

CHAPTER 6.0

ALTERNATIVES

CEQA Guidelines Section 15126.6(a) states that an environmental impact report shall describe and analyze a range of reasonable alternatives to a project. These alternatives should feasibly attain most of the basic objectives of the project while avoiding or substantially lessening one or more of the significant environmental impacts of the project. An EIR need not consider every conceivable alternative to a project, nor is it required to consider alternatives that are infeasible. The discussion of alternatives shall focus on those which are capable of avoiding or substantially lessening any significant effects of the project, even if they impede the attainment of the project objectives to some degree or would be more costly (CEQA Guidelines Section 15126.6(b)).

CEQA Guidelines Section 15126.6(d) states that the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the Project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the Project as proposed. The matrix appears as **Table 6.0-1** at the end of this section.

6.1 PROJECT OBJECTIVES

The proposed Seville Solar Farm Complex Project has the following objectives:

- Produce on-peak renewable power to the electrical grid in California.
- Assist California in meeting its current and future RPS goals.
- Support the greenhouse gas reduction goals of Assembly Bill 32 (California Global Warming Solutions Act of 2006).
- Site the projects in an area with excellent solar energy resources in order to maximize productivity from the PV or CPV panels.
- Use a proven and available solar PV technology to reliably and economically produce electricity during daylight hours.
- Comply with the terms and requirements of the five solar projects' long-term power purchase agreements.
- Locate solar power facilities as near as possible to the IID's electrical transmission facilities with anticipated capacity and reserved queue position.
- Construct and operate solar power facilities with minimal impacts to the environment by locating the facilities on previously disturbed land and existing infrastructure.
- Construct and operate solar power facilities which reduce the historic groundwater use on the Project site.
- Create additional employment and project-related expenditures in local businesses.

6.2 ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR ANALYSIS

Identifying alternatives to the proposed Project was limited by the fact that the Project is a utility-scale solar project (i.e., a solar energy project that generates a large amount of electricity that is transmitted from a solar energy plant to many users through the electrical grid). Based on the nature of the Project, it required three key considerations in order to determine where it could be sited: 1) an area with access to high solar insolation (i.e., exposure to the sun's rays) rates; 2) a large area to accommodate

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solar collectors; and 3) readily accessible interconnection to the IID transmission system and the California Independent System Operator (CAISO) transmission system to send electricity to consumers.

The proposed solar farm complex site is currently designated "Agriculture" in the Imperial County General Plan and zoned A-2 - General Agriculture. Solar energy electrical generators, electrical power generating plants, substations, and facilities for the transmission of electrical energy are allowed as uses in the A-2 designation with a Conditional Use Permit (CUP).

The Project area was chosen for the reasons identified above regarding utility-scale solar projects. West-central Imperial County has year-round, unobstructed access to sunlight during daytime hours. Likewise, sufficient land area is available on the Property to accommodate utility-scale solar projects. The proposed solar farm complex site was formerly used for agriculture and has a very mild slope (0.4 percent) making it ideal for development of the Project. The site is also located adjacent to an existing IID 12.5 kV distribution line located through land under the jurisdiction of Bureau of Land Management. On November 15, 2002, BLM granted IID right-of-way (ROW) CACA 044554 to construct the overbuilt 92 kV transmission line above this existing IID distribution line as part of a larger IID project. Approximately 2.25 miles of the proposed 92 kV transmission line would be constructed as an overbuild of the existing 12.5 kV distribution line allowing interconnection to the IID transmission system and the Anza Substation. Accessibility to the transmission grid for distribution to consumers is a key factor in providing utility-scale solar power.

6.2.1 ALTERNATIVE SITE

Choosing an "Alternative Site" was considered but not selected for detailed analysis. The Applicant does not own or possess access to an alternative site in Imperial County to develop the proposed Project. A feasible alternative site would likely either be an area of actively farmed land in the irrigated central portion of the Imperial Valley, or vacant and undisturbed open desert. A project alternative located on actively farmed land would prevent the farming of the developed areas over the life of the project (i.e. approximately 20 to 25 years). A project alternative located on vacant and undisturbed open desert could potentially have greater impacts on habitat for endangered and threatened species than a site that has been actively cultivated for agricultural purposes. Moreover, assembling sufficient land at an alternative location for the proposed Project in the vicinity of the Anza Substation would be difficult because all lands north of State Route (SR) 78 are owned or managed by the Ocotillo Well State Vehicular Recreation Area. South of SR 78 private land and public land managed by the BLM are generally found in alternating sections of 640 acres. Lands managed by the BLM are subject to significant environmental and development constraints. Development of the proposed Project at an alternative location is therefore infeasible because of the difficulties in assembling contiguous land as well as the additional and greater impacts associated with such a location.

6.2.2 270 MW SOLAR GENERATION FACILITY

A larger solar generation facility was also considered but not selected for detailed analysis. This alternative would have developed the entirety of the 2,440 acre Allegretti Farms Property. Development of these additional lands would allow the generation of approximately 135 MW of additional solar energy, or a total of approximately 270 MW. While this alternative would meet the Project objectives and provide more renewable energy, it would also likely have resulted in development of the approximately 600 acres of the Property which were not previously developed for farming, and remain vacant and undisturbed open desert. A project alternative developing these vacant and undisturbed open desert lands could potentially have substantial impacts on habitat for endangered and threatened species. For these reasons, this alternative was not selected for analysis.

6.2.3 DISTRIBUTED GENERATION ALTERNATIVE

A Distributed Generation Alternative to the proposed Project was also considered but not selected for detailed analysis. A distributed PV generation alternative would consist of small scale PV installations on private or publicly-owned residential, commercial, or industrial building rooftops, parking lots or areas adjacent to existing structures such as substations. The location of such small-scale installations is not geographically constrained and, as relevant for CEQA purposes, could be located anywhere in the State. California currently has over 773 MW of distributed PV systems which cover over 40 million square feet (CPUC 2010).

Even assuming that there are enough additional sites throughout California for installation of sufficient distributed PV to accomplish the Project's objective of generating 135 MW, this alternative cannot feasibly accomplish most of the Project's objectives. Such an alternative would not comply with the terms and requirements of the solar projects' long-term power purchase agreements. Likewise, a distributed generation alternative could not locate the solar power facilities as near as possible to the IID's electrical transmission facilities with anticipated capacity availability and a reserved queue position. Because distributed generation is not geographically constrained, there is no guarantee that any portion of the solar installation would occur in Imperial County. Furthermore, the County has no authority or influence over the installation of distributed PV generation systems outside of its jurisdiction. As such, there is no guarantee that action by the County to approve a distributed generation alternative would 1) result in the installation of 135 MW of generating capacity; 2) support the objective of assisting the State of California meet to its RPS goals; or 3) create additional employment and Project-related expenditures in local businesses. For these reasons, a distributed solar alternative was not considered for further analysis.

6.2.4 REDUCED SIZE PROJECT ALTERNATIVE

A Reduced Size Project Alternative would result in a reduction in power output and would not meet the Project objectives. Therefore, a Reduced Size Project Alternative was not analyzed in detail. However, as a part of refining the Project design plans toward final design, the Applicant is working to increase Project efficiency and further reduce impacts to the environment and natural resources. Therefore, the proposed Project layout and associated impacts as identified and analyzed in this Draft EIR are considered a conservative (worst-case) scenario, and may be further revised and reduced in the Final EIR.

