

APPENDIX A

NOP, INITIAL STUDY AND COMMENT LETTERS

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Notice of Preparation

Notice of Preparation

To: State Clearinghouse

P.O. Box 3044

Sacramento, California 95812-3044

From: Imperial County Planning and Development Services Department

801 Main Street

El Centro, California 92243

Subject: Notice of Preparation of a Draft Environmental Impact Report

Imperial County Planning and Development Services Department will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (☒ is ☐ is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Imperial County Planning and Development Services Department at the address shown above. We will need the name for a contact person in your agency.

Project Title: Seville Solar Farm Complex

Project Applicant, if any: Regenerate Power LLC

Date September 11, 2013

Signature 

Title Imperial County Planning and Development Services Director

Telephone (760) 482-4236

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

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INITIAL STUDY

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Date: September 12, 2013

1. Project Title: Seville Solar Farm Complex
2. Lead Agency: Imperial County Planning & Development Services Department (ICPDS)
3. Contact Person: Dave Black, Planner IV
4. Address: 801 Main Street
El Centro, CA 92243
5. Phone Number: (760) 482-4320 Fax Number: (760) 353-8338
6. Project Location: The proposed Project site is a property in west-central Imperial County, California, approximately eight miles west of the junction of State Route (SR) 78 and SR 86, and approximately three miles east of the San Diego County line. The property includes seven parcels (Assessor Parcel Numbers: 018-010-025, 018-170-004, 018-170-005, 018-170-006, 018-170-007, 018-170-008, 018-170-010, 018-170-011, 018-170-012 and 018-170-013)
7. Project Sponsor: Regenerate Power LLC.
8. Sponsor Address: 1050 Doyle Street
Menlo Park, California, 94025
9. General Plan Designation: Agriculture
10. Zoning: A-2 (General Agriculture)
11. Description of project: See attached project summary.
12. Surrounding Land Uses and Setting: See attached project summary.
13. Other Agencies whose approval may be required (e.g., permits, financing approval, or participation agreement) include but are not limited to: Imperial Irrigation District, Bureau of Land Management, Imperial County Air Pollution Control District, California Department of Transportation, California State Water Resources Control Board, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a potentially significant Impact as indicated by the checklist on the following pages.

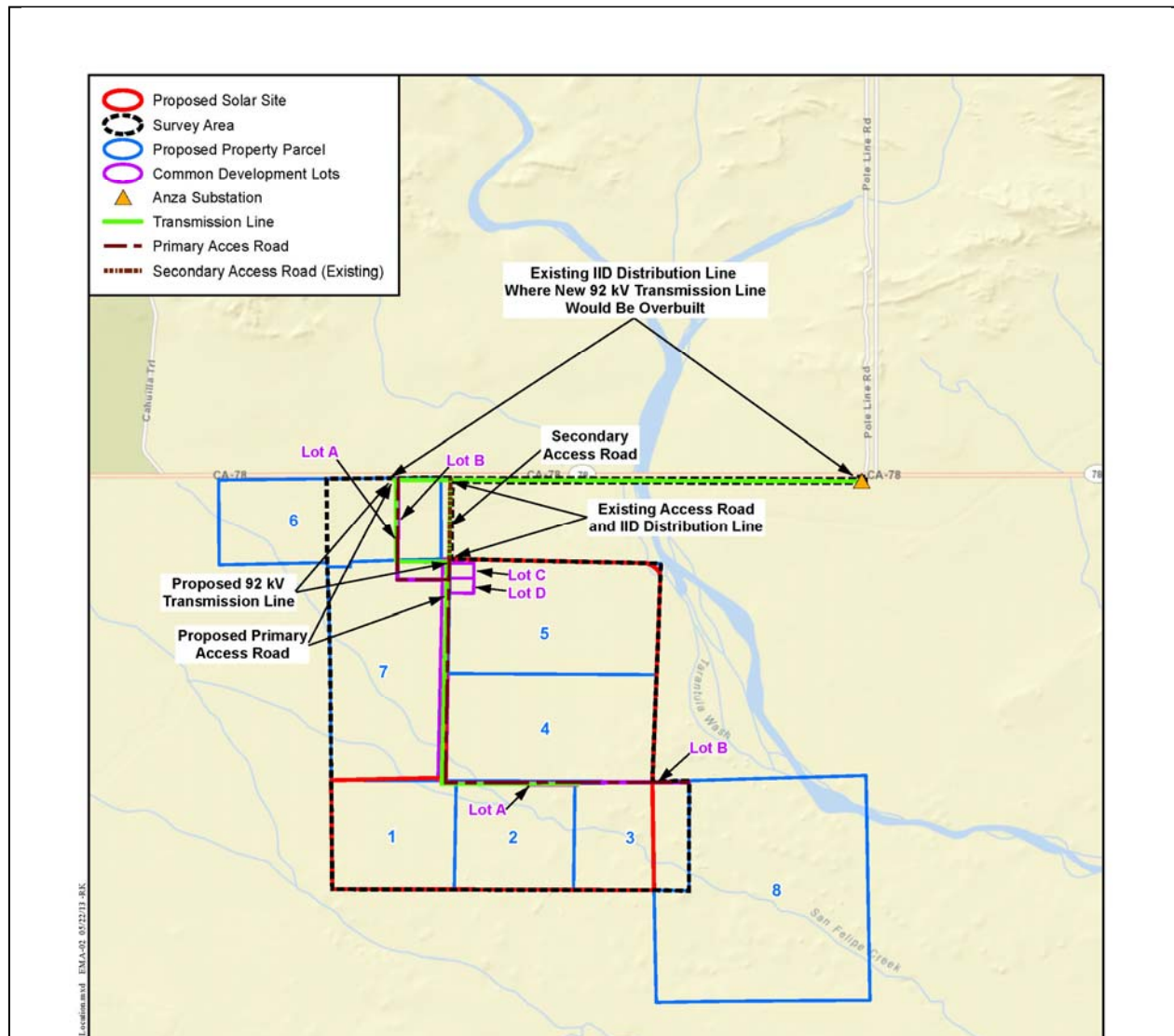
- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology & Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Hydrology & Water Quality |
| <input checked="" type="checkbox"/> Land Use & Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population & Housing | <input checked="" type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation & Traffic | <input checked="" type="checkbox"/> Utilities and Service and Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

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- 1) Found that the proposed Project COULD NOT have significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐
 - 2) Found that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent in the form of mitigation measures which are described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared. ☐
 - 3) Found that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☒
 - 4) Found that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐
 - 5) Found that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION, pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project nothing further is required. ☐

PROJECT SUMMARY

LOCATION:

The Project is located on portions of the approximately 2,440-acre Allegretti Farms property in west-central Imperial County, California, approximately eight miles west of the junction of SR 78 and SR 86, and approximately three miles east of the San Diego County line (see **Figure 1**). Specifically, the Project is located in portions of Sections 13, 14, 15, 22, 23 and 25-27, Township 12 South (T12S), Range 9 East (R9E), San Bernardino Baseline and Meridian (SBB&M).



Source: Helix 2013.

Figure 1 – Site Location Map

All of the existing Allegretti Farms property parcels are currently zoned A-2 (general agriculture). Approximately 1,700 acres of the property have, to varying degrees, been under agricultural production for several decades or more, although the acreage under active agricultural production has declined to less than 100 acres since the peak in the late 1970's.

THE PROJECT:

The proposed Seville Solar Farm Complex (proposed Project) includes the construction, operation and reclamation of up to five solar energy projects. The Project proposes a new access road from SR 78 and internal access roads, an IID (Imperial Irrigation District) electrical switch station, electrical substations for each of the five solar projects, and internal solar development transmission lines to the substations and IID switch station. The Project would also include the construction for, and operation by, the IID of a new 92 kilovolt (kV) transmission line for interconnection to the existing IID Anza Substation.

The proposed major subdivision/tract map would reconfigure the existing parcels into eight individual lots (Lots 1-8) and four common development interest lots (Lots A - D), as follows (see **Figure 2**):

- Lot 1 (approx. 185 acres): Portion NW/4 Section 26 + NE/4 Section 27;
- Lot 2 (approx. 185 acres): Portion NE/4 Section 26 + Portion NW/4 Section 26;
- Lot 3 (approx. 185 acres): Portion NW/4 Section 25 + Portion NE/4 Section 26;
- Lot 4 (approx. 319 acres): S/2 Section 23 (approx.);
- Lot 5 (approx. 307 acres): N/2 Section 23 (approx.);
- Lot 6 (approx. 266 acres): Portion S/2 Section 15 + Portion NE/4 Section 22;
- Lot 7 (approx. 339 acres): Portion E/2 Section 22;
- Lot 8 (approx. 599 acres): Section 25 less portion of NW/4 Section 25;
- Lot A (approx. 34 acres): Solar projects transmission line corridors within the property;
- Lot B (approx. 11 acres): Common access road corridors within the property;
- Lot C (approx. 5 acres): Site for IID switch station in Portion NW/4 Section 23; and
- Lot D (approx. 5 acres): Site for solar project substations in Portion NW/4 Section 23.

Of these 12 proposed lots, eight would be specifically developed as the Seville Solar Farm Complex (Project area). Lots 1-5 would be developed as individual solar farm projects (respectively, Seville Solar Farm Projects One - Five). Lots A, C and D would be developed specifically for the benefit of all five solar farm projects. These three common development interest lots include land for the IID electrical switch (Lot C), land for the solar development substations (Lot D) and land for the solar development transmission lines to the solar development substations (Lot A) (see Figure 2). Lot B would be a common development interest lot for the internal property road system supporting all of the other 11 lots. Lots 6-8 are not proposed for any specific development at this time.

Seven ground water wells are located on the property (see **Figure 2**), although only the domestic water well (#7) and two commercial water wells (#4 and #6) are currently operational. The IID currently provides electrical power to the property for use by the water wells and the existing farm buildings. Water for each of the property lots/proposed developments would be provided by up to nine ground water wells (the seven existing water wells, plus two new water wells). Water would be provided to each individual development lot either by the owner of each individual lot, or by the Ranch Oasis Mutual Water Company, established in 1994 by Allegretti & Co. The existing and proposed ground water wells are located on the following proposed lots (see **Figure 2**):

- Lot 1: Existing water well #4;
- Lot 2: New water well (well #8);
- Lot 3: Existing water well #6;
- Lot 4: Existing water well #5;
- Lot 5: Existing water well #1 and existing water well #7;
- Lot 6: Existing water well #3;
- Lot 7: Existing water well #2; and
- Lot 8: New water well (well #9).

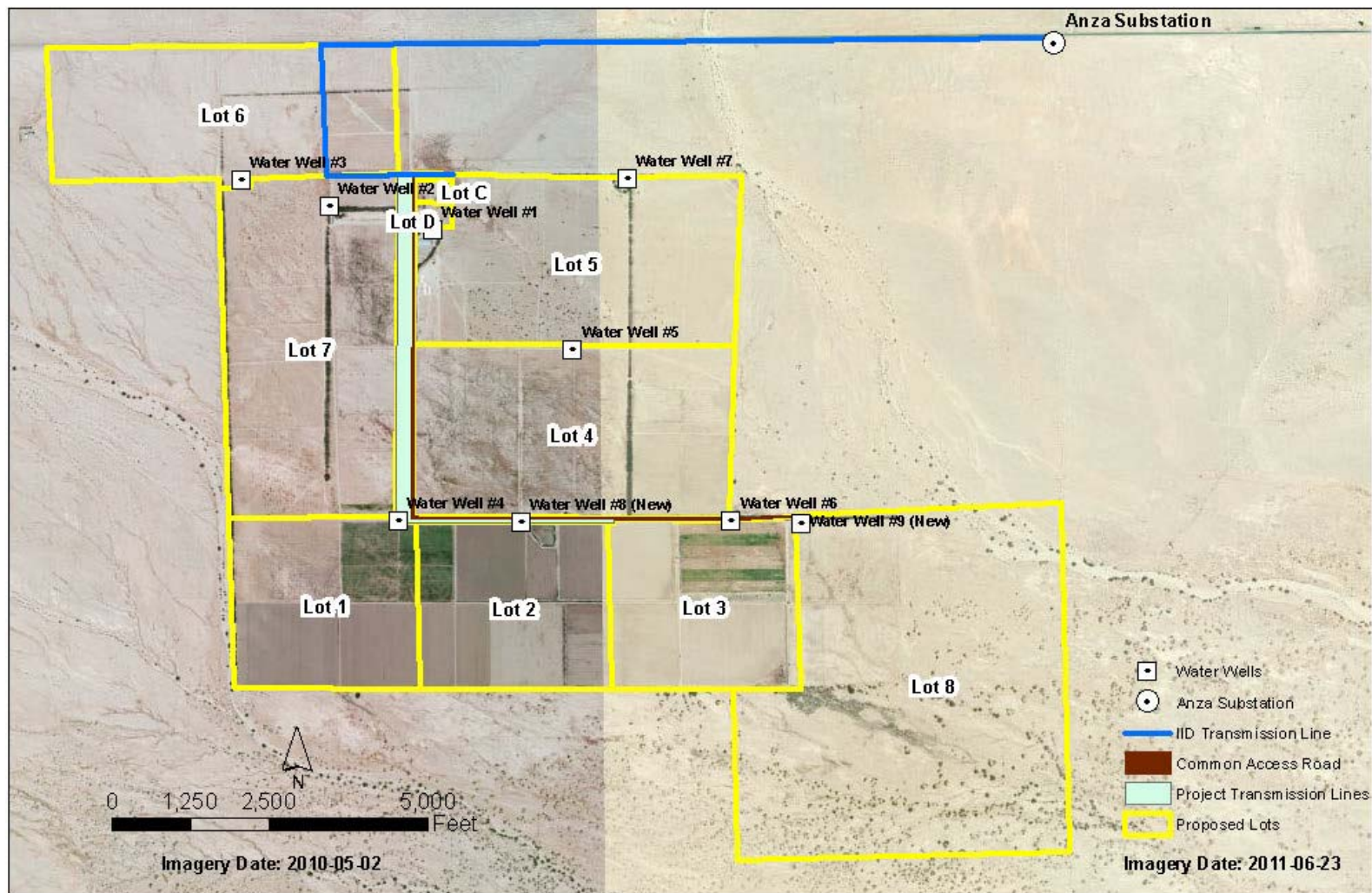


Figure 2 – Lot Configuration and Well Locations

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Project Facilities

The Project would consist of the construction, operation and reclamation of up to five solar energy projects, including a new access road from SR 78 and internal access roads, an IID electrical switch station, electrical substations for each of the five projects, and internal solar development transmission lines to the substations and IID switch station. The Project would also include the construction for, and operation by, the IID of new 92 kV transmission line for interconnection to the existing IID Anza Substation (see **Figure 1**). A description of the Project components follows.

