part of construction, operation and reclamation of the proposed Project. Therefore, the proposed Project is consistent with this objective.
Objective 3.2 Minimize the possibility of hazardous materials/waste spills.	Yes	Very little hazardous waste (waste oil and lubricants, spill cleanups, etc.) is expected to be generated from either construction or normal operations of the Project. In addition, fuel that may be used on site during construction would be stored in secondary containment (refer to Table 2.0-6, in Chapter 2.0). Therefore, the proposed Project is consistent with this objective.
Objective 3.3 Discourage incompatible development adjacent to sites and facilities for the production, storage, disposal, and	Yes	The solar farm complex site is surrounded by former agricultural land and open desert. The proposed 92 kV transmission line extends through open desert. Likewise the

TABLE 4.10-1
IMPERIAL COUNTY GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goal and Objectives	Consistent with General Plan?	Analysis
transport of hazardous materials/waste as identified in the County General Plan and other regulations.		Anza Substation modifications would expand the existing facility within open desert. The proposed Project is compatible with surrounding uses and the Project area is not adjacent to any hazardous facilities. Therefore, the Proposed Project is consistent with this objective.

Imperial County Office of Emergency Services – Emergency Operations Plan

The Imperial County Fire Department (ICFD) is the local Office of Emergency Services (OES) in Imperial County. The County Fire Chief is the OES Coordinator. An Assistant OES Coordinator maintains the OES program for the County of Imperial. ICFD acts as the lead agency for the Imperial County Operational Area (OA) and provides leadership in all phases of developing the emergency management organization, including public education, training, emergency operations center operations, interagency coordination, and plan development (Imperial County OES 2007).

The County of Imperial has adopted the "Imperial County Operational Area - Emergency Operations Plan," (EOP) which addresses the County's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and nuclear defense operations. The EOP provides a comprehensive, single source of guidance and procedures for the County to prepare for and respond to significant or catastrophic natural, environmental, or conflict-related risks that produce situations requiring coordinated response. It further provides guidance regarding management concepts relating to response and abatement of various emergency situations, identifies organizational structures and relationships, and describes responsibilities and functions necessary to protect life and property. The EOP is consistent with the requirements of the Standardized Emergency Management System (SEMS) as defined in Government Code Section 8607(a) and the U.S. Department of Homeland Security National Incident Management System (NIMS) for managing response to multi-agency and multi-jurisdictional emergencies. SEMS/NIMS incorporates the use of the Incident Command System (ICS), mutual aid, the operational area concept, and multi/interagency coordination (Imperial County OES 2007).

The EOP identifies certain open space areas and public buildings to serve as emergency shelters when residents must be relocated. The Project area is located to the west of the Salton Sea in Zone 5 as depicted on the "Fire/Emergency Management/Staging and Shelter Zone Map" of the EOP (Imperial County OES 2007, p. 73). No portion of the proposed Project area is designated as an emergency shelter area on the "Fire/Emergency Management/Staging and Shelter Zone Map" of the EOP (Imperial County OES 2007).

County of Imperial Fire Prevention and Explosives Ordinance

The County of Imperial Fire Prevention and Explosives Ordinance, Section 53101-53300, contains provisions for the purpose of prescribing regulations governing conditions hazardous to life and property from fire or explosion. Such measures in this Ordinance include the following:

- Storage of flammable materials

- Storage of radioactive materials
- Permit required for sale and use of fireworks
- Abatement of weeds and other vegetation

Weed and vegetation control would be enforced as part of operations and maintenance of the proposed Project.

4.10.2 ENVIRONMENTAL SETTING

A. SOLAR FARM COMPLEX

The solar farm complex site is located on approximately 1,238 acres of privately-owned land in Imperial County formerly used for agricultural. The Project area is located in west-central Imperial County, California, approximately eight miles west of the junction of SR 78 and SR 86, and approximately three miles east of the San Diego County line. The Project area is also approximately 14 miles from the southern tip of the Salton Sea and one-half mile west of Pole Line Road. Specifically, the Project area is located in portions of Sections 13, 14, 15, 22, 23, 25, 26, and 27, Township 12 South (T12S), Range 9 East (R9E), San Bernardino Baseline and Meridian (SBB&M) (refer to Figure 2.0-1 and Figure 2.0-2 in Chapter 2.0).