6.3 SUMMARY OF ALTERNATIVES ANALYZED

In accordance with the provisions of CEQA Guidelines Section 15126.6, the following alternatives to the proposed Project are evaluated:

6.3.1 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 extending from SR 78 approximately 1,000 feet east of the locations identified as part of 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 fugitive dust generated during solar project construction and operation, and increase the distance between the access road and the identified prehistoric cultural

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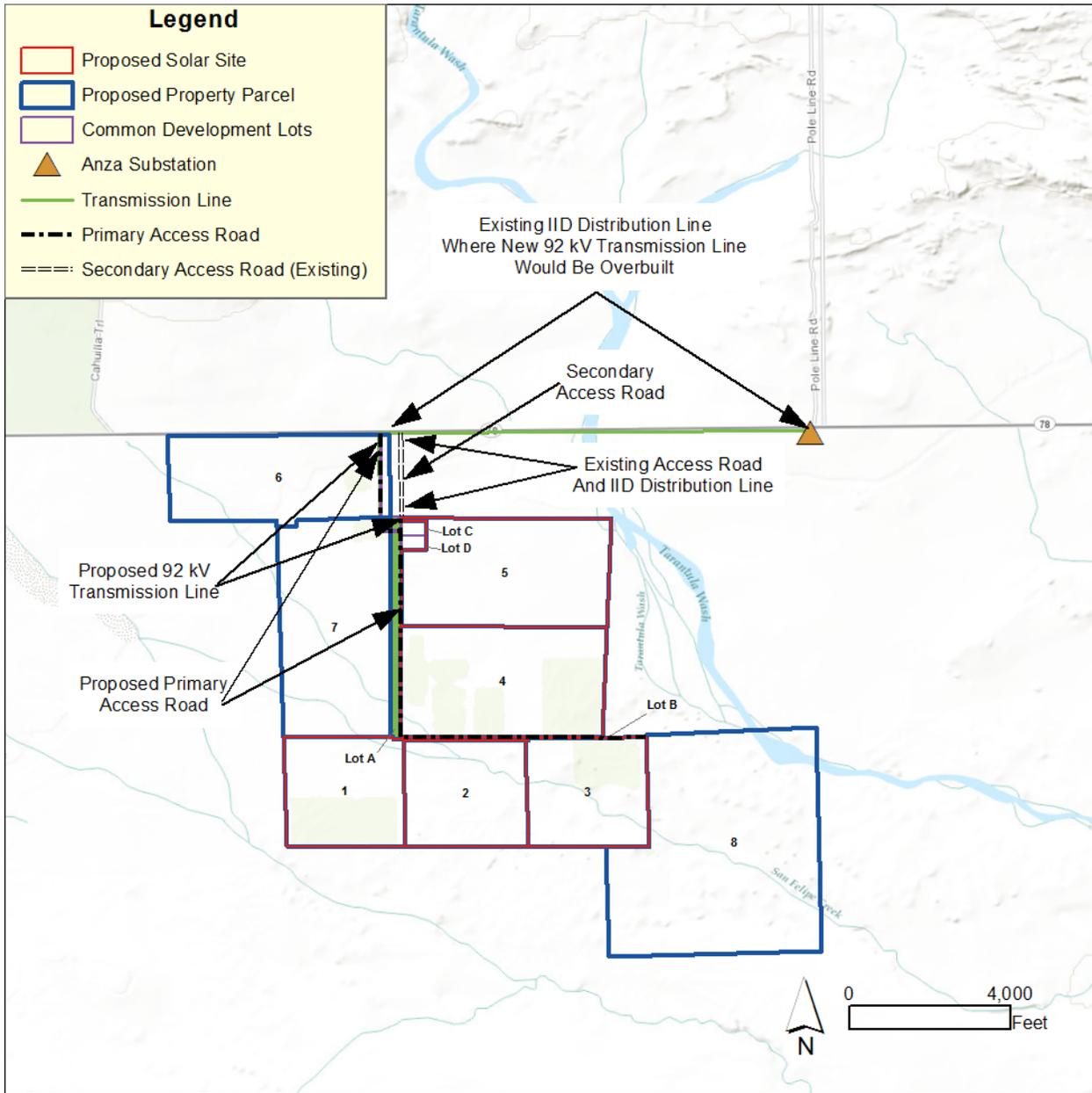
resource site which could be eligible for the California Register of Historical Resources (CRHR). **Figure 6.0-1** depicts this relocated primary access road and transmission line alternative.

6.3.2 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 residences located west of the Project.

6.3.3 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 solar farm complex site could remain in its existing condition as idle farmland zoned General Agricultural (A-2) in the County's Land Use Ordinance and designated Agriculture in the County's General Plan. The 92 kV IID transmission line could still be constructed, but would not be constructed as part of this Project, and no modifications to the Anza Substation would be required.



Source: EMA 2014.

FIGURE 6.0-1
ALTERNATIVE 1 – RELOCATED PRIMARY ACCESS ROAD AND TRANSMISSION LINE ALTERNATIVE

6.4 ANALYSIS OF ALTERNATIVES

This section identifies the environmental effects of the alternatives and compares the environmental effects with those resulting from the proposed Project. **Table 6.0-1** at the end of this section provides a summary of the comparisons. An "environmentally superior" alternative is also identified.

6.4.1 ALTERNATIVE 1 - RELOCATED PRIMARY ACCESS ROAD AND TRANSMISSION LINE ALTERNATIVE

Alternative 1 is the Relocated Primary Access Road and Transmission Line Alternative. This alternative considers the circumstance under which the Project proceeds with same five solar projects and supporting infrastructure as would occur under the proposed Project, but with the primary access road and transmission line reconfigured as shown in **Figure 6.0-1**. This discussion analyzes the impacts of this alternative by projecting what can reasonably be expected to occur in the foreseeable future if the Project were implemented with the reconfigured access road and transmission line as compared to the proposed Project configuration.

Characteristics

Under the Relocated Primary Access Road and Transmission Line Alternative, the Seville Solar Farm Complex would be constructed. The solar farm complex site would be developed with five solar projects and the same supporting on-site structures/infrastructure as would occur under the proposed Project. The solar farm complex site would continue to be separated by private roads (constructed per County Standards as specified in Title 9, Division 8, #43 and mature tamarisk trees and surrounded by open desert. Approval of a 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 requested to develop the Project. However, the proposed primary access road extending south from SR 78 and the adjacent proposed 92kV transmission line would be relocated approximately 1,000 feet east of the locations identified as part of the proposed Project. Under this Alternative, at the end of the Project's operational life, the solar farm complex site would be reclaimed to its existing condition as idle farmland zoned General Agricultural (A-2) in the County's Land Use Ordinance and designated Agriculture in the County's General Plan.

Relationship to Project Objectives

Implementation of the Relocated Primary Access Road and Transmission Line Alternative would result in the proposed primary access road extending south from SR 78 and the adjacent proposed 92kV transmission line being constructed and operated 1,000 feet east of the locations proposed as part of the Project. Implementation of the Relocated Primary Access Road and Transmission Line Alternative would fulfill the Project's objectives to construct and operate solar power facilities with minimal impacts to the environment by locating the facilities on previously disturbed land. Further, this alternative would fulfill the Project's objective to locate facilities as near as possible to IID's electrical transmission facilities. Therefore, the Relocated Primary Access Road and Transmission Line Alternative would achieve all of the objectives identified by the proposed Project.

Comparative Impacts

Aesthetics

Under the Relocated Primary Access Road and Transmission Line Alternative, the aesthetic condition of the solar farm complex site would be altered in association with development of five solar farm sites and supporting common areas identically to the proposed Project, with the exception of the primary access road and the adjacent proposed 92kV transmission line from SR 78. The solar farm complex site

would include PV panels, inverters, transformers, gen-tie lines, and a segment of 92 kV the transmission line. Under the Relocated Primary Access Road and Transmission Line Alternative, the primary access road and transmission line would be 1,000 feet further east of KOP #1 and KOP #3, so potential visual impacts could be slightly better from KOP #1 and KOP #3 than under the proposed Project. Under this alternative, the primary access road and transmission alignment would be 1,000 feet closer to KOP #2 and KOP #4, so potential visual impacts could be slightly worse from these KOPs than under the proposed Project. Visual impacts to the nearest residential uses, associated with KOP #1 (Blu-In RV Park) and KOP #3 (Scholl residence) may be slightly better under the Relocated Primary Access Road and Transmission Line Alternative than under the proposed Project. Visual impacts to travelers on SR 78 and recreational users at the OWSVRA to the north would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project, as the transmission line would remain visible, but located slightly further east. New sources of light and glare would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project.

Overall, potential impacts related to a scenic vista, the existing visual character, light and glare, and cumulative impacts would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project.

Land Use

The solar farm complex site has an existing General Plan land use designation Agriculture and a zoning designation of A-2, General Agriculture. Solar energy electrical generators, electrical power generating plants, substations, and facilities for the transmission of electrical energy are allowed as conditional uses in the A-2 designation. The proposed Project would require a Major Subdivision/Tract Map application to reconfigure the existing parcels into eight development lots; five CUP application packages for each of the proposed solar farm projects, and nine CUP application packages for each of the groundwater wells. In addition, 55 acres of the solar farm complex site would be disturbed by the required access roads, gen-tie corridors and substations and 2.3 acres are estimated to be disturbed by the IID 92 kV transmission line.

Under the Relocated Primary Access Road and Transmission Line Alternative, the primary access road would be approximately 1,000 feet shorter, and the transmission line would be approximately 2,000 feet shorter. However, the same Major Subdivision/Tract Map applications and CUP applications would be required. No changes to General Plan or zoning designations would be required under the Relocated Primary Access Road and Transmission Line Alternative or the proposed Project. Under both the proposed Project and Relocated Primary Access Road and Transmission Line Alternative, at the end of the Project's operational life, the solar farm complex site would be reclaimed to approximate the existing idle farmland, consistent with the site's existing A-2 designation.