Solar Technology: The Project proposes to utilize either thin film or crystalline solar photovoltaic (PV) technology modules mounted either on fixed frames or horizontal single-axis tracker (HSAT) systems. The PV module arrays would be mounted on racks that would be supported by driven piles. The depth of the piles would be dependent on the geotechnical recommendations for the Project. The fixed-frame racks would be secured at a fixed tilt of 20° to 25° from horizontal facing a southerly direction. If HSAT technology is used, the PV modules would rotate around the HSAT axis so that the PV modules would continue to face the sun as the sun moves across the sky throughout the day. The PV modules would reach their maximum height (up to nine feet above the ground, depending on the final design) at both sunrise and sunset, when the HSAT is rotated to point the modules at the rising or setting sun. At noon, or when stowed during high winds, when the HSAT system is rotated so that the PV modules are horizontal, the nominal height would be about six feet above the ground, depending on the final design. The individual PV systems would be arranged in large arrays by placing them in columns spaced approximately ten feet apart to maximize operational performance and to allow access for panel cleaning and maintenance.

Current Project design would have individual PV modules, each approximately two feet wide by four feet long (depending on the specific PV technology selected), mounted on a frame which is attached to an HSAT system. The HSAT system supports are typically steel posts that are driven into the ground.

The Project proposes either thin film or crystalline solar photovoltaic (PV) or concentrating photovoltaic (CPV) solar panels. Current Project design would have individual PV modules, each approximately two feet wide by four feet long (depending on the specific PV technology selected), mounted either on fixed frames or horizontal single-axis tracker (HSAT) system.

The individual PV HSAT systems would be arranged in large arrays by placing them in columns spaced approximately ten feet apart (in the stowed position) to maximize operational performance and to allow access for panel cleaning and maintenance. These arrays would be separated from each other and the perimeter security fence by nominal 20-foot wide roads, consistent with agency emergency access requirements. Each PV array would have an electrical output of approximately 1.3 megawatts alternating current (MWAC). The Project's power would be transmitted by the IID to the point of interconnection with the utility which had agreed to purchase the output from each of the five solar projects pursuant to a power purchase agreement (PPA).

If HSAT technology is used, the PV modules would reach their maximum height (up to nine feet above the ground, depending on the final design) at both sunrise and sunset, when the HSAT is rotated to point the modules at the rising or setting sun. At noon, or when stowed during high winds, when the HSAT system is rotated so that the PV modules are horizontal, the nominal height would be about six feet above the ground, depending on the final design.

CPV technology uses optics such as lenses to concentrate a large amount of sunlight onto a small area of PV cells to generate electricity. The CPV technology focuses the sunlight onto highly efficient solar cells using Fresnel lenses. The CPV technology would likely use a dual-axis tracking system to position the tracker to ensure that concentrated sunlight remains precisely focused on the solar cells throughout the day. The dual-axis tracking structures use single pole/mast-mounted panels that would

be about 30-feet high at both sunrise and sunset, when the panel is rotated to point at the rising or setting sun. The dual-axis modules would be spaced approximately 80 feet apart.

Electrical Power System: Strings of PV modules would be fused and electrically combined together, then electrically connected through underground wiring to an inverter. Inverters would take the DC electricity produced by the PV modules and convert it to AC electricity. A transformer would then increase the voltage of the AC electricity to 13.8 kV or 34.5 kV so that the power could be economically and efficiently conducted over above-ground transmission lines within each project and to the project substation (see Figure 6). Each project would deliver its produced power over a separate, above-ground 13.8 kV or 34.5 kV transmission line constructed in the transmission common interest development lot from the project area to the project substation.

Substations: Up to five substations (one for each project) would be constructed in the northwest corner of Section 23, within Lot D (see Figure 2). Each substation would take delivery of the 13.8 kilovolt (kV) or 34.5 kV power from its respective project and increase the voltage of the electricity to 92 kV for metering and delivery to the IID switch station (Lot C) and connection with the IID electric grid at the IID Anza Substation. Each substation would include a transformer, circuit breakers, meters, disconnect switches, microwave or other communication facilities and an electrical control house.

Transmission Lines: Electrical interconnection with the IID electrical transmission system would require construction of a new 92 kV transmission line (with static grounding/communication line[s]) from the IID switch station on the property to the existing Anza Substation on SR 78 (see Figure 1). Approximately 0.75 miles of new 92 kV transmission line would be constructed on the Allegretti Farms property. An additional 2.25 miles of new 92 kV transmission line would be “overbuilt” on top of the IID’s existing 12.5 kV distribution line located immediately south of SR 78 from the property to the existing IID Anza Substation.

Operations and Maintenance (O&M) Buildings: The Project could include construction of an O&M building and parking area within each of the five solar project development lots. Each O&M building could include a small office, material and equipment storage, an electrical/array control room and restrooms. Electrical power for each O&M building would 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.

Each O&M building could also include its own emergency power, fire suppression equipment, potable water system and septic system. Additional auxiliary facilities located on each solar development lot could include a garage, security lighting, backup uninterruptible power supply systems and diesel power generators, fire and hazardous materials safety systems and emergency response facilities. The design and construction of this building would be consistent with County building standards.

Water Tank: Water could be required for domestic use, solar panel washing and fire protection. Water for these purposes would be stored in an on-site water tank of approximately 20,000 gallons. An approximately 10,000-gallon portion of the water storage tank would be reserved and dedicated to provide water for fire protection.

Septic System: Wastewater from sanitary facilities such as sinks and toilets in each of the O&M buildings would be collected. This waste stream would be sent to a sanitary waste septic system and leach field located on each of the five developed solar project lots. In consideration of the number of permanent employees, the soil conditions at the site and consultation with a local geotechnical contractor, an engineered septic system is expected to be installed and designed in compliance with standards established by the County Environmental Health Department.

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

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

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

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

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

Site Access:

The principal access to the solar projects would be via a new private access road off of SR 78 constructed on the property approximately one-quarter mile west of the existing property access road (see **Figure 1**). The new primary access road would be provided with a minimum of 30-foot double swing gates with a coded entry and “Knox Box” over-ride. Internal to the property, a network of 25-foot wide roads would provide operations and maintenance access to all property lots and Project components. The existing gated, private road from SR 78 would be used for the solar development projects only for secondary, emergency access (see **Figure 1**).

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

OFFICIAL CHECKLIST:

AESTHETICS Would the project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) **Less than Significant Impact.** The Project site consists of flat, agricultural land located in an unincorporated portion of Imperial County surrounded by generally undeveloped desert. There are no panoramic scenic views from the Project area, and the nearest residential structure is located nearly approximately 3,200 feet from the Project area boundary. No scenic vistas or areas with high visual quality would be affected by development of the proposed Project site. Therefore, adverse effects on a scenic vista are considered less than significant.
- b) **No Impact.** The Project site consists of seven parcels of land historically cultivated for agricultural uses. The site is essentially vacant with several out buildings, an above-ground diesel fuel storage tank within a concrete block secondary containment structure, a covered material storage, a truck weigh scale and shed. Two residences are also located in the northeast corner of Lot 5. None of the existing structures are considered historic. Several Tamarisk Windbreaks extend through the property however there are no rock outcroppings. SR 78 is approximately one-half mile north of the northern property boundary. According to the Imperial County General Plan Circulation and Scenic Highways Element, "The portion of SR 78 from the junction with SR 86 to the San Diego County line is eligible for future Scenic Highway Designation. The area is considered scenic because of its desert characteristics and view of the Salton Sea" (Imperial County 1998, p. 30). However, SR 78 is not officially designated as a Scenic Highway. Therefore, no impact is anticipated and impacts to resources within a state scenic highway will not be discussed in the EIR.
- c) **Potentially Significant Impact.** Views of the proposed Project are partially obstructed by the presence of Tamarisk windbreaks extending north-south through the property (Lots 4, 5 and 7) as well as east-west along the northern boundary of Lots 2, 3, 5 and 7. The Project includes development of approximately 1,238 acres of the 2,440-acre Allegretti Farms property. The Project site is surrounded by private properties and open desert land administered by the BLM. The site is visible, though set back from, SR 78. In addition, the areas along the existing IID distribution line right-of-way adjacent to SR 78 and along the western boundary of the Project site are used by off-road vehicles.

The Project would introduce thin film or crystalline solar photovoltaic (PV) or concentrating photovoltaic (CPV) solar panels to the largely vacant agricultural site. Current Project design would have individual PV modules, each approximately two feet wide by four feet long (depending on the specific PV technology selected), mounted either on fixed frames or horizontal single-axis tracker (HSAT) systems. If HSAT technology is used, the PV modules would reach their maximum height (up to nine feet above the ground, depending on the final

design) at both sunrise and sunset, when the HSAT is rotated to point the modules at the rising or setting sun. At noon, or when stowed during high winds, when the HSAT system is rotated so that the PV modules are horizontal, the nominal height would be about six feet above the ground, depending on the final design.

The Project could also introduce up to five substations and five O&M buildings disbursed throughout the property. A new 92 kV transmission line extending from the IID switch station on the property to the existing Anza Substation on SR 78 (see **Figure 1**) and an on-site water tank approximately 20,000 gallons in size are also proposed as part of the Project.

The introduction of all of these features would be noticeable to travelers along SR 78 and surrounding lands. Therefore, a potentially significant impact is identified for this issue area. Impacts to visual character and quality of the site will be addressed in the EIR.

- d) Potentially Significant Impact.** The proposed Project includes lighting that would be directed on-site and shielded as necessary to minimize illumination of the night sky and potential impacts to surrounding viewers. The solar panels would be constructed to absorb light and minimize any potential glare. Nevertheless, a potentially significant impact is identified for light and glare impacts. This issue will be discussed in the EIR.

II. AGRICULTURE AND FOREST RESOURCES -- In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 511 04(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) **Potentially Significant Impact.** Approximately 651 acres of the area to be developed with the solar complex have been mapped as “prime farmland” by the California Farmland Mapping and Monitoring Program (FMMP). Prime farmland is defined as having the best combination of physical and chemical features able to sustain long-term agricultural production. Prime farmland has the soil quality, growing season, and moisture supply needed to produce sustained high yields. However, to be considered as “prime farmland” the land must have been used for production of irrigated crops at some time during the two update cycles prior to the mapping date. Approximately 219 acres have been mapped as “farmland of statewide importance.” Farmland of statewide importance is similar to prime farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Approximately 352 acres have been mapped as “farmland of local importance.” Farmland of local importance is defined as land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

The California Department of Conservation (CDOC) Land Evaluation Site Assessment (LESA) model was used to evaluate the potential impacts from permanent conversion of Project area agricultural land to other purposes. The LESA analysis indicates that the permanent conversion of the Project area agricultural lands to other uses may create a significant impact. This issue will be discussed in the EIR.

- b) **No Impact.** There are no Williamson Act lands within or adjacent to the Project area. Therefore, conversion of land under Williamson Act Contract is not an issue and will not be discussed in the EIR.
- c) **No Impact.** Based on the Imperial County General Plan, Conservation and Open Space Element, mixed chaparral, pinyon-juniper habitats, and the montane hardwood-conifer forest are located in restricted areas of the County. Mixed chaparral and pinyon-juniper habitats are located in the extreme southwestern corner of the County and montane hardwood-conifer forest is in the extreme northwestern corner of Imperial County. Thus, there are no existing forest lands, timberlands, or timberland zoned Timberland Production either on or near the Project site that would conflict with existing zoning. This issue will not be discussed in the EIR.
- d) **No Impact.** There are no existing forest lands either on-site or in the immediate vicinity of the Project site. The proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area.
- e) **Potentially Significant Impact.** The proposed Project would introduce a solar farm complex into an isolated area of the County with sparse development and surrounding desert lands. The Project would convert a piece of historically cultivated agricultural land to a non-agricultural use. The acreage under active agricultural production has declined to less than 100 acres since the peak in the late 1970's. Nevertheless, the conversion of the agricultural land to a solar farm complex represents a potentially significant impact that will be discussed in the EIR.

III. AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to the following determinations.	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III. AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to the following determinations. Would the project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** The Project site is located within the Salton Sea Air Basin (SSAB) and is subject to the Imperial County Air Pollution Control District (ICAPCD) Rules and Regulations. Approximately 1,238 acres of the Project site would be disturbed in association with construction of the solar farm complex. Construction of the proposed Project would potentially create temporary emissions of dust, fumes, equipment exhaust, and other air contaminants that may conflict with the ICAPCD Rules and Regulations. This is considered a potentially significant impact unless mitigation is incorporated.
- b,c) **Potentially Significant Impact Unless Mitigation Incorporated.** Currently, the SSAB is either in attainment or unclassified for all federal and state air pollutant standards with the exception of O₃ (8-hour) and total suspended particulate matter less than 10 microns in diameter (PM₁₀). Air pollutants transported into the SSAB from the adjacent South Coast Air Basin (Los Angeles, San Bernardino County, Orange County, and Riverside County) and from Mexicali (Mexico) substantially contribute to the non-attainment conditions in the SSAB. Thus, a potentially significant impact is identified for this issue area. Construction of the proposed Project may result in a cumulatively considerable net increase of one or more criteria pollutants as a result of point, and non-point source emissions for which the region is in nonattainment under applicable federal and state ambient air quality standards. Thus, a potentially significant impact is identified for this issue area. Both temporary construction air quality emissions and stationary source emissions during operation (if emergency diesel generators were installed for any of the projects) have the potential to result in an increase of criteria pollutants. This is considered a potentially significant impact unless mitigation is incorporated. An analysis of air quality impacts is being prepared for the proposed Project and these potential air quality impacts will be addressed in the EIR.
- d) **Less than Significant Impact.** The Project site and surrounding areas are currently agricultural land and open desert. Two single-family residences are located at the northeast corner of the property and another is located in the north central portion of the site. None of the homes are occupied and the one in the central portion of the property will likely be demolished to accommodate the project. Therefore, impacts to sensitive receptors are considered less than significant.
- e) **No Impact.** The proposed Project is the installation of a solar farm complex. No malodorous chemicals or substances would be used or generated during Project construction or operations. No impact is identified for this issue area.

IV. BIOLOGICAL RESOURCES				
Would the project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances Protecting biological resource, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** The Project site consists of disturbed vacant agricultural land with 21 vegetation types/land cover types. Biological surveys of these lands have been conducted with the focus of documenting the habitat, potential jurisdictional state / federal waters, and wetlands, and documenting suitable threatened, endangered, and sensitive wildlife species habitats. A "Baseline Biological Resources Survey Report" prepared for the Project concluded that "No critical habitat occurs in the survey area and no federally listed species were observed or are expected to occur there" (HELIX 2013, p. 15). However, the burrowing owl has moderate potential to occur in the survey area due to potentially suitable habitat. The burrowing owl is a BLM Sensitive Species, a U.S. Fish and Wildlife Service Bird of Conservation Concern and a California Department of Fish and Wildlife (CDFW) Species of Special Concern. The proposed solar development could result in potentially significant impacts to burrowing owls (refer to item e) below). This is considered a potentially significant impact unless mitigation is incorporated. A full discussion of the findings of the Biological Resources Evaluation will be provided in the EIR.

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- b) **Potentially Significant Impact Unless Mitigation Incorporated.** According to the “Baseline Biological Resources Survey Report” prepared for the Project (HELIX 2013, p. 19), Mesquite thicket is the only sensitive vegetation community impacted on the proposed Project site. In terms of off-site impacts, construction of the proposed Project may result in significant impacts to 0.5 acre of jurisdictional streambed and 0.1 acre of tamarisk thicket, both of which are sensitive vegetation/land cover types. Therefore, a potentially significant impact unless mitigation is incorporated is identified for impacts to riparian habitat and sensitive natural communities. These impacts will be discussed in the EIR.
- c) **Potentially Significant Impact Unless Mitigation Incorporated.** A Jurisdictional Delineation was prepared for the Project that identified 0.05 acre of tamarisk thicket and 0.58 acre of non-wetland Waters of the U.S. (i.e. streambed and drainage ditch), along a total of 1,043 linear feet. Impacts to Waters of the U.S. may potentially occur in association with construction of the transmission line as well. This is considered a potentially significant impact unless mitigation is incorporated.
- d) **Less than Significant Impact.** The proposed Project will include the installation of a chain link fence around the perimeter of the site. The fencing would inhibit medium- and large-sized mammals from moving through the solar farm complex site. However, small-sized mammals would still be able to access the site. Unlined drainage ditches and concrete lined irrigation ditches throughout the Project site currently provide connectivity corridors. Ditches located within the solar field would be removed. However, it is already likely that animals do not regularly move through the proposed solar site (i.e. use it as a wildlife movement corridor) since it is essentially an island of disturbed agricultural land within otherwise relatively undisturbed desert habitat. Therefore, if the proposed solar site is fenced during construction and/or operation, a less than significant impact is anticipated to migratory wildlife corridors.
- e) **Potentially Significant Impact Unless Mitigation Incorporated.** The Imperial County General Plan Open Space and Conservation Element contains an Open Space Conservation Policy that requires detailed investigations to be conducted to determine the significance, location, extent, and condition of natural resources in the County, and to notify any agency responsible for protecting plant and wildlife before approving a project which would impact a rare, sensitive, or unique plant or wildlife habitat. In accordance with this policy, a “Baseline Biological Resources Survey Report” has been prepared for the Project site. The Imperial County General Plan Land Use Element Policy notes that the majority of the privately owned land in the County is designated “Agriculture,” which is also the predominate area where burrowing owls create habitats, typically in the brims and banks of agricultural fields. Consistent with these policies, a burrowing owl survey was conducted of the Project site and surrounding area in July 2013. Because the Project site has the potential for burrowing owl, this is considered a potentially significant impact unless mitigation is incorporated. The results of the “Baseline Biological Resources Survey Report” and focused burrowing owl survey will be discussed in the EIR.
- f) **No Impact.** Imperial County does not have a Habitat Conservation Plan (HCP). Thus, no conflicts or impacts would occur between the proposed Project and an adopted HCP. Some lands in the County under the jurisdiction of the Bureau of Land Management (BLM) are covered by the California Desert Conservation Area (CDCA) Plan which includes Areas of Critical Environmental Concern (ACEC). The Project site is not within or immediately adjacent to an ACEC of the CDCA. Therefore, no impact would occur.

V. CULTURAL RESOURCES				
Would the project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) **No Impact.** The Project site has been disturbed by past farming activities but is essentially vacant. Several structures associated with farming such as outbuildings, an above-ground diesel fuel storage tank within a concrete block secondary containment structure, a covered material storage, a truck weigh scale and shed are in the north central portion of the property. Two residences are also located in the northeast corner of Lot 5. None of these structures were identified as historical resources as part of the “Baseline Cultural Resources Survey Report” prepared for the Project site. These areas are disturbed and actively cultivated. Therefore, no impacts to historical resources would occur.
- b) **Potentially Significant Impact Unless Mitigation Incorporated.** A search of sacred lands on file at the Native American Heritage Commission (NAHC) was conducted to determine if any designated Sacred Lands are present in the immediate vicinity of the Project site. A search of the NAHC Sacred Lands File did not indicate the presence of Native American cultural sites within the Area of Potential Effect. However, a survey on private land was conducted from January 23 to January 31, 2013 where an archaeological pot-drop site and 14 prehistoric isolates were identified. Therefore, impacts to archaeological resources are considered potentially significant unless mitigation is incorporated and will be discussed in the EIR.
- c) **Potentially Significant Impact Unless Mitigation Incorporated** Many paleontological fossil sites recorded in Imperial County have been discovered during construction activities. Paleontological resources are typically impacted when earthwork activities such as mass excavation cut into geological deposits (formations) with buried fossils. The site lies near the western boundary of the old meandering shoreline of ancient Lake Cahuilla. However, it is not known if any paleontological resources are located on the Project site. A potentially significant impact unless mitigation is incorporated has been identified for paleontological resources and unique geologic features. This issue will be addressed in the EIR.
- d) **Potentially Significant Impact Unless Mitigation Incorporated.** As described in item “a)” above, it is not likely that human remains would be found on the Project site based on years of disturbance associated with agricultural activities. Nevertheless, the potential exists for previously unknown human remains to be discovered during construction of the solar farm complex and is considered a potentially significant impact unless mitigation is incorporated. This issue will be discussed in the EIR.

VI. GEOLOGY AND SOILS	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong Seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction and seiche/tsunami?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial risk to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-i) No Impact. The Project site is not within an designated State of California Alquist-Priolo Earthquake Fault Zone. In addition, no known active faults have been identified on the site. While Fault rupture would most likely occur along established fault traces, fault rupture could occur at other locations. However the potential for active fault rupture at the site is considered to be very low. Therefore, no impact is anticipated.

a-ii) Potentially Significant Impact Unless Mitigation Incorporated. The site is located within and active tectonic area with several significant faults capable of producing moderate to strong earthquakes. The Coyote Creek Fault, the Borrego Mountain fault, the Superstition Hills fault and the Elmore Ranch fault are all in close proximity to the site and capable of producing strong ground motions. Therefore, exposure to strong seismic groundshaking is considered a potentially significant impact unless mitigation is incorporated and will be discussed in the EIR.

a-iii) Less than Significant Impact. The "Preliminary Geotechnical Investigation" prepared for the proposed Project site examined potential for seismic related ground failure. Secondary effects of seismic activity normally considered as possible hazards to a site include several types of ground failure, as well as earthquake-induced flooding. Liquefaction occurs when dynamic loading of a saturated sand or silt causes pore-water pressures to increase to levels where grain-to-grain

contact is lost and material temporarily behaves as a viscous fluid. Based on the analyses in the "Preliminary Geotechnical Investigation", no liquefiable soil layers were identified at the six cone penetration test sounding locations on the project site.

Seismically induced flooding that might be considered a potential hazard to a site normally includes flooding due to tsunami or seiche (i.e., a wave-like oscillation of the surface of water in an enclosed basin that may be initiated by a strong earthquake) or failure of a major reservoir or retention structure upstream of the site. The Salton Sea is situated approximately 14 miles from the site with an elevation differential greater than approximately 180 feet. In addition, no major reservoir is located near, or upstream of the site. Therefore, the potential for seiche or inundation is considered negligible. Because of the inland location of the site, flooding due to a tsunami is also considered negligible. Therefore, impacts associated with seismic-related ground failure would be less than significant.

- a-iv) **No Impact.** The site exhibits a generally flat topography and no landslides exist within or near the site. Based on the topography across the site, the potential for landsliding is considered negligible. Thus, no impact is identified for this issue area and it will not be discussed in the EIR.
- b) **Potentially Significant Impact Unless Mitigation Incorporated.** The majority of the soils in the Project area consist of Vint fine sandy loam. Other soils include Indio-Vint complex, Rositas sand (0-2 percent slopes), Rositas fine sand (0-2 percent slopes), Meloland fine sand, Indio loam, Glenbar complex, Rositas sand (2-5 percent slopes), Carsitas gravelly sand (0-5 percent slopes), and Glenbar clay loam. Soil erosion could result during construction of the proposed Project in association with clearing and grubbing, sheet grading, foundations and cut areas and is considered a potentially significant impact unless mitigation is incorporated. Standard erosion control methods will be required in accordance with County standards including preparation, review and approval of a grading plan by the County Engineer. During operations, both dust and erosion would be controlled by the periodic application of chemical stabilization agents (soil binders) to exposed soil surfaces. Potential for erosion during construction and operations will be discussed in the EIR.
- c) **Less than Significant Impact.** The site is underlain by alluvial and eolian deposits consisting of interbedded clean sands, silty sands, silts and sandy silts. A thin, isolated layer of plastic silty clay, 1 to 2 feet thick, was encountered in eight of the exploratory borings. The top of the thin clay layer was encountered at depths varying from about 3 to 11 feet below grade. The clean sands are prevalent in the upper 20 to 25 feet over the northerly and northeasterly portions of the site while the finer-grained silty sands, silts and sandy silts are more prevalent in the upper 10 to 25 feet over the southern and southwestern portions of the site. The alluvial soils were generally found to be loose in the upper approximately 2 feet, medium dense at a depth interval of approximately 2 to 5 feet, and dense to very dense to the depths explored.

Undocumented artificial fill of undetermined depth associated with the in-filling of San Felipe Creek exists within the southern portion of the site along the previous alignment of the Creek. Minor amounts of shallow undocumented artificial fill also exist in several areas along the existing dirt access roads. In addition, a tilled horizon related to farming activities exists within the agricultural fields, and the depth of the tilled surface is estimated to be approximately 2 feet.

Various general types of ground failures which might occur as a consequence of severe ground shaking at the site include ground subsidence, ground lurching, and lateral spreading. The probability of occurrence of each type of ground failure depends on the severity of the earthquake, distance from faults, topography, subsoil and groundwater conditions, in addition

to other factors. Based on the site conditions and relatively flat topography, ground subsidence, ground lurching and lateral spreading is considered unlikely at the site.

- d) **Potentially Significant Impact Unless Mitigation Incorporated.** As noted in item b) above, the Project site contains soils that consist dominantly of sand. The expansion potential of the surface and subsurface soils across the site vary from very low to low. Soils exhibiting a low expansion potential can affect the performance of concrete slabs or structures with shallow foundations. Soils exhibiting a low expansion potential are present in the upper 10 to 25 feet over the southern and southwestern portions of the site. Therefore, structures built on these soils could be susceptible to damage and construction on expansive soils is considered a potentially significant impact unless mitigation is incorporated. Recommendations to mitigate the potential effects of expansive soils are provided in the *Preliminary Foundation Recommendations* section of the "Preliminary Geotechnical Investigation". This issue will be discussed in the EIR.
- e) **Potentially Significant Impact Unless Mitigation Incorporated.** The Project proposes to construct a sanitary waste septic system and leach field on each of the five developed solar project lots. Based on the soil conditions at the site and consultation with a local geotechnical contractor, an engineered septic system is expected to be installed and designed in compliance with standards established by the County Environmental Health Department. Alternatively, the septic system may be designed to direct waste streams to an underground tank for storage until it is pumped out, on a periodic or as-needed basis, and transported for disposal at a licensed waste treatment facility. Development of the septic system is considered a potentially significant impact unless mitigation is incorporated and will be discussed in the EIR.