Phase I Environmental Site Assessment

Information contained in this section is summarized from the *Phase I ESA Report for the Seville Solar Farm 1791 W. Hwy 78, Westmorland, California* prepared by GS Lyon (GS Lyon 2013). This Phase I ESA covered the 1,238 acre solar farm complex site. In addition, the *Phase I Environmental Site Assessment Seville Solar Farm One Portions of Sections 26 and 27 of T12S, R9E, SBB&M Imperial County, California* prepared by Environmental Management Associates (EMA 2013b) was also incorporated into the analysis as appropriate. The Phase I ESA prepared by EMA covered approximate 320 acres and encompassed Lots 1 and 2 of the proposed solar farm complex site. Both Phase I ESAs are provided in **Appendix H** on the attached CD of Technical Appendices of this EIR.

The purpose of a Phase I ESA is to determine if any recognized or potential environmental conditions are present on the property to be developed. The American Society for Testing and Materials (ASTM) defines "recognized environmental conditions" as "any hazardous substance or petroleum product under conditions that indicate an existing, past, or material threat of release into the structures, ground, groundwater, or surface water at the subject site."

A Phase I ESA includes the results of a site reconnaissance to identify current conditions of the subject property and adjoining properties, a review of various readily available federal, state, and local government agency records, and review of available historical site and site vicinity information.

For the purposes of the analysis in this section, the Phase I ESAs were prepared for parcels associated with the solar farm complex. The Phase I ESA's focused on these parcels based on the historical use of the Property as agricultural land. The portion of the 92 KV line extending off the Property and the modifications to the Anza Substation would occur in open desert. Based on past use of these areas for the existing IID 12.5 kV distribution line and the existing Anza Substation, a Phase I ESA was not warranted for these areas.

Background Review

A review of historic topographic maps (provided in Appendix B of the Phase I ESA Report prepared by GS Lyon included as **Appendix H** of this EIR), historic aerial photographs (provided in Appendix C of the Phase I ESA Report prepared by GS Lyon included as **Appendix H** of this EIR), was performed to evaluate

potentially adverse environmental conditions resulting from previously ownership and uses of the site (GS Lyon 2013, p. 2). The 1954 aerial photograph shows the solar farm complex site as undeveloped desert land. The 1978, 1984, 1992, 2005, 2009, 2010 and 2012 aerial photographs show the solar farm complex site as agricultural fields in and out of production depending on year (GS Lyon 2013, p. 8).

Regulatory Review

GS Lyon contracted Environmental Data Resources, Inc. (EDR) to generate a compilation of State and Federal regulatory lists consisting information regarding hazardous material occurrence on or within a one mile radius of the solar farm complex site (GS Lyon 2013, p. 2). The EDR report is provided in Appendix E of the Phase I ESA Report prepared by GS Lyon included as **Appendix H** of this EIR.

Site Reconnaissance

A site reconnaissance was performed by GS Lyon staff on September 23, 2013. The reconnaissance included visual observation of surficial conditions at the solar farm complex site and observation of adjoining properties to the extent that they were visible from public areas. The reconnaissance also included: observation of the solar farm complex site for the presence of polychlorinated biphenyls (PCBs) and/or asbestos containing materials (ACMs); indications of surface or subsurface hydro carbon or pesticide contamination; the presence of on-site groundwater wells, pits or sumps, wastewater discharge practices; and, surface water drainage patterns (GS Lyon 2013, p. 2).

Properties surrounding the solar farm complex site consist of vacant desert land. The solar farm complex site is also bounded by Fish Creek on the south side, and Tarantula Wash to the northeast. San Filipe Creek previously bisected the solar farm complex site. Flood control along the western edge of the solar farm complex site divert the San Filipe Creek stormwater flows to the south and east of the solar farm complex site (GS Lyon 2013, p. 7).

Site Conditions

All agricultural activities on the Property have been suspended within the last few years with the only exception being a small area in the southeast corner of the solar farm complex site which contained grain crops in 2012. At the height of agricultural use, approximately 1,700 acres were being farmed. In the past few years, 80 to 100 acres have been farmed. During development of the farm, a series of transite pipes (asbestos concrete pipe) were used to distribute irrigation water from five on-site water wells. A storage area is located along the east side of the entry road at the western boundary of Lot 5.

General practices performed on-site at farm shops in the Imperial Valley include: filling farm equipment with oils and gasoline; changing engine oil; repairing vehicles; and, storing pesticides, herbicides, gasoline and oil. No sumps or pits (other than a truck scale at the farm office) were observed on the proposed solar farm complex site. The office building and each on-site residence has a buried septic tank and either a leach field or seepage pit for onsite wastewater disposal (GS Lyon 2013, p. 5).

Various features on the proposed solar farm complex site have potential to contain hazardous substances or potential contamination. Each is briefly described below based on details provided in the Phase I ESAs (EMA 2013 and GS Lyon 2013).

