

**CHAPTER 7.0**

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**OTHER CEQA REQUIRED  
CONSIDERATIONS**

## 7.0 OTHER CEQA REQUIRED CONSIDERATIONS

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This section discusses the additional topics statutorily required by the California Environmental Quality Act (CEQA). The topics whether the proposed Project would: cause significant irreversible environmental changes; result in growth inducing impacts; or create unavoidable significant environmental impacts. A discussion of Mandatory Findings of Significance is also included. This section begins with a discussion of CEQA Guidelines, CEQA Appendix F, Energy Conservation.

### 7.1 ENERGY CONSERVATION

The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: 1) decreasing overall per capita energy consumption; 2) decreasing reliance on fossil fuels such as coal, natural gas and oil; and 3) increasing reliance on renewable energy sources.

In order to assure that energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed Projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code section 21100(b)(3)).

The proposed Project includes a renewable energy project: five solar energy facilities and supporting roadways, structures and transmission lines. The five solar energy facilities would produce an alternative fuel that would help the State of California meet its goals for use and production of alternative fuels and would also generate biogas, a renewable fuel, to power the on-site electricity generation plant. The production of ethanol would contribute to the production of renewable energy

#### 7.1.1 ENERGY BACKGROUND

The study area for energy resources includes the entire State of California. The following sections describe the electricity supply in California, and summarize California's status in achieving statewide renewable energy goals.

##### A. CALIFORNIA'S ENERGY SUPPLY

In 2002, California established its Renewable Portfolio Standard (RPS) program with the goal of increasing the annual percentage of renewable energy in the state's electricity mix by the equivalent of at least one percent of sales, with an aggregate total of 20 percent by 2017. The California Public Utilities Commission (CPUC) subsequently accelerated that goal to 2010 for retail sellers of electricity (Public Utilities Code Section 399.15(b)(1)). Governor Schwarzenegger signed EO S-14-08 in 2008, increasing the target to 33 percent renewable energy by 2020. Specifically, California's RPS requires retail sellers [investor-owned utilities (IOUs), electric service providers (ESPs) and community choice aggregators (CCAs)] regulated by the CPUC to procure 33 percent of their annual retail sales from eligible renewable sources by 2020. The RPS also requires retail sellers to achieve intermediate RPS targets of 20 percent from 2011-2013 and of 25 percent from 2014-2016. The CPUC and the California Energy Commission (CEC) are jointly responsible for implementing California's 33 percent RPS program (CPUC 2013).

California produces almost 70 percent of its electricity consumption from power plants located within the state, and the rest is imported. The amount of power imported in a given year varies due to several factors, including the availability of in-state hydropower. California's three large IOUs: Pacific Gas and Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E) currently provide approximately 68 percent of the state's electric retail sales. On August 1, 2013, the large IOUs reported in their Preliminary 2012 Annual RPS Compliance Reports that they served 19.6 percent of their retail electric load with RPS-eligible generation in 2012. PG&E served 19.04 percent of its 2012 retail sales with RPS-eligible renewable energy, SCE with 19.9 percent, and SDG&E with 20.31 percent.

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Pursuant to the procurement requirements in Senate Bill 2 (SB 2 [1X]), the IOUs must average 20 percent renewable energy during the first RPS compliance period (2011-13) (CPUC 2013).

Since 2003, 5,281 MW of renewable capacity achieved commercial operation under the RPS program. More than 783 MW of renewable capacity came online in the first and second quarters of 2013, and another 1,944 MW of capacity is forecasted to reach commercial operation by the end of the year. The 2,727 MW of renewable generation capacity forecasted to come online in 2013 would represent the largest year-to-year increase in capacity since the beginning of the program (CPUC 2013).

In 2011, Californians consumed 272,645 million of kilowatt hours (MKWh) of electricity, and 12,924 million therms of natural gas (CEC 2013a). The IID, the provider of electricity to the County of Imperial, uses a comprehensive energy strategy that relies on expansion of customer energy efficiency and demand-side management programs to meet its customers' future power needs in ways that are consistent with the state's Energy Action Plan. The strategy also includes securing additional renewable power resources before seeking to meet customer energy needs through efficient traditional generation sources.