Overall, potential impacts to alternative-specific and cumulative land use conflicts with applicable land use plans, policies and regulations would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project.

Transportation and Circulation

Under the Relocated Primary Access Road and Transmission Line Alternative, short-term construction-related traffic (Near-Term Year 2015 Construction) would increase similar to the proposed Project. Long-term increases in vehicle traffic related to operation and maintenance of the proposed solar farm complex would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project under all traffic scenarios modeled (Existing Plus Project, Near-Term Year 2015/Project Opening Year, Long-Term Year 2025, Year 2025 Plus Project Plus Cumulative). Similar to

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the proposed Project, the Relocated Primary Access Road and Transmission Line Alternative includes the construction of a new access off of SR 78 (as approved by Caltrans). Under both this alternative and the proposed Project, the new access would be required to be designed per all applicable Caltrans standards, and would be reviewed and approved by Caltrans prior to construction.

Overall, potential impacts related to roadway Level of Service standards, hazardous design features and cumulative impacts would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project.

Air Quality

Under the Relocated Primary Access Road and Transmission Line Alternative, short-term construction-related air quality impacts would be less than those of the proposed Project because of the decreased length of the primary access road (1,000 feet, or 24 percent) and transmission line (2,000 feet). A slight reduction in combustion emissions (including NO_x and PM₁₀) would be anticipated from the construction equipment used to in association with building the reduced lengths of both the transmission line and primary access road. Substantial reductions in fugitive dust (PM₁₀) emissions, of from 8 to 15 percent of the predicted fugitive dust emitted during each phase of construction, would also occur because the length of unpaved road driven by each construction worker and vehicle would be reduced (EMA 2014b). As a result, the exposure of sensitive receptors to air pollutant concentration would be slightly less in association with the Relocated Primary Access Road and Transmission Line Alternative compared to the proposed Project. However, emission impacts for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project would be mitigated through measures to reduce NO_x and PM₁₀. Vehicle miles traveled on unpaved roads from operation and maintenance traffic, and thus fugitive dust emissions, would also be less for the Relocated Primary Access Road and Transmission Line Alternative compared to the proposed Project.

Overall, potential impacts related to air quality plans and standards, and objectionable odors, would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project. Potential impacts related to sensitive receptors and cumulative pollutant emissions would be better for the Relocated Primary Access Road and Transmission Line Alternative compared to the proposed Project.

Climate Change and Greenhouse Gases

Under the Relocated Primary Access Road and Transmission Line Alternative, short-term construction-related greenhouse gas/climate impacts are anticipated to be similar to, though slightly less than, the proposed Project as construction equipment would be operating, and thus emitting GHGs, for a shorter period of time to construct the shorter transmission line and access road. GHG emissions during operation and maintenance of the Relocated Primary Access Road and Transmission Line Alternative are expected to be the same as those generated by the proposed Project.

Potential alternative-specific and cumulative impacts related to GHG generation would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project.

Geology and Soils

Under the Relocated Primary Access Road and Transmission Line Alternative, the geographic area of the solar farm complex would be identical to the proposed Project, and would result in exposure to similar geologic and seismic hazards as the proposed Project (seismic exposure, liquefaction, expansive soils, erosion, and corrosive soils). Implementation of the Relocated Primary Access Road and Transmission Line Alternative would result in the primary access road extending south from SR 78 and the adjacent

proposed 92kV transmission line being constructed and operated 1,000 feet east of the locations identified as part of the proposed Project. Under this alternative the transmission line would be 2,000 feet shorter, and the primary access road would be 1,000 feet shorter, resulting in less soil disturbance.

Potential impacts related to seismic ground shaking, liquefaction, expansive soils, soil capability to support septic systems, and soil corrosivity, and cumulative impacts, would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project. Because of the decreased length of the primary access road, impacts with regards to erosion would be better for the Relocated Primary Access Road and Transmission Line Alternative than the proposed Project.

Cultural and Paleontological Resources

Under the Relocated Primary Access Road and Transmission Line Alternative, potential to disturb previously unknown subsurface archaeological resources, human remains or paleontological resources would be less than would occur under the proposed Project, due to the disturbance of 1,000 fewer feet for the primary access road and 2,000 fewer feet for the transmission line, and the need for fewer transmission line towers. Under both Relocated Primary Access Road and Transmission Line Alternative and the proposed Project, implementation of the same mitigation measures to avoid and minimize potential impacts would be required. Impacts to a potential CRHR-Eligible Resource (i.e. pot drop SDI-12151) would be better under the Relocated Primary Access Road and Transmission Line Alternative as compared to the proposed Project, because this alternative was designed in part to relocate the primary access road further from the known potentially CRHR-Eligible resource.

Potential impacts related to CRHR-eligible resources, unrecorded subsurface archaeological resources, subsurface human remains, and unknown fossil remains, as well as cumulative impacts to archaeological, historic and paleontological resources, would be better for the Relocated Primary Access Road and Transmission Line Alternative compared to the proposed Project.

Noise

Under the Relocated Primary Access Road and Transmission Line Alternative, short-term construction-related noise impacts are anticipated to be slightly better than under the proposed Project, as the area in which access road and transmission line construction noise would be farther away from the residences to the west. Operational traffic noise on the access road would also be farther away from the residences to the west. Noise impacts to residents from all other construction and operational sources would be unchanged.

Therefore, potential impacts related to temporary and long-term noise increases (from traffic and stationary sources), and cumulative impacts, would be better for the Relocated Primary Access Road and Transmission Line Alternative compared to the proposed Project. Impacts related to groundborne vibration would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project.

Agricultural Resources

Under both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project, the primary access road and 92kV transmission line would be constructed primarily on lands designated as Farmland of Local Importance. However, under the Relocated Primary Access Road and Transmission Line Alternative, a portion of the access road/transmission line alignment through the northeast corner of Lot 7 would be built on land designated as Prime Farmland. Therefore, impacts to agricultural resources (conversion of important farmland, indirect environmental effects of the conversion of farmland and cumulative impacts) would be slightly worse under the Relocated Primary

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Access Road and Transmission Line Alternative as compared to the proposed Project. Under both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project, activities would not preclude Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the solar farm complex site from being reclaimed to approximate the existing idle farmland at the end of the Project's operational life.

Hazards and Hazardous Materials

Risks associated with site hazards, including construction activities and conditions (e.g., soil disturbance, use of hazardous materials associated with construction activities), and operational activities (e.g., transport, use and storage of fuel and herbicides) are anticipated to be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project. Existing residual on-site hazards located on the solar farm complex site which present a risk of upset during construction would be the same for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project.

Therefore, potential impacts related to the transport, use, disposal and accidental release of hazardous materials; the upset or release of hazardous materials onsite; and cumulative hazards and hazardous material impacts, would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project.

Hydrology and Water Quality

Under the Relocated Primary Access Road and Transmission Line Alternative, impacts associated with surface water quality from construction activities, increased impervious surfaces, and potentially higher levels of contaminants in runoff are anticipated to be similar to the proposed Project. The same solar farm complex site would be developed for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project with on-site retention basins, and implementation of the same construction and operational phase BMPs. The decrease in length of the primary access road and transmission line associated with the Relocated Primary Access Road and Transmission Line Alternative compared to the proposed Project is not anticipated to appreciably change hydrology and water quality impacts. Under both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project, some structures and activities would occur within areas mapped by FEMA as Flood Zone "A," in association with the Tarantula Wash and former San Felipe Creek floodplains.

Therefore, potential impacts related to water quality standards/waste discharge requirements; ground water supply/recharge; on- or off-site flooding, erosion or siltation; placement within an area subject to flood hazards; and cumulative hydrology and water quality impacts would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project.

Biological Resources

It is assumed that construction of the proposed Project would result in temporary impacts to approximately 1,238 acres of vegetation communities/land cover types as a result of vegetation removal, grading, and installation of proposed Project components on the proposed solar farm complex site. Under the Relocated Primary Access Road and Transmission Line Alternative, slightly less temporary land disturbance (less than one acre) would occur than under the proposed Project due to the shorter length of the primary access road (1,000 feet) and 92kV transmission line (2,000 feet).

Under the Relocated Primary Access Road and Transmission Line Alternative, potential impacts to FTHL and avian and bat collision risks along the overbuild portion of the IID transmission line would be slightly

reduced when compared to the proposed Project, as activities related to the overbuilt portion of the transmission line would be 1,000 feet (8 percent) shorter.

