This chapter provides an overview of the Seville 4 Solar Project (Project) and the environmental analysis. For additional detail regarding specific issues, please consult the appropriate sections (4.1 through 4.13) (Environmental Consequences) of Chapter 4.0 of the Draft Environmental Impact Report (Draft EIR).

2.1 PURPOSE AND SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

The Draft EIR provided a thorough analysis of the potential environmental effects associated with the implementation of the Seville 4 Solar Project pursuant to the California Environmental Quality Act (CEQA). The EIR analysis focuses upon potential environmental impacts arising from the project. The EIR adopts this approach in order to provide a credible worst-case scenario of the impacts resulting from project implementation.

2.2 PROJECT CHARACTERISTICS

Titan Solar II, LLC (hereafter referred to as "Applicant") is proposing to build, operate, and maintain a solar generation facility capable of producing approximately 20 mega-watts (MW) on land within the Seville Solar Farm Complex. The Project site is located at 2085 "H" West Highway 78, Borrego Springs, CA 92004 in west-central Imperial County, California, approximately eight miles west of the junction of State Route (SR) 78 and SR 86, and approximately five miles east of the San Diego County line. The actual net electrical output of the Project will depend upon the technology selected and final design and layout. The proposed Project includes the construction, operation and reclamation of:

- A 20-MW solar photovoltaic (PV) energy project on approximately 146 or 174 acres of the 572.10 acres in Lot 8 of Tract Map 00988.
- A 34.5-kilovolt (kV) generator intertie line (Gen-Tie Line) connecting to the existing substation.
- A 34.5/92-kV substation and expansion of the adjacent Imperial Irrigation District (IID) Switching Station in common development interest Lot D of Tract Map No. 00988.
- Internal access roads and infrastructure (i.e. PV modules, inverters, internal transmission lines, security fence, etc.)
- Energy generated by the Seville 4 Solar Project would be conveyed to the IID transmission system via the Gen-Tie Line which starts in the northwest corner of Lot 8 and ends at the proposed Seville 4 Substation in Lot D. From the northwest corner of Lot 8 the Gen-Tie Line crosses the north end of Lot 3 to Lot A ("Utility Quarter"). The Gen-Tie Line continues in Lot A (adjacent to the north end of Lot 2) to the northeast corner of Lot 1 where Lot A turns north. At a point opposite Lots C and D, the Gen-Tie Line will cross east over the main access road (Lot B) and terminate at the proposed Seville 4 Substation in Lot D. After increasing the voltage to 92 kV, the Seville 4 Substation will deliver the generated power to an IID Switching Station which then delivers the power to the existing IID 92-kV transmission line connected to the IID Anza Substation. If feasible, the Gen-Tie Line may be constructed on existing power poles supporting power lines within the property. If not feasible, the Gen-Tie line will be constructed on new power poles.
- Water tank(s) capable of storing 20,0000 gallons for fire protection.

The proposed Seville 4 Solar Project has the following objectives:

- Produce a minimum of 20 MW alternative current, on-peak, renewable power to the electrical grid in California.

- Assist California in meeting its current and future Renewable Portfolio Standard goals.
- Support the greenhouse gas reduction goals of Assembly Bill 32 (California Global Warming Solutions Act of 2006).
- Site the Project in an area with excellent solar energy resources in order to maximize productivity from the PV panels.
- Use a proven and available solar PV technology to reliably and economically produce electricity during daylight hours.
- Locate the solar power facility as near as possible to the Imperial Irrigation District's (IID) existing electrical transmission facilities with anticipated capacity.
- Minimize environmental impacts by constructing and operating the solar power facility adjacent to existing and approved solar facilities and existing supporting infrastructure (transmission lines and roads).
- Construct and operate a solar power facility that would reduce the historic groundwater use on the Project site.
- Create additional employment and project-related expenditures for local businesses.

2.3 AREAS OF CONTROVERSY

The County of Imperial was identified as the lead agency for the proposed project. In accordance with CEQA Guidelines Section 15082, the County prepared and distributed a Notice of Preparation (NOP) of an EIR on June 22, 2017. This notice was circulated to the public, local, state, federal agencies and other interested parties to solicit comments on the proposed Project. The NOP is presented in Appendix A in the Draft EIR. In addition, an Initial Study was prepared for the project and released for public review at the same time as the NOP. The Initial Study is also included in Appendix A in the Draft EIR. Concerns raised in response to the NOP were considered during the preparation of the Draft EIR. Comments and areas of controversy are summarized in Table 1.0-1 of the Draft EIR.

2.4 PROJECT ALTERNATIVES SUMMARY

CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to the project which could feasibly attain the objectives of the project and reduce the degree of environmental impact. In addition to the No Project Alternative and proposed Project, the Draft EIR examined one alternative (Alternative 1 – Environmentally Sensitive Avoidance Alternative). Alternatives are discussed in detail in Chapter 6.0, Alternatives, of the Draft EIR.

2.4.1 PROPOSED PROJECT

A. PROJECT COMPONENTS

Each of the components of the proposed Project is described in detail below. The components would be installed as part of construction, in use during operation, and removed and decommissioned as part of reclamation.

The net electrical output of the proposed Project is anticipated to be approximately 20 MWAC. The actual net electrical output of the Project will depend upon the technology selected and final design and layout.

Solar Technology

The Project proposes to use either thin film or crystalline solar photovoltaic (PV) technology modules mounted on either fixed frames or horizontal single-axis tracker (HSAT) systems. The Fixed-Frame Configuration would occupy 146 acres including 128 acres of panels and an 18-acre retention basin in the southeast portion of the Project site. The HSAT Configuration would occupy 174 acres including 156 acres of panels and six retention basins totaling 18-acres. The entire Project including an additional 7 acres associated with the Gen-Tie, Seville 4 Substation, IID Switch Station, and access road extension would bring total acreage to 153 acres for the Fixed-Frame Configuration and 181 acres for the HSAT Configuration.

Fixed-Frame Configuration (146 Acres Project Site Only)

The Fixed-Frame 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 recommendations of the Geotechnical Report prepared for the Project. The fixed-frame racks would be secured at a fixed tilt of 20° to 25° from horizontal facing a southerly direction. Current Project design would have individual PV modules each approximately 3.25 feet wide by 6.5 feet long (depending on the specific PV technology selected), mounted two high on a fixed frame, providing a two-foot ground clearance and resulting in the tops of the panels at approximately 7.5 feet above the ground.

