
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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) **Potentially Significant Unless Mitigation Incorporated.** The Project site parcels consist of flat, agricultural land located in unincorporated southwestern Imperial County. The parcels are surrounded by agricultural land, scattered rural residences, and other solar facilities either under construction or nearing completion. No scenic vistas or areas with high visual quality would be affected by development of the proposed Project. However, views of some residents may be altered. Therefore, a potentially significant impact unless mitigation incorporated is identified with regard to impacts on a scenic vista. This issue will be discussed in the EIR.

b) **Less than Significant Impact.** The Project site parcels consist of 32 parcels of land cultivated for agricultural uses. All of the parcels have been disturbed and do not contain trees or rock outcroppings. The presence of historic buildings or structures would be determined by the Cultural Resources Investigation being prepared for the Project. Three parcels border State Route (SR) 98 while several others are located one-half mile to a mile from the highway. While SR 98 is not designated as a Scenic Highway, the Project would alter existing views of the site for travelers on area roadways, SR 98 and residents nearby. Therefore, a less than significant impact is identified with regard to damaging scenic resources.

c) **Potentially Significant Impact.** During construction, temporary facilities will be located onsite to facilitate the construction process. These facilities may include construction trailers, a temporary septic system or holding tank, parking areas, material receiving / storage areas, water storage ponds, construction power service, recycling / waste handling areas, and others. These facilities will be located at the construction areas designated on the final site plans and would be visible from surrounding roadways and properties.

Once constructed, the Project would introduce a solar development including panels, inverters, O&M Building(s), water tanks and overhead transmission lines up to 140 feet in height to parcels previously in agricultural production. Trackers are anticipated to range between 30 and 50 feet in height and 50 to 75 feet in width. Twelve CPV modules collectively form a supermodule that is 8 feet wide by 16 feet long. The introduction of all of these features would be noticeable to travelers along SR 98, bordering roadways and surrounding lands. Likewise, decommissioning activities would be visible throughout their duration. Therefore, a potentially significant impact is identified with regard to visual character and quality of the site. This issue will be addressed in the EIR.

d) **Potentially Significant Impact.** The Project includes a lighting system to provide operation and maintenance personnel with illumination in both normal and emergency conditions. Lighting will be designed to provide the minimum illumination needed to achieve safety and security

objectives and will be shielded and oriented to focus illumination on the desired areas, minimizing light spillover. 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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.** All of the thirty-two Project parcels are currently in agricultural production. The Project would preclude cultivation of the land throughout the tenure of its operational life. Upon the termination of its operational life, the Project would be decommissioned and the parcels would be restored to their previous condition. The California Department of Conservation (CDOC) Land Evaluation Site Assessment (LESA) model was used to evaluate the potential impacts from conversion of Project area agricultural land to other purposes. According to the LESA model, the Project is considered to have a potentially significant impact on conversion of agricultural land. This issue will be discussed in the EIR.
- b) **Potentially Significant Impact.** Out of the Project's 32 parcels, one parcel (APN 052-210-020) approximately 436 acres in size, is under the Williamson Act. The contract term of this encumbrance expires on January 1, 2016. As a result, the Project would require cancellation of this contract. Therefore, conversion of land under Williamson Act Contract is considered a potentially significant impact.

- 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 parcels 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 parcels. 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 area of the County characterized by agricultural lands and other solar developments. The Project would convert up to 32 parcels of agricultural land to a non-agricultural use. Nevertheless, 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. Would the project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
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"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Potentially Significant Unless Mitigation Incorporated.** The Project site parcels are located within the Salton Sea Air Basin (SSAB) and subject to the Imperial County Air Pollution Control District (ICAPCD) Rules and Regulations. Approximately 2,793 acres of the Project site parcels would be disturbed in association with construction of the solar facility on the various parcels. 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 and will be discussed in the EIR.
- b,c) **Potentially Significant 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 unless mitigation is incorporated is identified for these issue areas. Once operational, the Project will have zero emissions and burn no fossil fuels (aside from employee and maintenance worker trips to the site). As a result, the Project will eliminate emissions of criteria pollutants that would have otherwise originated from fossil-based electricity production including CO, NO_x, PM₁₀, ROG and SO_x. Operational air quality impacts are therefore anticipated to be less than significant.

