

CHAPTER 6.0

ALTERNATIVES

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

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

6.1 PROJECT OBJECTIVES

Pursuant to CEQA Section 15124(d), the following objectives have been identified for the proposed Project:

- To utilize Imperial County's abundance of available solar energy (sunlight) to generate approximately 250 megawatts of renewable energy consistent with the County General Plan renewable energy objectives.
- To meet the terms and requirements of any Power Purchase Agreement (PPA) or Large Generator Interconnection Agreement that the Applicant may enter into.
- To deploy a technology that is safe, readily available, efficient, and environmentally responsible.
- To generate electricity in an efficient manner and at a cost that is competitive on the renewable market on sites controlled by the applicant.
- To provide a new source of renewable energy to assist the State of California in achieving and exceeding the RPS.
- To provide a new source of renewable energy to assist the State of California in achieving and exceeding its current 1.3 GW energy storage target.
- To maximize local construction jobs for a variety of trades, reducing unemployment in the construction sector.
- To locate the Project in Imperial County in close proximity to the existing California Independent System Operator (CAISO) electric transmission system at a location which has available capacity to deliver electricity to major load centers in California.
- To locate the Project in an area that ranks among the highest in solar resource potential in the nation, as measured by the CEC.
- To minimize potential impacts to aesthetics, health and safety and other potential environmental impacts:
 - Locate a majority of the Project on disturbed land.

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- Consistent with County conditions on similar solar generation projects, group or co-locate the Project's proposed electrical interconnection facilities with existing or proposed electrical interconnection facilities, to the extent that such grouping/co-location can be accommodated.
- Utilize existing infrastructure (transmission lines, roads, and water sources) where feasible to locate the project proximate to existing electric transmission systems in Imperial County with capacity to deliver electricity to major load centers in California.
- To indirectly reduce the need to emit greenhouse gases caused by the generation of similar quantities of electricity from either existing or future non-renewable sources through the use of renewable energy sources during on-peak power periods.
- To create a sustainable form of electricity that requires little fuel to be consumed.
- Where existing agricultural operations are active, to promote continued agricultural operations until that CUP is developed for use through efficient project grading.
- To encourage economic investment in renewable energy activities.
- To maximize opportunities for construction employment, reducing unemployment in one of the labor sectors most affected by the recession.
- To diversify Imperial County's economic base by developing environmentally-responsible non-agricultural activities.
- To provide tax revenue through sales, use and property taxes generated by renewable energy development within Imperial County.
- To reinforce Imperial County's position as a leader in renewable energy production.
- To expand the renewable energy sector in Imperial County's economy.
- On developed CUPs, to provide a reduction in water use to assist the IID in fulfilling its obligations to reduce the incidences of water supply/demand imbalance that, under IID's Equitable Distribution Plan, would require farmers to fallow land to generate water supplies necessary for IID to fulfill its Salton Sea conservation obligations under various State Water Resources Control Board Orders, the Quantification Settlement Agreement (QSA), and IID's Water Transfer Agreement.

6.2 ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR ANALYSIS

6.2.1 LARGER PROJECT ALTERNATIVE

A larger, 3,240-acre Project site that includes APN 052-180-018 (447 acres) could reduce indirect impacts by lowering the emission of greenhouse gases (GHGs) caused by the generation of similar quantities of electricity from either existing or future non-renewable sources (i.e. gas-fired peaker plants used to increase power during peak periods of use). The increased acreage of this alternative would further assist the State in meeting or exceeding its renewable energy goals. In addition, this alternative would further reduce water use on 447 acres thereby assisting IID in fulfilling its obligation to reduce the incidences of water supply/demand imbalance. In order to reduce water demand under IID's Equitable Distribution Plan, farmers would be required to fallow land to generate water supplies necessary for IID to fulfill its Salton Sea conservation obligations under various SWRCB Orders, the Quantification Settlement Agreement, and IID's Water Transfer Agreement. The Larger Project Alternative was rejected from further analysis because APN 052-180-018 contains a high concentration of burrowing owls and the Applicant and ICPDSD desire to reduce potentially significant impact to this species. Finally, this

Alternative was rejected because development of the additional 447 acres is not necessary to achieve the Project goal of generating approximately 250 MW of renewable energy.

6.2.2 BLM LAND ALTERNATIVE

This alternative proposes construction of the Project on BLM land near the Imperial Valley Substation. The BLM Land Alternative could reduce potentially significant impacts to burrowing owls, which tend to burrow on or near disturbed agricultural lands. However, this Alternative was rejected from further analysis because its location on BLM land rather than agricultural land may have greater impacts to cultural resources, native vegetation, and flat-tailed horned lizard habitat than the proposed Project. The Larger Project Alternative (described above) was rejected in order to avoid potentially significant impacts to a high concentration of burrowing owls on APN 052-180-018. However, the need to further avoid potentially significant impacts to burrowing owls at the risk of disturbing potentially significant cultural resources, native vegetation, and flat-tailed horned lizard habitat on BLM land, on balance, is not merited. Therefore, the BLM Land Alternative was rejected from further consideration.

6.2.3 DISTRIBUTED GENERATION ALTERNATIVE

A distributed generation alternative to the proposed Project was also considered but not selected for analysis. A distributed generation alternative would consist of small-scale PV installations on private or publicly owned residential, commercial, or industrial building rooftops, parking lots or areas adjacent to existing structures such as substations. A typical distributed generation system produces less than 10 kW of electricity and would therefore require the Applicant to obtain control of 25,000 sites to achieve 250 MW of electricity generation. The location of such small-scale installations is not geographically constrained and, as relevant for CEQA purposes, could be located anywhere in the State.

Even assuming that there are enough additional sites throughout California for installation of sufficient distributed PV to accomplish the Project's objective of generating 250 MW, the Distributed Generation Alternative cannot feasibly accomplish most of the Project's objectives. Because distributed generation is not geographically constrained, there is no guarantee that any portion of the solar installation would occur in Imperial County. As such, this alternative would not meet any of the County's objectives (i.e., economic investment in the County; diversifying the County's economic base; generating local jobs and tax revenue; reinforcing the County's position as a leader in renewable energy production; and expanding the local renewable energy sector). Furthermore, because distributed PV can be installed anywhere in the State, such installations could be installed in areas that do not meet the objective of locating the Project in an area that ranks among the highest in solar resource potential. Imperial County has no authority or influence over the installation of distributed PV generation systems outside of its jurisdiction. As such, there is no guarantee that action by the County to approve a distributed generation alternative would: 1) result in the installation of 250 MW of generating capacity; or, 2) support the objective of assisting the State of California in meeting its RPS goals.

Additionally, one of the major objectives of the Project is to develop 250 MW of electricity in an efficient manner that is competitive on the renewable energy market on sites controlled by the Applicant. By comparison it costs more to generate one MW from distributed generation than to generate one MW from a large-scale solar energy generation project. Furthermore, the Applicant does not control the approximately 25,000 small rooftops and parking lots necessary to install solar panels that could generate 250 MW of electricity. Likewise, it would take many more years for the Applicant to acquire control of such sites compared to the relatively short period of time necessary to obtain financing and construct the proposed Project, particularly with homeowner tax incentives for distributed generation on the decline. Under CEQA, the definition of "feasible" includes actions that are capable of being implemented within a reasonable period of time.