The preliminary site plan shows the Fixed-Frame PV modules arranged in analysis spaced approximately 20 to 25 feet apart (pile-to-pile) to maximize performance and to allow access for panel cleaning (if necessary). These arrays would be separated from each other and the perimeter security fence by nominal 20-foot wide roads.

HSAT Configuration (174 Acres Project site only)

If HSAT technology is used, the PV modules would rotate around the north-south HSAT axis so that the PV modules would continuously face the sun as it moves across the sky throughout the. 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 approximately six feet above the ground, depending on the final design.

The individual PV systems would be arranged in large arrays. PV systems would be placed on 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 HSAT 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. These HSAT arrays would be separated from each other and the perimeter security fence by nominal 20-foot wide roads consistent with agency emergency access requirements.

Electrical Power System

Electricity generated by the PV modules would be collected by a direct current (DC) collection system routed underground in trenches. This DC power would be delivered to one of the pad-mounted inverters in weatherproof enclosures located within the arrays. The inverters would convert the DC power to 34.5-kV, three-phase alternating current (AC). Underground collection lines would transmit the electricity to the new Project collection station in the northwestern corner of the Project site.

Gen-Tie

The electrical energy produced by the Seville 4 Solar Project would be conducted to the proposed Seville 4 Substation from the Project collection station via the proposed above-ground 34.5-kV Gen-Tie Line located on common development interest Lot A of Tract Map No. 00988. The electricity would be delivered to the proposed Seville 4 Substation on Lot D.

Substation

A Seville 4 Substation would be constructed in common development interest Lot D of Tract Map No. 00988. This substation would take delivery of the 34.5-kV power from the Project collection station Gen-Tie Line and increase the voltage of the electricity to 92 kV for metering and delivery to the IID electric grid. The substation would include a transformer, circuit breakers, meters, disconnect switches microwave or other communication facilities and an electrical control building. The Project's power would then be transmitted by the IID to the point of interconnection with the utility which has agreed to purchase the output from the Seville 4 Solar Project pursuant to a power purchase agreement (PPA).

Security

Eight-foot-high security fencing would be installed around the perimeter of the Project site at the commencement of construction and site access would be limited to authorized site workers. In addition, a motion detection system and closed-circuit camera system may also be installed. The site would be remotely monitored 24 hours per day 7 days per week. In addition, routine unscheduled rounds may be made by the security team monitoring the site.

Site Access

Primary access to the Property, including Lot 8, is available via an existing private access road from the north off SR 78. This primary access road is provided with 30-foot double swing gates with a coded entry and "Knox Box"® over-ride for emergency vehicle access. Secondary access to the Property is also a gated, private road from SR 78 which continues to be available for access to any agricultural operations on the Property, and for secondary emergency access to the Property.

Internal to the Seville Solar Farm Complex, a network of private roads provide construction, operations and maintenance access to all lots and existing solar facilities developed as part of Seville 1 Solar and Seville 2 Solar. Legal and physical access is provided by a common interest development access road corridor (Lot B) from SR 78 through Lot 6 and Lot 7, then all the way to Lot 8, between Lots 4 and 5 on the east and north and Lot A and Lot 3 on the west and south.

Internal to the Project site, nominal 20-foot wide roads would be developed between the PV arrays as well as around the perimeter of the Project site inside the perimeter security fence. These roads would provide access to all areas for maintenance and emergency vehicles.

Further details of the proposed are described in subsection 2.1.5 of the Draft EIR.

2.4.2 ALTERNATIVE 1 – ENVIRONMENTALLY SENSITIVE AVOIDANCE ALTERNATIVE

The Environmentally Sensitive Avoidance Alternative would shift the eastern boundary of the Fixed-Frame Configuration and HSAT Configuration approximately 200 feet to the west. Both configurations would be adjusted to fit into the same overall footprints in Lot 8 and designed to produce 20 MW of electricity. The purpose of the Environmentally Sensitive Avoidance Alternative is to avoid the Environmentally Sensitive Area containing cultural resources identified in the 200-foot wide eastern strip. This alternative would avoid potential impacts to cultural resources that have not yet been evaluated for eligibility for listing in the California Register of Historic Resources (CRHR).

2.4.3 ALTERNATIVE 2 - NO PROJECT ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(1) requires that a No Project Alternative be analyzed in order to allow the decision-makers to compare the impacts of approving a proposed Project with the impacts of not approving the proposed Project. Under the No Project Alternative, the proposed Seville 4 Solar Project would not be developed. No GPA, Zone Change or CUP application would be approved. The Project site could remain in its existing condition as low gradient desert lands and idle farmland reverting to open desert.

2.5 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table 2.0-1 displays a summary of impacts and proposed mitigation measures that would avoid or minimize potential impacts. In the table, the level of significance is indicated both before and after the implementation of each mitigation measure. For detailed discussions of all project level mitigation measures, refer to Sections 4.1 through 4.13 in Chapter 4.0 of the Draft EIR.

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
AESTHETICS			
Adverse Effect on Scenic Vista **Impact 4.1.1** Implementation of the proposed Project would result in a minor alteration of views of the Project area from surrounding lands and SR 78. The Project area is not considered a scenic vista nor does it contain any outstanding aesthetic features. Moreover, views of the Project site would be partially obscured by the existing tamarisk windbreak along its northern boundary as well as the set-back from SR 78 and nearby uses. Therefore, adverse effects on a scenic vista are considered **less than significant**.	LTS	None required.	LTS
Degrade Existing Visual Character or Quality of the Site **Impact 4.1.2** The proposed Project would convert existing low gradient desert and idle farmland to a solar generation facility. In addition, the Project includes construction of a Gen-Tie Line, access road, water tank(s), Seville 4 Substation and the IID Switching Station. While the Project would alter existing conditions of the Project area, it would not substantially degrade the existing visual character or quality of the area. Therefore, this impact is considered **less than significant**.	LTS	None required.	LTS