### **B. ENERGY RESOURCES**

Issues related to energy use include the levels of consumption of non-renewable and renewable energy sources for the construction, operation, and decommissioning of the proposed Project. Transportation energy use is related to the following factors: the efficiency of automobiles, trucks, off-road equipment, and other mobile transportation; the choice of employee travel mode (automobile, carpool, or public transit); and miles traveled for each mode. Energy would also be consumed with construction equipment and routine operation activities, and decommissioning activities associated with Project.

Construction of each of the solar development projects is expected to be completed in approximately four to five months (for each of the three smaller lots) or seven to eight months (for each of the two larger lots). Each of the proposed five solar development projects would be constructed independently, and construction of any one project is not expected to overlap the construction of another. Construction of the first solar project would overlap construction of common facilities during Year 2014. Therefore, if the first solar project started construction in the third quarter of 2014, the five projects could be completed by the first quarter of 2017. However, dependent on the timing of individual solar site development, construction may also be staggered over a longer period of time.

### **7.1.2 ENERGY THRESHOLDS AND ENERGY RESOURCE IMPACTS**

#### **A. ENERGY THRESHOLDS**

Based on Appendix F, Energy Conservation, of the CEQA Guidelines, a project would result in significant impacts related to energy if construction, operation, or decommissioning of the proposed facilities would result in the wasteful, unnecessary, or inefficient use of energy resources. Environmental effects may include the Project's energy requirements and its energy use efficiencies by amount and fuel type during construction, operation and decommissioning; the effects of the Project on local and regional energy supplies; the effects of the Project on peak and base period demands for electricity and other forms of energy; the degree to which the Project complies with existing energy standards; the effects of the Project on energy resources; and the Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives, if applicable. The discussion of energy resources impacts collectively addresses these topics.

### B. ENERGY RESOURCES IMPACTS

#### Use of Energy Resources

**Impact 7.0.1** Implementation of the proposed solar complex would result in the use of energy during construction, operation and maintenance, and reclamation of the facility. Gasoline and diesel fuel energy would be used in association with worker vehicles and maintenance vehicles. Electrical energy would be used in association with operation of site buildings and infrastructure. This is considered a **less than significant impact**.

#### **Construction Energy Consumption**

Construction energy refers to the energy required to construct the buildings and transportation network as well as manufacture and maintain on-road vehicles and transit vehicles. Other energy consumption also includes changes in energy demand due to a project, such as building materials, supplies, changes related to trip origins and destinations or travel modes. Indirect energy consumption from the production of fuel as well as transportation/transmission services for end users is not included in this analysis because any such analysis would be speculative. Project construction would result in new on-site transmission lines, as well as a new connection to and construction of new IID transmission lines to the IID's Anza Substation.

Natural-gas fired and electrically-powered construction equipment or vehicles are not expected to be used during construction of the proposed Project. Thus, there would not be a need for new or substantially altered electrical power or natural gas utility systems during construction.

Construction equipment and vehicles would use diesel fuel and gasoline. However, use of these resources in this manner is not considered a wasteful use of energy resources. Construction activities would be a necessary component of the Project, and a one-time expenditure of non-renewable energy in order to achieve a new source of renewable solar energy. Additionally, the relatively small increases in electricity consumption during construction of the proposed Project would not create any significant negative impacts on local or regional energy supplies and would not create a significant effect on either peak or baseload energy demand. Thus, construction of the Project site parcels would create **less than significant** impacts on local and regional energy supplies.

#### **Operation Energy Consumption**

The majority of fuel consumption associated with operation of the proposed solar complex would involve the use of motor vehicles. The Project proposes solar facilities that, once operational, would only require energy consumption for the operation of conversion and transmittal facilities, O&M buildings operations, panel washing, and maintenance of Project site roadways and berms. As the proposed Project would result in employment growth within the plan area, there would also be an associated increase in the overall VMT.

The Air Pollutant Emission Assessment prepared for the Project estimated operational energy use for each small lot at 250 kWh per day (91.3 MWh per year), and each large lot at 400 kWh (146 MWh per year), for a project total of 566 MWh per year (EMA 2013c). According to the CEC, in 2011 Imperial County used 1,421,000,000 MWh (CEC 2013a). The Project's operational energy consumption would therefore be 0.00004% of the Imperial County consumption. However, the proposed Project is a PV/CPV solar farm complex producing renewable energy. Annual energy production from the completed 135 MW complex would likely be approximately 400,000 MWh. Therefore, the Project would result in an increase to the State's renewable energy supply.