- d) **Potentially Significant Unless Mitigation Incorporated.** The Project site parcels and surrounding areas are currently agricultural land with scattered rural residences and other solar developments. The nearest receptor is approximately 80 feet from the property line of one of the Project parcels. Therefore, impacts to sensitive receptors are considered potentially significant unless mitigation is incorporated. This impact will be discussed in the EIR.
- e) **Less than Significant Impact.** The proposed Project is the development of a 250 MW solar farm. No malodorous chemicals or substances would be used or generated during Project construction or operations. However, some temporary dust and exhaust may present a short-term nuisance for area residences. Therefore, a less than significant impact is identified with regard to objectionable odors.

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"/>

IV. BIOLOGICAL RESOURCES	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
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 Unless Mitigation Incorporated.** The Project site parcels consist of disturbed agricultural land. Biological surveys of these lands have been conducted which focus on documenting the habitat, potential jurisdictional state / federal waters, wetlands, suitable threatened, endangered, and sensitive wildlife species habitats. The burrowing owl has moderate potential to occur in the Project area due to potentially suitable habitat. The burrowing owl is a Bureau of Land Management (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 facility 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 various surveys and reports will be provided in the EIR.
- b) **Potentially Significant Unless Mitigation Incorporated.** The Project site parcels are crossed by a number of IID canals and drains. These features have the potential to contain riparian habitat. The extent of these potential impacts to riparian habitat and sensitive natural communities will be examined as part of the Biological Technical Report prepared for the Project. 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.** As noted in item b), above, the presence of IID canals and drains throughout the Project area present the potential for jurisdictional wetlands. A Jurisdictional Delineation is being prepared for the Project and its findings will be discussed in the EIR. Therefore, impacts to jurisdictional wetlands are 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 facility. However, small-sized mammals would still be able to access the site. IID ditches throughout the Project site parcels currently provide connectivity corridors. 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 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 Biological Technical Report has been prepared for the Project site parcels. 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, burrowing owl surveys were conducted for the Project between April and July, 2013. Because the Project site parcels have the potential for burrowing owl, this is considered a potentially significant impact unless mitigation is incorporated. The results of the Biological Technical Report and burrowing owl surveys 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 BLM are covered by the California Desert Conservation Area (CDCA) Plan which includes Areas of Critical Environmental Concern (ACEC). None of the Project site parcels are within or immediately adjacent to an ACEC of the CDCA. Therefore, no impact would occur.

V. CULTURAL RESOURCES	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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,b) **Potentially Significant Unless Mitigation Incorporated.** The Project site parcels have been disturbed by past and current farming activities. A records search at the South Coast Information Center indicated that 35 cultural resource technical studies have been conducted on or within a one-mile radius of the Project area which resulted in the recordation of 29 cultural resources. Of these, three are prehistoric sites, nine are remnants of old wagon trails, and the remainder consist primarily of segments of various historic canals. Based on the initial findings, impacts to historical and archaeological resources are considered potentially significant unless mitigation is incorporated. Both historical and archaeological resources will be discussed in the EIR.

- c) **Potentially Significant 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 records searches at the San Diego Natural History Museum and the Colorado Desert District Stout Research Center revealed no known fossil locality in the Project area or within a one-mile radius (Murray 2012; Randall 2012; Appendix 2). The nearest fossil localities identified in the records search results were found approximately five miles to the southwest, where shells of terrestrial invertebrates (e.g., freshwater snails and clams) and bone fragments of terrestrial vertebrates (e.g., mammals) were unearthed within the lacustrine deposits of the Ancient Lake Cahuilla beds during construction activities (Randall 2012). Nevertheless, both institutions point out that the lakebed

sediments, within which the Project area lies, have been previously determined to be at least moderately sensitive for nonrenewable paleontological resources, both vertebrates and invertebrates (Murray 2012; Randall 2012). Therefore, 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 Unless Mitigation Incorporated.** As described in item “a)” above, it is not likely that human remains would be found on the Project site parcels based on years of disturbance associated with agricultural activities. Nevertheless, the potential exists for previously unknown human remains to be discovered during construction of proposed Project. This is considered a potentially significant impact unless mitigation is incorporate and 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 parcels are not within a designated State of California Alquist-Priolo Earthquake Fault Zone. In addition, surface rupture at the site is considered to be low. Therefore, no impact is anticipated with regard to rupture of a known earthquake fault.