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
New Source of Substantial Light or Glare **Impact 4.1.3** The Project proposes to use either thin film or crystalline solar PV technology modules mounted on either fixed frames or HSAT systems. No lighting is proposed on the Project site. Glare modeling determined that there would be no substantial or prolonged period of glare created by either the fixed-frame configuration or the HSAT configuration. Therefore, impacts associated with creation of substantial light and glare are considered **less than significant**.	LTS	None required.	LTS
Cumulative Visual Impacts **Impact 4.1.4** Implementation of the proposed Project, in conjunction with large scale proposed, approved and reasonably foreseeable renewable energy projects in the Imperial Valley and the Ocotillo Wells Solar Project to the west in San Diego County, would alter the visual character of the region, resulting in a change to public views as well as increased daytime glare and nighttime lighting levels. Such impacts are typically addressed on a project-by-project basis. Therefore, cumulative impacts to visual resources are considered **less than cumulatively considerable**.	LCC	~~Implement mitigation measure MM 4.1.3a and MM 4.1.3b.~~ None required.	LCC

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TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
LAND USE			
Conflict With Any Applicable Land Use Plan, Policy, or Regulation **Impact 4.2.1** The proposed Project is consistent with the existing General Plan land use designation of Agriculture with a CUP and would not conflict with any County policies or regulations or the OWSRVA north of the Project area. Therefore, conflicts with applicable land use plans, policies and regulations are considered a **less than significant** impact.	LTS	None required.	LTS
Cumulative Conflicts with Applicable Land Use Plans, Policies, or Regulations **Impact 4.2.2** Development of the proposed Project in combination with large scale proposed, approved and reasonably foreseeable renewable energy projects in the region would not incrementally add to conflicts with applicable land use plans, policies and regulations. Each project would be required to be consistent with the applicable plans that apply to the area in which it is located. Thus, this impact is considered **less than cumulatively considerable**.	LCC	None required.	LCC

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Cumulative Land Use Compatibility/Conflict Impacts **Impact 4.2.3** Development of the proposed Project in combination with large-scale proposed, approved and reasonably foreseeable renewable projects in the region would change the land use patterns, present potential land use conflicts, and result in conversion of agricultural. This impact is considered **less than cumulatively considerable**.	LCC	None required.	LCC
TRANSPORTATION AND CIRCULATION			
Conflict with an Applicable Plan/Level of Service Standard (Near-Term Year 2018) **Impact 4.3.1** Implementation of the proposed Project would add traffic to existing volumes on SR 78 during construction and to a lesser degree during operation. The segment of SR 78 north of the Project area and two study area intersections would operate above LOS C without and with the Project construction and operational traffic. Therefore, conflicts with the General Plan Circulation and Scenic Highway Element and impacts to LOS	LTS	None required.	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
standards would be **less than significant** under the Near-Term Year 2018 scenario.			
Substantially Increase Hazards Due to a Design Feature **Impact 4.3.2** The existing access road off of SR 78 would be used to access the Project area. No new driveways or other design features are proposed that would impact SR 78 or infringe upon emergency access. Therefore, the proposed Project is not anticipated to substantially increase hazards due to a design feature and this impact is considered **less than significant**.	LTS	None required.	LTS
Cumulative Impacts to Roadway Segment LOS (Near-Term Year 2018 Plus Cumulative Plus Project) **Impact 4.3.3** Implementation of the proposed Project in Near-Term Year 2018 in combination with projected cumulative traffic in Year 2018 would add traffic to the segment of SR 78 north of the Project area. However, this segment would continue to operate at LOS B under cumulative conditions. Therefore, impacts to cumulative traffic on SR 78 during Near-Term Year 2018 Plus Cumulative Plus	LCC	None required.	LCC

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Project conditions are considered **less than cumulatively considerable.**			
Conflict With an Applicable Plan/Level of Service Standard (Long-Term Year 2050) **Impact 4.3.4** Implementation of the proposed Project would add minimal traffic to existing traffic volumes on the segment of SR 78 north of the Project area during operations. This segment of SR 78 would continue to operate at LOS A with the addition of Project operational traffic. Therefore, conflicts with the General Plan Circulation and Scenic Highway Element and impacts to LOS standards would be **less than cumulatively considerable** under Long-Term Year 2050 Project conditions.	LCC	None required.	LCC
Cumulative Increase in Hazards Due to a Design Feature **Impact 4.3.5** Implementation of the proposed Project would not require improvements or modifications to any Project study area highway segments or intersections. Therefore, cumulative increases in hazards due to a design feature are considered **less than cumulatively considerable**.	LCC	None required.	LCC

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SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
AIR QUALITY			
Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard **Impact 4.4.1** Implementation of the proposed Project would increase air pollutant emissions during Project construction and operation. The mitigated and unmitigated daily emissions (both winter and summer) of PM_{10} were calculated to exceed ICAPCD thresholds during construction weeks 3-20 ~~of~~ for both the Fixed-Frame Configuration and HSAT Configuration. No criteria pollutant thresholds were calculated to be exceeded during Project operations. Therefore, the Project's potential to conflict with or obstruct an air quality plan or violate an air quality standard is considered a **potentially significant impact** during Project construction.	PS	**MM 4.4.1a Compliance with ICAPCD Regulation VIII** The Project Applicant shall prepare a Dust Control Plan for control of fugitive dust during construction as required by ICAPCD Regulation VIII. The Dust Control Plan shall also include dust control measures to be implemented during the operation and maintenance phase of the Project. The Dust Control Plan shall address construction and earthmoving activities, track-out, open areas and unpaved roads. The Dust Control Plan shall also include information on the dust suppressants to be applied and the specific surface treatment(s) and/or control measures to be utilized to control track-out where unpaved and/or access points join paved public access roads. The Dust Control Plan shall be submitted for ICAPCD review prior to any earthmoving activities. As noted in the Methodology discussion, all construction activity CalEEMod modeling was done incorporating on-site watering three	LTS