Under the Relocated Primary Access Road and Transmission Line Alternative, potential impacts to special status animal species (desert pupfish, loggerhead shrike and burrowing owl), avian nesting species protected under California Fish and Wildlife Code and the MBTA, and invasive species would be similar to the proposed Project, as these species could occur throughout the Project area and vicinity.

Under the Relocated Primary Access Road and Transmission Line Alternative, potential impacts related to mesquite thicket and jurisdictional wetlands and waters of the U.S. and State would be similar to the proposed Project, because the reconfigured primary access road and 92kV line would not be constructed in or near San Felipe Creek or the Tarantula Wash.

Under the Relocated Primary Access Road and Transmission Line Alternative, potential indirect impacts related to dust on plants, noise and artificial night lighting, and direct impacts associated with runoff/decreased water quality, would be similar to the proposed Project, as these impacts could occur throughout the Project area and vicinity.

Under the Relocated Primary Access Road and Transmission Line Alternative, impacts related to wildlife movement and cumulative impacts would be similar to the proposed Project.

Public Services and Utilities

The Relocated Primary Access Road and Transmission Line Alternative would require similar public services impacts as the proposed Project. Specifically, under both the Relocated Primary Access Road and Transmission Line Alternative and proposed Project, a similar increase in the demand for fire services and law enforcement services would occur, because under both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project, similar activities, structures, and infrastructure are proposed. Like the proposed Project, this alternative would be conditioned to provide appropriate law enforcement and fire service fees.

Therefore, under the Relocated Primary Access Road and Transmission Line Alternative, project specific and cumulative impacts to law enforcement services, fire protection and emergency response would be similar to the proposed Project.

The Relocated Primary Access Road and Transmission Line Alternative would result in similar utilities impacts as the proposed Project. Specifically, under both the Relocated Primary Access Road and Transmission Line Alternative and proposed Project, a similar increase in the demand for wastewater treatment and infrastructure, solid waste service and landfill capacity, electrical service and facilities, potable water service, and telephone and internet service would occur.

The Relocated Primary Access Road and Transmission Line Alternative would result in similar groundwater supply impacts as the proposed Project. Under the Relocated Primary Access Road and Transmission Line Alternative, slightly less groundwater may be required for construction and operational phase dust control due to the shorter primary access road and 92kV transmission line. However, under both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project, similar quantities of groundwater would be maintained onsite for construction, maintenance, and fire suppression needs. Therefore, under the Relocated Primary Access Road and Transmission Line Alternative, impacts to groundwater supply would be similar to the proposed Project.

Also, potential impacts related to water distribution and storage, and all cumulative impacts, would be similar for both the Relocated Primary Access Road and Transmission Line Alternative and the proposed Project

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6.4.2 ALTERNATIVE 2 – LOWER PROFILE SOLAR TECHNOLOGY NEAREST RESIDENCES

Alternative 2 is the Lower Profile Solar Technology Nearest Residences Alternative. This alternative includes the same solar farm complex as the proposed Project, with the exception 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 solar farm complex site. This discussion analyzes the impacts of the Lower Profile Solar Technology Nearest Residences Alternative by projecting what can reasonably be expected to occur in the foreseeable future if the Project were implemented without the use of CPV systems mounted on dual-axis tracking systems at Lot 1, as compared to the proposed Project configuration.

Characteristics

Under the Lower Profile Solar Technology Nearest Residences Alternative, the Seville Solar Farm Complex would be constructed. The solar farm complex site would be developed with five solar projects and the same supporting on-site structures/infrastructure as would occur under the proposed Project, without the option to use higher profile CPV/dual-axis tracking systems on Lot 1. The solar farm complex site configuration for the Lower Profile Solar Technology Nearest Residences Alternative would remain the same as identified for the proposed Project. The solar farm complex would be bordered by mature tamarisk on the west and open desert. Approval of a Major Subdivision/Tract Map application, CUP applications (for the five proposed solar farm projects and nine water wells), and floodplain development permit applications would be requested to develop the site. The 92 kV transmission line would be overbuilt and the Anza Substation would be modified to accommodate the proposed interconnection. Under this Alternative, at the end of the Project's operational life, the solar farm complex site would be reclaimed to its existing condition as idle farmland zoned General Agricultural (A-2) in the County's Land Use Ordinance and designated Agriculture in the County's General Plan.

Relationship to Project Objectives

Implementation of the Lower Profile Solar Technology Nearest Residences Alternative would eliminate the option to use higher profile CPV/dual-axis tracking systems on Lot 1. One objective of the Project is to use a proven and available solar PV technology to reliably and economically produce electricity during daylight hours. As discussed in Chapter 2.0, Project Description, and analyzed by issue area in Sections 4.1 through 4.13 of this EIR, the Project Applicant has not committed to a particular technology at this time, in order to allow for incorporation of the best proven and available technology at the solar energy project sites when final design and construction plans for each site are being developed. Therefore, implementation of the Lower Profile Solar Technology Nearest Residences Alternative may fail to fulfill this Project objective at Lot 1 if available lower profile technology would be less reliable or economical in producing renewable solar energy than use of higher profile CPV/dual-axis tracking systems.

Comparative Impacts

Aesthetics

Under the Lower Profile Solar Technology Nearest Residences Alternative, the aesthetic condition of the majority of the solar farm complex site would be altered in association with development of five solar energy projects and supporting common areas identical to the proposed Project, with the exception of Lot 1. The Solar Farm Complex site would include PV panels, inverters, transformers, gen-tie lines and a segment of the 92 kV transmission line and result in the same visual impacts from three of the four KOPs. Visual impacts looking toward Lot 1 from KOP #3 (Scholl residence) and other residences to the west of Lot 1 could be reduced, as this alternative would remove the option to utilize higher profile CPV/dual-axis tracking systems. The small portion of the CPV modules that would be visible above the

existing tamarisk windbreak along the site's western boundary would not be visible under the Lower Profile Solar Technology Nearest Residences Alternative. New sources of light would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project. If the lower profile technology chosen for Lot I consisted of Fixed-tilt PV arrays, potential after-image glare at sunrise and sunset in non-winter months (mid-March through October) could occur in short intervals (15 to 30 minutes) to the residences due west of the solar farm complex site.

Overall, potential impacts related to a scenic vista, light and glare, and cumulative impacts would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project. Potential impacts to the existing visual character would be better under the Lower Profile Solar Technology Nearest Residences Alternative compared to the proposed Project.

Land Use

The solar farm complex site has an existing General Plan land use designation Agriculture and a zoning designation of A-2, General Agriculture. The site has an existing General Plan land use designation of A-2, General Agriculture. Solar energy electrical generators, electrical power generating plants, substations, and facilities for the transmission of electrical energy are allowed as conditional uses in the A-2 designation. The proposed Project would require a Major Subdivision/Tract Map application to reconfigure the existing parcels into eight development lots; five CUP application packages for each of the proposed solar farm projects within the Project area, and nine CUP application packages for each of the ground water wells located on the property. In addition, 55 acres of the Property would be disturbed by the required access roads, gen-tie corridors and substations, 2.3 acres are estimated to be disturbed by the IID 92 kV transmission line and 0.24 acres would be affected by the proposed Anza Substation modifications.

Under the Lower Profile Solar Technology Nearest Residences Alternative, the same Major Subdivision/Tract Map applications and CUP applications would be required. No changes to General Plan or zoning designations would be necessary for either the Lower Profile Solar Technology Nearest Residences Alternative or the proposed Project. At the end of the Project's operational life, the solar farm complex site would be reclaimed to approximate the existing idle farmland for both the proposed Project and Lower Profile Solar Technology Nearest Residences Alternative.

Overall, potential impacts to land use conflicts with applicable land use plans, policies and regulations would be similar under the Lower Profile Solar Technology Nearest Residences Alternative compared to the proposed Project. Cumulative impacts would also be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Transportation and Circulation

Under the Lower Profile Solar Technology Nearest Residences Alternative, short-term construction-related traffic (Near-Term Year 2015 Construction) would increase similar to the proposed Project. Long-term increases in vehicle traffic related to operation and maintenance of the proposed solar farm complex would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project under all traffic scenarios modeled (Existing Plus Project, Near-Term Year 2015/ Project Opening Year, Long-Term Year 2025, Year 2025 Plus Project Plus Cumulative). Similar maintenance traffic would be generated for the Lower Profile Solar Technology Nearest Residences Alternative because the area to be maintained would remain the same and level of maintenance would be similar. Similar to the proposed Project, the Lower Profile Solar Technology Nearest Residences Alternative includes the construction of a new access off of SR 78. Under both this alternative and the

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proposed Project, this access would be required to be designed per all applicable Caltrans standards, and would be reviewed and approved by Caltrans prior to construction.