Storage Tanks

The aboveground gasoline tank in the central portion of the storage yard along the east side of the entry road at the western boundary of Lot 5 is within a walled containment slab (GS Lyon 2013, p. 5).

No underground storage tanks (USTs) were observed on the solar farm complex site during the site reconnaissance. However, USTs have not be determined to be non-existent (GS Lyon 2013, p. 5).

Transformers

Transformers were noted on power poles in six locations on the five lots. (The transformers were noted on the Site Map included in Appendix B of the Phase I ESA *Report* prepared by GS Lyon included as **Appendix H** of this EIR). Three transformers are located at each of the three onsite water wells. A single transformer was located on the power pole supplying the mobile home on the west side of Lot 5. No evidence of leakage from the transformers was noted and IID records indicate that all transformers in the Imperial Valley have been tested for PCB content. The transformers containing PCBs have been replaced by the IID (GS Lyon 2013, p. 5).

Vehicle Fueling Area

A vehicle fueling area has a concrete slab that slopes to the center of the slab to contain accidental spills. Hydrocarbon stains were not found in the area (GS Lyon 2013, p. 5.).

Waste Disposal

No trash piles or dumping was observed on the solar farm complex site during the site reconnaissance (GS Lyon 2013, p. 5).

Pesticide Use

Typical agricultural practices in the Imperial Valley consist of aerial and ground application of pesticides and application of chemical fertilizers to both ground and irrigation water. Many agricultural fields are burned after crop removal (wheat stubble, asparagus, etc.). Typical concentrations of DDT and DDE pesticides in the soil from agricultural applications prior to 1980 are approximately 25% to 50% of regulatory action levels (GS Lyon 2013, p. 9).

On-site Wells

Five wells are currently dispersed throughout the solar farm complex site. Two wells are located on Lot 5 (Well 1 and Well 7) and one well each is located on Lots 1 (Well 4), Lot 3 (Well 6) and Lot 4 (Well 5). The wells were used to irrigate the Allegretti Farms property (GS Lyon 2013, p. 7).

Asbestos

Two rural residences on the north side of Lot 5 and the two farm houses adjacent to the farm shop yard on the west side of Lot 5 may have asbestos containing materials (ACM). The potential for ACM exists based on the age of the structures (could pre-date 1978) (GS Lyon 2013, p. 9).

Irrigation pipeline could exist below the surface of the solar farm complex site. Property records suggest that about one-half mile of 15-inch diameter transite cement pipeline is located along the northern boundary of Lots 1 and 2. Transite is an asbestos containing cement in common use during the timeframe that the irrigation network was constructed. Asbestos fibers were historically used in the construction of transite to provide tensile strength to the cement pipeline. The use of asbestos to manufacture transite was phased out in the 1980s (EMA 2013b).

Lead-based Paint

Concern related to the potential for lead-based paint (LBP) is primarily related to older structures. The existing structures on the solar farm complex site include two rural residences on the north side of Lot 5 and two farm houses adjacent to the farm shop yard on the west side of Lot 5 (GS Lyon 2013, p. 9).

Radon

Radon gas is not believed to be a potential hazard at the solar farm complex site. A report titled "California Statewide Survey Screening Results" dated November 1990 and published by the California State

Department of Health Services for indoor areas, notes that Southern California showed a low risk of elevated radon level. This conclusion was based on two-day tests conducted from January through April 1990. Some of the reported testing was performed in Imperial County; however no data was observed as being at or near the solar farm complex site. The EDR report indicates that Imperial County lies within the EPA Radon Zone 3 (< 2 pCi/L) (GS Lyon 2013, p. 9). Areas designated Zone 3 have a low potential for radon.

Fire Hazard / Smoke

The potential for a major fire in the unincorporated areas of the County is generally low. According to the Imperial County Natural Hazard Disclosure (Fire) Map prepared by the California Department of Forestry and Fire Protection (CDF 2000), the Project area is not located in an area characterized as either: (1) a wildland area that may contain substantial forest fire risk and hazard; or (2) very high fire hazard severity zone. The closest wildland area prone to forest fire is located approximately 30 miles southwest of the Project area near Interstate 8 and State Route 98 west of Ocotillo.