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
		times daily during the grading activities. Accordingly, the following mitigation measures shall be employed: **MM 4.4.1b** To reduce fugitive dust, water shall be applied to the all-weather private road at least three times per day and speeds shall be limited to 25 mph during construction. **MM 4.4.1c** Actively disturbed areas on the Project site would also be watered at least three times a day as necessary to reduce fugitive dust emissions during grading, racking installation, panel installation, system wiring and trenching and inverter installation.	
Expose Sensitive Receptors to Substantial Pollutant Concentrations **Impact 4.4.2** Exhaust generated by diesel equipment during construction, operation and maintenance, and reclamation could result in elevated levels of diesel particulate matter emissions. However, the nearest sensitive receptors are over 2.5 miles from Project site. Therefore, exposure of sensitive receptors to substantial pollutant	LTS	None required	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
concentrations is considered a **less than significant impact.**			
Create Objectionable Odors Affecting a Substantial Number of People **Impact 4.4.3** Use of diesel equipment during construction, operation, and reclamation activities could result in temporary emissions of adverse odors. This is considered a **less than significant impact.**	LTS	None required.	LTS
Violate air Quality Standard/Cause Air Quality Violation **Impact 4.4.4** The proposed Project would generate criteria pollutant emissions during construction. However, the short-term construction emissions exceedances of ICAPCD thresholds would be mitigated with implementation of mitigation measures, including those in the ICAPCD's Policy 5. Operational emissions would not exceed ICAPCD thresholds but would still incorporate Applicant-proposed measures, including the requirement for the adoption of an Operational Dust Control Plan (ODCP) detailing how dust emissions will be controlled and maintained during the operational phase of the project, to reduce dust. Therefore, the proposed Project would	LCC	Implement mitigation measures MM 4.4.1a, MM 4.4.1b and MM 4.4.1c.	LCC

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
result in a **less than cumulatively considerable impact** with regard to violating an air quality standard."			
CLIMATE CHANGE AND GREENHOUSE GASES			
Generation of Greenhouse Gas Emissions **Impact 4.5.1** The proposed Project would generate GHG emissions during construction and reclamation activities, primarily related to emissions from construction equipment. Operational emissions would occur to a lesser degree in relation to the use of maintenance equipment. This impact is considered **less than significant**.	LTS	None required.	LTS
Conflict with an Applicable Plan, Policy, or Regulation Adopted to Reduce Greenhouse Gas Emissions **Impact 4.5.2** The proposed Project would not conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions. **No impact** would occur.	LTS	None required.	LTS
GEOLOGY AND SOILS			
	PS	**MM 4.6.1** Structures within the Project	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Strong Seismic Ground Shaking **Impact 4.6.1** The primary seismic hazard at the Project area has the potential for strong ground shaking during earthquakes along the San Jacinto-Borrego fault. This is considered a **potentially significant impact.**		area shall be designed and constructed in accordance with the 2016 California Building Code (CBC) and ASCE 7-10 Seismic Parameters.	
Liquefaction **Impact 4.6.2** Sand and silty sand are the predominant soils on the Project site. Based on these soil types, the risk of liquefaction induced settlement on the Project site is very low. Therefore, liquefaction is considered a **less than significant impact**.	LTS	None required.	LTS
Unstable Soils – Seismic/Differential Settlement **Impact 4.6.3** Potential for seismic settlement across the Project site is 0.35 inch or less. This is considered minimal and would be addressed through design to address differential movement. Therefore, seismic settlement is	LTS	None required.	LTS

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
considered a **less than significant impact**.			
Erosion **Impact 4.6.4** Surface soils on the Project site are generally classified as AASHTO Group A1 and A3, which are highly erodible. Construction, operation, and reclamation activities could result in erosion and loss of top soil on the Project site. Therefore, erosion is considered a **potentially significant impact.**	PS	**MM 4.6.4a** All permanent slopes shall not be steeper than 3:1 to reduce wind and rain erosion. Protected slopes with ground cover may be as steep as 2:1. Note: Maintenance with motorized equipment may not be possible at this inclination. **MM 4.6.4b** Low slope angles (less than 3H:1V) shall be used for unprotected slopes. Where significant exposure is expected, addition of cement to the soil or concrete filled rock facing shall be employed to create a cemented mass that is resistant to water movement. **MM 4.6.4c** Dressing (fine grading and compacting) of the slopes shall be implemented ~~periodically~~ as needed to fill small rivulets caused by direct rainfall onto the slopes. Surface soils coagulants shall also be considered for wind erosion control of the	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
		sandy ground surface	
Expansive Soils **Impact 4.6.5** The near surface soils in the Project site are silty sand and sandy silts. These soils are considered non-expansive. Therefore, impacts associated with expansive soils are considered **less than significant.**	LTS	None required.	LTS
Soil Corrosivity **Impact 4.6.6** Soils within the Project site are corrosive to concrete and metals. This is considered a **potentially significant impact.**	PS	**MM 4.6.6** The Project shall implement the recommendations of the Geotechnical Report regarding structural concrete, non-structural concrete, concrete mixes and corrosivity, driven pile design criteria, settlement, excavations, stormwater detention basin berms, lateral earth pressures, seismic design, soil erosion factors for SWPPP, and all-weather access roadways.	LCC
Cumulative Exposure to Geologic and Seismic Impacts **Impact 4.6.7** Implementation of the proposed Project, in combination with existing, approved, proposed, and reasonably foreseeable development, may result in cumulative exposure to geologic and seismic hazards.	LCC	Implement mitigation measures MM 4.6.1, MM 4.6.4a, MM 4.6.4b, MM 4.6.4c, and MM 4.6.6, as well as MM 4.4.1a and MM 4.4.1b	LCC

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
This is considered a **less than cumulatively considerable impact**.			
CULTURAL RESOURCES, TRIBAL CULTURAL RESOURCES AND PALEONTOLOGICAL RESOURCES			
Impacts to Historical Resources **Impact 4.7.1** No historic resources were identified in the survey area. Therefore, **no impact** to a historic resource would occur as a result of development of the proposed Project.	NI	None required.	NI
Impacts to Archaeological Resources - Prehistoric Isolates **Impact 4.7.2** A total of five prehistoric isolates were identified during field surveys of the survey area. As isolates they are ineligible to the CRHR and not significant under CEQA. Therefore**, no impact** would occur with regard to prehistoric isolates.	NI	None required.	NI