Overall, potential impacts to roadway Level of Service standards, hazardous design features and cumulative impacts would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Air Quality

Under the Lower Profile Solar Technology Nearest Residences Alternative, short-term construction-related air quality impacts would be essentially the same as those of the proposed Project. The same area of land would be disturbed and similar levels of earth-moving activities and equipment would be required. Emissions of air pollutants from engines (including NO_x) and fugitive dust (PM₁₀) would be generated during construction in association with site preparation, equipment and vehicle exhaust. Similar exposure of sensitive receptors would occur for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project. Impacts would be mitigated through measures to reduce NO_x and PM₁₀. Vehicle trips associated with operation and maintenance would also be essentially the same for the Lower Profile Solar Technology Nearest Residences Alternative as compared to the proposed Project, because the area to be maintained would remain the same, and type of maintenance activities and equipment would be similar.

Therefore, potential impacts related to air quality plans and standards, objectionable odors, sensitive receptors and cumulative impacts would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Climate Change and Greenhouse Gases

Under the Lower Profile Solar Technology Nearest Residences Alternative, short-term construction-related GHG impacts would be essentially the same as those of the proposed Project. The same area of land would be disturbed and similar levels of earth-moving activities and equipment would be required. Vehicle trips associated with operation and maintenance would also be essentially the same for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project because the area to be maintained would remain the same, and type of maintenance activities would be similar under both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Therefore, potential impacts to GHG generation and cumulative impacts would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Geology and Soils

Under the Lower Profile Solar Technology Nearest Residences Alternative, the geographic area of the solar farm complex site and transmission lines would be identical to the proposed Project, and would result in exposure to similar geologic and seismic hazards as the proposed Project (seismic exposure, liquefaction, expansive soils, erosion, and corrosive soils). The Lower Profile Solar Technology Nearest Residences Alternative may result in the use of smaller or different footings for lower profile solar arrays at Lot 1 than may occur under the proposed Project, thereby requiring slightly less earth-moving activity. However, the foundations would be subject to compliance with design and engineering standards specific to the types of arrays proposed under both the Lower Profile Solar Technology Nearest Residences Alternative and proposed Project.

Potential impacts related to seismic ground shaking, liquefaction, expansive soils, soil capability to support septic systems, soil corrosivity, erosion and cumulative impacts would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Cultural Resources

Under the Lower Profile Solar Technology Nearest Residences Alternative, potential to disturb previously unknown subsurface archaeological resources, human remains or paleontological resources would be the same as would occur under the proposed Project. The Lower Profile Solar Technology Nearest Residences Alternative may result in the use of smaller or different footings for lower profile solar arrays at Lot 1 than would occur under the proposed Project, thereby requiring slightly less earth-moving activity that could impact unknown resources. Overall, however, the same area would be disturbed, and the same type of site preparation and installation activities would occur under both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project. Impacts to a potential CRHR-Eligible Resource (i.e. pot drop SDI-12151) would also be the same under the Lower Profile Solar Technology Nearest Residences Alternative as compared to the proposed Project. Implementation of the same mitigation measures to avoid and minimize potential impacts would be required for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Potential impacts to CRHR-eligible resources, unrecorded subsurface archaeological resources, subsurface human remains, unknown fossil remains and cumulative impacts to archaeological, historic and paleontological resources would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Noise

Under the Lower Profile Solar Technology Nearest Residences Alternative, short-term construction-related noise impacts are anticipated to be similar to the proposed Project, as the same area of disturbance would occur, and construction activities would be nearly identical. There may be slightly less construction noise at Lot 1 under the Lower Profile Solar Technology Nearest Residences Alternative, should less earth-moving activity be required for lower profile solar array footings. However, the Project has not identified which type of arrays or footings would be used. Operational traffic noise and stationary noise impacts are also anticipated to be similar under the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project. Under both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project, the same operational noise impacts could occur at the residences to the west of the solar farm complex site. Likewise, under either the Lower Profile Solar Technology Nearest Residences Alternative or the proposed Project, operational noise levels could not exceed applicable noise standards at solar farm complex site property lines.

Therefore, potential impacts related to temporary and long-term noise increases (from traffic and stationary sources), and cumulative impacts would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Agricultural Resources

The Lower Profile Solar Technology Nearest Residences Alternative would result in similar impacts to agricultural resources as those anticipated under the proposed Project. Both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project would be constructed on the same lands previously used for agriculture that is currently reverting to open desert to a solar farm complex. Both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project would not preclude Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the

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solar farm complex site from being reclaimed to approximate the existing idle farmland at the end of the Project's operational life. Therefore impacts to agricultural resources (conversion of important farmland, indirect environmental effects of the conversion of farmland and cumulative impacts) would be similar under the Lower Profile Solar Technology Nearest Residences Alternative as compared to the proposed Project.

Hazards and Hazardous Materials

Risks associated with site hazards, including construction activities and conditions (e.g., soil disturbance, use of hazardous materials associated with construction activities), and operational activities (e.g., transport, use and storage of fuel and herbicides) are anticipated to be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project. Existing residual on-site hazards located on the solar farm complex site which present a risk of upset during construction would be the same for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Potential impacts related to the transport, use, disposal and accidental release of hazardous materials; the upset or release of hazardous materials onsite; and cumulative impacts would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Hydrology and Water Quality

Under the Lower Profile Solar Technology Nearest Residences Alternative, impacts associated with surface water quality from construction activities, increased impervious surfaces, and potentially higher levels of contaminants in runoff are anticipated to be similar to the proposed Project. The same solar energy complex site would be developed for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project with on-site retention basins, and implementation of the same construction and operational phase BMPs. Under both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project, similar quantities of groundwater would be maintained on site for construction, maintenance, and fire suppression needs. Under both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project, some structures and activities would occur within areas mapped by FEMA as Flood Zone A, in association with the Tarantula Wash and former San Felipe Creek floodplains.

Therefore, potential impacts related to water quality standards/waste discharge requirements; ground water supply/recharge; on- or off-site flooding, erosion or siltation; placement within an area subject to flood hazards; and cumulative impacts would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Biological Resources

It is assumed that construction of the proposed Project would result in impacts to approximately 1,238 acres of vegetation communities/land cover types as a result of vegetation removal, grading, and installation of proposed Project components on the proposed solar farm complex site. Under the Lower Profile Solar Technology Nearest Residences Alternative, the same temporary land disturbance would occur as under the proposed Project.

Potential impacts to FTHL and avian and bat collision risks along the overbuild portion of the IID transmission line would be identical for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project, as activities related to the overbuild portion of the transmission line would be identical for both.

Under the Lower Profile Solar Technology Nearest Residences Alternative, potential impacts to special status animal species (desert pupfish, loggerhead shrike and burrowing owl), avian nesting species protected under California Fish and Wildlife Code and the MBTA, and invasive species would be similar to the proposed Project, as these species could occur throughout the solar farm complex site and vicinity.

Under the Lower Profile Solar Technology Nearest Residences Alternative, potential impacts related to mesquite thicket and jurisdictional wetlands and waters of the U.S. and State would be similar to the proposed Project, because the same activities would occur near San Felipe Creek and the Tarantula Wash.

Under the Lower Profile Solar Technology Nearest Residences Alternative, potential indirect impacts related to dust on plants, noise and artificial night lighting, and direct impacts associated with runoff/decreased water quality would be similar to the proposed Project, as these impacts could occur throughout the solar farm complex site and vicinity.

Also, under the Lower Profile Solar Technology Nearest Residences Alternative, potential impacts related to wildlife movement and cumulative impacts would be similar to the proposed Project.

Public Services and Utilities

The Lower Profile Solar Technology Nearest Residences Alternative would result in impacts to public services similar to what would occur if the proposed Project were implemented. Specifically, under both the Lower Profile Solar Technology Nearest Residences Alternative and proposed Project, a similar increase in the demand for fire services and law enforcement services would occur, because under both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project, similar activities, structures, and infrastructure would occur. Like the proposed Project, this alternative would be conditioned to provide appropriate law enforcement and fire service fees.

Therefore, under the Lower Profile Solar Technology Nearest Residences Alternative, alternative-specific and cumulative impacts to law enforcement services, fire protection and emergency response would be similar to the proposed Project.

The Lower Profile Solar Technology Nearest Residences Alternative would result in similar utilities impacts as the proposed Project. Specifically, a similar increase in the demand for wastewater treatment and infrastructure, solid waste service and landfill capacity, electrical service and facilities, potable water service, and telephone and internet service would occur.