-
- a-ii) **Potentially Significant Unless Mitigation Incorporated.** The Project site parcels are located in the seismically active Imperial Valley of Southern California. The Imperial Valley has numerous mapped faults of the San Andreas fault traversing the region. As a result, the site has the potential to be subject to moderate to strong ground motion during a seismic event. The Project would be designed in accordance with the California Building Code. Therefore, a potentially significant impact unless mitigation is incorporated is identified strong seismic groundshaking. This issue will be discussed in the EIR.
- a-iii) **Potentially Significant Unless Mitigation Incorporated.** The site is not near any large bodies of water. Thus, the threat of tsunami or seiche is unlikely and no impact would occur. However, the Project site parcels do possess soil conditions that would make it susceptible to liquefaction. These conditions include saturated, loosely packed relatively cohesionless soils and groundshaking of sufficient intensity to trigger liquefaction. Therefore, impacts associated with seismic-related ground failure are considered potentially significant unless mitigation is incorporated. This issue will be discussed in the EIR.
- a-iv) **Potentially Significant Unless Mitigation Incorporated.** According to the “Preliminary Geotechnical and GeoHazards Report” prepared for the Project, the hazard of landslide is unlikely due to the relatively planar topography of the Project site parcels. However, the northeastern margin of the site is located adjacent to the incised New River channel. The bluffs range from 25 to 35 feet in height and have a potential for small to moderate-scale landslides. Typical remedial action along the New River bluff consist of either re-grading the bluff slope to a 2 horizontal to 1 vertical or to set back permanent structures beyond a 2:1 slope angle projected from the toe of the bluff slope (LandMark 2013). Therefore, a potentially significant impact unless mitigation is incorporated is identified with regard to landslides. This issue will be discussed in the EIR.
- b) **Potentially Significant Unless Mitigation Incorporated.** Site preparation will be planned and designed to minimize the amount of earth movement required for the Project to the extent feasible. The Project anticipates using driven piles to support the panels. Additional compaction of the soil in order to support the building and traffic loads as well as the PV module supports may be required and is dependent on final project engineering design. It may be necessary to remove, relocate and/or fill in portions of the existing drainage ditches or delivery canals to accommodate the final panel layout for the Project. The final engineering designs for these facilities will be reviewed by IID and the County to ensure that the purpose for the facilities (if needed) is met. Therefore, a potentially significant impact unless mitigation is incorporated is identified with regard to erosion during construction and operations. This issue will be discussed in the EIR.
- c) **Potentially Significant Unless Mitigation Incorporated.** As previously noted item a-iii), liquefaction is a potential design consideration on the Project site parcels due to possible saturated sandy substrata. In addition, much of the near surface soils within the Project site parcels consist of silty clays and clays having a high to very high expansion potential. Development of building foundations, concrete flatwork, and asphaltic concrete pavements should include provisions for mitigating potential swelling forces and reduction in soil strength which can occur from saturation of the soil. Landsliding has the potential to occur along the New River bluff. Therefore, impacts with regard to a geologic unit or soil that is unstable or that would become unstable as a result of the Project are considered potentially significant unless mitigation is incorporated. This issue will be discussed in the EIR.
- d) **Potentially Significant Unless Mitigation Incorporated.** As noted in item c) above, near surface soils within the Project site parcels consist of silty clays and clays. Clay is expansive when wet
-

and can shrink with moisture loss. Expansive soils can result in damage to building foundations, concrete flatwork and asphaltic concrete pavements without mitigation to address potential swelling forces and reduction in soil strength. Therefore, impacts resulting from expansive soils are considered potentially significant unless mitigation is incorporated. This issue will be discussed in the EIR.

- e) **Potentially Significant Unless Mitigation Incorporated.** The Project proposes to collect wastewater from sanitary facilities such as sinks and toilets in the O&M building(s). This waste stream will be sent to an onsite sanitary waste septic system and leach field to be installed in compliance with standards established by the County Environmental Health Department. Alternatively, the Project 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.

According to the "Preliminary Geotechnical and GeoHazards Report" prepared for the Project, the near surface soils on the Project site parcels generally consist of silty clays and clays having a very low to low infiltration rate. The near surface soils are considered poor in supporting on-site septic systems and leach fields for wastewater disposal. Site specific studies will be required to determine that State health standards are met in regard to soil percolation rates and separation of leach fields from groundwater (LandMark 2013). Therefore, 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 Unless Mitigation Incorporated.** The proposed Project has the potential to generate greenhouse gas emissions during construction associated with travel required to and from the Project site parcels by construction workers, delivery of materials, and operation of heavy equipment. The number of workers expected to be on-site would vary over the construction period and will likely average up to 250 workers per day. Deliveries of equipment and supplies to the site would also vary but have the potential to range from 5 to 40 daily trips, averaging approximately 10 daily trips during the construction period. In comparison, during operations, the Project would be expected to generate approximately 4 to 10 trips per day from maintenance and security personnel. The number of trips associated with decommissioning the Project has not yet been determined, but would occur in the future when vehicle and equipment technology will have improved and resulted in lower emissions. 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. Nevertheless, a potentially significant impact unless mitigation is incorporated is identified for greenhouse gases. A Greenhouse Gas Emissions/Climate Change technical report has been prepared for the proposed Project. The findings of this report with regard to reduction of criteria pollutants/and greenhouse gases will be discussed in the EIR.