VII. GREENHOUSE GAS EMISSIONS				
Would the project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a, b) **Potentially Significant Impact Unless Mitigation Incorporated.** The proposed Project has the potential to generate greenhouse gas emissions during construction in association with travel required to and from the Project site by construction workers, delivery of materials, and operation of heavy equipment. During the construction period, the total number of daily trips is anticipated to be 312. In comparison, during operations, total daily trips are estimated at 20 per day. In the long-term, the Project is expected to provide a benefit with respect to reduction of greenhouse gas emissions as a result of generation of renewable power in place of fossil fuels. A Greenhouse Gas Emissions/Climate Change technical report is being completed for the proposed Project. Thus, a potentially significant impact unless mitigation is incorporated is identified for greenhouse gases.

VIII. HAZARDS AND HAZARDOUS MATERIALS				
Would the project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Create a Significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a Significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **Less than Significant Impact.** The Project would not use nor store any appreciable quantities of hazardous chemicals on site during normal operations. Fuel that may be used on site during construction would be stored in secondary containment. This impact is considered less than significant.
- b) **Potentially Significant Impact Unless Mitigation Incorporated.** A Phase I Environmental Site Assessment (ESA) was prepared for one of the five solar farms. This ESA identified potential for a buried transite cement pipeline used for irrigation in association with past farming activities. Transite is an asbestos containing cement. If the pipeline is somehow exposed during site construction for the proposed solar farm development of the site, the pipeline should be managed as asbestos containing material (ACM). A separate Phase I ESA will be prepared for the Allegretti Farms property in its entirety. Based on past farming uses on the site, as well as existing structures (e.g. above-ground diesel fuel storage tank), potential for release of

hazardous materials is considered a potentially significant impact. Likewise, as the Project site was cultivated for various crops, there is the potential that at some time during its use as farmland that one or more pesticides may have been applied on the Allegretti Farms property. Therefore, impacts associated with the release of hazardous materials are considered potentially significant unless mitigation is incorporated and will be discussed in the EIR.

- c) **No Impact.** The Project site is not located within one-quarter mile of an existing school. No impact would occur.
- d) **No Impact.** An Agency Database Record Search was undertaken of available compiled agency database records for the purpose of determining if the proposed Project would be located on lands which were included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5 Based on the information available, the Project would not be located on such a site. No impact is identified for this issue area.
- e,f) **No Impact.** The Project site is not located within two miles of a public airport or a private airstrip. The Salton Sea Airport is approximately 9 miles northeast of the Project site and the Ocotillo Airport is approximately 6.75 miles to the northwest. Thus, no impact is identified for these issue areas.
- g) **No Impact.** As identified in the Seismic and Public Safety Element of the County of Imperial General Plan, the "Imperial County Emergency Plan" addressed Imperial County's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and nuclear defense operations. The proposed circulation plan for the Project site will be required to provide emergency access points and safe vehicular travel. In addition, local building codes would be followed to minimize flood, seismic, and fire hazard. Thus, the proposed Project would not impair the implementation of, or physically interfere with, any adopted emergency response plans or emergency evacuation plans. No impact is identified for this issue area.
- h) **No Impact.** The Project site is not characterized as an area of urban/wildland interface. According to the Imperial County Natural Hazard Disclosure (Fire) Map prepared by the California Department of Forestry and Fire Protection (2000), the Project site does not fall into an area characterized as either: (1) a wildland area that may contain substantial forest fire risk and hazard; or (2) a very high fire hazard severity zone. Thus, the Project site would not expose people or structures to significant risk of loss injury or death involving wildland fire. No impact is identified for this issue area.

IX. HYDROLOGY AND WATER QUALITY		Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:					
a) Violate any water quality standards or waste discharge requirements?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IX. HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect the flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss injury or death <i>involving</i> flooding, including flooding as a result of the failure of a <i>levee</i> or dam?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** Water quality violations have the potential to occur during construction and operation of the Project. Prior to construction, the Project would file a Notice of Intent with the State Water Resources Control Board (SWRCB) to comply with the general permit for construction activities. In addition, the Project would be required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) consistent with the requirements of the SWRCB. Once operational, panel washing activities are not anticipated to generate runoff or contain pollutants (e.g. grease, heavy metals) other than dust. Any runoff from panel washing would evaporate or percolate through the ground, as a majority of the surfaces in the solar field will remain pervious. Thus, violation of water quality standards is considered a potentially significant unless mitigation is incorporated. This issue will be discussed in the EIR.
- b) **Potentially Significant Impact.** The Project intends to use groundwater as its source of water during both construction and operation. Seven ground water wells are located on the property, although only the domestic water well (#7) and two commercial water wells (#4 and #6) are currently operational. An estimated 100 to 175 acre-feet of water could be used for dust

control over the construction period of each of the five solar fields. This water would be obtained from either the existing water wells or the new wells to be constructed. During operations, periodic washing of the PV modules could be needed to remove dust in order to maintain power generation efficiency. The amount of water needed for this purpose, for each Project, is conservatively estimated at six to ten acre-feet per washing (depending on the Project size), with up to five washings per year, or a total of up to 30 to 50 acre-feet per year. This water would be obtained from the seven existing on-site water wells or the two new on-site water wells to be constructed. The amount of groundwater available has not yet been determined and therefore impacts to groundwater are considered potentially significant. A Water Supply Assessment (WSA) will be prepared for the proposed Project in accordance with SB 610 (Part 2.10 Div. 6 of the California Water Code) evaluating the amount of water supplies. The findings of the WSA with regard to groundwater availability will be discussed in the EIR.

- c,d) Potentially Significant Impact.** The Project site is situated between Tarantula Wash and San Felipe Creek. Two historic branches of the San Felipe Creek are shown to cross northwest to southeast over the central portion and southwestern corner of the Project site. In its natural state, San Felipe Creek previously flowed through the southern third of the property in a southeasterly direction; however, the creek has been subsequently diverted at the western property boundary by an earthen berm and man-made drainage channel and now flows south. No changes to Tarantula Creek or San Felipe Creek are proposed. However, the berm's ability to divert flood flows will be examined in the EIR.

The proposed Project would alter drainage on the site through the introduction of PV solar panels on driven piles, O&M buildings, inverters, etc. While the majority of the site would remain pervious, on-site retention would be required. The Project area currently drains generally to the southeast at a gentle gradient of approximately 0.30 to 1.20 percent. To fully retain the 100-year 24-hour peak flood volume resulting from precipitation falling on each of the five solar project areas, storm water retention basins are proposed on the southeastern corner of each of the five solar project areas. The Project's modification of existing drainage patterns and potential for off-site flooding and erosion is considered potentially significant and will be examined in the EIR.

- e) Less than Significant Impact.** The proposed Project would not generate substantial amounts of runoff as described in item b), above. Water used for panel washing will continue to percolate through the ground as a majority of the surfaces on the Project site will remain pervious. Thus, the proposed Project will not substantially alter the existing drainage pattern of the site, substantially increase the rate of runoff, or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Therefore, a less than significant impact is identified for these issue areas.
- f) Less than Significant Impact.** The Project is not anticipated to degrade water quality based on the required stormwater permit as well as Best Management Practices (BMPs). This issue is considered less than significant.
- g) No Impact.** The Project does not include a residential component. Therefore, no homes would be constructed within a 100-year flood zone. No impact would occur.
- h) Less than Significant.** Historic portions of San Felipe Creek that crossed the site (refer to item a, above) are within a Federal Emergency Management Agency (FEMA) area designated as Flood Zone A (100-year flood zone). Zone A is defined as those areas with a 1% annual chance of flooding (and a 26% chance of flooding over the life of a 30-year project). The remainder of the Project site is within Flood Zone X (an area of moderate flood hazard, between the limits of the 100-year and 500-year floods.) As discussed in items c-d) above, a berm along the western boundary of the Project site diverts flows from the Creek and away from the Project site.

The Project does not include a residential component, so no homes would be within a 100-year flood zone. However, to minimize flood hazards and risk, all habitable structures would be located outside of the FEMA 100-year flood zone. In addition, all habitable structures, inverters, transformers, and switch gear would be placed on foundations raised above the projected maximum flood levels. The existing berms on the west and north sides of the property which currently divert off-site flow around the property will be maintained, but any flows which breach the berm(s) will be allowed to flow unimpeded across the Project site and under the solar panels. Thus, based on project design, impacts associated with placing structures in a 100-year floodplain are considered less than significant.

- i) **Potentially Significant Impact.** San Filipe Creek to the west of the Project site is prevented from flowing across the site by an earthen berm. Assuming the berm is structurally sound and capable of withholding the off-site flows, the flows generated by the off-site areas west of the property could be fully contained and directed around the southwest corner of the site to the existing natural watercourse. Based on a preliminary analysis of flood depths, if the berm is not capable of preventing off-site flood flows from entering the Project site, maximum floodwater depth at two cross sections in the southwest corner of the site may range from 2.1 feet to 2.3 feet in depth decreasing northeasterly. This is a potentially significant impact that will be discussed in the EIR.

No dams or levees are in the vicinity of the Project site. Therefore, no impact would occur with regard to exposing people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam.

- j) **No Impact.** No bays or lakes are located within a two-mile radius of the Project. Furthermore, the Project site and Imperial Valley are over 75-miles inland from the Pacific Ocean. In addition, the Project site and agricultural fields are relatively flat and level. Therefore, there is no potential for the Project site to be inundated by seiches, tsunamis, or mudflows. Thus, no impact is identified for these issues.

X. LAND USE AND PLANNING				
Would the project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (include, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **No Impact.** The Project is located on portions of the approximately 2,440-acre Allegretti Farms property in west-central Imperial County. No other development is located in the vicinity of the Project site. Thus, no impact is identified with regard to dividing an established community.
- b) **Potentially Significant Impact Unless Mitigation Incorporated.** All of the existing Allegretti Farms property parcels are currently zoned A-2 (general agriculture). Per Section 90508.02 (Uses Permitted with a Conditional Use Permit) of Division 5 of Title 9 of the Imperial County Land Use Code, development of the site with a "Solar energy electrical generator" is an allowed use subject to a Conditional Use Permit (CUP). The Project also proposes major subdivision of

the parcels to reconfigure the existing parcels into eight individual lots (Lots 1-8) and four common development interest lots (Lots A - D). No change in the existing zoning for any of the parcels would occur. However, impacts associated with the allowed CUP would be addressed. Therefore, conflicts with applicable land use plan, policy or regulation is considered a potentially significant impact unless mitigation is incorporated. This impact will be examined in the EIR.

- c) **No Impact.** Imperial County is not within the jurisdiction of any adopted habitat conservation plan (HCP) or natural community conservation plan (NCCP), or other approved local, regional or state habitat conservation plan. Therefore, no impact to an HCP or NCCP would occur and this issue will not be examined in the EIR.

XI. MINERAL RESOURCES				
Would the project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a, b) **No Impact.** The Project site was historically used for agriculture and is currently vacant. According to the Conservation and Open Space Element of the County of Imperial General Plan, no known mineral resources occur within the Allegretti Farms property nor does the Project site contain any mapped mineral resources. Thus, no impact is identified with regard to mineral resources.

XII. NOISE				
Would the project result in:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XII. NOISE				
Would the project result in:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
e) For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a,c,d) Potentially Significant Impact Unless Mitigation Incorporated. Short-term noise levels would increase on the Project site and surrounding roadways during construction. Traffic and heavy equipment would all increase noise levels from existing levels associated with a vacant property. Construction noise would be limited to the period of heavy equipment operated during daylight hours and to construction traffic. The Project would also generate noise during operations in association with the transformers, inverters, HSAT, substation and transmission line. A noise analysis will be prepared to identify any potential short-term construction and long-term operational impacts of the proposed Project. These issues will be addressed in the EIR.

b) No Impact. Construction and operation of the solar farm complex is not anticipated to create groundborne vibration. As no blasting is anticipated based on the site's characteristics, site preparation activity is not likely to generate groundborne vibration. Heavy equipment was historically used on the agricultural lands to be converted to solar fields. No changes in vibrations are anticipated in association with conversion of vacant agricultural land to a solar farm complex. Therefore, no impacts are identified with regard to groundborne vibration and this issue will not be discussed in the EIR.

e,f) No Impact. The Project site is not located within two miles of a public airport or a private airstrip. Thus, the Project site would not be exposed to excessive aircraft noise. The solar farm complex is industrial in nature and therefore is not a noise sensitive land use. No impacts are identified with regard to airport noise and this issue will not be discussed in the EIR.

XII. POPULATION AND HOUSING				
Would the project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **No Impact.** The Project does not propose the development of new housing on the Project site nor does it propose construction or extension of new roads (aside from access) in the Project area. The Project, by its nature as solar generation facility, would not induce growth. Rather it would produce renewable energy to meet existing demands. No impact would occur for this issue.
- b,c) **No Impact.** The proposed Project site is currently vacant, agricultural land with two habitable residential structures, all of which are currently unoccupied. As a result, development of the proposed solar farm complex would not displace substantial numbers of existing housing or people requiring construction of replacement housing elsewhere. No impact would occur for these issues.