Compliance with the State's RPS policies and implementation programs, taken as a whole, would ensure that the proposed Solar Energy Center is operated in a manner that does not use fuel or energy in a

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wasteful manner. Additionally, as the proposed Project would result in an increase in renewable energy supply, energy consumption during operation of the proposed Project would not create any significant negative impacts on local or regional energy supplies, and would not create a significant effect on either peak or baseload energy demand. With adherence to and implementation of County General Plan policies, California Scoping Plan implementation programs, and RPS goals, impacts related to efficient use of electricity, diesel fuel and natural gas use during Project operations would be **less than significant**.

### ***Reclamation Energy Consumption***

The solar energy farm complex site would be decommissioned, and its surface disturbance reclaimed, at the end of its useful life, with the exception of the roads constructed on Lot B to access each of the parcels and all of the water wells. These features would remain as part of the major subdivision proposed by the Project. The creation of the subdivision requires that each lot have physical and legal access, and each lot have the access to water. The IID-owned facilities (IID switchyard and 92 kV transmission line on the Property, 92 kV transmission line with underbuilt 12.5 kV distribution line, and the 12.5 kV distribution line system constructed on the Property) would not be removed until IID determined that these improvements were no longer needed and could be retired and removed. As such, subject to IID need, IID energy transmission infrastructure implemented as part of the proposed Project would remain in place upon reclamation of the solar farm complex.

Similar to the construction phase, decommissioning of the solar farm complex would require expenditure of energy in the form of gasoline and diesel fuel for worker vehicles and equipment to be used for decommissioning activities. However, use of these resources in this manner is not considered a wasteful use of energy resources. Reclamation activities would be necessary to return the solar farm complex site to approximate the existing idle farmland.

Additionally, the relatively small increases in electricity consumption during reclamation of the proposed solar complex site would not create any significant negative impacts on local or regional energy supplies and would not create a significant effect on either peak or baseload energy demand. Thus, reclamation of the solar complex site parcels would create **less than significant** impacts on local and regional energy supplies

### ***Compliance with State RPS Requirements***

As discussed above, California's RPS, enacted in 2002 and later amended in 2003 and 2006, requires IOUs and certain other electricity service providers to increase the percentage of renewable energy supplied to their customers by one percent of retail sales per year, reaching a total of 20 percent by 2010. The RPS does not apply to IID, although IID has its own renewable goals. When in office, former Governor Schwarzenegger also set a goal to achieve 33 percent renewable energy sales by 2020.

Eligibility for the California RPS is primarily contingent on a facility's fuel source and its location. Renewable facilities that are located in California or have their first point of interconnection to the electrical transmission system within the state are considered RPS eligible as long as they meet the fuel and technology-related requirements. This proposed Project is a solar energy generation facility which would be eligible to be considered as a RPS source.

Energy would be consumed throughout the construction, operation and maintenance, and reclamation of the proposed Project. Energy would be required for site preparation activities such as light grading and compaction, as well as for demolition of the existing structures and facilities left behind from prior agricultural uses of the site. Energy would be required during construction for the transportation of building materials, manufacturing of building materials, and the actual construction of solar arrays,

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buildings and infrastructure on the Project site. During the operation of the solar complex, energy would be consumed for purposes including, but not limited to, building heating and cooling, use of consumer products, lighting, and vehicular traffic.

The proposed Project is not subject to any adopted energy conservation plans, so it would not conflict with energy conservation plans. Any new electrical equipment installed for the proposed Project would be required to comply with established energy standards.

### **General Plan Consistency**

The County's General Plan includes numerous policies and implementation programs that are focused on improving the sustainability of the community, including through the reduction of energy consumption in existing and new construction. These policies and implementation programs encourage energy efficient technologies in new construction and support renewable and alternative energy sources. The proposed Project is not subject to any adopted energy conservation plans, so it would not conflict with energy conservation plans. Any new electrical equipment installed for the proposed Project would be required to comply with established energy standards.

However, the General Plan includes multiple policies and implementation programs that would promote certain land use patterns to reduce vehicle trip lengths and to reduce reliance on the automobile, thereby reducing the energy use associated with transportation in the area. The General Plan also includes several policies and implementation programs that would encourage the development of housing near existing employment and transportation centers, leading to a potential decrease in VMT.