The Lower Profile Solar Technology Nearest Residences Alternative would also result in groundwater supply impacts similar to the proposed Project. Under the Lower Profile Solar Technology Nearest Residences Alternative, a similar quantity of groundwater would be required for construction and operational phase dust control as well as panel washing. Under both alternatives, similar quantities of groundwater would be maintained on site for construction, maintenance, and fire suppression needs. Therefore, impacts to groundwater supply would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

Also, potential impacts related to water distribution and storage, and all cumulative impacts, would be similar for both the Lower Profile Solar Technology Nearest Residences Alternative and the proposed Project.

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6.4.3 ALTERNATIVE 3 - NO PROJECT ALTERNATIVE

Alternative 3 is the No Project Alternative. Analysis of the No Project Alternative is required by CEQA Guidelines Section 15126.6(e)(1). The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. This alternative considers the circumstance under which the Project does not proceed. This discussion analyzes the impacts of the No Project Alternative by projecting what can reasonably be expected to occur in the foreseeable future if the Project were not approved, as compared to the proposed Project. For the purposes of this analysis, the No Project Alternative assumes that the proposed solar farm complex site would continue to remain as idle agricultural land and that the proposed Seville Solar Farm Complex would not be built.

Characteristics

Under the No Project Alternative, the Seville Solar Farm Complex would not be constructed. The proposed solar farm complex site would remain in its existing state as previously cultivated agricultural fields separated by dirt roads and mature tamarisk trees and surrounded by open desert. Approval of the Major Subdivision/Tract Map application, CUP applications (for the five proposed solar farm projects and nine water wells), and floodplain development permit applications would not be granted to develop the Project. Instead, for this analysis the proposed solar farm complex site is assumed to remain in its existing condition as idle farmland reverting to open desert, although it is also possible that the site could be reestablished as farmland should it become economically feasible to do so.

Relationship to Project Objectives

Implementation of the No Project Alternative would fail to fulfill the Project's objectives to develop the Seville Solar Farm Complex. Failure to construct the Project would forego development of a new source of renewable energy and forfeit locating a project of this size on previously disturbed land in a rural setting in proximity to the existing IID infrastructure (i.e. the Anza Substation).

The solar farm complex site remaining in its existing state would not support the objective of producing on-peak renewable power to the electrical grid in California, assisting California in meeting its current and future Renewable Portfolio Standard goals, or support the greenhouse gas reduction goals of Assembly Bill 32 (California Global Warming Solutions Act of 2006). The Applicant would not be able to meet its obligation to meet the terms and requirements of its Power Purchase Agreement, and other Seville Solar Farm Complex Project objectives outlined above. Therefore, the No Project Alternative would not achieve the objectives of the proposed Project.

Comparative Impacts

Aesthetics

Under the No Project Alternative, the aesthetic condition of the solar farm complex site would remain as it currently exists. Alteration of the site from formerly used agriculture fields to a solar farm complex would not occur, the 92 kV transmission overbuild would not be built in association with the Project and the modifications to the Anza Substation would not be needed. As such, there would be no new sources of light or glare introduced to the site from security night lighting or the PV or CPV panels. Likewise, this alternative would not alter public views from surrounding lands and SR 78.

Therefore, potential impacts related to a scenic vista, the existing visual character, light and glare and cumulative impacts would be better under the No Project Alternative compared to the proposed Project.

Land Use

The solar farm complex site has an existing General Plan land use designation of Agriculture and a zoning designation of A-2, General Agriculture. Solar energy electrical generators, electrical power generating plants, substations, and facilities for the transmission of electrical energy are allowed as conditional uses in the A-2 designation. The proposed Project would require a Major Subdivision/Tract Map application to reconfigure the existing parcels into eight development lots; five CUP application packages for each of the proposed solar farm projects, and nine CUP application packages for each of the ground water wells located on the Property.

Under the No Project Alternative, no Major Subdivision/Tract Map applications or CUP applications would be required as the proposed Project would not be developed with a solar farm complex, new access roads or new transmission lines. For this analysis it is assumed that the existing land use pattern would remain unchanged as former agricultural land reverting to open desert, although the acreage could be reestablished as farmland within the A-2 designation. Overall, potential impacts to alternative-specific and cumulative land use conflicts with applicable land use plans, policies and regulations would be similar under the No Project Alternative compared to the proposed Project.

Transportation and Circulation

Short-term construction-related traffic impacts would not occur under the No Project Alternative. Long-term increases in vehicle traffic related to operation and maintenance of the solar farm complex would also not occur under the No Project Alternative. No major changes in traffic volumes or patterns would occur on SR 78 and no new access road to the solar farm complex site would be constructed.

Therefore, potential impacts related to roadway Level of Service standards, hazardous design features and cumulative impacts would be better under the No Project Alternative compared to the proposed Project. If the solar farm complex site were reestablished as active farmland, some traffic would be associated with agricultural operations.

Air Quality

Under the No Project Alternative, air pollutant emissions during both Project construction and operations would not occur. Likewise, the Project's potential to conflict with or obstruct an air quality plan or violate an air quality standard would not occur. Therefore, potential impacts to air quality would be better in its existing condition as idle farmland under the No Project Alternative compared to the proposed Project. If the solar farm complex site were reestablished as active farmland, air quality dust emissions may be better than those during Project construction but worse in association with agricultural operations when compared to Project operations.

Overall, potential impacts related to air quality plans and standards, objectionable odors, sensitive receptors and cumulative impacts would be better under the No Project Alternative compared to the proposed Project.

Climate Change and Greenhouse Gases

Short-term construction-related greenhouse gas (GHG)/climate impacts would not occur under the No Project Alternative as no construction would take place in the Project area. Likewise, minimal operational GHG/climate change impacts resulting from operations and maintenance vehicle trips would not occur under the No Project Alternative. Therefore, GHG/climate change impacts would be better if the No Project Alternative were implemented compared to the proposed Project. However, if the solar farm complex site were reestablished as active farmland, GHGs would be generated in association with

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the operation of farm equipment and pumping of water to irrigate the fields. No such long-term impacts would be associated with the proposed solar farm complex.

Overall, potential impacts related to GHG generation and cumulative impacts would be better under the No Project Alternative compared to the proposed Project.

Geology and Soils

Under the No Project Alternative, no structures would be built on the solar farm complex site and neither the 92 kV transmission line overbuild or Anza Substation modifications would occur. Under the No Project Alternative, impacts associated with geologic hazards (i.e. seismic ground shaking, expansive, corrosive soils) would be avoided as none of the solar farm complex structures (i.e. PV or CPV panels, switch yard, etc.) and facilities (i.e. O&M buildings, water tanks) would be developed on the solar farm complex site. Therefore, impacts to geology and soils would be better under the No Project Alternative compared to the proposed Project. Impacts from geologic hazards would also likely be better than those from the proposed Project if the proposed solar farm complex site is reestablished as farmland.

Overall, potential impacts related to seismic ground shaking, liquefaction, expansive soils, soil capability to support septic systems, soil corrosivity and cumulative impacts would be better under the No Project Alternative compared to the proposed Project.

Cultural and Paleontological Resources

Cultural resource impacts associated with potential disturbance of undiscovered resources are not likely to occur under the No Project Alternative as the solar farm complex site would remain in its existing state of reverting to open desert. Construction activities required to install the Project (i.e. solar panel footing installation, well drilling, etc.) would not occur. Potential to disturb previously unknown subsurface archaeological, human remains or fossils would not occur under the No Project Alternative as no deep disturbance of soils layers would occur. Impacts to a potential CRHR-Eligible Resource (i.e. pot drop SDI-12151) would also likely be avoided under the No Project Alternative. Overall, potential impacts to cultural resources would be better under the No Project Alternative than under the proposed Project. If under the No Project Alternative the Project property is reestablished as active farmland, the site would also be disturbed, but likely only to the same levels as had occurred in association with tilling the land for agricultural use. There would also be no guarantee of avoidance or mitigation as is prescribed for the potential CRHR-Eligible Resource under the proposed Project if the land was to be reestablished as active farmland.

Overall, potential impacts related to CRHR-eligible resources, unrecorded subsurface archaeological resources, subsurface human remains, unknown fossil remains and cumulative impacts to archaeological, historic and paleontological resources would be better under the No Project Alternative compared to the proposed Project.