XIII. PUBLIC SERVICES	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a-1) **Potentially Significant Impact Unless Mitigation Incorporated.** The Project site is within the jurisdiction of the Imperial County Fire Department. The proposed Project will pose a very small fire risk. All vegetation will be removed from the site and the solar farm complex does not include any flammable materials. The PV modules are typically Class C fire-rated and the remainder of the equipment is of nonflammable material (aluminum, steel, and glass). Buildings will be designed with fire protection systems based on applicable Imperial County requirements. Systems where pressurized firewater is used will have electric pumps. Portable fire extinguishers of appropriate sizes and types would be located throughout the buildings. Class C (electrical) rated fire extinguishers will be mounted at each inverter.

Each development lot (1 - 5) would have 10,000 gallons reserved for firefighting in an onsite water tank. The final site plan would be designed in consultation with the Imperial County Fire Department. Thus, impacts to fire protection are potentially significant unless mitigation is incorporated. This impact will be discussed in the EIR.

- a-2) **Potentially Significant Impact Unless Mitigation Incorporated.** Police protection to the Project site would be under the jurisdiction of the Imperial County Sheriff Department. The Project site incorporates a variety of security features to protect the site including eight-foot high security fencing around the perimeter of each development lot at the commencement of construction. Access to each solar Project site would be limited to authorized site

construction workers and operations personnel. In addition, a motion detection system and closed circuit camera system may also be installed. The sites would be monitored 24 hours per day, 7 days per week. However, impacts to police protection may be potentially significant unless mitigation is incorporated. This impact will be discussed in the EIR.

a-3,-4,-5) Less than Significant Impact. The proposed solar farm complex would not result in a substantial increase in population because it neither includes a residential component nor would it generate the need for new housing to accommodate workforce population. Based on the nature of the project as a solar farm complex, no increase in schools, parks, or other public facilities are anticipated. As such, the proposed Project would not have an adverse physical effect on the environment resulting from construction of a new school, park or other public facility. Therefore, no impact is identified for this issue area.

XIV. RECREATION	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a,b) No Impact. The proposed Project is a solar facility and would not create a demand for recreation or parks in the County. The Ocotillo Wells State Vehicular Recreation Area (SVRA) is located less than 1.5 miles north of the Project site and immediately north of SR 78. Recreational off-road vehicle riding and primitive camping is popular in the SVRA, and a few developed recreational vehicle (RV) parks are located in the Project vicinity. The Blu-In Café/RV Park is located about 1.5 miles west of the access road to the Project and immediately south of SR 78. No impact to these uses would occur as a result of the proposed Project. Thus, no impact is identified for these issues and recreation will not be discussed in the EIR.

XVI. TRANSPORTATION/TRAFFIC	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XVI. TRANSPORTATION/TRAFFIC	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
b) Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion/management agency for designated roads or highways?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflicts with adopted policies, plans, programs, regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a,b) Potentially Significant Impact Unless Mitigation Incorporated. The construction of the proposed Project would result in an increase of traffic on area roadways and intersections, which may reduce levels of service below County thresholds and result in a potentially significant impact. Construction of the Project would generate approximately 312 total daily trips, including 150 vehicle trips during the AM peak hour and 150 vehicle trips during the PM peak hour. The development areas would all be accessed off SR 78.

Once operational, each of the five solar developments is expected to have no more than one daily maintenance worker. Additional workers would occasionally be required to access the site to clean the solar panels or to perform specific maintenance. Deliveries would occur irregularly. Operation of the project is anticipated to generate approximately 20 trips per day, substantially less than construction. Therefore, impacts to area highways and intersections during construction are considered a potentially significant unless mitigation is incorporated. A Traffic Impact Study is being prepared for the project and its findings will be discussed in the EIR.

c) No Impact. The proposed Project would not result in changes to existing air traffic patterns through an increase in traffic levels or change in location. Thus, no impact is identified for this issue area.

d) Less than Significant Impact. The principal access to the property and solar development projects would be via a new, private access road extending from the north off of SR 78 constructed on the property approximately one-quarter mile west of the existing access road. Traffic volumes in the area are currently quite low. Thus, a less than significant impact with regard to an increase in hazards due to a design feature or incompatible uses is anticipated with regard to the new access road. Nevertheless, the EIR will examine the effects of the new access road off of SR 78.

e) No Impact. The proposed circulation plan for the Project will be required to provide emergency access points and safe vehicular travel. The Project site is currently accessed using a gated,

private road from SR 78 which crosses approximately one-half mile of public land managed by the BLM. The existing gated, private road from SR 78 would be used for the solar development projects only for secondary, emergency access. Nominal 20-foot wide roads would be provided between the PV arrays, consistent with agency emergency access requirements.

The final site plan would be designed in accordance with the Imperial County Fire Department requirements for access and would not impact the ability to provide emergency access to the site. The Project is not anticipated to hinder the ability of fire or law enforcement to access nearby properties. Thus, no impact is identified for this issue area.

- f) **No Impact.** The proposed Project is a rural, sparsely populated portion of the County void of public transit, bike lanes and pedestrian facilities. Thus, development of the solar farm complex would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Thus, no impact is identified for this issue area.

XVII. UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** In consideration of the number of permanent employees, the soil conditions at the site and consultation with a local geotechnical contractor, an engineered septic system is expected to be installed to serve the Project. Wastewater would be generated from sanitary facilities such as sinks and toilets in

each of the O&M buildings. This waste stream would be sent to a sanitary waste septic system and leach field located on each of the five developed solar project lots. The septic system will be designed in compliance with standards established by the Imperial County Environmental Health Department. During construction, portable toilets will be used to provide needed sanitary facilities. Nevertheless, impacts with regard to development of an on-site septic system are considered potentially significant unless mitigation is incorporated. Impacts associated with development of the sanitary system will be discussed in the EIR.

- b) **Potentially Significant Impact Unless Mitigation Incorporated.** The Project proposes to construct two new groundwater wells in addition to the existing seven wells on the Project parcels. The environmental effects of developing the wells will be discussed. In addition, a Water Supply Assessment is being prepared to discuss the availability of groundwater to serve the project. Construction of new water facilities is considered a potentially significant impact unless mitigation is incorporated and will be discussed in the.
- c) **Potentially Significant Impact Unless Mitigation Incorporated.** To fully retain the 100-year 24-hour peak flood volume resulting from precipitation falling on each of the five solar project areas, storm water retention basins are proposed on the southeastern corner of each of the five solar project areas. The site would be configured to direct onsite storm water flows to drain to these basins. Construction of the basins is considered a potentially significant impact unless mitigation is incorporated and will be discussed in the EIR.
- d) **Potentially Significant Impact Unless Mitigation Incorporated.** The proposed Project is anticipated to result in an increase in water demand/use during construction and operation. During construction, water will be used to facilitate soil compaction and to control fugitive dust on exposed soils. During operation, the Project will use water only for periodic washing of the solar panels and reapplication of the soil binding agent if necessary. Past agricultural uses would have required more water than the proposed solar farm complex. Water for each of the property lots/proposed developments would be provided by up to nine ground water wells (the seven existing water wells, plus two new water wells). Water would be provided to each individual development lot either by the owner of each individual lot, or would be provided to each development lot by the Ranch Oasis Mutual Water Company, established in 1994 by Allegretti & Co. The quantity of water estimated to be consumed during construction (approximately 650 acre-feet for all five solar projects) and operation of the Project is small (approximately 190 acre-feet per year). Depending on the size of each project, an estimated 100 to 175 acre-feet of water could be used for dust control over the construction period of each project.

Periodic washing of the PV modules could be needed to remove dust in order to maintain power generation efficiency. The amount of water needed for this purpose, for each project, is conservatively estimated at six to ten acre-feet per washing (depending on the project size), with up to five washings per year, or a total of up to 30 to 50 acre-feet per year. This water would be obtained from the project's onsite water wells or the new water wells to be constructed. Because the exact quantity of groundwater available is not known at this time, the availability of water supplies to serve the project is considered a potentially significant impact unless mitigation is incorporated. The amount of groundwater available will be examined in a Water Supply Assessment prepared for the Project. The findings of the WSA will be discussed in the EIR.

- e) **No Impact.** An on-site septic system will be developed to serve the project. Thus, no impact to a wastewater provider would occur.

- f-g) Less than Significant Impact.** Some solid waste would be generated during demolition and construction of the proposed Project. Such materials would be hauled to an appropriate disposal facility. During operations of the proposed Project, waste generation will be minor. Solid wastes will be disposed of using a locally-licensed waste hauling service. Thus, a less than significant impact is identified for this issue.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) Potentially Significant Impact.** Implementation of the proposed Project has the potential to result in potentially significant impacts to aesthetics, agricultural resources, air quality, hydrology and water quality, and noise. In addition, the Project is anticipated to result in potentially significant impacts unless mitigation is incorporated to the following: biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use, public services, transportation/circulation, and utilities and service systems. These issues will be further evaluated in the EIR.
- b) Potentially Significant Impact.** The proposed Project has the potential to result in a cumulatively considerable net increase or one or more criteria pollutants for which the Project region is in non-attainment under applicable federal and state ambient air quality standards. Therefore a potentially significant cumulative impact may occur. An analysis of air quality impacts is being prepared for the proposed Project and will be discussed in the EIR.
- c) Potentially Significant Impact.** The proposed Project has the potential to result in significant environmental effects, which could directly or indirectly cause adverse effects on human beings. As demonstrated in this Initial Study, the proposed Project has the potential to result in significant impacts to air quality and noise and potentially significant impacts unless mitigation is incorporated to geology and soils and hazards and hazardous materials. These impact areas could result in direct or indirect adverse effects on human beings. Thus, these issues will be discussed in the EIR.

REVIEWING AGENCIES (Copies and/or Notice Provided)

LOCAL AGENCIES

- ☒ AG. DEPT.
- ☒ APCD
- ☐ ASSESSOR
- ☒ C.E.O.
- ☒ COUNTY COUNSEL
- ☒ E.H.S. DIVISION
- ☒ FIRE /O.E.S.
- ☒ FISH & GAME (COUNTY)
- ☒ IMPERIAL IRRIGATION DISTRICT
- ☒ PUBLIC WORKS DEPT.
- ☒ SHERIFF
- ☐ OTHER

CITIES

- ☐ BRAWLEY
- ☐ CALEXICO
- ☐ CALIPATRIA
- ☐ EL CENTRO
- ☐ HOLTVILLE
- ☐ IMPERIAL
- ☒ WESTMORLAND

LIBRARIES

- ☐ CALEXICO
- ☐ COACHELLA VALLEY
- ☐ BRAWLEY
- ☐ EL CENTRO
- ☐ HOLTVILLE
- ☐ IMPERIAL
- ☐ IMPERIAL VALLEY COLLEGE
- ☐ INDIAN HILL
- ☐ MEYER MEMORIAL
- ☐ PALO VERDE
- ☐ SAN DIEGO STATE UNIVERSITY

STATE AGENCIES

- ☒ AIR RESOURCES BOARD
- ☒ CALTRANS District 11/San Diego
- ☒ CALIFORNIA HIGHWAY PATROL
- ☒ DEPT. OF FISH & GAME *TRUSTEE AGENCY*
- ☒ HISTORIC PRESERVATION
- ☐ HOUSING & COMMUNITY DEVELOPMENT
- ☐ CALIFORNIA INTEGRATED WASTE BOARD
- ☐ STATE LANDS COMMISSION *TRUSTEE AGENCY*
- ☐ MINE RECLAMATION (OMR)
- ☒ NATIVE AMERICAN HERITAGE
- ☒ OFFICE OF PLANNING & RESEARCH (OPR)
- ☒ PARKS & RECREATION DEPT. *TRUSTEE AGENCY*
- ☒ REGIONAL WATER QUALITY BOARD
- ☐ RESOURCE AGENCY
- ☐ SCAG
- ☐ STATE GEOLOGIST
- ☒ WATER RESOURCE BOARD
- ☐ OTHER: DEPARTMENT OF CONSERVATION

FEDERAL AGENCIES

- ☒ BUREAU OF LAND MANAGEMENT (BLM)
- ☐ BUREAU OF MINES
- ☐ BUREAU OF RECLAMATION
- ☒ BORDER PATROL
- ☐ MARINE CORPS. AIR STATION, YUMA
- ☒ NAVAL AIR FACILITY, EL CENTRO
- ☐ SOIL CONSERVATION SERVICE
- ☒ U.S. FISH & WILDLIFE SERVICE (CARLSBAD)
- ☐ OTHER

FOR ADDITIONAL & GENERAL NOTICING
SEE DISTRIBUTION LIST IN PROJECT FILE

NOP COMMENT LETTERS

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Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

Notice of Preparation

RECEIVED

September 12, 2013

SEP 16 2013

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

To: Reviewing Agencies

Re: Seville Solar Farm Complex
SCH# 2013091039

Attached for your review and comment is the Notice of Preparation (NOP) for the Seville Solar Farm Complex draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Dave Black
Imperial County Planning & Dev. Services Dept.
801 Main Street
El Centro, CA 92243

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

NOP Distribution List

SK

County: IMPERIAL

SCH# **2013091039**

Regional Water Quality Control Board (RWQCB)

- ☐ **RWQCB 1**
Cathleen Hudson
North Coast Region (1)
- ☐ **RWQCB 2**
Environmental Document
Coordinator
San Francisco Bay Region (2)
- ☐ **RWQCB 3**
Central Coast Region (3)
- ☐ **RWQCB 4**
Teresa Rodgers
Los Angeles Region (4)
- ☐ **RWQCB 5S**
Central Valley Region (5)
- ☐ **RWQCB 5F**
Central Valley Region (5)
Fresno Branch Office
- ☐ **RWQCB 5R**
Central Valley Region (5)
Redding Branch Office
- ☐ **RWQCB 6**
Lahontan Region (6)
- ☐ **RWQCB 6V**
Lahontan Region (6)
Victorville Branch Office
- ☒ **RWQCB 7**
Colorado River Basin Region (7)
- ☐ **RWQCB 8**
Santa Ana Region (8)
- ☐ **RWQCB 9**
San Diego Region (9)