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 checked="" type="checkbox"/>	<input 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) **Potentially Significant Unless Mitigation Incorporated.** The Project would involve use of limited quantities of hazardous chemicals on-site during construction, operation and decommissioning. Hazardous material handled on-site would be limited to small amounts of fuels, cleaners and chemicals used for cleaning and maintenance of equipment. These materials would be transported off-site for disposal according to the applicable State and County restrictions and laws governing the disposal of hazardous waste during construction and operation of the Project. Nevertheless, the manner in which the materials are handled needs to be fully addressed. Therefore this impact is considered potentially significant unless mitigation is incorporated and will be discussed in the EIR.
- b) **Potentially Significant Unless Mitigation Incorporated.** The Project site parcels are currently used as agricultural land. Therefore, the Project parcels may potentially contain soils contaminated with residual pesticides, herbicides or other chemicals. This is considered a

potentially significant impact unless mitigation is incorporated. A Phase I Environmental Site Assessment is being prepared for the Project parcels and its findings will be discussed in the EIR.

The construction, operation and decommissioning of the solar facility is anticipated to require limited quantities of hazardous materials. These may include solvents, grease, oil, diesel fuel and other chemicals used for cleaning and maintenance of equipment. The Project will be required to comply with State laws and County Ordinance restrictions, which regulate and control the materials handled on-site. Such hazardous wastes would be transported off-site for disposal according to applicable State and County restrictions and laws governing the disposal of hazardous waste during construction, operation and decommissioning of the Project. Therefore impacts associated with release of hazardous materials into the environment are considered potentially significant unless mitigation is incorporated.

- c) **No Impact.** None of the Project site parcels are located within one-quarter mile of an existing school. Furthermore, the Project would not create any hazardous emissions. Therefore, this issue will not be discussed in the EIR.
- d) **No Impact.** Based on the information available, none of the Project parcels are anticipated to be listed as hazardous materials sites pursuant to government Code Section 65962.5. This will be confirmed by the Phase I Environmental Site Assessment. However, no impact is identified for this issue.
- e,f) **No Impact.** The Project site parcels are not located within two miles of a public airport or a private airstrip. The Naval Air Facility El Centro is approximately 6 miles north of northernmost Project parcels and the El Centro Airport is approximately 7.5 miles to the northeast. Thus, no impact is identified with regard to a safety hazard associated with a public airport or a private airstrip. This will not be discussed in the EIR.
- 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 parcels will be required to provide emergency access points and safe vehicular travel. In addition, local building codes would be followed to minimize flooding, seismic damage, 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 parcels are 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), none of the Project site parcels fall within an area characterized as either: (1) a wildland area that may contain substantial forest fire risk and hazard; or (2) a very high fire hazard severity zone. Thus, the Project would not expose people or structures to significant risk of loss injury or death involving wildland fire. No impact is identified for this issue area.

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)
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" 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)
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 <i>level</i> (e.q., 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 <i>have</i> been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 Unless Mitigation Incorporated.** Water quality violations have the potential to occur during construction, operation and decommissioning 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. Potential for water quality violations during decommissioning would be similar to those occurring during construction. Thus, violation of water quality standards is considered a potentially significant unless mitigation is incorporated. This issue will be discussed in the EIR.