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Furthermore, distributed generation systems typically do not have an energy storage component and therefore would not meet the Project objective of contributing to State's target of procuring 1.3 GW of energy storage by the end of 2020.

The Project objectives include both meeting and exceeding the State's current RPS targets because Imperial County desires to be the State's leader in renewable energy production and because having raised the RPS from 20 percent to 33 percent, the State is capable of raising it again. Distributed generation does not contribute significantly to a utility company meeting such high current and future RPS standards.

Construction of solar panels on 25,000 rooftops would also have significant cumulative visual impacts, specifically with regard to Homeowner Associations with Covenants, Conditions & Restrictions (CC&Rs). In many instances, CC&Rs require uniformity of house and rooftop colors. Solar panels on rooftops disrupt the color scheme of existing homes that were constructed to have a compatible house and rooftop color. Such color schemes become blighted with the introduction of black solar panels.

For these reasons (each being individually sufficient to reject the alternative), the Distributed Solar Generation Alternative was not considered for further analysis.

6.3 SUMMARY OF ALTERNATIVES ANALYZED

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

6.3.1 ALTERNATIVE 1 – WILLIAMSON ACT AVOIDANCE ALTERNATIVE

The Williamson Act Avoidance Alternative would exclude CUPs 13-0051 and 13-0052 which are part of APN 052-210-020 (**Figure 6.0-1**). This alternative would avoid potentially significant impacts associated with temporary conversion of 436 acres agricultural land currently under Williamson Act contract.

6.3.2 ALTERNATIVE 2 – REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE

This Reduced Size Solar Generation Alternative, which is the environmentally superior alternative, would exclude CUP 13-0047, a 130-acre site (**Figure 6.0-2**), which is proximate to the New River. Development of CUP 13-0047 would result in a potentially significant impact to biological resources and solar facilities within its eastern boundary within the incised New River flood channel and floodplain. Facilities placed in these areas may be subject to minor damage due to liquefaction settlement and ground fissures during a strong seismic event. Biological impacts would be reduced to below a level of significance through implementation of all applicable biological resources mitigation measure that apply to CUP 13-0047 (including mitigation measure MM 4.12.3) while liquefaction impacts are mitigated through implementation of mitigation measures MM 4.6.2a and MM 4.6.2b. Implementation of the Reduced Size Solar Generation Facility Alternative would result in reducing the initial potential for significant impacts to biological resources. Whereas the proposed Project would result in the removal of sensitive vegetation communities including 10.69 acres of Arrow Weed Scrub, 2.06 acres of drains and canals, 1.26 acres of open water, and 45.21 acres of tamarisk scrub, the Reduced Size Solar Generation Facility Alternative would impact fewer acres of sensitive vegetation communities including 7.72 acres of Arrow Weed Scrub, 0.15 acres of drains and canals, 1.26 acres of open water, and 42.13 acres of tamarisk scrub. In addition, the Reduced Size Solar Generation Facility Alternative would avoid potentially significant impacts to 27.63 acres of waters of the U.S. (WUS) and State (WS), 0.008 acres of non-waters of the U.S. and State, and 19.77 acres of riparian area jurisdiction to the California Department of Fish and Wildlife compared to the proposed Project.

6.3.3 ALTERNATIVE 3 – NO PROJECT ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(1) requires that a No Project Alternative be analyzed in order to allow the decision-makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed Project. The No Project Alternative would result in the solar field site parcels remaining agricultural land supporting agricultural use. The proposed Wistaria Ranch Solar Energy Center would not be developed on these parcels, and no new electric collector lines or upgrades to the Mount Signal Solar Farm Gen-Tie lines would be constructed.

6.4 ANALYSIS OF ALTERNATIVES

This section identifies the environmental effects of the alternatives under consideration and compares the environmental effects with those resulting from the proposed Project. Table 6.0-1 at the end of this section provides a summary of the comparisons. The "environmentally superior" alternative is also identified. It is important to understand at the outset of this analysis that because the proposed Project reduces all of its potentially significant impacts to below a level of significance, Alternatives 1, 2 and 3 only reduce the level of the initial potentially significant impact of the proposed Project. Therefore, Alternatives 1, 2 and 3 only serve to reduce the need for the public agency to impose the higher level of mitigation required of the proposed Project. CEQA does not require the lead agency to select feasible alternatives or additional feasible mitigation measures where the proposed Project already mitigates the impact to below a level of significance.¹ However, the lead agency may select a feasible alternative simply because as a matter of policy and the exercise of its land use authority, the lead agency prefers the alternative to the proposed Project.