- ☐ **Other** _____
- _____
- _____
- ☐ _____
Conservancy

Last Updated 08/27/2013

Resources Agency

- ☒ **Resources Agency**
Nadell Gayou
- ☐ **Dept. of Boating & Waterways**
Nicole Wong
- ☐ **California Coastal Commission**
Elizabeth A. Fuchs
- ☐ **Colorado River Board**
Tanya M. Trujillo
- ☐ **Dept. of Conservation**
Elizabeth Carpenter
- ☒ **California Energy Commission**
Eric Knight
- ☐ **Cal Fire**
Dan Foster
- ☐ **Central Valley Flood Protection Board**
James Herola
- ☐ **Office of Historic Preservation**
Ron Parsons
- ☒ **Dept of Parks & Recreation**
Environmental Stewardship Section
- ☐ **California Department of Resources, Recycling & Recovery**
Sue O'Leary
- ☐ **S.F. Bay Conservation & Dev't. Comm.**
Steve McAdam
- ☐ **Dept. of Water Resources Resources Agency**
Nadell Gayou

Fish and Game

- ☐ **Dept. of Fish & Wildlife**
Scott Flint
Environmental Services Division
- ☐ **Fish & Wildlife Region 1**
Donald Koch

Other Departments

- ☐ **Food & Agriculture**
Sandra Schubert
Dept. of Food and Agriculture
- ☐ **Dept. of General Services**
Public School Construction
- ☐ **Dept. of General Services**
Anna Garbeff
Environmental Services Section
- ☐ **Dept. of Public Health**
Jeffery Worth
Dept. of Health/Drinking Water
- ☐ **Delta Stewardship Council**
Kevan Samsam

Independent Commissions, Boards

- ☐ **Delta Protection Commission**
Michael Machado
- ☐ **Cal EMA (Emergency Management Agency)**
Dennis Castrillo

Business, Trans & Housing

- ☐ **Caltrans - Division of Aeronautics**
Philip Crimmins
- ☐ **Caltrans - Planning**
Terri Pencovic
- ☒ **California Highway Patrol**
Suzann Ikeuchi
Office of Special Projects
- ☐ **Housing & Community Development**
CEQA Coordinator
Housing Policy Division

Dept. of Transportation

- ☐ **Caltrans, District 1**
Rex Jackman
- ☐ **Caltrans, District 2**
Marcelino Gonzalez
- ☐ **Caltrans, District 3**
Gary Arnold
- ☐ **Caltrans, District 4**
Erik Alm
- ☐ **Caltrans, District 5**
David Murray
- ☐ **Caltrans, District 6**
Michael Navarro
- ☐ **Caltrans, District 7**
Dianna Watson

- ☒ **Native American Heritage Comm.**
Debbie Treadway
- ☒ **Public Utilities Commission**
Leo Wong
- ☐ **Santa Monica Bay Restoration**
Guangyu Wang
- ☐ **State Lands Commission**
Jennifer Deleong
- ☐ **Tahoe Regional Planning Agency (TRPA)**
Cherry Jacques

Cal EPA

Air Resources Board

- ☐ **Airport/Energy Projects**
Jim Lerner
- ☐ **Transportation Projects**
Douglas Ito
- ☐ **Industrial Projects**
Mike Tollstrup

- ☐ **State Water Resources Control Board**
Regional Programs Unit
Division of Financial Assistance

- ☐ **State Water Resources Control Board**
Student Intern, 401 Water Quality
Certification Unit
Division of Water Quality

- ☐ **State Water Resources Control Board**
Phil Crader
Division of Water Rights
- ☐ **Dept. of Toxic Substances Control**
CEQA Tracking Center

- ☐ **Department of Pesticide Regulation**
CEQA Coordinator



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GS-ES

October 8, 2013

Mr. Armando Villa
Director
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: NOP of a DEIR for the Seville Solar Farm Complex Project

Dear Mr. Villa:

The Imperial County Planning & Development Services Department (ICPDSD) has issued a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Seville Solar Farm Complex Project. Regenerate Power, LLC proposes the construction and operation of up to five (5) solar energy projects, including a new access road from SR 78, internal access roads, an IID electrical switch station, electrical substations for each of the five projects and internal transmission lines to the substations and IID switching station. The project also includes the construction of a new 92 kV transmission line for the IID to interconnect to the IID Anza Substation. Additionally two new wells are proposed for the project. The complex will be located on portions of the Allegretti Farms, approximately eight miles west of SR78 and SR 86, west of Brawley. CA.

The Imperial Irrigation District (IID) has reviewed the initial documentation and has the following comments:

1. IID is currently at the initial stages of performing a Facility Study (FS) for this project. The FS includes a detail analysis for performing the interconnection of the project and defines how each portion of the interconnection and system upgrade will be implemented; if a new transmission line will need to be built, or an existing line needs to be re-built or relocated; making it virtually impossible to evaluate the impacts of its transmission interconnection facilities on IID's electrical infrastructure at this time. Nonetheless, we reserve the right to comment on these issues in the future as we deem necessary and as additional information becomes available.
2. The electric service for the project's construction, station service and O&M building is planned to be provided by IID. Accordingly, existing IID overhead electrical distribution lines, on and off the project site, will be impacted significantly, resulting in the need to undertake a distribution circuit system study. Thus, project proponent is urged to contact IID Energy - Customer Operations & Planning Section at 760-482-3402 or 760-482-3300 for additional information regarding electrical service for the project and the respective circuit study. It is important to note that all costs associated with the relocation and/or upgrade of IID electrical infrastructure to service the project or the performance of a system study will be the responsibility of the project proponent, including any additional rights-of-way needed. A

complete set of electrical plans for the entire facility and the project's construction schedule will be required for initial review.

3. Any construction or operation on IID property or within its existing and proposed right of way or easements will require an encroachment permit or encroachment agreement (depending on the circumstances), including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities. A copy of the encroachment permit application is included in the IID's *Developer Project Guide 2008* and can be accessed at the following website: <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2328>. Furthermore, instructions for the completion of encroachment applications can be found at <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2335>. The IID Real Estate Section, at (760) 339-9239, should be contacted for additional information regarding encroachment permits.
4. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, canals, drains, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

Should you have any questions, please do not hesitate to contact me by phone at 760-482-3609 or by e-mail at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,



Donald Vargas
Environmental Analyst

Kevin Kelley – General Manager
Jesse Silva – Manager, Water Dept.
Carl Stills – Interim Manager, Energy Dept.
Vance Taylor – Asst. General Counsel
Tom King – Interim Deputy Energy Manager, Engineering & Operations
Paul G. Peschel – Interim Manager Planning & Engineering, Energy Dept.
Angela Evans - Interim Manager Distribution Services & Maintenance Operations
Juan Carlos Sandoval – Asst. Mgr., Transmission Expansion Development, Energy Dept.
David Zavala – Interim Portfolio Management Officer, Portfolio Mgmt. Office
Michael P. Kemp – Superintendent, Environmental & Real Estate
Shayne Ferber – Asst. Supervisor, Real Estate
Vikki Dee Bradshaw – Supervisor, Environmental Management

October 3, 2013

Carl Scholl
2273 W. Hwy 78
Borrego Springs Ca 92004

Owner (5) 40 acre parcels adjacent to Allegretti Farms
Assessment # s 018-210-015, 016, 017, 018, 019.

To: Imperial Co Planning and Development Services Dept.

Armando Villa
801 Main St.
El Centro Ca 92243

Re: Notice of Preparation of draft EIR for Seville Solar Farm Project

Sir,

I respectfully submit my concerns about this solar project and how it will affect my property. I purchased the first parcel in 1978 and the last in about 2000.


I have (4) wells on these properties and am concerned about drilling two more wells at the farm which could lower my water table to the point that I would lose my water for normal living use and irrigation for my trees.

I plan on retiring to my property in the not too distant future. I am 69 years old and drawing social security. I currently use this property as my weekend home and get away from the hectic city life in the LA area. I am also concerned about the esthetic results of power lines, poles and other equipment that would destroy our pristine desert view.

Besides my weekend living, I have two other people living there. One is a San Diego Co sheriff and the other my nephew who is my property custodian. The sheriff plans on retiring there also.

I love my desert home and would hate to see its beauty destroyed by having this solar farm so close by. I want to know more about the project and what effects it will have on our property and lifestyle.

Sincerely,


Carl Scholl

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SEP 17 2013

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

FRI/8/13

Requesting Environmental
Impact Report, ((EIR)) Supplement
Reports By IID of New 92 KV
Transmission line and inter-connection
to IID ANZA SUBSTATION

Concerning parcel number #
018-170-013

designated in zone section A-2
Informal Request in format style

Assessed effects use of sound
and safe practice, Noted as
Following water, Hydrology,
Land use, Hazards, Aesthetics
and Local wild life Impact Report
Studies back log files under
federal guidelines

and also Complimenting Report
Concerning (SR, 78#), (SR, 86,
with in Approximity

SSB&M, Quality Control
Measures affect future statistics
in Algorithm form, percentage
as well a graphs

Department of Narration Planning Development

Concern general welfare of numerous
diverse species, that will be
endangered if Relocated

if is Requested that this letter
Remain private & Confidential
ON a Need to Know bases
with written Request
MAY be publish for public
Interest

Notarized if possible
upto dated Revised

if possible delivered personally
at address ON Envelope

Thank you, in Regard to Request
all information Requested
Not Nesacery, just Equivilents
accprding to format of Request
AND AVAlibility

Cole JvDD

Name

Booking #

P.O. Box 679

El Centro, CA 92244

Cole Judd

938507-75109

GTANK L9

RECEIVED

OCT 03 2013

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES



02 1R
0002004261
MAILED FROM

MR. ARMANDO G. VILLA
Imperial County Planning & Development
801 Main Street El Centro
92243



NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916) 373-5471 – FAX
e-mail: ds_nahc@pacbell.net

RECEIVED

September 136 3013

SEP 18 2013

Mr. David Black, Senior Planner

**Imperial County Planning &
Development Services Department**

801 Main Street
El Centro, CA 92243

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

RE: SCH#2013091039 CEQA Notice of Preparation (NOP); draft Environmental
Impact Report (DEIR)n for the **"Seville Solar Farm Complex**

Project;"located on approximately 1,700-acres west central Imperial County,
California about three miles east of the San Diego County Line

Dear Mr. Black:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604); the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. This area is known to the NAHC to be very culturally sensitive. A Mitigation & Monitoring Plan is recommended.

The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,



Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
Imperial County
September 16, 2013**

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
PO Box 1120 Diegueno/Kumeyaay
Boulevard , CA 91905
gparada@lapostacasino.
(619) 478-2113
619-478-2125

Manzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
PO Box 1302 Diegueno/Kumeyaay
Boulevard , CA 91905
ljbirdsinger@aol.com
(619) 766-4930
(619) 766-4957 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA 91906
chairgoff@aol.com
(619) 478-9046
(619) 478-5818 Fax

Torres-Martinez Desert Cahuilla Indians
Mary Resvaloso, Chairperson
PO Box 1160 Cahuilla
Thermal , CA 92274
mresvaloso@torresmartinez.
(760) 397-0300
(760) 397-8146 Fax

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas
P.O. Box 775 Diegueno -
Pine Valley , CA 91962
(619) 709-4207

Fort Yuma Quechan Indian Nation
Keeny Escalanti, Sr., President
PO Box 1899 Quechan
Yuma , AZ 85366
qitpres@quechantribe.com
(760) 572-0213
(760) 572-2102 FAX

Torres-Martinez Desert Cahuilla Indians
Matthew Krystal, Cultural Resources Manager
P.O. Box 1160 Cahuilla
Thermal , CA 92274
mkkrystall@tmdci-nsn.gov
760) 397-0300,
(760) 409-2987- cell
(760) 397-8146 Fax

Ewiiapaayp Tribal Office
Will Micklin, Executive Director
4054 Willows Road Diegueno/Kumeyaay
Alpine , CA 91901
wmicklin@leaningrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

his list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013091039; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Seville Solar Farm Complex Project; located in west central Imperial County, California.

**Native American Contacts
Imperial County
September 16, 2013**

Quechan Indian Nation
Arlene Kingery, THPO
P.O. Box 1899
Yuma , AZ 85366
(760) 572-2423
historicpreservation@quechantribe.com
(760) 572-0515 - FAX

Ah-Mut-Pipa Foundation
Preston J. Arrow-weed
P.O. Box 160
Bard , CA 92222
ahmut@earthlink.net
(928) 388-9456

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator; Viejas THPO
240 Brown Road
Alpine , CA 91901
frbrown@viejas-nsn.gov
(619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
1095 Barona Road
Lakeside , CA 92040
(619) 478-2113
(KCRC is a Coalituon of 12
Kumeyaay Governments)
bp@lapostatribe.com

Cocopah Indian Reservation
Attn: H. Jill McCormick, Tribal Archaeologist
County 15th & Avenue G
Sommerton , AZ 85350
culturalres@cocopah.com
(928) 530-2291

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

his list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013091039; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Seville Solar Farm Complex Project; located in west central Imperial County, California.