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Impacts to Archaeological Resources Potentially Eligible for the CRHR **Impact 4.7.3** Thirteen archaeological sites were identified during field surveys of the Project area. These archaeological sites have not been previously evaluated for eligibility for the CRHR or for significance under CEQA. Therefore, impacts these archeological sites are considered **potentially significant**.	PS	**MM 4.7.3a** If avoidance of archaeological sites P-13-008029 (subsumed 08587)/CA-IMP-1266 (subsumed 8010), P-13-008586/CA-IMP-8009, P-13-008606/CA-IMP-8089, P-13-009941/CA-IMP-10004, P-13-009942/CA-IMP-10005, P-13-014438, JL_S_1, JL_S_2, JL_S_3, JL_S_4, JL_S_5, JL_S_6, JL_S_7, JL_S_8, JL_I_3, JL_I_4, JL_I_6A and JL_I_6B is not possible, a formal evaluation for eligibility for the CRHR under CEQA Guidelines and the Imperial County General Plan Renewable Energy and Transmission Element MMRP CUL-1d (Site Characterization, Sitting and Design and Construction) shall be undertaken. Evaluation shall include a combination of surface mapping and collection, excavation, and special analyses designed to understand site formation and human habitation of the resource in a regional context.	LTS

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Impacts to Archaeological Resources Potentially Eligible for the CRHR **Impact 4.7.3** Thirteen archaeological sites were identified during field surveys of the Project area. These archaeological sites have not been previously evaluated for eligibility for the CRHR or for significance under CEQA. Therefore, impacts these archeological sites are considered **potentially significant**.	PS	**MM 4.7.3b** In keeping with mitigation measures CUL-1d and CUL-3 of the MMRP for the Final Programmatic Environmental Impact Report for the Imperial County Renewable Energy and Transmission Element Update, Imperial County, California, construction monitoring by a qualified archaeologist and a local Native American monitor of all ground disturbance is recommended due to the presence of numerous prehistoric cultural resources within the survey area and 1-mile record search radius.	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Impacts to Unrecorded Subsurface Archaeological Resources **Impact 4.7.4** Unrecorded subsurface archaeological resources in the Project area could potentially be damaged during construction of the proposed Project. This is considered a **potentially significant impact**.	PS	**MM 4.7.4** If subsurface deposits are discovered during construction, all work shall halt within a 200-foot radius of the discovery. A qualified professional archaeologist shall be retained to evaluate the significance of the find. A local Native American monitor, following the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites established by the NAHC, may also be required. Work cannot continue at the discovery site until the archaeologist conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially significant or eligible for listing on the NRHP or CRHR. If a potentially-eligible resource is encountered, then the archaeologist, lead agency, and project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations to evaluate eligibility for the CRHR and, if eligible, data recovery as mitigation.	LTS

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SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Impacts to Subsurface Human Remains **Impact 4.7.5** It is unknown whether there are human remains in the Project area that could be discovered during construction. Therefore, impacts to subsurface human remains are considered a **potentially significant impact**.	PS	**MM 4.7.5** In the event that evidence of human remains is discovered, construction activities within 200 feet of the discovery shall be halted or diverted and the Imperial County Coroner shall be notified (Section 7050.5 of the Health and Safety Code). If the Coroner determines that the remains are Native American, the Coroner will notify the NAHC which will designate a Most Likely Descendant (MLD) for the Project (Section 5097.98 of the Public Resources Code). The designated MLD then has 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains (AB 2641). If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the Public Resources Code). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a document with the county in which the property is located (AB 2641).	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Impacts to Unknown Fossil Remains **Impact 4.7.6** Unknown fossil remains, if discovered in the Project area, could be destroyed by excavation and other earth-moving activities occurring during construction. This is considered a **potentially significant impact**.	PS	**MM 4.7.6a** Prior to the start of construction, a paleontological resource monitoring plan shall be prepared. The plan shall include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the SDNHM or other approved repository. **MM 4.7.6b** A qualified paleontological monitor shall be present during ground-breaking activities associated with Project construction. The depth of excavation that requires paleontological monitoring shall be determined by the paleontological monitor and the construction contractor based on initial observations during construction earth moving. The paleontological monitor will be equipped to salvage fossils as they are unearthed (to help avoid construction delays) and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors are empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens will be prepared. The report and inventory, when	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
		submitted to the Imperial County Department of Planning and Development Services, along with confirmation of the curation of recovered specimens into an established, accredited museum repository, will signify completion of the program to mitigate impacts to paleontological resources. In general, a paleontological monitor will not be required after possible fossil bearing sediments have been fully explored.	
Cumulative Impacts to Archaeological and Historic Resources **Impact 4.7.7** Implementation of the proposed Project, in combination with large-scale proposed, approved and reasonably foreseeable renewable energy projects in the region, has the potential to result in impacts to archaeological and historic resources. However, impacts are addressed on a project-by-project basis. Therefore, this is considered a **less than cumulatively considerable impact**.	LCC	Implement mitigation measures MM 4.7.6a and MM 4.7.6b.	LCC

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NOISE			
Noise Levels in Excess of Standards/Substantial Temporary Noise Increase **Impact 4.8.1** Activities associated with construction would increase short-term noise levels on the Project site and in the vicinity of the Project area. However, no County of Imperial noise standards would be exceeded during construction. Therefore, a **less than significant** impact would occur in association with temporary noise increases.	LTS	None required.	LTS
Exposure to Groundborne Vibration **Impact 4.8.2** Ground-borne vibration levels associated with short-term Project construction and long-term operational activities would not exceed applicable groundborne vibration criterion at nearby land uses. This impact would be considered **less than significant.**	LTS	None required.	LTS
Long-Term Exposure to Increased Traffic Noise **Impact 4.8.3** Long-term operation of the proposed Project would not result in a substantial increase in traffic noise levels. This impact would be considered **less than significant.**	LTS	None required.	