Valley Fever

Valley Fever is an illness caused by a fungus (*Coccidioides immitis* and *C. posadasii*) that grows in soils under certain conditions. Favorable conditions for the Valley Fever fungus include low rainfall, high summer temperatures, and moderate winter temperatures. Soils within the Imperial Valley, including the Project area, fit the profile to harbor Valley Fever spores. When soils are disturbed by the wind or other activities such as construction and farming, Valley Fever fungal spores become airborne. The spores present a potential health hazard when inhaled. Individuals in occupations such as construction, agriculture, and archaeology have a higher risk of exposure due to working in areas of disturbed soils which may have the Valley Fever fungus. Infection risk is highest in California during a six month period from June to November. Animals are also susceptible to the disease. In extreme cases, the disease can be fatal, though the majority of Valley Fever cases are very mild with over 60 percent or more of infected people having no symptoms or flu-like symptoms (BLM 2010). Imperial County has a relatively low Valley Fever incidence rate. Data as of September 10, 2011 indicated that there were 3 cases in 2006; 11 cases is 2007; 8 cases in 2008; 9 cases in 2009 and 4 cases in 2010 (CDPH 2011).

B. TRANSMISSION LINE

The Phase I ESAs prepared for the proposed Project did not include the portion of the 92 transmission line to be located on lands under the jurisdiction of the BLM or the IID land on which the Anza Substation modifications are proposed. On November 15, 2002, BLM granted IID right-of-way (ROW) CACA 044554 to construct the overbuilt 92 kV transmission line above an existing IID distribution line as part of a larger IID project. No separate NEPA review was required for this aspect of the Project as the BLM has confirmed that the granted ROW remains valid (BLM 2012). Modifications to the Anza Substation would occur in open desert on lands owned by the IID and would expand the existing facility approximately 0.24 acre.

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. The Project would limit vehicle access and laying of poles to existing disturbed areas with no further disturbance of vegetation or land allowed. During the construction phase, small amounts of hazardous materials such as fuels and lubricants may be used on equipment within the ROW if necessary. No hazardous materials would be used or stored within the transmission line alignment during operations. If any such materials are needed during maintenance activities, they will be used in accordance with required practices.

4.10.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the following CEQA Guidelines, as listed in Appendix G. The project would result in a significant impact to hazards and hazardous materials if it would result in any of the following:

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 reasonably 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.

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 result in a safety hazard for people residing or working in the project area.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

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 or where residences are intermixed with wildlands.

B. ISSUES SCOPED OUT AS PART OF THE INITIAL STUDY

Several criteria were eliminated from further evaluation as part of the Initial Study. Criterion “c” was eliminated because the Project is not located within one-quarter mile of an existing school. Criterion d was eliminated because the solar farm complex site did not appear in an Agency Database Record Search of a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5. Criteria e and f were eliminated because the Project is not located within two miles of a public airport or a private airstrip. The Salton Sea Airport is approximately 9 miles northeast of the Project; the Ocotillo Airport is approximately 6.75 miles to the northwest of the Project. Thus, no impact is identified for these issue areas and they will not be discussed further.

Criterion “g” was eliminated because the proposed circulation plan for the solar farm complex site will be required to provide emergency access points and safe vehicular travel. In addition, local building codes would be followed to minimize flood, seismic, and fire hazard. Thus, the proposed Project would not impair the implementation of, or physically interfere with, any adopted emergency response plans or emergency evacuation plans. No impact is identified for this issue area and it will not be discussed further.

Criterion “h” was eliminated because the Project area is not characterized as an area of urban/wildland interface. According to the Imperial County Natural Hazard Disclosure (Fire) Map prepared by the

California Department of Forestry and Fire Protection (2000), the Project area does not fall into an area characterized as either: 1) a wildland area that may contain substantial forest fire risk and hazard; or 2) a very high fire hazard severity zone. Thus, the Project would not expose people or structures to significant risk of loss injury or death involving wildland fire. Therefore, no impact is identified for this issue area and it will not be discussed further.

C. Issues of Concern with No Applicable Criteria

Several hazards of potential concern to the public with no corresponding criteria are briefly discussed below. These hazards are acknowledged and discussed to the extent that they would result from the proposed Project.

Electromagnetic Fields

Potential impacts from the proposed Project to public health for residents of Imperial County with respect to electromagnetic fields are briefly acknowledged in this discussion. Both electric and magnetic fields occur together whenever electricity flows (BLM/CEC 2010). Electric voltage (electric field) and electric current (magnetic field) from the proposed transmission line would create the potential for electromagnetic field (EMF) exposure. The available evidence as evaluated by the California Public Utilities Commission and other regulatory agencies has not established that such fields pose a significant health hazard to exposed humans (BLM/CEC 2010). To date, there are no health-based federal regulations or industry codes specifying environmental limits on the strengths of fields from power lines. Likewise, the State has not adopted any specific limits or regulation on EMF levels related to electric power facilities (BLM/CEC 2010).