Noise

Short-term construction-related noise impacts would not occur under the No Project Alternative. Therefore, temporary increases in noise levels resulting from construction (especially if occurring during the nighttime hours) would be avoided. Similarly, without development of the solar farm complex, 92 kV transmission line and Anza Substation modifications, operational noise from the solar farm complex site would be avoided. Under the No Project Alternative, the site would remain in its current state of former agricultural land reverting to open desert, resulting in no change from the current ambient noise levels. Therefore, noise impacts would be better under the No Project Alternative if the site remains in its current state as both construction and operational noise levels would be less compared to the

proposed Project. If the proposed solar farm complex site is instead reestablished as active farmland, noise levels from the No Project Alternative would likely be somewhat similar to those of the proposed Project during construction but would likely be worse than the operational noise levels of the proposed Project.

Overall, potential impacts related to temporary and long-term noise increases (from traffic and stationary sources), groundborne vibration and cumulative impacts would be better under the No Project Alternative compared to the proposed Project.

Agricultural Resources

For the analysis of the No Project Alternative, the solar farm complex site is assumed to remain in its existing condition as idle farmland. However, it is also possible that the site could be reestablished as farmland should it become economically feasible to do so. Were this to occur, the current impacts to agricultural resources would be better under the No Project Alternative, compared to the proposed Project.

Hazards and Hazardous Materials

Under the No Project Alternative, the proposed solar farm site is assumed to remain in its existing condition as idle farmland. Risks from the proposed Project associated with site hazards, including construction activities and conditions (e.g., soil disturbance, use of hazardous materials associated with construction activities), and operational activities (e.g., transport, use and storage of fuel and herbicides) would not occur in association with the No Project Alternative. Existing residual on-site hazards located on the solar farm complex site which present a risk of upset during construction would also not occur in association with the No Project Alternative. Therefore, potential impacts from hazards and hazardous materials would be better under the No Project Alternative compared to the proposed Project. If, however, the proposed solar farm complex site was reestablished as active farmland, there would be some hazards associated with the transport, storage and use of diesel fuel, pesticides and fertilizer.

Overall, potential impacts related to the transport, use, disposal and accidental release of hazardous materials; the upset or release of hazardous materials onsite; and cumulative impacts would be better under the No Project Alternative than for the proposed Project.

Hydrology and Water Quality

Implementation of the No Project Alternative would not result in substantial changes to existing runoff rates or patterns. Without the introduction of a solar farm complex, no new pervious surfaces or structures would be developed on the solar farm complex site and groundwater would continue to be allowed to percolate uninhibited over the proposed solar farm site. No erosion or siltation as a result of construction activities would occur. The No Project Alternative would also avoid placing a solar farm complex within areas identified by FEMA as Zone A. Therefore, impacts to hydrology and water quality would likely be better under the No Project Alternative. However, if the solar farm complex site were to be reestablished as active farmland, a greater amount of groundwater would be required to sustain agricultural production than would be required for the proposed Project (215 AF/Y). The California Department of Water Resources estimates that annual groundwater recharge for the entire Ocotillo-Clark Valley Groundwater Basin averages 2,300 AF/. Historically (between 1983 and 1996), when water demand for the Allegretti Farms agricultural operations was reportedly 3,250 to 6,050 AF/Y, the groundwater table under the Allegretti Farms property dropped over 50 feet. As a result, no more than 2,000 AF/Y would likely be for available for agriculture on the Allegretti Farms property without resulting in an annual overdraft of the basin. (Note: The issue of groundwater use is also discussed under Public Services and Utilities).

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Overall, potential impacts related to water quality standards/waste discharge requirements; ground water supply/recharge; on- or off-site flooding, erosion or siltation; placement within an area subject to flood hazards and cumulative impacts would be better under the No Project Alternative compared to the proposed Project.

Biological Resources

Under the No Project Alternative, the site could remain in its current condition as former agricultural land reverting to open desert. If the solar farm complex site was allowed to continue reverting to open desert, impacts from implementation of the proposed Project to biological resources such as special status plants and animals (e.g. Mesquite Thicket, Flat tailed horned lizard, Loggerhead Shrike, Burrowing Owl, desert pupfish); jurisdictional areas; and nesting and migratory birds would be avoided. In addition, there would be no potential for avian and bat collision or the introduction of nighttime lighting. Therefore, impacts to biological resources would be better under the No Project Alternative if the solar farm complex site were to continue to revert to open desert. If the proposed solar farm complex site were to be reestablished as active farmland under the No Project Alternative, indirect impacts, such as dust on plants and noise disturbance to animals, could occur. Likewise, if any special status plants or animals are present, they could be disrupted, harmed or damaged if the solar farm complex site is actively farmed. Thus, impacts to biological resources may be similar to the proposed Project if the solar farm complex site is reestablished as active farmland.

Overall, potential impacts related to special status plant species (mesquite thicket); special status animal species (flat-tailed horned lizard, loggerhead shrike, burrowing owl, desert pupfish); nesting and migratory birds; avian and bat collision risks; jurisdictional areas; indirect impacts from dust, noise and lighting; runoff and decreased water quality, invasive species and wildlife movement would be better under the No Project Alternative compared to the proposed Project.

Public Services and Utilities

Under the No Project Alternative the proposed solar farm complex, 92 kV transmission line and Anza Substation modifications would not be constructed. If the solar farm complex site is allowed to continue reverting to open desert, impacts to the ICFD and ICSO level-of-service would be avoided; no wastewater would be generated; no solid waste pick-up or disposal would be necessary; no additional electrical infrastructure would need to be extended; and no telephone or internet service would be required. In addition, no new renewable energy would be generated at the solar farm complex site and distributed to the California electricity grid. Therefore, impacts related to public services and utilities would be better if the proposed solar farm complex site continues in its present condition as idled farmland under the No Project Alternative as compared to the proposed Project. However, if under the No Project Alternative the proposed solar farm complex site were reestablished as active farmland, groundwater would be pumped which would result in a greater demand for electricity compared to the proposed Project. If the proposed solar farm complex site were reestablished as active farmland, impacts related to utilities would be worse under the No Project Alternative compared to the proposed Project.

Overall, potential impacts to fire protection and emergency response, law enforcement services, groundwater supply, water distribution and storage, groundwater, wastewater treatment, solid waste service and landfill capacity, electrical service, telephone and internet service, and cumulative impacts would be better under the No Project Alternative compared to the proposed Project.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based upon the evaluation described in this section, the No Project Alternative (Alternative 3) is considered to be the environmentally superior alternative, as it would avoid all adverse impacts associated with the proposed Project. The No Project Alternative was determined to have less adverse environmental impacts than the proposed Project on most issues overall.

Under CEQA Guidelines Section 15126.6 (e)(2), if the environmentally superior alternative is the No Project Alternative, another environmentally superior alternative must be selected from the other alternatives analyzed. After the No Project Alternative, the alternative with the least potential impacts would be the Relocated Primary Access Road and Transmission Line Alternative. When compared to the proposed Project, this alternative resulted in 15 impacts that would be better than would occur in association with implementation of the proposed Project. Only three impacts relative to Agricultural Resources (Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and Cumulative Agricultural Resources Impacts) were considered worse for the Relocated Primary Access Road and Transmission Line Alternative compared to the proposed. Therefore, the Relocated Primary Access Road and Transmission Line Alternative would be the environmentally superior alternative.

Table 6.0-1, below, provides a summary of the potential impacts of the alternatives evaluated in this section, as compared with the potential impacts of the proposed Project.

**TABLE 6.0-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT**

ISSUE AREA/IMPACT	RELOCATED PRIMARY ACCESS ROAD AND TRANSMISSION LINE ALTERNATIVE	LOWER PROFILE SOLAR TECHNOLOGY NEAREST RESIDENCES ALTERNATIVE	NO PROJECT ALTERNATIVE
AESTHETICS			
Impact 4.1.1 - Adverse Effect on Scenic Vista	S	S	B
Impact 4.1.2 - Degrade Existing Visual Character or Quality of the Site	S	B	B
Impact 4.1.3 - New Source of Substantial Light or Glare	S	S	B
Impact 4.1.4 - Cumulative Visual Impacts	S	S	B
LAND USE			
Impact 4.2.1 - Conflict With Any Applicable Land Use Plan, Policy, or Regulation	S	S	S
Impact 4.2.2 - Cumulative Conflicts with Applicable Land Use Plans, Policies, or Regulations	S	S	S
Impact 4.2.3 - Cumulative Land Use Compatibility/Conflict Impacts	S	S	S
TRANSPORTATION AND CIRCULATION			
Impact 4.3.1 - Conflict with an Applicable Plan/Level of Service Standard (Near-Term [Year 2015] Construction)	S	S	B
Impact 4.3.2 - Conflict With an Applicable Plan/Level of Service Standard (Existing Plus Project)	S	S	B
Impact 4.3.3 - Impacts to Roadway Segment LOS (Near-Term Year 2015 / Project Opening Year)	S	S	B
Impact 4.3.4 - Impacts to Roadway Segment LOS (Long-Term Year 2025)	S	S	B
Impact 4.3.5 - Substantially Increase Hazards Due to a Design Feature	S	S	B
Impact 4.3.6 - Cumulative Impacts to Roadway Segment LOS (Year 2025)	S	S	S
AIR QUALITY			
Impact 4.4.1 - Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard	S	S	B
Impact 4.4.2 - Expose Sensitive Receptors to Substantial Pollutant Concentrations	B	S	B
Impact 4.4.3 - Create Objectionable Odors Affecting a Substantial Number of People	S	S	B
Impact 4.4.4 - Cumulative Pollutant Emissions	B	S	B