6.4.1 ALTERNATIVE 1 - WILLIAMSON ACT AVOIDANCE ALTERNATIVE

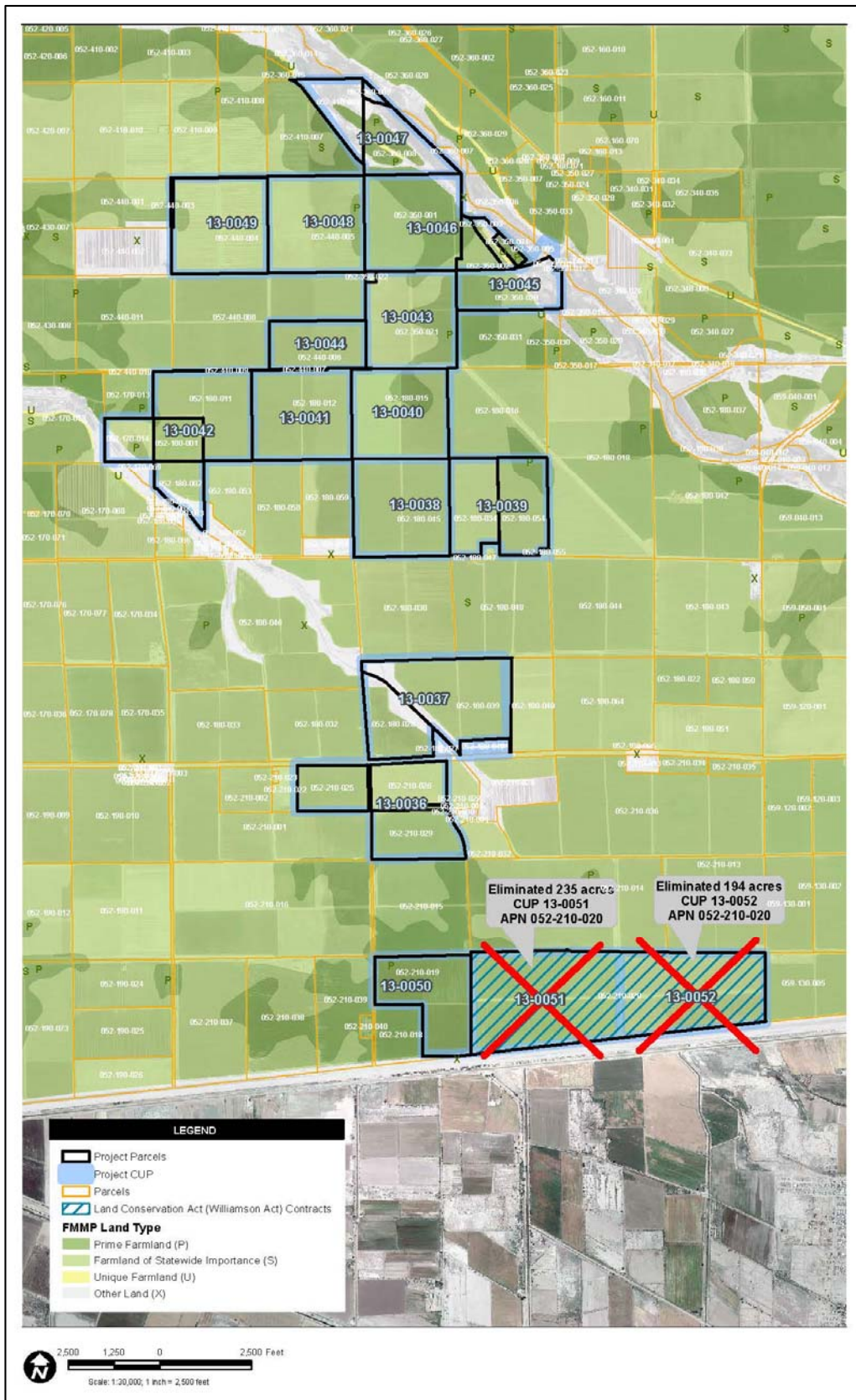
Alternative 1 is the Williamson Act Avoidance Alternative (Figure 6.0-1). This alternative considers the circumstance under which the Project proceeds with development of the Solar Energy Center, Electric Collector Line Corridor, and Mount Signal Solar Farm Gen-Tie line upgrades, but excludes development of CUPs 13-0051 and 13-0052 which are part of APN 052-210-020. This alternative would avoid the proposed Project’s initial potentially significant impact of temporarily converting approximately 436 acres of agricultural land under Williamson Act contract (including 236 acres of Farmland of Statewide Importance on CUP 13-0051 and 190.1 acres of Farmland of Statewide importance on CUP 13-0052 [refer to tables 4.9-19B and 4.9-20B in Section 4.9, Agricultural Resources]). This discussion analyzes the

¹ “Findings rejecting alternatives are required only if one or more significant environmental effects will not be avoided or substantially lessened by mitigation measures. An agency need not make findings rejecting alternatives described in the EIR if all of the project’s significant impacts will be avoided or substantially lessened by mitigation measures. An agency need make only one or more of the findings listed in Pub Res Code §21081(a) for each significant impact, so if it makes a mitigation finding for each significant impact, no further findings are required. See Pub. Res. Code §21081(a)(1)-(2); 14 Cal Code Regs §15091(a)(1)-(2).

In *Laurel Hills Homeowners Ass’n v City Council* (1978) 83 Cal App 3d 515, the court held that, if mitigation measures substantially lessen a project’s significant environmental effects, the lead agency may approve the project without making findings on the feasibility of the EIR’s project alternatives. Noting that mitigation measures and project alternatives are mentioned in Pub Res Code §§21002-21002.1 in the alternative, the court concluded that CEQA does not mandate the choice of the environmentally most desirable project if, through mitigation measures alone, the agency has reduced the project’s environmental effects to an acceptable level. 83 Cal App 3d at 521. See also *Stevens v City of Glendale* (1981) 125 Cal App 3d 986, 996; *No Slo Transit, Inc. v City of Long Beach* (1987) 197 Cal App 3d 241.

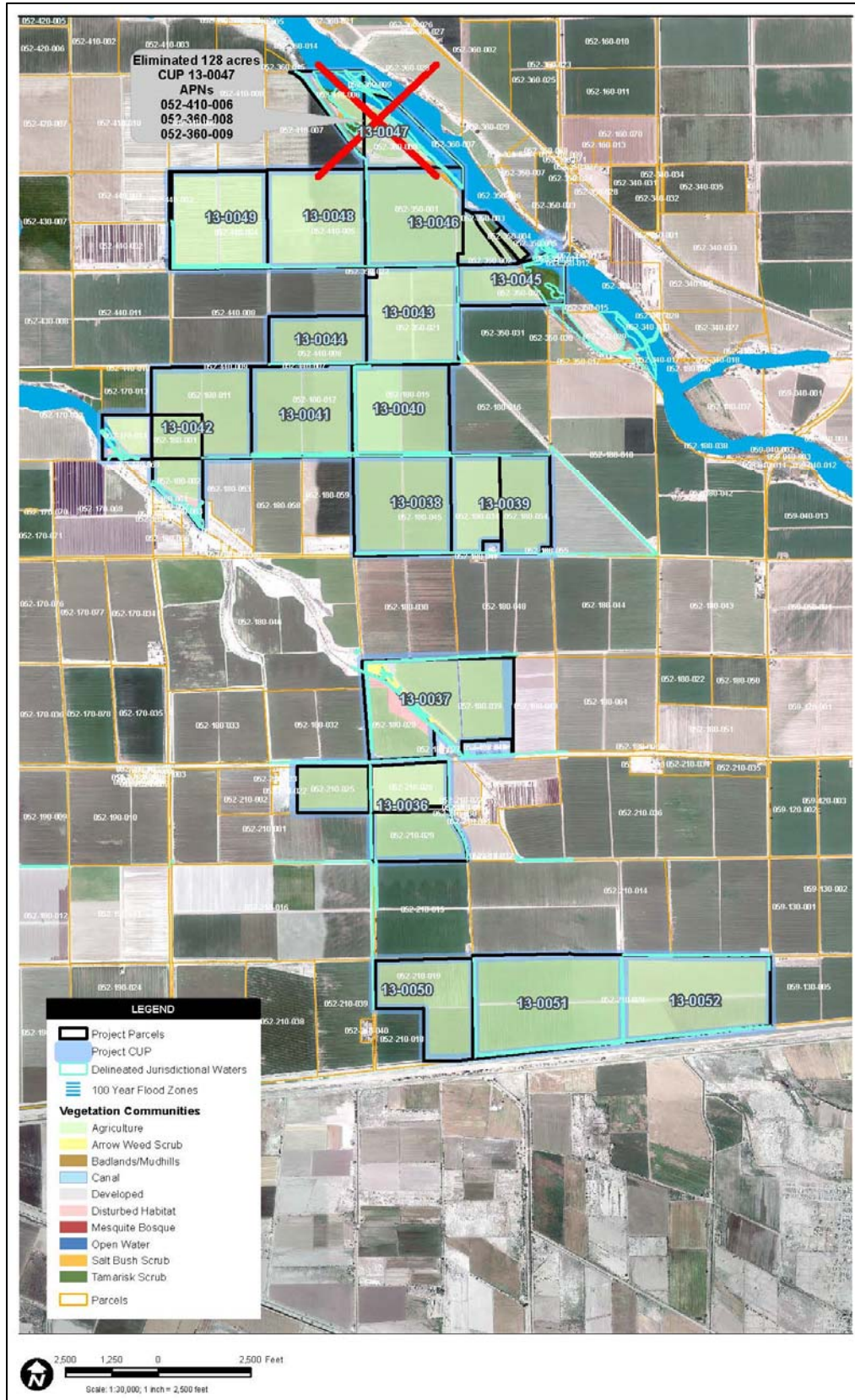
In *Laurel Heights Improvement Ass’n v Regents of Univ. of Cal.* (1988) 47 Cal. 3d 376, 402, the California Supreme Court noted with approval the holding in *Laurel Hills* that CEQA does not require an agency to consider an environmentally superior alternative when approving a project if mitigation measures will substantially reduce environmental impacts. See also *Rio Vista Farm Bureau Ctr. v County of Solano* (1992) 5 Cal. App. 4th 351, 379 (agency is not required to make findings on feasibility of EIR’s alternatives if mitigation measures will reduce environmental impacts to acceptable levels).