Policy 2 for Industry under the Land Use Element of the General Plan indicated that new industrial development is essential to maintaining a viable County economy. The encouragement of transit-oriented development could allow for an increase in vehicle trip chaining, or combining several errands into one trip, which could result in a reduction in overall VMT. The Project site was chosen because of its proximity to existing IID transmission lines, and because the land was no longer in agricultural production. There are no transit or housing facilities near the site that would facilitate shared trips or a reduction in VMT to and from the site itself. However, the Project would contribute in the long term to California's renewable energy supply.

There would be an increase in diesel fuel usage caused by the operation of diesel-fueled maintenance equipment during operation of the proposed Project. While diesel fuel is a non-renewable resource, the use of diesel fuel to operate and maintain a solar energy complex that enables the County and State to comply with the requirements of the AB 2076 regulation (i.e., CEC and CARB strategy to reduce petroleum dependence) is not considered a wasteful or inefficient use of energy resources. Based upon these considerations, significant impacts to energy from the construction or operation of the proposed Project are not expected. The Project does not propose use of natural gas.

With adherence to and implementation of County General Plan policies and California Scoping Plan implementation programs, impacts related to electricity, diesel fuel and natural gas use would **be less than significant**.

### **Mitigation Measures**

None required.

### **Significance After Mitigation**

Not applicable.

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### 7.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. In addition, Section 15093(a) of the CEQA Guidelines requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed Project against its unavoidable environmental risks when determining whether to approve the project. The County of Imperial can approve a project with unavoidable adverse impacts if it adopts a “Statement of Overriding Considerations” setting forth the specific reasons for its decision. Based on the analysis provided in Sections 4.1 through 4.13, the proposed Seville Solar Farm Complex would not result in any significant and unavoidable adverse impacts.

### 7.3 GROWTH-INDUCING IMPACTS

#### A. INTRODUCTION

CEQA Guidelines Section 15126.2[d] requires that an EIR evaluate the growth-inducing impacts of a proposed action. A “growth-inducing impact” is defined by the CEQA Guidelines as:

*“...the way in which a proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth... It is not assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.”*

Growth inducement potential can result from a project either directly or indirectly. Direct growth inducement results from a project which can accommodate population growth such as residential subdivision or apartment complex. Indirect growth inducement potential can result from new permanent employment opportunities associated with commercial or industrial development. Likewise, indirect growth can occur if a project removes an obstacle to additional growth and development, such as removing a constraint on a required public service. Growth inducing projects provide resources (such as water) or infrastructure capacity (such as wastewater conveyance and treatment) that has previously been missing or inadequate to allow growth.

Environmental effects of growth inducement are considered indirect impacts. These indirect impacts or secondary effects of growth have the potential to result in significant, adverse environmental impacts. Potential secondary effects of growth include: increased traffic and noise; increased demand on other community and public services and infrastructure; adverse environmental impacts such as degradation of air and water quality; degradation or loss of plant and animal habitat; and conversion of agricultural and open space land to developed uses.

Growth inducement may constitute an adverse impact if the growth is inconsistent with the land use plans, growth management plans, and growth policies for the area affected. Local land use plans provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by public utilities and services. A project that would induce unplanned growth or growth that conflicts with the local land use plans could indirectly cause additional adverse environmental and public services and utilities impacts. To determine if a growth-inducing project will result in adverse secondary effects, it is important to assess the degree to which the growth occurring as part of a project would or would not be consistent with applicable land use plans.

### B. COMPONENTS OF GROWTH

The timing, location and extent of development and population growth in a community or region are based on multiple factors. Key variables include regional economic trends, market demand for residential and nonresidential uses, land availability and cost, the availability and quality of transportation facilities and public services, proximity to employment centers, the supply and cost of housing, and regulatory policies or conditions. The general plan is the primary mechanism used to regulate development and growth in California as it is used to define location, type, and intensity of growth.