**TABLE 6.0-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT**

ISSUE AREA/IMPACT	RELOCATED PRIMARY ACCESS ROAD AND TRANSMISSION LINE ALTERNATIVE	LOWER PROFILE SOLAR TECHNOLOGY NEAREST RESIDENCES ALTERNATIVE	NO PROJECT ALTERNATIVE
CLIMATE CHANGE AND GREENHOUSE GASES			
Impact 4.5.1 - Generation of Greenhouse Gas Emissions	S	S	B
Impact 4.5.2 - Conflict with an Applicable Plan, Policy, or Regulation Adopted to Reduce Greenhouse Gas Emissions	S	S	B
GEOLOGY AND SOILS			
Impact 4.6.1 - Strong Seismic Ground Shaking	S	S	B
Impact 4.6.2 - Liquefaction/Seismically Induced Settlement	S	S	B
Impact 4.6.3 - Erosion	B	S	B
Impact 4.6.4 - Expansive Soils	S	S	B
Impact 4.6.5 - Soil Capability to Support Septic Systems	S	S	B
Impact 4.6.6 - Soil Corrosivity	S	S	B
Impact 4.6.7 - Cumulative Exposure to Geologic and Seismic Impacts	S	S	B
CULTURAL RESOURCES			
Impact 4.7.1 - Prehistoric Isolates	B	S	B
Impact 4.7.2 - Impacts to Potential CRHR-Eligible Resource	B	S	B
Impact 4.7.3 - Impacts to Unrecorded Subsurface Archaeological Resources	B	S	B
Impact 4.7.4 - Impacts to Subsurface Human Remains	B	S	B
Impact 4.7.5 - Impacts to Unknown Fossil Remains	B	S	B
Impact 4.7.6 - Cumulative Impacts to Archaeological and Historic Resources	B	S	B
Impact 4.7.7 - Cumulative Impacts to Paleontological Resources	B	S	B
NOISE			
Impact 4.8.1 - Noise Levels In Excess Of Standards/Substantial Temporary Noise Increase	B	S	B
Impact 4.8.2 - Long-Term Exposure to Increased Traffic Noise	B	S	B

6.0 ALTERNATIVES

**TABLE 6.0-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT**

ISSUE AREA/IMPACT	RELOCATED PRIMARY ACCESS ROAD AND TRANSMISSION LINE ALTERNATIVE	LOWER PROFILE SOLAR TECHNOLOGY NEAREST RESIDENCES ALTERNATIVE	NO PROJECT ALTERNATIVE
Impact 4.8.3 - Long-Term Exposure to Increased Stationary-Source Noise	B	S	B
Impact 4.8.4 - Exposure to Groundborne Vibration	S	S	B
Impact 4.8.5 - Contribution to Cumulative Noise Levels	B	S	B
AGRICULTURAL RESOURCES			
Impact 4.9.1 - Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance	W	S	W
Impact 4.9.2 - Indirect Environmental Effects of Conversion of Farmland	W	S	W
Impact 4.9.3 - Cumulative Agricultural Resources Impacts	W	S	W
HAZARDS AND HAZARDOUS MATERIALS			
Impact 4.10.1 - Hazardous Materials Transport, Use, Disposal and Accidental Release	S	S	B
Impact 4.10.2 - Hazard Through Upset/Release of Hazardous Materials	S	S	B
Impact 4.10.3 - Cumulative Hazards and Hazardous Materials Impact	S	S	B
HYDROLOGY AND WATER QUALITY			
Impact 4.11.1 - Violate Water Quality Standards or Waste Discharge Requirements	S	S	B
Impact 4.11.2 - Result in Depleted Groundwater Supplies or Interfere Substantially with Groundwater Recharge	S	S	B
Impact 4.11.3 - Result in Substantial Flooding On- Or Off-Site/Create or Contribute Runoff Exceeding Capacity	S	S	B
Impact 4.11.4 - Result in Substantial Erosion or Siltation On- or Off-site	S	S	B
Impact 4.11.5 - Result in Placement of People or Structures within an Area Subject to Flood Hazards	S	S	B
Impact 4.11.6 - Cumulative Impact to Hydrology and Water Quality	S	S	B
BIOLOGICAL RESOURCES			
Impact 4.12.1 - Impacts to Special-Status Species – Plants (Mesquite Thicket)	S	S	B

**TABLE 6.0-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT**

ISSUE AREA/IMPACT	RELOCATED PRIMARY ACCESS ROAD AND TRANSMISSION LINE ALTERNATIVE	LOWER PROFILE SOLAR TECHNOLOGY NEAREST RESIDENCES ALTERNATIVE	NO PROJECT ALTERNATIVE
Impact 4.12.2 - Impacts on Jurisdictional Area	S	S	B
Impact 4.12.3 - Impacts on Special Status Animal Species – Flat Tailed Horned Lizard (FTHL)	B	S	B
Impact 4.12.4 - Impacts on Special Status Animal Species – Loggerhead Shrike	S	S	B
Impact 4.12.5 - Impacts on Special Status Animal Species with Potential to Occur on the Project Site	S	S	B
Impact 4.12.6 - Impacts on Special Status Animal Species – Burrowing Owl	S	S	B
Impact 4.12.7 - Impacts on Special Status Animal Species - Desert Pupfish	S	S	B
Impact 4.12.8 - Impacts to Nesting and Migratory Birds	S	S	B
Impact 4.12.9 - Impacts Associated with Avian and Bat Collision Risk	B	S	B
Impact 4.12.10 - Indirect Impacts - Dust on Plants	S	S	B
Impact 4.12.11 - Indirect Impacts - Noise	S	S	B
Impact 4.12.12 - Impacts Associated with Night Lighting	S	S	B
Impact 4.12.13 - Impacts Associated with Runoff/Decreased Water Quality	S	S	B
Impact 4.12.14 - Impacts Associated with Invasive Species	S	S	B
Impact 4.12.15 - Impacts to Wildlife Movement	S	S	B
Impact 4.12.16 - Cumulative Impacts to Biological Resources	S	S	B
PUBLIC SERVICES AND UTILITIES			
Impact 4.13.1 - Impacts to ICFD Services	S	S	B
Impact 4.13.2 – Cumulative ICFD Fire Protection and Emergency Response	S	S	B
Impact 4.13.3 - Impacts to Law Enforcement Services	S	S	B
Impact 4.13.4 - Cumulative Law Enforcement Impacts	S	S	B
Impact 4.13.5 - Impacts to Groundwater Supply	S	S	B
Impact 4.13.6 - Water Distribution and Storage Impacts	S	S	B

6.0 ALTERNATIVES

**TABLE 6.0-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT**

ISSUE AREA/IMPACT	RELOCATED PRIMARY ACCESS ROAD AND TRANSMISSION LINE ALTERNATIVE	LOWER PROFILE SOLAR TECHNOLOGY NEAREST RESIDENCES ALTERNATIVE	NO PROJECT ALTERNATIVE
Impact 4.13.7 - Cumulative Groundwater Impacts	S	S	B
Impact 4.13.8 - Cumulative Water Distribution and Storage Impacts	S	S	B
Impact 4.13.9 - Wastewater Treatment and Infrastructure	S	S	B
Impact 4.13.10 - Cumulative Wastewater Impacts	S	S	B
Impact 4.13.11 - Impacts to Solid Waste Service and Landfill Capacity	S	S	B
Impact 4.13.12 - Cumulative Impacts to Solid Waste Service and Landfill Capacity	S	S	B
Impact 4.13.13 - Impacts to Electrical Service and Facilities	S	S	B
Impact 4.13.14 - Cumulative Impacts to Electric Service	S	S	B
Impact 4.13.15 - Impacts to Telephone and Internet Service	S	S	B
Impact 4.13.16 - Cumulative Impacts to Telephone and Internet Services	S	S	B

Notes: S = Similar Impact compared to the Proposed Project

B = Better Impact compared to the Proposed Project

W = Worse Impact compared to the Proposed Project.