- b) **No Impact.** The groundwater in the Project area is brackish and typically encountered at a depth of 5 to 10 feet below ground surface. WRS plans to secure water rights from the IID under the IID's Interim Water Supply Policy for Non- Agricultural Projects. In the event this isn't feasible, WSR will truck water to the site for operations purposes. The project would not substantially change the amount of pervious surface on the Project site such that groundwater recharge would be affected. Therefore, no impact to groundwater would occur.
- c,d) **Potentially Significant Mitigation Incorporated.** On-site drainage patterns will be maintained to the greatest extent possible. The hydrology design will be given first priority in order to protect the Project's facilities and adjacent facilities including any IID/County facilities from large storm events. It may be necessary to remove, relocate and/or fill in portions of the existing drainage ditches or delivery canals to accommodate the final panel layout for the Project. The final engineering designs for these facilities will be reviewed by IID and the County to insure that the purpose for the facilities (if needed) is met. Therefore a potentially significant impact unless mitigation is incorporated is identified with regard to alteration of drainage patterns. This issue will be discussed in the EIR.
- e) **Potentially Significant Impact Unless Mitigation Incorporated.** The proposed Project is not anticipated to generate substantial amounts of runoff as the majority of the site would remain unpaved. According to the *Conceptual Drainage Study and Storm Water Quality Analysis – Wistaria Ranch* (Fuscoe Engineering 2013), post-construction site conditions reflect increases in unattenuated peak runoff generated by the Project. However, the provision of detention (either through designated detention basin outside arrays or shallow areas of ponding under arrays, or a combination of both) will attenuate peak discharges from the Project. Therefore, creation or contribution of runoff impacts would be potentially significant unless mitigation is incorporated.
- f) **Less than Significant Impact.** The Project is not anticipated to degrade water quality based on the requirement of a General Construction Permit as well as the requirement that a SWPPP be developed and implemented. Therefore, 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) **Potentially Significant Unless Mitigation Incorporated.** Based on current FEMA Flood Insurance Rate Maps (FIRM), the majority of the Project parcels are located in Zone X which corresponds to areas that are located above the flood level having a 1% chance of occurrence (the 100-year event). Parcels bounded by the New River and Greeson Drain are located within Zone A. This zone corresponds to areas within the 100-year event; however no base flood elevations or depths have been determined. Therefore, development within this area could potentially be subject to flooding. For this reason, impacts with regard to placing structures within a 100-year flood hazard area are considered potentially significant unless mitigation is incorporated.
- i) **No Impact.** FIRMettes of the Project parcels show that the 100-year flood is contained within the banks of the New River and Greeson Drain. No solar array development is proposed in these areas. In addition, no dams or levees are in the vicinity of the Project site parcels. 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 parcels are approximately 90-miles inland from the Pacific Ocean. In addition, the Project site parcels and agricultural fields are relatively flat and level. Therefore, there is no potential for the Project site parcels to be inundated by seiches, tsunamis, or mudflows and 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.** There are several other approved solar projects in the immediate vicinity surrounding the Project site parcels. The other projects include Centinela Solar, the Mount Signal and Calexico Solar projects, and Imperial Solar Energy Center South. The rest of the area is predominantly agricultural with very few residences and agricultural buildings mixed in. Therefore, no impact would occur with regard to dividing an established community.
- b) **Potentially Significant Unless Mitigation Incorporated.** All of the existing Project parcels are currently zoned A-2 (General Agriculture), A-2-R (General Agriculture, Rural Zone) or A-3 (Heavy 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 Project site parcels with a "Solar energy electrical generator" is an allowed use subject to a Conditional Use Permit (CUP). No change in the existing zoning for any of the parcels would occur. However, impacts associated with the 17 allowed CUPs 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 parcels have historically and currently been used for agriculture. According to the Conservation and Open Space Element of the County of Imperial General Plan, no known mineral resources occur within the Project parcels nor does the Project 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
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 Unless Mitigation Incorporated.** Short-term noise levels would increase on the Project site parcels and surrounding roadways during construction. Typical construction work hours are expected to be from 6:00 am to 4:00 pm. However, the schedule may change based on a need to comply with various biological mitigation measures, overall construction timing, or worker safety such as avoidance of excessive midday heat.

If CPV tracking technology is implemented, the primary noise sources during operation of the Project are anticipated to be from inverter tracking motors and blowers (that are used to remove condensation from solar panels), which would be distributed throughout the facility. Previous noise analyses (Imperial Solar Energy Center – West, Operation Noise and Vibration, AECOM 2011) show that tracking motors would generate an average of 44.4 A-Weighted decibels (dBA) at 10 feet during operation, and blower units would generate average noise levels of 55.1 dBA at 10 feet. Further, inverter fans would generate a noise level of 77 dBA at 5 feet, and the transformer would generate a noise level of 60 dBA at 5 feet. These estimates are considered to be conservative as they did not include the enclosure for the inverters which would provide additional noise attenuation.