September 24, 2013

Mr. Armando Villa
Planning & Development Services
801 Main Street
El Centro, CA 92243

SUBJECT: Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for Seville Solar Farm Complex

Dear Mr. Villa,

The NOP to prepare a Draft EIR for the Seville Solar Farm Complex Project has been reviewed by the Imperial County Air Pollution Control District (Air District). As you know, the Air District's established programs to keep the air in Imperial County from declining are found within the Rules and Regulations of the Air District, the California Environmental Quality Act (CEQA), the most current CEQA Air Quality Handbook for Imperial County, the Air District State Implementation Plans (SIP's) for Ozone and PM₁₀, and the Air District non-attainment status. Currently, the "moderate" non-attainment status for ozone, serious" non-attainment status for PM₁₀, non attainment for PM_{2.5} are the driving criteria in establishing the thresholds for NO_x, ROG, PM₁₀, SO_x and CO. These thresholds and their significance are explained within the pages of the Imperial County CEQA Air Quality Handbook. Section 6 of the CEQA handbook describes the preparation of the Air Quality Analysis for an Environmental Impact Report (EIR). **However, in the event that any of the protocols conflict with the provisions of CEQA or its Guidelines, the provisions of CEQA or its Guidelines shall control.**

The following is a synopsis of the information pertinent to the development of an Air Quality analysis. A **comprehensive Air Quality Analysis** of the construction and operational impacts of the project is required. A thorough analysis should include a description, impacts and health consequences of all air quality and associated emissions. The analysis should be conducted using the Air Districts approved modeling factors.¹ The analysis should include short and long term emissions as well as daily and yearly emission calculations. Project alternatives should be included along with a thorough emissions analysis per alternative. A description of the Air District attainment status, State and Federal, is required as is describing any regulatory restrictions to the project. All temporary construction and grading impacts should quantify fugitive dust and combustion emissions and propose mitigation measures.

¹The most current modeling tool recently adopted is CalEEMod.

A health risk assessment such as a diesel exhaust screening level should be included for projects anticipating the use of heavy-duty diesel equipment.² A health risk assessment should also be conducted for projects locating near already existing facilities with a potential to emit toxics. Typically, these health risk assessments are of a quantitative nature but can be a mixed qualitative and quantitative analysis. In any case, the relative human exposure, location of the project, distance to sensitive receptors all should be considered when developing the risk assessment.

Projects anticipating heavy volumes of traffic should conduct hot spot modeling.³ Hot spot modeling will help determine compliance with the state CO standard at intersections and roadway links as determined by traffic impact analysis. In addition, existing and proposed projects must have a cumulative impact analysis. For each sub analysis and risk assessment mitigation measures should be identified, quantified for effectiveness and incorporated into the environmental document (i.e. Environmental Impact Report EIR or Environmental Impact Statement EIS). All mitigation measures must follow District Rules and Regulations including the most current CEQA Air Quality Handbook. Consultation with the most recent Clean Air Plans (SIP's), District Rules and Regulations and other Air District approved programs is recommended for effective applicability of standards. When it becomes apparent that on-site mitigation is insufficient to reduce the impacts to insignificance then off-site mitigation should be discussed and appropriately applied. Finally, in accordance with Assembly Bill 32 known as the Global Warming Solutions Act of 2006 and the most recent amendments to the CEQA Guidelines dated March of 2010, a discussion of the impacts from Green House Gas emissions and its relation to Climate Change is required.

The EIR shall discuss combined cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in section 15065 (c)(a)(3) of the California Environmental Quality Act (CEQA) Guidelines.⁴ Cumulative impacts are those that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of this project. A cumulative effect assessment looks at the collective impacts posed by individual land use plans and projects. Cumulative impacts can result from individually minor, but collectively substantial impacts taking place over a period of time.

In addition, all construction sites regardless of size must adhere to the requirements of Regulation VIII, Fugitive Dust Control. This regulation is comprised of six individual rules which combined apply Best Available Control Measures to any size construction or earthmoving activity. Aside from the standard of measurement, is the requirement of a dust control plan, notification 10 days prior to the commencement of construction to the Air District, and the submittal of the equipment list that shall be used in the construction

² Guidelines and procedures as approved by the California Air Resources Board and the Office of Environmental Health Hazard Assessment (OEHHA)

³ Using APCD approved hot spot modeling such as CALINE4, developed by and available through the California Department of Transportation.

⁴ CEQA Guidelines, Section 15130, describes when a cumulative impact analysis is warranted and what elements are necessary for an adequate discussion of cumulative impacts. The definition of cumulative impacts, under CEQA, can be found in Section 15355 of the CEQA Guidelines. A definition of cumulative impacts, under NEPA, can be found in 40 CFR, Section 1508.7 of the CEQ Regulations

and operation of the project is important. Finally, all new residential and commercial projects are subject to the requirements of the Air District's Rule 310 – Operational Development Fees by which provide the Air District with a mitigation method for the emissions produced in the operation of the proposed project. The Imperial County's Rule book can be found at <http://www.imperialcounty.net> under "Air Pollution Control." We encourage all developers, construction companies, cities and interested parties to obtain of copy of the Regulation VIII, Fugitive Dust Control. Should you have any questions please do not hesitate to call the office at 760-482-4606.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Belen Leon". The signature is fluid and cursive, with the first name "Belen" and the last name "Leon" clearly distinguishable.

Belen Leon
APC Environmental Coordinator

CC: Brad Poiriez
Monica Soucier
David Black

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST., M.S. 240

SAN DIEGO, CA 92110

PHONE (619) 688-6960

FAX (619) 688-4299

TTY 711

www.dot.ca.gov

*Flex your power!
Be energy efficient!*

September 25, 2013
Seville Solar Farm
NOP SCH 2013091039

Imperial County
Planning and Development Services
David Black
801 Main Street
El Centro, CA 92243

Dear Mr. Black:

The California Department of Transportation (Caltrans) received a copy of the Notice of Preparation (NOP) of a Draft Environmental Impact Report (Draft EIR) for the proposed Seville Solar Farm Complex project located near State Route 78 (SR-78). Caltrans has the following comments:

Utility Encroachment:

The NOP identifies that the project is proposing a transmission line that will connect to the Imperial Irrigation District Switch Station near SR-78. The following statements are general information for transmission line crossings on State highways. Please refer to Caltrans Encroachment Permits Manual

(http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment_permits_manual/index.html) for guidance on utility encroachment.

Any traffic control for utility work will need to be addressed as part of Caltrans permit approval. Stoppage of traffic for placement of aerial lines, installation or removal of overhead conductors crossing a highway requires traffic control in accordance with policy shown in the Caltrans Standard Plans and the California Manual on Uniform Traffic Control Devices (MUTCD).

Access:

The NOP identifies that the project is proposing a new access road from SR-78. Any new access needs to be reviewed and approved by Caltrans.

A Traffic Control Plan or construction traffic impact study may be required by the developer for approval by Caltrans prior to construction for any access to SR-78. The plans shall be prepared in accordance with Caltrans's *Manual of Traffic Controls for Construction and Maintenance Work Zones*. Traffic restrictions and pedestrian / bicycle detours may also need to be addressed. All work proposed within the (R/W) requires lane and shoulder closure charts. All roadway features (e.g., signs, pavement delineation, roadway surface, etc.) within the State R/W must be protected, maintained in a temporary condition, and/or restored. For more information, contact the District Traffic Manager, Camille Abou-Fadel, at 619-718-7833

Any work performed within Caltrans R/W must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. If these materials are not included with the encroachment permit application, the applicant will be required to acquire and provide these to Caltrans before the permit application will be accepted. Identification of avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary regulatory and resource agency permits.

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

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

Sincerely,



JACOB M. ARMSTRONG, Chief
Development Review Branch



Ocotillo Wells District
5172 Highway 78
Borrego springs, CA 92004

RECEIVED

OCT 15 2013

October 9, 2013

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Dave Black
Planner IV
Imperial County Planning & Development Services Department (ICPDS)
801 Main Street
El Centro, CA 92243

RE: Notice of Preparation for Seville Solar Farm Complex by Regenerate Power LLC.
The project is located on portions of approximately 2,440 acres Allegretti Farms property in west central Imperial County, California approximately 8 miles west of the junction of SR 78 and SR 86 and approximately three miles east of the San Diego County line.

Dear Mr. Black:

The Ocotillo Wells District of the California Department of Parks and Recreation (State Parks) appreciates the opportunity to comment on the NOP for the Seville Solar Farm Complex project.

State Parks is a State Agency as defined by the California Environmental Quality Act (CEQA) § 21082.1, a Trustee Agency as used by CEQA, its Guidelines and as defined by CCR § 15386 for the resources affected by this proposed project. Our mission is to provide for the health, inspiration, and education of the people of California by helping preserve the state's extraordinary biodiversity, protecting its most valued natural and cultural resources, and creating opportunities for high quality outdoor recreation.

As the governmental entity responsible for the stewardship of Ocotillo Wells State Vehicular Recreation Area (OWSVRA), we have a strong interest and concern about contemplated alterations of land use adjacent to the park. The long-term health of the OWSVRA is dependent on the health of the area ecosystems because the biotic boundaries of the park extend beyond its jurisdictional boundaries and must be managed with an eye toward wildlife corridors and regional concerns.

OWSVRA is an Off Highway Vehicle (OHV) park operated by the Ocotillo Wells District of State Parks. OWSVRA encompasses over 85,000 acres directly west of Anza-Borrego Desert State Park, east of State Route 86; primarily between State Route 78 and County Road S-22. Visitors to OWSVRA vary from 600,000 to over 1 million annually. OWSVRA also hosts over 50,000 people to its interpretive programs which include stargazing, wildlife, and wildflower viewing.

Portions of the Seville Solar Farm Complex project are located immediately adjacent to the OWSVRA boundary and the remainder of the project is located south of the park, but within the park view shed and biological community. The NOP makes reference to OWSVRA being 1.5 miles west of the project boundary which is inaccurate. The OWSVRA boundary is at SR 78 which is one half mile from the project site. It should also be noted that OWSVRA, via an MOU, administers BLM land that is also in the direct vicinity and view shed of the proposed project.

In general, based on our review of the NOP, we have found that the proposed project may result in significant and unavoidable impacts to OWSVRA. State Parks presents the following questions and recommendations as you prepare the EIS in relation to direct and proximity effects on OWSVRA:

Recreation:

In review of the NOP, we noticed that recreational impacts were not fully addressed in the Notice of Preparation (NOP). These effects would range from potential interruption of wildlife and OHV travel corridors between OWSVRA and the BLM Areas of Critical Environmental Concern (ACEC's) and Superstition BLM OHV area, to potential night sky impacts to our Interpretive Program's stargazing events. Potential aesthetic impacts from glare as well as public safety impacts also need to be analyzed in the EIR. We disagree with the NOP that "no impact" would occur within OWSVRA. As mentioned above, OWSVRA is a premier recreation destination that not only provides OHV recreation opportunities, but also provides numerous types of non OHV recreational opportunities as mentioned above. We strongly request that the project proponents work with State Parks staff during the development of the EIR to appropriately mitigate any impacts to recreation, visitor services, and associated public safety at OWSVRA.

Biological:

Would cumulative impacts to sensitive species such as the burrowing owl, kit fox, and flat-tailed horned lizard potentially affect these species viability in the nearby biological community or operations at OWSVRA? The mitigation for these species should be identified in the immediate area and within or adjacent to the project. This analysis should address lots 6-8 specifically. Additionally, it appears in the aerial photographs that undisturbed land may be affected by the proposed project. Please clearly identify how much undisturbed desert habitat corridors and linkages would be affected. As mentioned above, biotic boundaries extend beyond the park boundaries, and ensuring connectivity of habitat for wildlife, especially the listed species mentioned above, is very important and we are concerned that loss of this connectivity and foraging habitat will significantly impact the park.

Infrastructure/Transmission:

Per the NOP 2.25 miles of new 92kV transmission line will be "overbuilt" on top of the IID's existing 12.5 kV distribution line located immediately south of SR 78. This line will be directly adjacent to the OWSVRA boundary. How will the changes for required infrastructure affect OWSVRA? Will there be future expansion of power grid lines into OWSVRA that would cause direct effects? We request that the EIR address all reasonably foreseeable effects of new transmission corridors that may

affect OWSVRA as part of the cumulative impacts analysis in the Highway 78 and Highway 86 corridors

Aesthetics:

Potential aesthetic impacts are of concern because many visitors come to OWSVRA to escape nearby urban centers to enjoy unbroken views of natural vistas while camping with friends and family. Visitors to OWSVRA are attracted to the park due to the rugged and wild atmosphere. Power lines and industrial buildings work against this experience. We require visual renderings of the project and the new 92 kilovolt transmission line be included in the EIR. Please provide a full description of the 92 kilovolt line and physical dimensions of all buildings and whether or not they would be visible from OWSVRA. Would the facility's buildings be screened by the existing tamarisk trees? Fencing should be designed, and placed, to be visually compatible with the surrounding desert vistas and also wildlife friendly allowing for wildlife movement over and under to ensure habitat connectivity.

Water Use:

We agree with the NOP that the project may substantially alter the existing drainage and erosion patterns. Water use and the limited water table in the Ocotillo Wells area should be specifically addressed in the EIR as our park operations are dependent on well water and local wildlife is dependent on seeps and springs within the SVRA. The EIR should address the water use by the project and cumulative effects in the area.

Traffic:

In regards to the elevated traffic on SR 78 during the construction and operations phases of the project, we offer the following questions that State Parks would like project proponents to address in the EIR: Will the identified truck trips to export or import material to the jobsite create an unsafe condition for the park visitors as they ingress and egress on State Highway 78? Will the project cut off access between OWSVRA and the Superstition OHV area? How would the construction schedule for 5 different projects affect traffic along the 78 corridor over time? How often will there be periodic maintenance events and what would the traffic associated with those events be? The proposed project schedule needs to be addressed in the EIR.