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Long-Term Exposure to Increased Stationary-Source Noise **Impact 4.8.4** Long-term operation of the proposed Project is not anticipated to exceed applicable noise standards at the Project site's property line. Therefore, long-term exposure to increased stationary-source noise is considered a **less than significant impact.**	LTS	None required.	LTS
Contribution to Cumulative Noise Levels **Impact 4.8.5** The proposed Project would not result in a substantial contribution to cumulative noise levels. Therefore, cumulative noise impacts would be considered **less than cumulatively considerable.**	LCC	None required.	LCC

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AGRICULTURAL RESOURCES			
Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance **Impact 4.9.1** The proposed Project would temporarily convert Farmland of Local Importance and Other Land to non-agricultural uses. This land has not been farmed in several years and would be reclaimed to its existing condition following decommissioning of the Project. Therefore, conversion of Farmland of Local importance is considered a **less than significant impact**.	LTS	None required.	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Indirect Environmental Effects of Conversion of Farmland **Impact 4.9.2** The proposed Project would not result in the indirect conversion of other farmland to a non-agricultural use. Therefore, this impact is considered **less than significant**.	LTS	None required.	LTS
Cumulative Agricultural Resources Impacts **Impact 4.9.3** Implementation of the proposed Project would incrementally add to the temporary conversion of agricultural land in Imperial County. The acreage of farmland on the Project site is limited and has not been farmed in several years. Upon decommissioning of the Project, the site will be reclaimed to open desert and idle farmland. Therefore, temporary impacts to agricultural resources are considered **less than cumulatively considerable**.	LCC	None required.	LCC

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HAZARDS AND HAZARDOUS MATERIALS			
Hazardous Materials Transport, Use, Disposal and Accidental Release **Impact 4.10.1** The proposed Project does not involve the use of large quantities of hazardous materials that would present a risk to the public or the environment through transport, use, or disposal. This is considered a l**ess than significant impact**.	LTS	None required.	LTS
Create a Hazard Through Reasonably Foreseeable Upset/Release of Hazardous Materials **Impact 4.10.2** A portion of the Project site was historically used for agricultural production. Based on prior uses, on-site soils may contain low levels of residual pesticide residue which would be below regulatory threshold limits. Therefore, the potential for the Project site to create a hazard through reasonably foreseeable upset or release of hazardous materials is considered a **less than significant impact**.	LTS	None required.	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Cumulative Hazards and Hazardous Materials Impact **Impact 4.10.3** The proposed Project, in combination with other reasonably foreseeable projects in the vicinity of Lot 8, would increase the density of development in the area, thus potentially increasing the potential for the presence hazards and use of hazardous materials. However, this is considered to be a **less than cumulatively considerable impact**.	LCC	None required.	LCC
HYDROLOGY AND WATER QUALITY			
Violate Water Quality Standards or Waste Discharge Requirements **Impact 4.11.1** Implementation of the proposed Project would generate small amounts of runoff during construction and operation. This impact is considered **less than significant**.	LTS	None required.	LTS

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Result in Depleted Groundwater Supplies or Interfere Substantially with Groundwater Recharge **Impact 4.11.2** The proposed Project would purchase groundwater from the Ranch Oasis Mutual Water Company. The Project would require less water than has historically been required in association with past agricultural operations. The Project includes retention basins that would allow for groundwater recharge. Therefore, impacts to groundwater supplies and recharge are considered **less than significant**.	LTS	None required.	LTS
Result in Substantial Flooding On- or Off-Site/Create or Contribute Runoff Exceeding Capacity **Impact 4.11.3** Implementation of the proposed Project would generate on-site runoff. Existing drainage patterns would be maintained and the Project site would remain largely pervious. Therefore, impacts associated with flooding or exceedance of existing drainage capacity are considered **less than significant.**	LTS	None required.	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Result in Substantial Erosion or Siltation On- or Off-site **Impact 4.11.4** Implementation of the proposed Project could generate erosion during construction. Compliance with the provisions of the Construction General Stormwater Permit and Stormwater Pollution Prevention Plan would address erosion or siltation on- or off-site. Therefore, this impact is considered **less than significant**.	LTS	None required.	LTS
Result in Placement of People or Structures within an Area Subject to Flood Hazards **Impact 4.11.5** Implementation of the proposed Project would result in development within areas identified by FEMA as Flood Zone A. Project construction and operations would not result in the placement of habitable structures or people within the flood zone. Construction and operations would require the presence of construction workers and employees within Flood Zone A. Therefore, this impact is considered **potentially significant**.	PS	**MM 4.11.5** Construction and operation activities within Flood Zone A shall be halted during flash flood warnings and events or any other flooding events as predicted by local weather forecasts or the National Weather Service to which the Project site is subject. Upon notification of potential flood events in the Project vicinity, any non-stationary equipment and personnel located within Flood Zone A shall be relocated outside of the flood zone until such time as the threat of flooding has passed.	LTS

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Cumulative Impacts to Hydrology and Water Quality **Impact 4.11.6** The proposed Project, in combination with other large scale proposed, approved and reasonably foreseeable renewable energy projects in the Salton Sea watershed would contribute to the cumulative effects of changes in runoff patterns ultimately discharging to the Salton Sea, degradation of water quality, and reduction of groundwater supply. This impact is considered **less than cumulatively considerable**.	LCC	None required.	LCC
BIOLOGICAL RESOURCES			
Impacts to Sensitive Vegetation Community/Land Cover Type **Impact 4.12.1** Construction of the proposed Project would primarily result in the removal of idle farmland and disturbed habitat as well as a small portion of mesquite series-disturbed and tamarisk thicket. None of these vegetation communities and land cover types are considered special status habitats. Therefore, impacts to a sensitive vegetation community or land cover type is considered **less than significant**.	LTS	None required.	LTS

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SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Impacts to Jurisdictional Areas **Impact 4.12.2** Construction of the proposed Project would avoid potential federal and state jurisdictional areas located outside of the Project area. Thus, impacts to jurisdictional areas are considered **less than significant.**	LTS	None required.	LTS
Impacts to Special Status Species – Flat-tailed horned lizard **Impact 4.12.3** A survey of the Project site did not identify any suitable habitat or food sources for flat-tailed horned lizard. Thus, impacts to flat-tailed horned lizard are considered **less than significant.**	LTS	None required.	LTS
Impacts to Special Status Species – Loggerhead Shrike **Impact 4.12.4** Loggerhead shrike was observed during biological surveys of the Project area. Impacts to loggerhead shrike would be considered **potentially significant unless mitigation is incorporated**.	PS	**MM 4.12.4a** If construction or other Project activities are scheduled to occur during the bird breeding season (February through August for raptors and March through August for most other birds), a pre-construction nesting bird survey shall be conducted by a qualified biologist. The focus of the survey will be detecting nesting activities of bird and raptor species on the Project site, including presence of loggerhead shrike. The survey should be completed no more than 3 days prior to initial	LTS