Additional noise may be generated by equipment within the substation which typically this includes switches, protection and control equipment, transformers, and the incoming

transmission lines. The noise generated by transmission lines and switches has previously been analyzed to be 25 dBA at 50 feet. Transformers within the substation would generate noise levels similar to those at the inverters. Substation switches do not generate an audible noise, and circuit breakers (70 dBA at 65 feet) would not be a common noise source, as they would only operate for short periods of time during an emergency event in order to protect the switches and transformers within the substation. Noise impacts are considered potentially significant unless mitigation is incorporated and will be discussed in the EIR.

- b) Potentially Significant Unless Mitigation Incorporated.** Construction of the proposed Project may create groundborne vibration in association with circular piers or I-beam posts that will be driven into the prepared base grade of the Project site parcels. Therefore, construction groundborne vibration is a potentially significant impact unless mitigation is incorporated and will be discussed in the EIR. However, no blasting is anticipated based on the site's characteristics and no groundborne vibration is anticipated during operation of the Project.
- e,f) No Impact.** The Project site parcels are not located within two miles of a public airport or a private airstrip. Thus, the Project site parcels would not be exposed to excessive aircraft noise. The proposed Project is a solar development that is considered 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 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 parcels 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 parcels are currently agricultural land. As a result, development of the proposed solar facility 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 Unless Mitigation Incorporated.** The Project site parcels are within the jurisdiction of the Imperial County Fire Department (ICFD). The proposed Project will pose a very small fire risk. All vegetation will be removed from the Project parcels and the solar facility does not include any flammable materials. The PV modules and ancillary equipment are constructed of fire-resistant material. Additionally, routine weed abatement and landscape maintenance will occur. As such, the Project represents a negligible increase in fire potential. However, a Fire Management Plan will be prepared in accordance with Fire Department requirements for access and the Project must be reviewed by the ICFD. In addition, the ICFD must review existing resources, staffing and equipment to determine adequacy of service. Therefore, a potentially significant impact unless mitigation is incorporated is identified with regard to fire protection.
- a-2) Potentially Significant Unless Mitigation Incorporated.** Police protection to the Project site parcels would be under the jurisdiction of the Imperial County Sheriff's Office. The Sheriff's Office must review existing resources, staffing and equipment to determine adequacy of service. To ensure the safety of the public and the facility, the property will be fenced with a 7-foot chain link fence with 3-strand barb wire placed at the top, extending to a total of up to 8 feet. In addition, security lighting may be installed and warning signs will be posted. Access to the site will be controlled, and gates will be installed at the roads entering the property. The fence will be monitored periodically to detect any intrusion into the property. Landscaping and entry monumentation will be maintained at the entrance to the O&M building(s). Impacts to police protection are considered 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 development 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 facility, 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 these issue areas.

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. 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"/>
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 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. Daily trip generation during the construction of the Project would be from delivery of equipment and supplies and the commuting of the construction workforce. The number of workers expected onsite during construction of the Project would vary and will likely average up to 250 workers per day. Decommissioning activities would likely generate similar trips. Deliveries of equipment and supplies to the site would also vary over the construction period but have the potential to range from 5 to 40 daily trips, averaging approximately 10 daily trips during the construction period. Based on the expected trips generated, traffic on the local roads would increase during construction but impacts to current traffic patterns are anticipated to be minimal. 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.

Operation of the site would be expected to generate approximately 4 to 10 trips per day from maintenance and security personnel. With a phased Project, the total number of trips generated during construction would be about the same, but the number of daily trips would be reduced and the number of days to complete construction would be extended resulting in a decrease in intensity. Operation of multiple phases could result in a need for a few more onsite employees. It is possible that each phase could require approximately 2 full time equivalent personnel to operate the facility; however, the phases may also be supported by one staff which manages the entire Project. No impact to current traffic patterns is anticipated during operation of the Project.