Air Quality:

How will air quality impacts associated with construction and operation affect the overall PM₁₀ and PM_{2.5} levels on and off-site? Mitigation for PM₁₀ and PM_{2.5} needs to be addressed thoroughly and should incorporate an analysis of how effective water use would be for air quality mitigation given the high evaporation rates at the site.

Lighting:

State Parks has concerns regarding the potential for disruption of breeding and habitat use associated with off-site lighting and glare. Also we are concerned with light pollution on OWSVRA due to off-site light migration from the project site. The project's lighting should be designed to directionally orient, shield, and hood lighting to minimize off-site migration of light. We look forward to working with the project proponent to ensure the measures put forth, as stated above, are addressed in the EIR.

Landscaping:

State Parks recommends that landscaping needs to address materials used and possible problematic importation of various exotics species. We also recommend that the project proponent pre plan for the early introduction of native vegetation to expedite in their growth, and increase the visual quality of operational structures.

Cultural Impacts:

Per the NOP/IS, we agree that there is potential for significant impact of cultural sites within the project area. If the project is near, or will disturb, the Ancient Lake Cahuilla shoreline, there will be high potential for impacts to cultural resources and possibly human remains. The project should be designed to avoid these impacts. If not, we look forward to reviewing the cultural mitigation avoidance measures in the EIR.

Noise:

Please address why the noise impacts are potentially significant and why they would continue past the short-term construction periods in the EIR. Also, an analysis of the desert wind hitting the solar panels and creating noise should be addressed. There will be proximity effects from this project on the camping, visual, interpretive and public safety operations at OWSVRA that we request be fully addressed in the EIR.

We request that the Lead Agency and project proponent work with State Parks, where appropriate, to address the above questions and concerns prior to release of the EIR. Overall, we are concerned about the possible cumulative impacts of this project on OWSVRA, its visitors, and its wildlife. It is important that all land use decisions adjacent to OWSVRA be compatible with the park and the tremendous resources found there.

We appreciate the opportunity to comment on the proposed project. Thank you for your consideration of these comments and please contact Tina Robinson of my staff at (760) 767-1302 or tina.robinson@parks.ca.gov if you have additional questions.

Sincerely,



Garratt Aitchison
District Superintendent

cc: Christopher Conlin, Deputy Director OHMVR, DPR
Steve Lehman, Deputy Director, Park Operations, DPR
Jay Chamberlin, Chief Natural Resources, DPR
Kathryn J. Tobias, Senior Staff Counsel, DPR
Rich Rozzelle, Channel Coast District Superintendent, DPR



Colorado Desert District
200 palm Canyon Drive
Borrego springs, CA 92004

October 10, 2013

Mr. Dave Black
Planner IV
Imperial County Planning & Development Services (ICPDS) Department 801 Main
Street
El Centro, CA 92243

RE: Notice of Preparation for Seville Solar Farm Complex by Regenerate Power LLC.
The project is located on portions of approximately 2,440 acres Allegretti Farms
property in west central Imperial County, California, approximately 8 miles west of the
junction of SR 78 and SR 86 and approximately three miles east of the San Diego
County line.

Dear Mr. Black:

The Colorado Desert District of the California Department of Parks and Recreation
(State Parks) appreciates the opportunity to comment on the Notice of Preparation
(NOP) for the Seville Solar Farm Complex Project.

State Parks is a State Trustee Agency as defined by the California Environmental
Quality Act (CEQA) § 21082.1 and its Guidelines, defined by CCR § 15386, and is
responsible for the resources affected by this proposed project. Our mission is to
provide for the health, inspiration, and education of the people of California by helping
preserve the state's extraordinary biodiversity, protecting its most valued natural and
cultural resources, and creating opportunities for high quality outdoor recreation.

As the governmental entity responsible for the stewardship of Anza Borrego Desert
State Park (ABDSP), we have a strong interest regarding contemplated alterations of
land use in close proximity to ABDSP. The long-term health of ABDSP is dependent on
the health of the area ecosystems because the biotic boundaries of the park extend
beyond its jurisdictional boundaries and must be managed with an eye toward wildlife
corridors, habitat connectivity, and regional concerns.

ABDSP encompasses over 650,000 acres directly east of Ocotillo Wells State Vehicular
Recreation Area which lies directly adjacent to the proposed project location. ABDSP
was established to preserve the unique and diverse natural, cultural and scenic
resource of the Western Colorado Desert region and to provide opportunities for high
quality recreation that supports a healthy natural environment. ABDSP is a state
biosphere reserve due to its large diversity of features; 12 wilderness areas, 28
mountain summits and peaks, over 4500 cultural sites, and over 110 miles of hiking

trails. In general, based on our review of the NOP, we present the following questions and recommendations as you prepare the EIR.

Biological:

We have a high concern about possible impacts to biological resources. The NOP names only the burrowing owl as a species to be considered. However, we believe this project could also negatively impact the desert pupfish. There are several species with various levels of recognition by state or federal agencies known to reside in the project area which may also be negatively impacted: flat-tailed horned lizard, fringe-toed lizard, badger, kit fox, prairie falcon, and pallid bat. We request that the project proponent address impacts to these species in the EIR. Also, the Swanson's hawk is both a species of concern and protected by the Migratory Bird Act and has been observed roosting and /or foraging in the Allegretti property area which is in the direct vicinity of the proposed project. We recommend that specific impacts to the Swanson's hawk be addressed in the EIR.

Other important biological issues we would like to see addressed in the EIR is the potential effect that this solar farm complex will have on water fowl. It is a well-known phenomenon that water fowl mistake solar fixtures as places to land. The issue of avian mortality in relation to solar projects sites has been observed at other large scale solar projects and we would like to see the project proponent address this avian mortality phenomenon in the EIR. The project site is on a flyway between the Salton Sea and the Pacific as well as a migratory north-south route which may exacerbate this phenomenon even more.

As mentioned above, biotic boundaries extend beyond the park boundaries, and ensuring connectivity of habit for wildlife, especially the listed species mentioned above, is very important and we are concerned that the loss of this connectivity and foraging habitat will significantly impact ABDSP.

Hydrology and Water Quality:

It appears by the map of the project area that Lot 8 has major drainages that would appear to require alteration for solar development. A concern of State Parks, as mentioned above, is the downstream effects of the endangered desert pupfish population. We look forward to seeing the analysis and mitigation for this species in the EIR.

We would also like the EIR to address the cumulative effects of water use by the project proponent. How much water would be needed for cleaning and or maintenance/operation of the solar project? Will water or some other method be used for dust suppression on the facility itself? We would like to see a thorough study of the interconnection of aquifers in the EIR.

Air Quality:

State Parks agrees with the NOP that there is a potential for significant impact to air quality from construction at the project site. We look forward to the analysis that is being prepared for the EIR on how air quality impacts associated with construction and operation will affect the overall PM₁₀ and PM_{2.5} levels on and off-site. ABDSP is considered a sensitive land use receptor area by the San Diego Air Pollution Control District and mitigation for PM₁₀ and PM_{2.5} needs to be addressed thoroughly. Incorporating an analysis of how effective water use would be for air quality mitigation, given the high evaporation rates at the site, would be beneficial. Also, the NOP stated a less than significant impact to the surrounding area due to two unoccupied single-family residences located on the property; however, there is also an RV park located in proximity to the project site that may be adversely affected by project-related air quality issues, primarily with easterly winds.

We request that the Lead Agency and project proponent collaborate with State Parks, where appropriate, to address the above questions and concerns prior to release of the EIR. It is important that all land use decisions adjacent to State Parks be compatible with the tremendous resources found there.

We appreciate the opportunity to comment on the proposed project. Thank you for your consideration of these comments. You can contact me at (760) 767-4037, or at Dan.Falat@parks.ca.gov if you have additional questions.

Sincerely,



Dan Falat
District Superintendent

cc: Christopher Conlin, Deputy Director OHMVR, DPR
Steve Lehman, Deputy Director, Park Operations, DPR
Jay Chamberlin, Chief Natural Resources, DPR
Kathryn J. Tobias, Senior Staff Counsel, DPR
Rich Rozzelle, Acting Southern Division Chief, DPR



DEPARTMENT OF THE ARMY

Los Angeles District Corps of Engineers
Regulatory Division-Carlsbad Field Office
5900 La Place Court, Suite 100
Carlsbad, CA 92008

October 31, 2013

REPLY TO
ATTENTION OF

Office of the Chief
Regulatory Division

Regenerate Power LLC
1050 Doyle Street
Menlo Park, California 94025

SUBJECT: Information regarding requirement for Department of the Army Permit

Dear Sir/Madam:

This is in response to information received regarding Seville Solar Farm Complex. Based on the information you have provided, we are unable to determine if the proposed work would be regulated under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. Please review your project and determine if you need a permit.

Applications and additional information are available on our website <http://www.spl.usace.army.mil/Missions/Regulatory/PermitProcess.aspx>. If you have any questions, please contact Shari Johnson of my staff at 760-602-4829 or via e-mail at Shari.Johnson@usace.army.mil.

Sincerely,

A handwritten signature in cursive script, reading "Therese O. Bradford", is positioned above the typed name.

Therese O. Bradford
Chief, South Coast Branch



RECEIVED

September 27, 2013

SEP 30 2013

Dave Black

Imperial County Planning and Development Services Department

801 Main Street

El Centro, CA 92243

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Subject: Seville Solar Farm Complex (SCH# 2013091039) Notice of Preparation

Dear Mr. Black:

The California Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Notice of Preparation (NOP) for the Seville Solar Farm Complex (SCH# 2013091039). The Department is responding as a Trustee Agency for fish and wildlife resources [Fish and Game Code Sections 711.7 and 1802 and the California Environmental Quality Act (CEQA) Guidelines Section 15386], and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 *et seq.*) and/or a California Endangered Species Act (CESA) Permit (California Fish and Game Code Sections 2080 and 2080.1).

The Seville Solar Farm Complex (Project) proposes to develop the approximately 2,440-acre Allegretti Farms property in west-central Imperial County, California, approximately eight miles west of the junction of State Route (SR) 78 and SR 86, and approximately three miles east of the San Diego County line. The Project includes the construction, operation and reclamation of up to five solar energy projects. The Project proposes a new access road from SR 78 and internal access roads, an Imperial Irrigation District (IID) electrical switch station, electrical substations for each of the five solar projects, and internal solar development transmission lines to the substations and IID switch station. The Project would also include the construction for, and operation by, the IID of a new 92 kilovolt (kV) transmission line for interconnection to the existing IID Anza Substation.

The Flat-tailed Horned Lizard (*Phrynosoma mcallii*), is a California Species of Special Concern. The Department is a Signatory Agency to the Rangewide Management Strategy for the species, which designates and protects Management Areas and Research Areas for the species. The Project site abuts the Ocotillo Wells Research Area and the West Mesa Management Area, with documented records of the species' occurrence a short distance from the Project site. It is almost certain that Flat-tailed Horned Lizards occur on parts of the Project site, however the species was not addressed in the Biological Resources section of the NOP. The Department recommends that focused surveys are conducted for Flat-Tailed Horned Lizards and avoidance and mitigation activities are adopted for the Project, as per the Rangewide Management Strategy.

(link:http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/pdfs/elcentro_pdfs.Par.83352.File.dat/FTHLStrategy03.pdf)

The proposed Project site is located in potential habitat for the Western Burrowing Owl (*Athene cunicularia*). This species is designated a California Species of Special Concern. Section 15380 of the California Environmental Quality Act (CEQA) requires the lead agency to treat sensitive species as though they were listed, if the species meets the criteria for listing described in the section. The Department believes that the proposed project could further the decline of the above sensitive species. This species must be treated as though it were listed and appropriate avoidance, mitigation, and compensation for impacts need to be identified. Unavoidable impacts to the Western Burrowing Owl should be mitigated through acquisition and protection, in perpetuity, of high quality biological habitat. In addition, surveys and mitigation should be consistent with the 2012 Department Staff Report on Burrowing Owl Mitigation (link: <http://www.dfg.ca.gov/wildlife/nongame/docs/BUOWStaffReport.pdf>).

The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.

The Department has direct authority under Fish and G code §1600 et seq. in regard to any proposed activity which would divert, obstruct, or affect the natural flow or change the bed, channel, or bank of any river, stream, or lake.

The Department is emphasizing in comment letters on projects with impacts to lakes or streambeds, that alternatives and mitigation measures must be addressed in CEQA certified documents prior to submittal of an application of a Streambed Alteration Agreement (SAA). Any information which is supplied to the Department after the CEQA process is complete will not have been subject to the public review requirements of CEQA.

In order for the Department to process a SAA agreement, the CEQA-certified documents must include an analysis of the impacts of the proposed project on the lake or streambed, an analysis of the biological resources present on the site, copies of biological studies conducted on the site, biological survey methodology, and a discussion of any alternative, avoidance, or mitigation measures which will reduce the impacts of the proposed development to a level of insignificance. In addition, a discussion of potential adverse impacts from any increased runoff, sedimentation, soil erosion, and/or pollutants on streams and watercourses on or near the project site, with mitigation measures proposed to alleviate such impacts must be included in the CEQA - certified documents.

September 27, 2013

Page 2

Thank you for the opportunity to comment on this document. If you have any questions please contact Mr. Jack Crayon, Environmental Scientist, either via email at Jack.Crayon@wildlife.ca.gov or via phone at (760) 200-9172.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael D Flores".

Michael D Flores
Senior Environmental Scientist
Inland Deserts Region (6)