### C. PROJECT-SPECIFIC GROWTH-INDUCING IMPACTS

#### **Growth Inducement Potential**

As described in Chapter 2.0, Project Description, the Seville Solar Farm Complex proposes to build, operate, and maintain a 135 megawatt (MW), alternating current (AC) [135MW/AC] renewable energy facility on approximately 1,235 acres of private land in west-central Imperial County, 2.30 acres of 92 kV transmission line overbuild on BLM land, and 0.24 acres of modifications to the Anza Substation on IID land. The proposed Project includes the construction, operation and reclamation of the following:

- Five solar photovoltaic (PV) or concentrating photovoltaic (CPV) energy projects on five individual lots to be created by reconfiguring the existing legal parcels of the Property;
- An Operations & Maintenance (O&M) building, parking area, water well and sanitary waste septic system and leach field within each of the five solar energy project lots;
- Extending the existing 12.5 kilovolt (kV) electrical distribution system within the Property to each new building;
- A new access road from State Route (SR) 78 and internal access roads across portions of the Property to each lot;
- A new IID electrical switch station and private electrical substations for each of the five solar energy projects to be located within the Property;
- Internal solar development transmission lines (i.e. gen-tie lines) from each of the five solar energy projects to the electrical substations and switch station;
- Approximately three miles of new IID 92 kV transmission line for interconnection of the new IID switch station to the existing IID Anza Substation, 2.25 miles of which would be constructed atop an existing IID 12.5 kV distribution line.
- Modifications of the IID Anza Substation to expand the existing fenced area around the facility; relocate the existing 92kV switch and breaker bank into the expanded substation area and reorient the switch and breaker bank in a north/south alignment; construct a new 92 kV switch and breaker bank; and install up to five new steel and/or concrete poles.

[Note: The IID-owned facilities (IID switchyard and 92 kV transmission line on the Property; 92 kV transmission line with underbuilt 12.5 kV distribution line; 12.5 kV distribution line system constructed on the Property; and the IID Anza Substation modifications) would not be decommissioned until IID determined that these improvements were no longer needed and could be retired and removed. The roads constructed on Lot B to access each of the parcels created under the major subdivision and all of the water wells would not be decommissioned or reclaimed.]

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As described in Section 4.2, Land Use, the proposed Project site is located in unincorporated Imperial County, and is subject to the Imperial County General Plan and Land Use Ordinance. The site encompasses seven existing legal property parcels (refer to Table 2.0-1 in Chapter 2.0) with a General Plan designation of Agriculture and A-2 - General Agriculture.

The Seville Solar Farm Complex requires a CUP from Imperial County to construct and operate a solar energy facility on the proposed Project site. In addition, nine CUPs are required for the water wells within the Project area. The Project also proposes a major subdivision/tract map which would reconfigure the seven existing legal property parcels (Assessor Parcel Numbers: 018-010-025, [018-170-004, 018-170-005, 018-170-006, 018-170-007 Note: These four APN #'s comprise one legal parcel], 018-170-008, 018-170-010, 018-170-011, 018-170-012 and 018-170-013) into eight new individual lots and four common development interest lots. Lastly, the Project will require floodplain development permits from the ICPDSD for each of the five proposed solar farm projects and a development agreement/public benefit agreement.

Approval of the CUPs, major subdivision/tract map and floodplain development permits, and development agreement/public benefit agreement by the Imperial County Board of Supervisors would allow the Project to attain consistency with the General Plan and Land Use Ordinance allowable land uses. By its nature as a solar energy facility, the Project would not directly induce growth. Instead, the Project would provide renewable energy to meet existing and future electricity demands of the region and provide a new source of renewable energy to assist the State of California in achieving the Renewable Portfolio Standard.

### **Growth Effects of the Project**

#### ***Existing and Proposed Land Uses***

Criterion "e" in Section 4.9, Agricultural Resources section of this Draft EIR (Section 4.9) inquires whether the project would "Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use." The Project would conditionally allow a solar energy facility on lands designated for agriculture on the Imperial County General Plan Land Use Map. Although implementation of the proposed Project would result in the temporary conversion of agricultural land, at the end of the useful life of the Project, the solar farm complex would be removed and the Project site would be reclaimed to approximate the existing idle farmland.

#### **Infrastructure**

With the exception the extension of IID electrical lines to serve the O&M buildings the proposed Project would not result in the development and extension of infrastructure facilities located in and/or adjoining the Project site. Likewise, the Project is not expected to have an impact on infrastructure availability to adjacent parcels.

Electrical power would be obtained from the existing IID network of 12.5 kV distribution lines already on the property which serve the buildings and the ground water wells. Electrical power for each O&M building would also be provided by the IID by extending, as may be necessary, the existing 12.5 kV electrical distribution system on the property to each building. These extensions would be limited to the Project site to serve on-site facilities. No off-site extensions are proposed.