Thus, when an agency finds that significant adverse effects will be avoided or substantially lessened by mitigation measures, it need not make findings that environmentally superior alternatives are infeasible. See *Mira Mar Mobile Community v City of Oceanside* (2004) 119 Cal. App. 4th 477; *Protect Our Water v County of Merced* (2003) 110 Cal App 4th 362, 373.; *Kings County Farm Bureau v City of Hanford* (1990) 221 Cal App 3d 692.” §17.26, Practice Under the California Environmental Quality Act (2d ed Cal CEB 2008).



Source: WRS 2014.

FIGURE 6.0-1
ALTERNATIVE 1 – WILLIAMSON ACT AVOIDANCE ALTERNATIVE



Source: WRS 2014.

FIGURE 6.0-2
ALTERNATIVE 2 – REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE

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impacts of the Williamson Act Avoidance Alternative by projecting what can reasonably be expected to occur in the foreseeable future if the Project were implemented without CUPs 13-0051 and 13-0052 as compared to the proposed Project configuration, both as mitigated.

Characteristics

Under the Williamson Act Avoidance Alternative, the solar field site parcels would be developed with solar array fields on up to 15 individual CUPs (13-0036 thru 13-0050) with the same supporting on-site structures/infrastructure as would occur under the proposed Project. The solar field site parcels would continue to be separated by dirt roads and IID canals and drains and surrounded by active agricultural land and other solar energy projects. Fifteen CUP applications (13-0036 thru 13-0050) and 15 variance requests (V 13-0002 thru V-13-0016) for electric transmission line support structures exceeding the 120-foot maximum height limit would be required. However, no Williamson Act contract cancellation would be required and the existing contracts on CUP 13-0051 and 13-0052 would expire as scheduled on January 1, 2014. Under the Williamson Act Avoidance Alternative, the overall Project acreage would be reduced by 436 acres and the electric collector lines specific to CUPs 13-0051 and 13-0052 would not be required or constructed. The agricultural soils within CUPs 13-0036 thru 13-0050 would be reclaimed to the pre-Project conditions at the end of the each CUPs operational life as required by mitigation measure MM 4.9.1b.

Relationship to Project Objectives

Implementation of the Williamson Act Avoidance Alternative would fulfill some of the Project's objectives as identified in subsection 6.1, above. The removal of 436 acres from development as solar energy fields would also reduce potential environmental impacts related to the temporary conversion of agricultural land, Williamson Act contracts, and potential impacts to biological impacts related to collisions with electric collector lines, PV or CPV panels, and equipment used for Project construction, operation and decommissioning. However, 436 acres is 15.6% of the proposed Project's 2,793 acres ($[436 \text{ acres} \div 2,793 \text{ acres}] \times 100 = 15.6\%$). Therefore, reducing the acreage for solar array fields by 15.6% would reduce production capacity to less than 250 MW thereby generating less renewable solar energy in Imperial County to contribute towards the State's RPS goals. Nonetheless, the Williamson Act Avoidance Alternative would achieve "most of the basic objectives of the project" (14 Cal Code Regs §15126.6(a)-(b)), including: deploying safe, efficient, environmentally responsible technology; generating electricity in an efficient manner and at a cost that is competitive with the renewable energy market; providing a new source of renewable energy to assist the State of California in achieving and exceeding the RPS; locating the Project in Imperial County in close proximity to the existing CAISO electric transmission system; locating the Project in an area that ranks among the highest in solar resource potential; minimizing potential impacts to aesthetics, health and safety through locating the Project on disturbed land; providing a new source of renewable energy to assist the state in meeting energy storage targets; creating a sustainable form of electricity that requires little fuel to be consumed; and promoting continued agricultural operations until the alternative's 15 CUPs are developed.

However, there is also evidence that the Williamson Act Avoidance Alternative would impede the Project objectives beyond just "some degree." 14 Cal Code Regs §15126.6(a)-(b). The Williamson Act Avoidance Alternative would not result in the production of approximately 250 MW; maximize local construction jobs; or provide a significant reduction in water use to assist IID in meeting its obligations to reduce water supply/demand imbalance.

Again, because the proposed Project already mitigates all potentially significant impacts to below a level of significance, the County is not required to make feasibility findings on the alternatives. To the extent the County desires to make feasibility findings, it is the lead agency's discretion to determine whether or

not the alternative merely impedes the Project objectives to “some degree” or goes beyond and is infeasible due to inconsistency with fundamental Project objectives.

Comparative Impacts

Aesthetics

No potentially significant impacts to aesthetics, including light and glare, would occur in association with implementation of the proposed Project. The same would be true for the Williamson Act Avoidance Alternative. Under the Williamson Act Avoidance Alternative, the aesthetic condition of the solar field site parcels would be altered in association with development of up to 15 individual CUP areas (13-0036 thru 13-0050) with solar array fields and supporting facilities identical to the proposed Project, with the exception that 463 less acres, and two CUPs (13-0051 and 13-0052) would not be developed. The solar field site parcels associated with the 15 CUPs would be developed with PV or CPV panels, inverters, transformers, electric collector lines, and require connection to the Mount Signal Solar Farm Project Gen-Tie line. Because no sensitive residential receptors are located adjacent to CUPs 13-0051 and 13-0052, visual impacts to residential receptors would be similar to those occurring as a result of implementation of the proposed Project. Travelers along Anza Road would see active agriculture fields to the south as opposed to solar array fields at the location of CUPs 13-0051 and 13-0052. New sources of light and glare would be similar for both the Williamson Act Avoidance Alternative and the proposed Project, except no development would occur on the solar field site parcels designated for development as CUPs 13-0051 and 13-0052. Applicant proposed Measures/Project Design Features intended to reduce light and glare would continue to be implemented throughout the smaller footprint of the Williamson Act Avoidance Alternative, but would not be required at CUPs 13-0051 and 13-0052 where no development would occur. Overall, potential impacts related to views of the Solar Energy Center would be similar and less than significant for both the Williamson Act Avoidance Alternative and the proposed Project given the absence of sensitive receptors near CUPs 13-0051 and 13-0052.