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Impacts to Special Status Species – Loggerhead Shrike **Impact 4.12.4** Loggerhead shrike was observed during biological surveys of the Project area. Impacts to loggerhead shrike would be considered **potentially significant unless mitigation is incorporated**.	PS	ground disturbance. The nesting bird survey should include the Project site and adjacent areas where Project activities have the potential to cause nest failure. If an active nest is identified, a qualified biologist should establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities will need to be avoided within any disturbance limit buffer zones until the nest is deemed no longer active by the biologist. The Applicant shall develop and implement a Worker Environmental Awareness Program (WEAP) prior to the start of construction. The WEAP shall be submitted to the Imperial County Planning and Development Services Department for review and approval prior to the issuance of building permits. The WEAP training shall cover the following: • The potential presence and ecology of sensitive biological resources found on- site, such as loggerhead shrike, flat-tailed horned lizard, burrowing owl, potential jurisdictional waters, and nesting avian species; • Flagging/fencing of exclusion areas; • Proper implementation of protective measures to avoid impacts to special-status	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Impacts to Special Status Species – Loggerhead Shrike **Impact 4.12.4** Loggerhead shrike was observed during biological surveys of the Project area. Impacts to loggerhead shrike would be considered **potentially significant unless mitigation is incorporated**.	PS	species and sensitive vegetation communities (i.e. mesquite series east of the Project site boundary); • The reasons, need, and method by which employees should report on wildlife mortality, follow nest management protocols, disposal of carcasses, comply with applicable regulations (including the consequences of noncompliance), and the appropriate agencies (CDFW, USFWS) and personnel (ICPDSD) that should be contacted after incidents; and • Other permit requirements and environmental issues. • All construction site personnel shall be required to attend the WEAP training in conjunction with hazard and safety training prior to working on-site.	LTS

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Impacts to Special Status Species – Burrowing Owl **Impact 4.12.5** The burrowing owl is a CDFW Species of Special Concern. The Project site provides marginally suitable foraging habitat although no owls were discovered during surveys conducted on the Project site. Nevertheless, this species is migratory and could be present during Project construction. Therefore, impacts to burrowing owl are considered **potentially significant**.	PS	**MM 4.12.5** Pre-construction surveys for burrowing owl are recommended. The surveys should follow the methods described in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012). Two surveys should be conducted, with the first survey being scheduled between 30 and 14 days before initial ground disturbance (grading, grubbing, and construction), and second survey being conducted no more than 24-hours prior to initial ground disturbance. If burrowing owls and/or suitable burrowing owl burrows are identified on the Project site during the surveys, the Project should consult with CDFW and follow the methods listed in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012) for avoidance and/or passive relocation.	LTS
Impacts to Nesting and Migratory Birds **Impact 4.12.6** The proposed Project could result in direct impacts to avian nesting protected under California Fish and Wildlife Code and the MBTA. This is considered a **potentially significant impact.**	PS	Implement mitigation measures MM 4.12.4a, MM 4.12.4b and MM 4.12.5. A Bird and Bat Conservation Strategy (BBCS) shall be developed by the Project Applicant in coordination with the County of Imperial, USFWS, and CDFW. The BBCS will include the following components:	LTS

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Impacts to Nesting and Migratory Birds **Impact 4.12.6** The proposed Project could result in direct impacts to avian nesting protected under California Fish and Wildlife Code and the MBTA. This is considered a **potentially significant impact.**	PS	• A description and assessment of the existing habitat and avian and bat species; • An avian and bat risk assessment and specific measures to avoid, minimize, reduce, or eliminate avian and bat injury or mortality during all phases of the project. • A post-construction monitoring plan that will be implemented to assess impacts on avian and bat species resulting from the Project. The post-construction monitoring plan will include a description of standardized carcass searches, scavenger rate (i.e., carcass removal) trials, searcher efficiency trials, and reporting. Statistical methods will be used to estimate Project avian and bat fatalities if sufficient data is collected to support statistical analysis. • An injured bird response plan that delineates care and curation of any and all injured birds. • A nesting bird management strategy to outline actions to be taken for avian nests detected within the impact footprint during operation of the Project. • A conceptual adaptive management and decision-making framework for reviewing,	LTS

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Impacts to Nesting and Migratory Birds **Impact 4.12.6** The proposed Project could result in direct impacts to avian nesting protected under California Fish and Wildlife Code and the MBTA. This is considered a **potentially significant impact.**	PS	characterizing, and responding to monitoring results. • Monitoring studies following commencement of commercial operation of each CUP area. Monitoring results will be reviewed annually by the Applicant and the County of Imperial, in consultation with CDFW and USFWS, to inform adaptive management responses. During Project construction, incidental avian carcasses or injured birds found during construction shall be documented. Should a carcass be found by Project personnel, the carcass shall be photographed, the location shall be marked, the carcass shall not be moved, and a qualified biologist shall be contacted to examine the carcass. When a carcass is detected, the following data shall be recorded (to the extent possible): observer, date/time, species or most precise species group possible, sex, age, estimated time since death, potential cause of death or other pertinent information, distance and bearing to nearest structure (if any) that may have been associated with the mortality, location (recorded with a Global Positioning System [GPS]), and condition of carcass. Utility lines constructed above-ground shall	LTS

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Impacts to Nesting and Migratory Birds **Impact 4.12.6** The proposed Project could result in direct impacts to avian nesting protected under California Fish and Wildlife Code and the MBTA. This is considered a **potentially significant impact.**	PS	conform to Avian Power Line Interaction Committee (APLIC) standards. Post-construction monitoring studies shall be conducted by a third-party independent contractor for at least 2 years following commencement of commercial operation of the Project. Monitoring results shall be reviewed annually by the Applicant and the County of Imperial, in consultation with CDFW and USFWS, to determine if and to what extent post-construction monitoring studies shall be continued in future years.	LTS
Impacts to Wildlife Movement **Impact 4.12.7** The proposed Project would be developed on a parcel that is a mixture of desert and idle agricultural land surrounded by open desert. Therefore, impacts of the proposed	LTS	None required.	LTS