The potential for the transmission line on BLM land to impact human health is minimal because it would be located an existing ROW CACA 044554. The ROW already has an existing IID distribution line and the proposed 92 kV transmission line would be overbuilt above an existing IID distribution line as part of a larger IID project. No residential uses are allowed within this corridor. Based on the overall undeveloped and unpopulated nature of the setting for the Project (solar farm complex, transmission line and substation modifications), long-term exposure to EMFs generated by the transmission line are not expected and no impact would occur.

When the transmission line is activated and begins to transmit electricity, EMFs would be generated in proximity to the line. Currently, there is no agreement among scientists regarding the potential health risk related to EMFs.

Interference with Radio-Frequency Communications

Transmission line related radio-frequency interference is one of the indirect effects of project operation. Interference may be produced by the physical interactions of line electric fields. Such interference is due to the radio noise produced by the action of the electric fields on the surface of the energized conductor. The process involved is known as “corona discharge” (also discussed in Section 4.8, Noise), but is referred to as “spark gap electric discharge” when it occurs within gaps between the conductor and insulators or metal fittings (BLM/CEC 2010). When generated, spark gap electric discharge manifests itself as perceivable interference with radio or television signal reception or interference with other forms of radio communication. The level of interference depends on factors such as line voltage, distance from the line to the receiving device, orientation of the antenna, signal level, line configuration and weather conditions. As a result, maximum interference levels are not specified as design criteria for modern transmission lines. The level of any such interference usually depends on the magnitude of the electric fields involved and the distance from the line. The potential for such impacts is minimized by reducing the line electric fields and locating the line away from inhabited areas. The proposed transmission line is within existing ROW CACA 044554 in a rural portion of the county with a few scattered residences.

The proposed transmission line would be built and maintained in keeping with all applicable standards and regulations, including those prescribed by the State of California Rules for Overhead Electric Line Construction, General Order No. 95 (GO-95). The potential for spark gap electric discharge interference is usually of concern for lines 345-kV or above, not for 92-kV lines. Because the proposed transmission line would extend through an open desert area with no residences in the immediate proximity, no impacts to radio-frequency interference would occur.

Hazardous Shocks

Hazardous shocks are those that could result from direct or indirect contact between an individual and an energized line. No design-specific federal regulations have been established to prevent hazardous shocks from overhead power lines (BLM/CEC 2010). Safety is assured within the industry from compliance with the requirements specifying the minimum national safe operating clearances applicable in areas where the line might be accessible to the public. The proposed transmission line would be located in rural and uninhabited open desert area making it highly unlikely that the public would come in contact with the line. Moreover, the transmission line would be located within existing ROW CACA 044554. The Applicant has indicated that the transmission line component of the proposed Project would be designed, constructed, and operated to meet or exceed the requirements of GO-95.

Fire Hazard (Non-Wildland/Operational)

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 throughout the buildings. Class C (electrical) rated fire extinguishers will be mounted at each inverter.

The PV modules are typically Class C fire-rated; 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 is of nonflammable material (aluminum, steel, and glass). Each development lot (1 thru 5) would have 10,000 gallons of water in an on-site tank reserved for firefighting.

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.

Valley Fever

Construction of the proposed Project would occur in an area favorable to the growth of Valley Fever, a fungus (*Coccidioides immitis*) that grows in soils in areas of low rainfall, high summer temperatures, and moderate winter temperatures. Project construction would disturb the soil and cause the fungal spores to become airborne, potentially putting construction personnel and wildlife at risk of contracting Valley Fever. However, Imperial County is not considered to have a high incidence of Valley Fever (CDPH 2011). While the potential exposure of workers to Valley Fever spores could occur during construction, implementation of mitigation measures identified to reduce PM_{10} in Section 4.4, Air Quality (i.e. preparation of a Dust Control Plan) would be effective in reducing airborne dust. Implementation of these mitigation measures, as well as a dust control plan as required by the Imperial County Air Pollution Control District, would minimize the spread of fungal spores thereby reducing potential for contracting Valley Fever during construction. No impacts associated with exposure to Valley Fever would occur during

operations and maintenance as the applicant intends to apply a dust palliative to suppress fugitive dust during the operational phase of the project.

D. METHODOLOGY

The analysis of hazardous materials is twofold: those potentially existing on the site and those that would be used as part of project construction, operations and maintenance, and reclamation.

Potential existing hazards were assessed based on information contained in the *Phase I ESA Report for the Seville Solar Farm 1791 W. Hwy 78, Westmorland, California* prepared by GS Lyon (GS Lyon 2013). This Phase I ESA covered the 1,238 acre area within the proposed solar farm complex site. In addition, the *Phase I Environmental Site Assessment Seville Solar Farm One Portions of Sections 26 and 27 of T12S, R9E, SBB&M Imperial County, California* prepared by Environmental Management Associates (EMA 2013b). These documents are provided on the attached CD of Technical Appendices as **Appendix H** of this EIR.