Land Use

No potentially significant impacts to land use would occur in association with implementation of the proposed Project. The same would be true for the Williamson Act Avoidance Alternative. Under both the Williamson Act Avoidance Alternative and the proposed Project, the solar field site parcels would be temporarily converted from actively cultivated agricultural land to a solar energy generation facility. Both the Williamson Act Avoidance Alternative and the proposed Project would provide a beneficial use of the land by creating local jobs during construction (approximately 350) and to a lesser degree during operation (approximately 15). The land use and zoning designations, policies and regulations applicable to proposed Project and the Williamson Act Avoidance Alternative are very similar throughout all of the proposed CUP areas. Proposed uses throughout the solar field site parcels are also very similar at each CUP (i.e. O&M structures, PV and/or CPV panels, inverters, electric collector facilities, etc.). No change in land use or zoning designations would be required under either the proposed Project or the Williamson Act Avoidance Alternative. Solar energy facilities are conditionally allowed within the agricultural zoning of the solar field site parcels for both the proposed Project and the Williamson Act Avoidance Alternative. Likewise, a height limit of 120 feet applies to the solar field site parcels under both the proposed Project and the Williamson Act Avoidance Alternative. Because the Williamson Act Avoidance Alternative would develop two less CUP areas, the number of required CUP applications and height variance requests would be 15, compared to the 17 required as part of the proposed Project. Under the Williamson Act Avoidance Alternative, no cancellation of Williamson Act contracts would be required. However, temporary conversion of agricultural land for renewable solar energy generation facilities would occur for both the proposed Project and the Williamson Act Avoidance Alternative, albeit 436 fewer acres would be converted in association with the Williamson Act Avoidance Alternative. Further,

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the solar field site parcels would be reclaimed to pre-Project soil conditions use during decommissioning of both the proposed Project and the Williamson Act Avoidance Alternative. Therefore, potential land use impacts would be similar and less than significant for both the Williamson Act Avoidance Alternative and the proposed Project.

Transportation and Circulation

Potentially significant impacts were identified with regard to damage to County-maintained roadways during Project construction would occur in association with implementation of the proposed Project. The same would be true for the Williamson Act Avoidance Alternative, however improvements required as part of mitigation measure MM 4.3.6c for CUP 13-0051 (3-inch asphalt concrete overlay and 3-inch thick aggregate base shoulder backing on Anza Road west of Ferrell Road for approximately 0.75 miles) would be avoided. Under the Williamson Act Avoidance Alternative, the same Project study area roadways would be impacted with slightly lower volumes anticipated on Anza Road, Ferrell Road and Brockman Road in the vicinity of the CUPs that would be eliminated (13-0051 and 13-0052). The proposed Project would not exceed LOS C on any Project study area intersections, roadway segments or freeway segments, under any scenario modeled (both Project-specific and Cumulative Conditions for Existing Year 2013, Near-Term Year 2016, Mid-Term Year 2019, Long-Term Year 2024). Likewise construction traffic from the Williamson Act Avoidance Alternative would result in less than significant impacts. However, eliminating CUPs 13-0051 and 13-0052 would correspondingly result in lower traffic volumes on Project study area roadways. Therefore, overall construction traffic impacts to Project study area intersections, roadway segments or freeway segments would be less in association with implementation of the Williamson Act Avoidance Alternative compared to the proposed Project. Impacts with regard to hazards due to design features would be better for both the Williamson Act Avoidance Alternative and the proposed Project because slightly less damage to County-maintained roadways would occur in association with fewer trips on Anza Road and Ferrell Road in the vicinity of CUPs 15-0051 and 15-0052. Roadway damage resulting from construction of the Williamson Act Avoidance Alternative would be mitigated using the same measures identified for the proposed Project (mitigation measures MM 4.3.6a, MM 4.3.6b, MM 4.3.6c and MM 4.3.6d) with the exception of the need for 3-inch asphalt concrete overlay and 3-inch thick aggregate base shoulder backing on Anza Road west of Ferrell Road for approximately 0.75 miles required for CUP 13-0051. Because Project study area intersections, roadway segments or freeway segments, under any scenario modeled (both Project-specific and Cumulative Conditions for Existing Year 2013, Near-Term Year 2016, Mid-Term Year 2019, Long-Term Year 2024) would result in less than significant impacts for the Proposed Project, the reduction in roadway damage would result in overall better impacts in association with implementation of the Williamson Act Avoidance Alternative compared to the proposed Project.

Air Quality

Under the Williamson Act Avoidance Alternative, the quantity of fugitive dust (PM₁₀), NO_x, and DPM emissions would be less than the volume generated by the proposed Project because 436 fewer acres would be disturbed for construction, operation and decommissioning activities. Under the Williamson Act Avoidance Alternative, the solar field site parcels associated with CUPs 13-0051 and 13-0052 would continue to function as active farmland generating dust and DPM during cultivation and harvesting activities as part of on-going operations subject to ICAPCD Rule 800 (General Requirements for Control of Fine Particulate Matter [PM-10]). Agricultural operation emissions would be worse compared to operational emissions associated with development CUPs 13-0051 and 13-0052. Both the Williamson Act Avoidance Alternative and the proposed Project would require the same construction, operation and decommissioning equipment; however the volume of construction trips, pieces of construction equipment, and hours of equipment operation would all be reduced commensurate with eliminating development of CUPs 13-0051 and 13-0052. No sensitive receptors were identified directly adjacent to

CUPs 13-0051 and 13-0052, and as such, eliminating these CUPs from development would not result in an improvement to sensitive air quality receptors as compared to the proposed Project. Applicable mitigation measures (MM 4.4.1a, MM 4.4.1b, MM 4.4.1c and MM 4.4.1d) and regulatory compliance requirements to reduce emissions would be the same for both the Williamson Act Avoidance Alternative and the proposed Project. However, because less fugitive dust (PM₁₀), NO_x, and DPM emissions would be generated during construction under the Williamson Act Avoidance Alternative based on the reduction of 436 acres, less mitigation would be required to render air quality impacts insignificant. Overall, impacts to air quality would be slightly better under the Williamson Act Avoidance Alternative as compared to the proposed Project, both as mitigated.

Climate Change and Greenhouse Gases

No potentially significant impacts with regard to GHG and GCC would occur in association with implementation of the proposed Project. Under the Williamson Act Avoidance Alternative, short-term construction, operation, and decommissioning GHG/GCC impacts are anticipated to be slightly less than the proposed Project. The Williamson Act Avoidance Alternative has the potential for slightly lower GHG emissions because fewer vehicle trips and construction equipment emissions are required to support construction, operation and decommissioning of the 436 fewer acres of solar energy generation facilities eliminated in association with CUPs 13-0051 and 13-0052. However, the development of two less CUPs would also result in the generation of less renewable energy (approximately 20 MW per CUP/or 40 MW) towards meeting County and State RPS goals, and therefore have an indirect impact of causing the need for more non-renewable GHG emitting energy sources. The total amount of carbon savings from implementation of typical CUP area is estimated at 30,026 MT CO₂e per year. Therefore, the Williamson Act Avoidance Alternative would result in approximately 60,052 MT CO₂e (2 CUPs x 30,026 MT CO₂e) less carbon savings than the proposed Project. Overall, the Williamson Act Avoidance Alternative would result in slightly better direct GHG emissions/GCC impacts (through less construction, operation and decommissioning emissions) and slightly worse indirect GHG emissions/GCC impacts (through more fossil fuel-based energy generation) as compared to the proposed Project. Because indirect impacts have the potential for greater CO₂e over the long-term compared to direct impacts, the Williamson Act Avoidance Alternative would result in worse GHG emissions impacts than the proposed Project.