As a general rule, extension of utilities or increased capacity of infrastructure has the potential to result in growth inducement. Any such improvements not only accommodate a project for which they are built but also for any other projects in the surrounding area that would be proposed or become feasible as a result of the availability of new infrastructure.

However, the proposed Project site is located in a rural and remote area of west-central Imperial County with limited infrastructure. The extension of IID electrical lines would be limited to serving the proposed Project and are not considered growth inducing. Thus, implementation of the proposed Project would not contribute to growth in this area of the County.

### **Housing**

The Regional Housing Needs Assessment has determined that the unincorporated area of the county will need 13,427 housing units for the period 2006–2014. No housing is proposed as part of the Seville Solar Farm Complex nor is the Project anticipated to induce growth in other regions.

### **Roadways**

The proposed Project includes construction of a new private access road extending south approximately 0.80 mile off of SR 78 approximately one-quarter mile west of the existing property access road as well as an internal road network to accommodate vehicular access throughout the solar farm complex. No off-site improvements to area roadways would be necessary to accommodate the proposed Project.

### **D. SECONDARY EFFECTS OF GROWTH**

The Seville Solar Farm Complex would not result in the introduction of people and activities to an area that was formerly in agricultural use. Secondary effects of the proposed solar farm complex would include the creation of increased traffic, noise, and air emissions during construction. However, during operation and maintenance of the Project, traffic, noise and air emissions would not increase substantially over existing levels currently experienced at the site. No long-term increase in traffic, noise or air emissions would occur as a result of the proposed Project.

## **7.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES**

### **A. INTRODUCTION**

CEQA Guidelines Section 15126.2(c) describes irreversible environmental changes as follows:

*Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

Buildout of the proposed Project area would result in the temporary conversion of parcels previously used for agricultural purposes to solar energy production and transmission facilities.

Development of the Project site would irretrievably commit building materials and energy to the construction and maintenance of the solar farm complex, gen-tie lines and associated buildings and infrastructure. Renewable, nonrenewable, and limited resources that would likely be consumed as part of the development of the proposed Project would include, but are not limited to, oil, gasoline, lumber, sand and gravel, asphalt, water, steel, and similar materials. Energy would also be irreversibly consumed, both as part of the construction and during operation of the proposed Project.

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### 7.5 MANDATORY FINDINGS OF SIGNIFICANCE

State CEQA Guidelines Section 15065 identifies four mandatory findings of significance that must be considered as part of the environmental review process of a project. These findings are identified below with an analysis of the Project's relationship to these findings.

- 1) The project has the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory.

The Project's impacts on biological resources and cultural resources are evaluated in Section 4.12, Biological Resources, and Section 4.7, Cultural Resources, of this DEIR, respectively. Both sections identify mitigation measures to reduce impacts to these resources. Upon implementation these of these measures, impacts to biological and cultural resources will be less than significant.

- 2) The project has potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.

The Project would result in short-term traffic and air quality impacts as a result of construction. However, the Seville Solar Farm Complex would expand the renewable energy sector in Imperial County and reduce the emission of GHGs from the generation of electricity. In doing so, the Project would assist the State of California in achieving the RPS. Development of the site may result in disadvantages to long-term preservation goals for agricultural resources. The Project site has not been farmed in recent years and is reverting to open desert. At the end of the useful life of the Project, the solar farm complex would be removed and the Project site would be reclaimed to approximate the existing idle farmland. Therefore, the proposed Project would result in less than significant impacts to long-term environmental goals.

- 3) The project has possible environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The Project's potential cumulative impacts are summarized in Chapter 5.0 of this DEIR. Sections 4.1 through 4.13 evaluate cumulative impacts related to each resource and technical discussion area and identify mitigation measures addressing each cumulatively considerable impact. Upon implementation of these measures, cumulative impacts will be less than considerable.

- 4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

Potential adverse impacts on humans are discussed and evaluated in Section 4.4, Air Quality, Section 4.10, Hazards and Human Health, Section 4.8, Noise, and Section 4.5, Climate Change and Greenhouse Gases. As appropriate, each section identifies mitigation measures to reduce significant impacts associated with these resource areas. In addition, the proposed Project would remain subject to applicable local, state, and federal regulations intended to avoid adverse effects on humans. Seville Solar Farm Complex project would comply with all required regulatory/legal requirements, and project-specific conditions of approval, and would therefore result in less than significant impacts on humans.