Some hazardous materials would be used on a short-term basis during. Others would be stored on-site for use during operations and maintenance. Therefore, this analysis was conducted by examining the choice and amount of chemicals to be used, the manner in which the Applicant would use the chemicals, the manner by which they would be transported to the facility, and the way in which the Applicant plans to store the materials on site.

E. PROJECT IMPACTS AND MITIGATION MEASURES

Hazardous Materials Transport, Use, Disposal and Accidental Release

Impact 4.10.1 The proposed Project does not involve the use of large quantities of hazardous materials that would present a risk to the public or the environment through transport, use, or disposal. This is considered a l**ess than significant impact**.

Construction

Transport

Some hazardous materials would be required during construction of the proposed Project. These include diesel fuel, oil and grease for heavy equipment. Large quantities of these materials are not anticipated to be necessary but would require transport to the Project area. All hazardous materials (such as diesel fuel, oil and grease for heavy equipment) transported to the Project area during construction would occur in compliance with Department of Toxic Substances Control (DTSC) regulations. Therefore, the likelihood of an accidental release during transport, or residual contamination following accidental release, is not anticipated and impacts are considered **less than significant**.

Likewise, all hazardous materials (such as diesel fuel, oil and grease for heavy equipment) used on and transported to the transmission line ROW and Anza Substation modification area during construction would occur in compliance with applicable regulations. Thus, **less than significant impacts** are anticipated in association with use, transport, and disposal of hazardous materials during construction of the proposed Project.

Use and Storage

A variety of hazardous materials would be used during construction of the proposed Project. However, no acutely toxic hazardous materials would be used and none of the materials are anticipated to pose a significant potential for off-site impacts such as contamination through a large release of chemicals. The Applicant has indicated the fuel that may be used on site during construction would be stored in secondary containment (refer to Table 2.0-6 in Chapter 2.0). The Project will also be required to comply with State laws and County Ordinance restrictions, which regulate and control hazardous materials handled on site.

Therefore, potential for accident conditions involving the release of hazardous materials used or stored during construction is considered a **less than significant**.

Disposal

Very little hazardous waste (waste oil and lubricants, spill clean-ups, etc.) is expected to be generated during Project construction. Wastes generated during construction will be disposed of in accordance with local, State and federal regulations. Therefore, hazardous waste disposal impacts are considered **less than significant** during Project construction.

Operation

Transport

A limited quantity of hazardous materials may be required during operation the proposed Project. All hazardous materials transported to the Project area during operation would occur in compliance with DTSC regulations. Therefore, the likelihood of an accidental release during transport, or residual contamination following accidental release, is not anticipated throughout Project operation; impacts are considered **less than significant**.

Use and Storage

Each O&M building on each solar energy project could be outfitted with auxiliary facilities including hazardous materials safety systems and emergency response facilities. The design and construction of the O&M building(s) would be consistent with County building standards.

No hazardous materials would be used or stored within the transmission line alignment or Anza Substation modifications area during operations. If any hazardous substances are needed for operational maintenance activities, these materials would be used in accordance with required practices. Therefore, potential for accident conditions involving the release of hazardous materials used or stored during Project operation is considered a **less than significant**.

Disposal

Very little hazardous waste (waste oil and lubricants, spill clean-ups, etc.) is expected to be generated during Project operation. Wastes generated during operation (such as mineral oil used to electrically insulate the transformers) will be disposed of in accordance with local, State and federal regulations. Thin-film (CdTe) PV panels may be used in one or more of the Projects. Although CdTe is a lung carcinogen, the thin CdTe layers "are stable and solid and are encapsulated between thick layers of glass. Unless the module is purposely ground to a fine dust, dust particles cannot be generated. The vapor pressure of CdTe at ambient conditions is zero. Therefore, it is impossible for any vapors or dust to be generated when using PV modules…The only issue of some concern is the disposal of the well-encapsulated, relatively immobile CdTe at the end of the modules' useful life. Thin CdTe PV end-of-life or broken modules pass Federal (TCLP-RCRA) leaching criteria for non-hazardous waste. Therefore, according to current laws, such modules could be disposed of in landfills" (Fthenakis and Zweibel, 2003). However, it is most likely that the PV panels would be recycled at the end of their useful life. Therefore, hazardous waste disposal impacts are considered **less than significant** during Project operation.