Geology and Soils

Under the Williamson Act Avoidance Alternative, the geographic footprint of the Solar Energy Center would be 436 acres smaller than the proposed Project, but would result in exposure to similar potentially significant geologic and seismic hazard impacts (seismic exposure, liquefaction, landslides, expansive soils, septic-capable soils, and corrosive soils) as the proposed Project. Because the Williamson Act Avoidance Alternative would not develop CUPs 13-0051 and 13-0052, potential seismically-induced sheet-flooding impacts at these CUPs would be avoided. Further, development of 436 fewer acres under the Williamson Act Avoidance Alternative would result in less potential for soil erosion associated with construction, operation and decommissioning of the Solar Energy Center and Electric Collector Line Corridor. However, development under the Williamson Act Avoidance Alternative would be subject to compliance with the same regulatory framework and mitigation measures (MM 4.6.1, MM 4.6.2a, MM 4.6.2b, MM 4.6.4, MM 4.6.6, MM 4.6.7, MM 4.6.8 and MM 4.6.9), as the proposed Project in order to reduce impacts resulting from strong seismic ground shaking; liquefaction/ground failure; landslides; expansive soils; soil capability to support an on-site wastewater treatment system; and soil corrosivity to less than significant. Therefore, geology and soils impacts would be similar, but occur on 436 fewer acres, if the Williamson Act Avoidance Alternative were implemented as compared to the proposed Project.

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Cultural and Paleontological Resources

Under the Williamson Act Avoidance Alternative, potential to disturb previously unknown subsurface archaeological resources, human remains or paleontological resources would be slightly less than would occur in association with implementation of the proposed Project due to the disturbance of 436 fewer acres. However, because all CUPs, including CUPs 13-0051 and 13-0052, consist of land actively disturbed for agricultural activities, the likelihood of encountering cultural resources is considered low under both Williamson Act Avoidance Alternative and the proposed Project. Furthermore, implementation of both the Williamson Act Avoidance Alternative and the proposed Project would require the same mitigation measures (MM 4.7.1a and MM 4.7.1b) to avoid and minimize potential impacts to cultural resources. P-13-014396 consists of the Greeson Drain located midway in APN 052-210-020 on both CUP 13-0051 and 13-0052. P-13-014396 has the potential for intact buried deposits and could possibly yield additional information important to the understanding of the history of the region. However, the proposed Project would allow the Greeson Drain and Laterals to be left intact thereby avoiding damage to P-13-014396. As such, removal of CUPs 13-0051 and 13-0052 would result in similar less than significant impacts to unevaluated archeological sites as would occur in association with implementation of the proposed Project. Potential impacts to unrecorded archeological resources (mitigation measure MM 4.7.2), paleontological resources, or human remains (mitigation measure MM 4.7.3) would be subject to the same regulatory framework and mitigation measures under both the Williamson Act Avoidance Alternative and the proposed Project. Therefore, potential impacts to cultural resources would be similar for both the Williamson Act Avoidance Alternative and the proposed Project.

Noise

No potentially significant noise impacts requiring mitigation were identified in association with the proposed Project. Likewise, similar less than significant construction, operation and decommissioning noise impacts would occur under the Williamson Act Avoidance Alternative. However temporary construction, operation and decommissioning-related noise impacts are anticipated to be slightly less if the Williamson Act Avoidance Alternative is implemented compared to the proposed Project because a smaller area would be affected as a result of eliminating CUPs 13-0051 and 13-0052. Operational traffic noise and stationary noise impacts would also be slightly less under the Williamson Act Avoidance Alternative because operation and maintenance activities at 436 acres would be eliminated compared to proposed Project. However, no sensitive noise receptors were identified adjacent to CUPs 13-0051 or CUP 13-0052. Based on the distance from private and public airports, neither the Williamson Act Avoidance Alternative nor the proposed Project would expose individuals to excessive noise levels resulting from proximity to an airport. As such, noise and groundborne vibration impacts would be similar but cover a smaller area for the Williamson Act Avoidance Alternative and compared to the proposed Project.

Agricultural Resources

Potentially significant impacts resulting from temporary conversion of agricultural land under the Williamson Act Avoidance Alternative would be better than those anticipated under the proposed Project because 436 acres of active farmland at CUPs 13-0051 and 13-0052 would not be developed as part of the Solar Energy Center. Under the Williamson Act Avoidance Alternative, 236 acres of land and soils designated as Farmland of Statewide Importance at CUP 13-0051 and 190.1 acres of land and soils designated as Farmland of Statewide Importance at CUP 13-0052 would remain in active production. Both the Williamson Act Avoidance Alternative and proposed Project would be subject to compliance with the same regulatory framework and mitigation measures (MM 4.9.1a and MM 4.9.1b). Likewise, both the Williamson Act Avoidance Alternative and the proposed Project would not preclude Prime Farmland, Unique Farmland, or Farmland of Statewide Importance from being reclaimed to pre-Project soil conditions. Under both the Williamson Act Avoidance Alternative and proposed Project, a

Reclamation Plan would be implemented at the end of the Project's operational life as required by mitigation measure MM 4.9.1b. Because the Williamson Act Avoidance Alternative would impact 436 fewer acres than the proposed Project, this alternative would result in less extensive impacts with regard to temporary conversion of agricultural land as well as the need to cancel the existing Williamson Act contract on CUPs 13-0051 and 13-0052. As with the proposed Project, a solar generation facility is an allowed use within the existing A-2, A-2-R and A-3 zoning designations with approval of the 17 CUPs under the Williamson Act Avoidance Alternative. Likewise, the Williamson Act Avoidance Alternative also requires approval of 17 Variance applications associated with each parcel to allow Gen-Tie structures to exceed the 120-foot height limitation within these zones. However, unlike the proposed Project, the Williamson Act Avoidance Alternative does not have one solar field site parcel encumbered with a Williamson Act Contract. The Applicant has filed a petition for the cancellation of the Williamson Act Contract with the County in association with the proposed Project. With approval of the of the 17 CUPs (13-0036 thru 13-0052), 17 Variances (V13-0002 thru V13-0018), and cancellation of Williamson Act Contract, both the proposed Project and the Williamson Act Avoidance Alternative would result the same less than significant impact with regard to conflicting with zoning and the existing Williamson Act Contract. However, cancellation of the existing Williamson Act Contract would not be required under the Williamson Act Avoidance Alternative. The Williamson Act Avoidance Alternative also prevents the need to require as much mitigation in the form of a larger reclamation plan as the proposed Project. Therefore, impacts to agricultural resources are better in association with implementation of the Williamson Act Avoidance Alternative compared to the proposed Project.