- 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.** Access to the Project site parcels will be via County Highway S30, Lyons Road, Rockwood Road, and SR 98, as well as other roads in the area. Access to components of the solar facility will be controlled through security gates at several entrances. Multiple gate restricted access points will be used during construction and operation. 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. Nevertheless, the EIR will examine the effects of the new access points off of surrounding roadways.
- e) No Impact.** The proposed circulation plan for the Project will be required to provide emergency access points and safe vehicular travel. As noted in item d) above, multiple access points to the Project site parcels are proposed with associated security gates at several entrances. 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 in a rural, sparsely populated portion of the County void of public transit, bike lanes and pedestrian facilities. Thus, a solar facility 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 Unless Mitigation Incorporated.** Wastewater would be generated from sanitary facilities such as sinks and toilets in each of the O&M building(s). The Project will collect wastewater from sanitary facilities such as sinks and toilets in the O&M building(s). This waste stream will be sent to an onsite sanitary waste septic system and leach field to be installed in compliance with standards established by the County Environmental Health Department. Alternatively, the Project 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. 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 Unless Mitigation Incorporated.** Wistaria plans to secure water rights from the IID under the IID's Interim Water Supply Policy for Non- Agricultural Projects. Water for fire protection will be stored in a 10,000-gallon tank onsite. The Project may also utilize an additional 10,000 gallon storage tank or tanks to store treated water for sanitary uses. Potable water will be trucked to the site. Construction of new water facilities is considered a potentially significant impact unless mitigation is incorporated and will be discussed in the EIR.

-
- c) **Potentially Significant Unless Mitigation Incorporated.** The hydrology design will be given first priority in order to protect the Project's facilities and adjacent facilities including any IID/County facilities from large storm events. The onsite drainage patterns will be maintained to the greatest extent possible. It may be necessary to remove, relocate and/or fill in portions of the existing drainage ditches or delivery canals to accommodate the final panel layout for the Project. The final engineering designs for these facilities will be reviewed by IID and the County to be sure that the purpose for the facilities (if needed) is met. Therefore, construction of new drainage facilities is considered a potentially significant impact unless mitigation is incorporated and will be discussed in the EIR.
- d) **Potentially Significant Unless Mitigation Incorporated.** The proposed Project is anticipated to result in an increase in water demand/use during construction and operation. WRS plans to secure water rights from the IID under the IID's Interim Water Supply Policy for Non-Agricultural Projects.
- During construction of the Project, water will be required for a variety of construction activities, including dust suppression, earth compaction, the creation of engineered fill, and concrete preparation. Construction-phase water demand will be greatest during site grading which will consist of disc and roll compaction over the site. An estimated total of 1,200 acre-feet of water will be used for the Project dust control and other activities during the construction phase of the Project.
- The water used during operation will be used for domestic use and fire protection. The Project may also use water to wash the solar modules should it be determined to be beneficial to the Project. WRS anticipates a requirement of 60 acre-feet per year during plant operation. Water for fire protection will be stored in a 10,000-gallon tank onsite. Impacts to water supplies are considered potentially significant unless mitigation is incorporated. This impact 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 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 and air quality. 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, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, noise, public services, transportation/traffic, 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 in 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 with regard to air quality. 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 potentially significant impacts unless mitigation is incorporated to geology and soils, hazards and hazardous materials, and noise. 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
- ☐ OTHER

FOR ADDITIONAL & GENERAL NOTICING
SEE DISTRIBUTION LIST IN PROJECT FILE

NOP COMMENT LETTERS

THIS PAGE INTENTIONALLY LEFT BLANK.



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

September 26, 2013

To: Reviewing Agencies

Re: Wistaria Ranch Solar
SCH# 2013091084

Attached for your review and comment is the Notice of Preparation (NOP) for the Wistaria Ranch Solar 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

**Document Details Report
State Clearinghouse Data Base**

SCH# 2013091084
Project Title Wistaria Ranch Solar
Lead Agency Imperial County

Type NOP Notice of Preparation
Description The proposed project consists of a solar photovoltaic (PV) generating facility ~250 MW in size. The ultimate energy output is dependent on several variables, including off-take arrangements and the evolving efficiency of PV panels. As a result, the Project could generate more or less than 250 MW.

Lead Agency Contact

Name Dave Black
Agency Imperial County Planning & Dev. Services Dept.
Phone (760) 482-4320 **Fax** (760) 353-8338
email
Address 801 Main Street
City El Centro **State** CA **Zip** 92243

Project Location

County Imperial
City
Region
Cross Streets Wahl Road, Brockman and Rockwood Roads, Ferrell and Corda Roads
Lat / Long
Parcel No.