Reclamation

Transport

As with construction, some hazardous materials would be required during Project reclamation activities. All hazardous materials (such as diesel fuel, oil and grease for heavy equipment) transported to the Project area during reclamation would occur in compliance with DTSC regulations. Therefore, the likelihood of an

accidental release during transport, or residual contamination following accidental release, is not anticipated throughout reclamation; impacts are considered **less than significant**.

Disposal

Some hazardous waste (waste oil and lubricants, spill clean-ups, etc.) is expected to be generated during Project reclamation, including thin-film (CdTe) PV panels. As described under Operation, above, current laws allow such modules could be disposed of in landfills (Fthenakis and Zweibel, 2003). However, it is most likely that the PV panels would be recycled during reclamation. All wastes generated during reclamation will be disposed of in accordance with all local, State (e.g. DTSC) and federal regulations. Therefore, hazardous waste disposal impacts are considered **less than significant** during Project reclamation. Reclamation of the solar farm complex site to its end state of approximate existing idle farmland is not anticipated to require hazardous materials transport, use, or disposal or present the potential for accidental release.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

Create a Hazard Through Reasonably Foreseeable Upset/Release of Hazardous Materials

Impact 4.10.2 The proposed solar farm complex site was historically used for agricultural production and contains several structures that will require removal prior to Project construction. As a result of prior uses, on-site soils may contain minimal residual hazardous materials, pesticide residue and several other features that could be considered hazardous. Therefore, the potential for the solar farm complex site to create a hazard through reasonably foreseeable upset or release of hazardous materials is considered a **potentially significant impact**.

Construction

Herbicides/Pesticides

The solar farm complex site has historically been farmed leading to the presence of pesticides and herbicides as a Recognized Environmental Condition (GS Lyon 2013). Pesticides and herbicides typically used for farming in the Imperial Valley are likely to have been used on the Property (GS Lyon 2013, p. 12). Typical agricultural practices in the Imperial Valley consist of aerial and ground application of pesticides and application of chemical fertilizers to both ground and irrigation water. Typical concentrations of DDT and DDE pesticides in the soil are about 25% to 50% of regulatory action levels (GS Lyon 2013, p. 9). In general, the pesticide residue levels typically found within agricultural soils are less than 50% of USEPA preliminary remediation goals (PRGs). No hydrocarbon stains were found on the solar farm complex site surface soils. Therefore, no further action is recommended with regard to herbicides and pesticides and this impact is considered **less than significant**.

Above-ground Storage Tank (AST)

The Phase I ESA identified an aboveground fuel storage tank (AST) in the northwest corner of Lot 5. Because the AST was within a concrete containment area and no leaking was identified, no further action is recommended. Therefore, impacts associated with the on-site AST are considered **less than significant**.

Asbestos Containing Materials (ACM)

On-site structures on the solar farm complex site could predate 1978. As a result, there is potential risk of ACM to be present at the two small rural residences in the northeast corner of Lot 5 and the two rural residences adjacent to the farm shop yard on the west side of Lot 5 (GS Lyon 2013, p. 9).

There is also evidence of asbestos concrete (transite) pipe on site used in association with irrigation. The pipe material is only considered "friable" when disturbed. The piping material is not required to be removed, but if disturbed, requires proper handling with respiratory protection. Therefore, impacts associated with ACM are considered **potentially significant**.

Polychlorinated Biphenyls (PCBs)

No evidence of leakage from the pole mounted transformers was noted and IID records indicate that all transformers in the Imperial Valley have been tested for PCB content. The transformers containing PCB's have been replaced by the IID. Therefore, impacts associated with ACM are considered **less than significant**.

Lead-Based Paint (LBP)

Two small rural residences in the northeast corner of Lot 5 and the two rural residences adjacent to the farm shop yard on the west side of Lot 5 could contain lead based paint if constructed prior to 1978 (GS Lyon 2013, p. 9). Therefore, impacts associated with LBP are considered **potentially significant**. A lead-based paint survey is required of structures prior to demolition.

Operation

Following construction, the potential for on-site hazardous materials as described above would become a non-issue. Any potential existing hazards would be removed prior to commencing construction. Therefore, impacts associated with creating a hazard through reasonably foreseeable upset or release of hazardous materials is considered **less than significant** during Project operation

Reclamation

Reclamation activities 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. Any potential hazards present during reclamation (e.g. Thin-film CdTe PV panels) would be required to be handled in accordance with all local, State (i.e. DTSC) and federal regulations. Therefore, impacts associated with creating a hazard through reasonably foreseeable upset or release of hazardous materials is considered **less than significant** during reclamation activities. Reclamation of the solar farm complex site to its end state of approximate existing idle farmland is not anticipated to create a hazard through reasonably foreseeable upset or release of hazardous materials.