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Project site on wildlife movement are considered **less than significant.**			
Cumulative Impacts to Biological Resources **Impact 4.12.8** Implementation of the proposed Project in combination with other proposed, approved and reasonably foreseeable large-scale renewable energy projects, could have cumulative impacts on special status species, sensitive vegetation communities, and jurisdictional waters. However, impacts to biological resources are addressed and mitigated on a project-by-project basis. Therefore, cumulative impacts to biological resources are considered **less than cumulatively considerable**.	LTS	None required.	LTS
PUBLIC SERVICES AND UTILITIES			
Impacts to ICFD Services **Impact 4.13.1** The proposed Project would develop a solar generation facility on low gradient farmland and idle farmland in a remote area of Imperial County. The location of the facility and its size could result in increased demand on ICFD services. The lack of paved roads would	PS	**MM 4.13.1** The Project Applicant shall pay a fair share contribution towards capital purchases (e.g. specialized equipment) which may be required to assist in servicing the Project; costs for services during construction and the life of the Project; and/or training as negotiated with the ICFD.	LTS

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inhibit the ICFD's ability to serve the Project. Therefore, impacts to ICFD service are considered **potentially significant**.			
Cumulative Impacts to ICFD Services **Impact 4.13.2** Development of the proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the ICFD service area, would increase demand for fire protection. However, each individual project would be required to incorporate fire safety features and worker safety protocols in compliance with all applicable fire and occupational safety standards and codes. Therefore, cumulative impacts to ICFD services are considered **less than cumulatively considerable**.	LCC	Implement mitigation measure MM 4.13.1.	LCC
Impacts to ICSO Services **Impact 4.13.3** Implementation of the proposed Project may result in increased demands for service for the ISCO's Salton City Substation during construction and operation. The ISCO does not have proper vehicles to access the site's	PS	**MM 4.13.3** The Project Applicant shall pay a fair share contribution towards the purchase of a marked and equipped four-wheel drive patrol vehicle for the ISCO.	LTS

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unpaved roads. Therefore, impacts to ICSO services are considered a **potentially significant.**			
Cumulative Impacts to ICSO Services **Impact 4.13.4** Development of the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects in Imperial County would result in an increased cumulative demand for law enforcement. However, cumulative projects would not cause the ICSO the need to expand its facilities. Therefore, impacts to law enforcement services are **less than cumulatively considerable**.	LCC	Implement mitigation measure MM 4.13.3.	LCC
Impacts to Groundwater Supply **Impact 4.13.5** The proposed Project will require groundwater in association with both construction and operation activities. The groundwater resources were found to be adequate to meet	LTS	None required.	LTS

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Project water demands. Therefore, impacts to groundwater supply are considered **less than significant.**			
Water Distribution and Storage Impacts **Impact 4.13.6** The proposed Project would require water distribution and storage infrastructure. Any required improvements would occur within the Project site and would not disrupt any off-site areas. Therefore, impacts associated with water conveyance infrastructure are considered **less than significant**.	LTS	None required.	LTS
Cumulative Groundwater Supply Impacts **Impact 4.13.7** Development of the proposed Project would result in a reduced demand for groundwater from the Ocotillo-Clark Valley Groundwater Basin compared to historical demand. The WSA prepared for Seville Solar Farm Complex, which includes the proposed Project, demonstrated that there is adequate groundwater to serve Project development	LCC	None required.	LCC

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over the next 20 years. No other projects were identified within the cumulative setting to affect groundwater supply. Therefore, cumulative groundwater supply impacts are considered **less than cumulatively considerable**.			
Cumulative Water Distribution and Storage Impacts **Impact 4.13.8** The proposed Project would result in an increased demand for on-site water distribution and storage. No municipal water infrastructure is available on or in the vicinity of the Project area. The Project includes construction of the needed water distribution and storage facilities. Therefore, cumulative impacts to water distribution and storage are considered **less than cumulatively considerable**.	LCC	None required.	LCC
Impacts to Solid Waste Service and Landfill Capacity **Impact 4.13.9** Solid waste would be generated during demolition, construction and reclamation of the proposed Project. Such materials would be picked up by a locally-licensed waste hauling service and disposed of at a local	LTS	None required.	LTS

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
landfill with sufficient capacity to accept this waste. Thus, a **less than significant impact** is identified with regard to solid waste service and landfill capacity.			
Cumulative Impacts to Solid Waste Service and Landfill Capacity **Impact 4.13.10** Implementation of the proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial, would result in cumulative demand for solid waste service and landfill capacity. However, the proposed Project would not generate a substantial quantity of waste, pick-up service is available to serve the Project and sufficient landfill capacity is available. Therefore, cumulative impacts to solid waste service and landfill capacity are considered **less than cumulatively considerable**.	LCC	None required.	LCC
Impacts to Electrical Service and Infrastructure **Impact 4.13.11** The proposed Project would not increase the demand for electrical services from IID	LTS	None required	LTS

LTS = Less than Significant
LCC = Less than Cumulatively Considerable
PS = Potentially Significant
CC = Cumulatively Considerable
SU = Significant and Unavoidable
NI = No Impact

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
in association with construction or operation of the Fixed-Frame and HSAT Configurations. No new improvements are required to the IID infrastructure to serve the Project. Therefore, impacts to electrical service and infrastructure are considered **less than significant**.			
Cumulative Impacts to Electric Service **Impact 4.13.12** Implementation of the proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial, would result in a minimal increase in the current use of IID electricity and a substantial increase in solar energy generation. Therefore, cumulative impacts to electrical service are considered **less than cumulatively considerable**.	LCC	None required.	LCC
ENERGY RESOURCES			
Wasteful, Inefficient, and Unnecessary Consumption of Energy **Impact 7.1.1** The Project would not use energy in a wasteful manner. The impact would be **less than significant**.	LTS	None required.	LTS
Contribution to Cumulative Energy Usage **Impact 7.1.2** The proposed Project, combined with other large-scale proposed, approved and reasonably foreseeable renewable energy	LCC	None required.	LCC

TABLE 2.0-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
projects, would not develop land uses and patterns that cause wasteful, inefficient, and unnecessary consumption of energy or that would have excessive energy requirements for daily operation. Therefore, impacts to energy usage are **less than cumulatively considerable.**			

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SU = Significant and Unavoidable

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