Hazards and Hazardous Materials

No potentially significant hazards or hazardous materials impacts requiring mitigation were identified in association with the proposed Project. Furthermore, risks associated with hazards throughout all CUPs, including construction, operation and decommissioning activities and solar field site parcels site conditions (e.g., soil disturbance, use of hazardous materials associated with construction activities) are anticipated to be similar for both the Williamson Act Avoidance Alternative and the proposed Project. Existing residual on-site hazards throughout the solar field site parcels from ongoing agricultural uses would be similar for both the Williamson Act Avoidance Alternative and the proposed Project. However, no development would occur on the solar field site parcels associated with CUPs 13-0051 and 13-0052 if the Williamson Act Alternative is implemented. Both the Williamson Act Avoidance Alternative and proposed Project would be subject to compliance with the same regulatory framework as well as federal, state and local requirements regarding transport, handling and disposal of hazardous materials. Further, risks associated with the presence or release of hazardous materials are generally addressed in the immediate vicinity of the specific hazard. Upon compliance with applicable regulations a less than significant impact is anticipated to occur for both the Williamson Act Avoidance Alternative and the proposed Project. Therefore, potential impacts to hazardous materials/risk of upset would be similar and less than significant for both the Williamson Act Avoidance Alternative and the proposed Project.

Hydrology and Water Quality

Under the Williamson Act Avoidance Alternative, impacts associated with surface water quality from construction, operation, and decommissioning activities, increased impervious surfaces, and potentially higher levels of contaminants in runoff are anticipated to be similar to the proposed Project. However, under the Williamson Act Avoidance Alternative, the Solar Energy Center would be 436 acres smaller than under the proposed Project. Potential impacts relating to Project development and activities in proximity to 100-year Flood Zones at CUPs 13-0051 and 13-0052 would not occur under the Williamson Act Avoidance Alternative. Further, activities with potential to result in soil erosion (during construction and decommissioning addressed in mitigation measures MM 4.11.1a, MM 4.11.1c, MM 4.11.1d) or stormwater runoff (during construction, operation and decommissioning) would occur on 436 fewer

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acres if the Williamson Act Alternative is implemented as compared to the proposed Project. Less impervious area (i.e. O&M buildings, parking areas, etc.) would also be introduced in association with the Williamson Act Avoidance Alternative as compared to the proposed Project. However, under both the Williamson Act Avoidance Alternative and proposed Project drainage and detention facilities meeting County requirements would be implemented; compliance with State and local regulations would be required; implementation of the same Applicant proposed Measures/Project Design Features would occur; and compliance with the same mitigation measures (MM 4.11.1a, MM 4.11.1c, MM 4.11.1d), flooding (MM 4.11.4a, MM 4.11.4b, MM 4.11.4c, MM 4.11.5a and MM 4.11.5b) to address water quality standards and waste discharge requirements and exceedance of existing drainage capacity would be required. Under both the Williamson Act Avoidance Alternative and the proposed Project, potentially significant impacts to hydrology and water quality would be reduced to less than significant. The decrease in developed acreage associated with the Williamson Act Avoidance Alternative compared to the proposed Project is not anticipated to substantially reduce the hydrology and water quality impacts that will be reduced through mitigation. Therefore, impacts to hydrology and water quality would be similar for both the Williamson Act Avoidance Alternative and the proposed Project.

Biological Resources

Construction of the proposed Project would disturb up to 2,793 acres and result in the direct removal of approximately 2,564 acres of vegetation community/land cover types as a result of grading and installation of proposed Project components. In total, full build-out of the proposed Project would require removal of 10.69 acres of Arrow Weed Scrub, 2.06 acres of drains and canals, 1.26 acres of open water, and 45.21 acres of tamarisk scrub which are considered sensitive vegetation communities. While no vegetation communities would be avoided in association with implementation of the Williamson Act Avoidance Alternative, the amount of Agriculture cover type requiring removal would be reduced by 202.78 acres for CUP 13-0051 and 171.79 acres for 13-0052. Likewise, 0.001 acres of non-wetland waters would be avoided if the Williamson Act Avoidance Alternative were implemented. Overall, 436 fewer acres would be developed in association with elimination of CUPs 13-0051 and 13-0052. Direct impacts to vegetation communities would therefore be better under the Williamson Act Avoidance Alternative. Likewise, potential for indirect impacts vegetation communities associated with introduction of non-native plant species, creation of airborne dust, sedimentation, and erosion and jurisdictional waters would also be better under the Williamson Act Avoidance Alternative as a result of developing 436 fewer acres as well as implementation of mitigation measures including monitors to avoid sensitive vegetation communities and habitat (MM 4.12.1a, MM 4.12.1b, MM 4.12.1c, MM 4.12.1d, MM 4.12.1e, MM 4.12.1f); jurisdictional waters (MM 4.12.2); BUOW habitat (MM 4.12.7); plans to salvage and relocate rare plants (MM 4.12.13); and a Bird and Bat Conservation Strategy (MM 4.12.14a).

Potential for direct or indirect impacts to jurisdictional waters would be less under the Williamson Act Avoidance Alternative, as approximately 0.001 acres of potential jurisdiction waters identified on CUP 13-0051 would not be developed (refer to Table 4.12-14 in Section 4.12, Biological Resources).

Direct and indirect impacts to sensitive wildlife species utilizing on-site and adjacent vegetation communities for nesting, burrowing, foraging, and/or migratory habitat would also be better under the Williamson Act Avoidance Alternative because less burrowing/nesting/foraging habitat would be disturbed. Further, with 436 fewer acres developed, species would be subject to less potential for collisions with equipment, PV or CPV panels, and electric collector lines/support structures than would occur if the proposed Project were implemented. Nevertheless, the alternative, as mitigated, and the proposed Project, as mitigated, have similar impacts.

Potential impacts to terrestrial wildlife movement would be similar for both the Williamson Act Avoidance Alternative and the proposed Project because individual fenced-off CUPs are not anticipated

to interfere with larger wildlife routes along the New River, Greens Drain, or within utility line corridors in the vicinity of the Solar Energy Center. Cumulative impacts under the Williamson Act Avoidance Alternative are also anticipated to be similar to the proposed Project because impacts to biological resources would be mitigated to a level of less than significant at the Project-level thru the implementation of mitigation measures MM 4.12.1a, MM 4.12.1b, MM 4.12.1c, MM 4.12.1d, MM 4.12.1e, MM 4.12.1f, MM 4.12.2; MM 4.12.3, MM 4.12.5, MM 4.12.7, MM 4.12.14a and MM 4.12.14b.