Mitigation Measures

MM 4.10.2 The Applicant shall ensure that the AST, farm equipment area, and any other debris have been cleared from the site. Prior to the demolition of any building, structure, or transite pipe, the Applicant shall hire a California Certified Lead Inspector/Assessor and Certified Asbestos Consultant to evaluate these features for the presence of lead based paint (LBP) and/or asbestos containing materials (ACM). Confirmed LBP and/or ACM shall be handled by a licensed LBP contractor and/or Licensed Asbestos Contractor. All contaminants shall be remediated in compliance with California environmental regulations and policies. LBP and/or ACM shall be disposed of according to appropriate regulations.

Timing/Implementation: *Prior to the demolition of any building, structure, or transite pipe removal or disturbance/Applicant; California Certified Lead Inspector/Assessor and Certified Asbestos Consultant.*

Enforcement/Monitoring: *Imperial County Health Department, Environmental Health and Consumer Protection Services; CUPA County of Imperial.*

Significance After Mitigation

Implementation of mitigation measure MM 4.10.2 would reduce residual hazards on the solar farm complex from potential ACM and LBP in existing structures through testing and disposal, if necessary. Following the implementation of this mitigation measure, all potential upsets or release of hazardous materials would be reduced to **less than significant**.

4.10.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The geographic scope of the cumulative setting for hazards and hazardous materials is a one-mile radius around the solar farm complex site. One mile is the standard ASTM standard search distance for hazardous materials. This geographic scope encompasses an area larger than the Project area and provides a reasonable context wherein cumulative projects in the vicinity of the proposed Project could affect hazards and hazardous materials. Based on Table 3.0-1 (Large Scale Proposed, Approved and Reasonably Foreseeable Renewable Energy Projects) in Chapter 3.0, Introduction to the Analysis and Assumptions Used, there are no other projects from the list of cumulative projects within the geographic scope.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Hazards and Hazardous Materials Impact

Impact 4.10.3 The proposed Project, in combination with other reasonably foreseeable projects in the vicinity of the Project area, would increase the density of development in the area, thus potentially increasing the potential for the presence hazards and use of hazardous materials. However, this is considered to be a **less than cumulatively considerable impact**.

Construction

There are 20 cumulative projects that are not within a one-mile radius of the proposed Project and are considered outside of the geographic scope for the consideration of cumulative effects from hazardous materials sites. The proposed Project would involve the storage, use, disposal, and transport of hazardous materials to varying degrees during construction. Accidental release of hazardous materials can be mitigated to less than significant levels through compliance with various Federal, state, and local laws, regulations, and policies regarding transport and use of hazardous materials. It is reasonable to expect that the proposed Project would implement and comply with these existing hazardous materials laws, regulations, and policies. Therefore, the proposed Project would result in **a less than cumulatively considerable** contribution to a cumulative impact related to use or routine transport of hazardous materials during construction.

Existing on-site hazards are localized and site specific. Potential impacts are not expected to combine with similar impacts of past, present, or reasonably foreseeable projects. Mitigation measures have been developed to minimize the impacts of the proposed Project during construction, operation, and reclamation to the extent feasible. Project-specific mitigation measures have been developed for the proposed Project based on the Phase I ESA (MM 4.10.2 would potential impacts resulting from the

presence of LBP and ACM). Following implementation of this mitigation measures, Project-related impacts to hazards and hazardous materials would be less than significant. Therefore, the Project's contribution to cumulative hazardous materials impacts is **considered less than cumulatively considerable**.

Operation

The proposed Project would involve the storage, use, disposal, and transport of hazardous materials to varying degrees during operation. Based on the nature of the proposed Project as a solar farm complex, and its remote location removed from other development, it would not result in the generation or transport of substantial quantities of hazardous materials or present the potential for release of hazardous materials. Therefore, the proposed Project would result in a **less than cumulatively considerabl**e contribution to a cumulative impact related to use or routine transport of hazardous materials during operation.

Reclamation

Reclamation activities would be specific to each individual large scale renewable energy project identified in Table 3.0-1. Typical reclamation activities 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. Any potential hazards present during reclamation of each cumulative solar project (e.g. Thin-film CdTe PV panels) would be addressed through compliance with all local, State (i.e. DTSC) and federal regulations. Therefore, the proposed Project would result in a **less than cumulatively considerabl**e contribution to cumulative hazardous materials impacts during reclamation. Reclamation of the solar farm complex site to its end state of approximate existing idle farmland is not anticipated to create cumulative hazards and hazardous materials impacts.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

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