Township	Range	Section	Base
-----------------	--------------	----------------	-------------

Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use GPD: Agriculture
Z: A-2(General Agriculture), A-2-R (General Agriculture, Rural Zone) and A-3 (Heavy Agriculture)

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Geologic/Seismic; Other Issues; Toxic/Hazardous; Water Quality; Landuse; Noise; Public Services; Traffic/Circulation

Reviewing Agencies Colorado River Board; Department of Conservation; California Energy Commission; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 6; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; California Highway Patrol; Caltrans, District 11; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 7; Resources Agency

Date Received 09/26/2013 **Start of Review** 09/26/2013 **End of Review** 10/25/2013

NOP Distribution List

Resources Agency

- ☒ Resources Agency
Nadell Gayou
- ☐ Dept. of Boating & Waterways
Nicole Wong
- ☐ California Coastal Commission
Elizabeth A. Fuchs
- ☒ Colorado River Board
Tanya Trujillo
- ☒ Dept. of Conservation
Elizabeth Carpenter
- ☒ California Energy Commission
Eric Knight
- ☐ Cal Fire
Dan Foster
- ☐ Central Valley Flood Protection Board
James Herota
- ☐ 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

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

- ☐ Fish & Wildlife Region 1E
Laurie Harnsberger
- ☐ Fish & Wildlife Region 2
Jeff Drongesen
- ☐ Fish & Wildlife Region 3
Charles Amor
- ☐ Fish & Wildlife Region 4
Julie Vance
- ☐ Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program
- ☒ Fish & Wildlife Region 6
Gabrina Gatchel
Habitat Conservation Program
- ☐ Fish & Wildlife Region 6 I/M
Heidi Sickler
Inyo/Mono, Habitat Conservation Program
- ☐ Dept. of Fish & Wildlife M
George Isaac
Marine Region

Other Departments

- ☐ Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- ☐ Depart. 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

SL County: Imperial

- ☒ 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

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

- ☐ Caltrans, District 8
Dan Kopulsky
- ☐ Caltrans, District 9
Gayle Rosander
- ☐ Caltrans, District 10
Tom Dumas
- ☒ Caltrans, District 11
Jacob Armstrong
- ☐ Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

- ☐ All Projects
CEQA Coordinator
- ☐ Transportation Projects
Jon Taylor
- ☐ 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

SCH# **2013091084**

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

THIS PAGE INTENTIONALLY LEFT BLANK.



September 26, 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 Wistaria Ranch Solar, LLC

Dear Mr. Villa,

The NOP to prepare a Draft EIR for the Wistaria Ranch Solar, LLC 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 and operation of the project is important. Finally, all new residential and commercial

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

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" being more prominent than the last name "Leon".

Belen Leon
APC Environmental Coordinator

CC: Brad Poiriez
Monica Soucier
David Black

THIS PAGE INTENTIONALLY LEFT BLANK.



T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
christina@lozeaudrury.com

Via Email and U.S. Mail

October 1, 2013

Mr. David Black, Planner IV
Planning & Development Services
Imperial County
801 Main Street
El Centro, CA 92243
davidblack@co.imperial.ca.us

Re: Comments on the Notice of Preparation for the Wistaria Ranch Solar Energy Center (SCH 2013091084)

Dear Mr. Black:

I am writing on behalf of the Laborers International Union of North America, Local Union 1184 and its members living in Imperial County ("LiUNA"), regarding the Wistaria Ranch Solar Energy Center (SCH 2013091084), an approximately 250-megawatt (MW) solar photovoltaic (PV) generating facility located on thirty-two parcels within the area south of Interstate 8, east of Pulliam Road, and north of the All American Canal in southwestern unincorporated Imperial County. The project includes an on-site substation, a generation-tie line (gen-tie) which would be co-located with neighboring solar projects, and an operations and maintenance building complex (collectively, "Project").

LiUNA hereby requests and urges the County of Imperial ("County") to fully comply with the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 et seq., in all aspects of the Project, including but not limited to, preparation and consideration of any and all CEQA documents prepared for the Project, including the Draft Environmental Impact Report ("Draft EIR"), Final EIR, and any other CEQA documents prepared for the Project, responses to any and all comments submitted by responsible agencies, members of the public, or others on the Project, and consideration of any and all applications for licenses, permits, or any other notices or approvals sought for the Project.

October 1, 2013

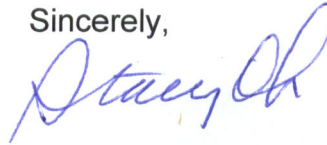
Scoping Comments on the Notice of Preparation for Wistaria Ranch Solar Energy Center

Page 2 of 2

LiUNA expressly reserves the right to submit additional comments on the Project in conjunction with both the Draft EIR and Final EIR for the Project or any other future actions taken with regard to the Project.

Please call should you have any questions. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stacey Osborne", is written over the word "Sincerely,".

Stacey Osborne
Paralegal
Lozeau | Drury LLP