Public Services and Utilities

No potentially significant public services impacts requiring mitigation were identified in association with the proposed Project. The Williamson Act Avoidance Alternative would require similar public services as the proposed Project, even though 436 fewer acres would be developed. Specifically, a similar increase in the demand for fire services and law enforcement services would occur because similar activities, structures, and infrastructure are proposed for both the Williamson Act Avoidance Alternative and proposed Project. Like the proposed Project, the Williamson Act Avoidance Alternative would not cause the need to expand fire or law enforcement public facilities. Therefore, impacts to public services would be similar for both the Williamson Act Avoidance Alternative and the proposed Project.

The Williamson Act Avoidance Alternative would also result in impacts to utilities similar to those of the proposed Project. Under the Williamson Act Avoidance Alternative, septic systems associated with potential O&M building(s) on CUPs 13-0051 and 13-0052 would not be constructed. However, potential impacts related to septic-capable soils are specific to the immediate septic system area. Therefore a similar impact would occur for both the Williamson Act Avoidance Alternative and the proposed Project. The Williamson Act Avoidance Alternative would result in slightly less demand for solid waste service and landfill capacity, electrical service and facilities, potable water service, and telephone and internet service as a result of developing 436 fewer acres. However, under the Williamson Act Avoidance Alternative, less renewable solar energy would be generated to contribute to the California electric grid. Therefore, impacts to demand for utilities would be similar under both scenarios, but the Williamson Act Avoidance Alternative would result in a worse impact to availability of electricity supply.

The Williamson Act Avoidance Alternative would result in a greater demand for water to support continued agricultural operations on CUPs 13-0051 and 13-0052 compared to the proposed Project. This is because farming requires approximately 5.45 AF/Y/A compared to the 3.5 AF/Y needed in association with dust control, panel washing, and fire suppression supply related to the construction, operation, and decommissioning of each CUP. Therefore, under the Williamson Act Avoidance Alternative, impacts to water supply would be worse as compared to the proposed Project.

6.4.2 ALTERNATIVE 2 – REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE

The Reduced Size Solar Generation Facility Alternative, which is the environmentally superior alternative, includes development of the Solar Energy Center, Electric Collector Line Corridor, and Mount Signal Solar Farm Project Gen-Tie line upgrades, excluding CUP 13-0047 (**Figure 6.0-2**). CUP 13-0047 encompasses 130 acres proximate to the New River with potential for biological resources impacts and is subject to liquefaction and ground failure. These impacts could be mitigated to below a level of significance with the implementation of the Project's biological mitigation measures MM 4.12.1a, MM 4.12.1b, MM 4.12.1c, MM 4.12.1d, MM 4.12.1e, and 4.12.1f (applicable to all sensitive biological resources); MM 4.12.2 (to mitigate impacts to federal and state jurisdictional areas); MM 4.12.3 (to mitigate impacts to non-listed special-status plant species); MM 4.12.5 (to mitigate impacts to YCR); MM 4.12.7 (to mitigate impacts to BUOW); and MM 4.12.14a and MM 4.12.14b (to mitigate impacts to nesting and migratory birds other special-status avian species) as well as MM 4.6.2a and MM 4.6.2b (to address liquefaction). Compared to the proposed Project, the Reduced Size Solar Generation Facility Alternative would reduce the initial potential for significant impacts to biological resources. The

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proposed Project would result in the removal of sensitive vegetation communities such as 10.69 acres of Arrow Weed Scrub, 2.06 acres of drains and canals, 1.26 acres of open water, and 45.21 acres of tamarisk scrub. In contrast, the Reduced Size Solar Generation Facility Alternative would only impact 7.72 acres of Arrow Weed Scrub, 0.15 acres of drains and canals, 1.26 acres of open water, and 42.13 acres of tamarisk scrub. In addition, the Reduced Size Solar Generation Facility Alternative would avoid potentially significant impacts to 27.63 acres of WUS and WS, 0.008 acres of non-waters of the U.S. and State, and 19.772 acres of riparian area jurisdictional waters exclusive to the CDFW. This discussion analyzes the impacts of the Reduced Size Solar Generation Facility Alternative by projecting what can reasonably be expected to occur in the foreseeable future if the proposed Project were implemented without CUP 13-0047 as compared to the proposed Project configuration, both as mitigated.

Characteristics

Under the Reduced Size Solar Generation Facility, development of the 130 acre CUP 13-0047 would be eliminated. Electric collector lines specific to CUP 13-0047 would likewise not be required or constructed. The Solar Energy Center would be developed on up to 16 individual CUPs (with the same supporting on-site structures and infrastructure as would occur in association with implementation of the proposed Project). The Project site would continue to be separated by dirt roads and IID canals and drains and surrounded by active agricultural land and other solar energy projects. Sixteen CUP applications (13-0036 thru 13-0046 and 13-0048 thru 13-0052) for the 16 individual CUPs would be required, and 16 variance requests (V-13-0002 thru V-13-0012 and V-13-0014 thru V-13-0018) for electric transmission line support structures exceeding the 120-foot maximum height limit would be required. Agricultural land on the 16 CUPs would be temporarily converted to solar energy generation facilities and to pre-Project soil conditions at the end of each CUP's operational life as required by mitigation measure MM 4.9.1b.

Relationship to Project Objectives

Implementation of the Reduced Size Solar Generation Facility would fulfill some of the Project's objectives as identified in subsection 6.1, above. The removal of 130 acres from development as part of the Solar Energy Center would also reduce potential environmental impacts related to biological resources associated with wetlands near the New River during Project construction, operation and decommissioning. However, 130 acres represents 4.6% of the proposed Project's 2,793 acres. Therefore, reducing the acreage of the Solar Energy Center by 130 acres would result in production capacity of less than 250 MW of renewable energy. The reduction in renewable energy below 250 MW would result in Imperial County contributing less renewable solar energy towards meeting State RPS goals. Nonetheless, the Reduced Size Solar Generation Facility Alternative would achieve "most of the basic objectives of the project" (14 Cal Code Regs §15126.6(a)-(b)), including deploying safe, efficient, environmentally responsible technology; generating electricity in an efficient manner, and at a cost that is competitive with the renewable energy market; providing a new source of renewable energy to assist the State of California in achieving and exceeding the RPS; locating the Project in Imperial County in close proximity to the existing CAISO electric transmission system; locating the Project in an area that ranks among the highest in solar resource potential; minimizing potential impacts to aesthetics, and health and safety through locating the Project on disturbed land; providing a new source of renewable energy to assist the State in meeting energy storage targets; creating a sustainable form of electricity that requires little fuel to be consumed; and promoting continued agricultural operations until the Reduced Size Solar Generation Facility Alternative's 16 CUPs are developed for solar energy production.

However, there is also evidence that the Reduced Size Solar Generation Facility Alternative would impede the Project objectives beyond just "some degree" 14 Cal Code Regs §15126.6(a)-(b). The Reduced Size Solar Generation Facility Alternative would result in the production of less than 250 MW;

fail to maximize local construction jobs; and fail to provide a significant reduction in water use to assist IID in meeting its obligations to reduce water supply/demand imbalance.

Again, because the proposed Project already mitigates all potentially significant impacts to below a level of significance, the County is not required to make feasibility findings on the alternatives. To the extent the County desires to make feasibility findings, it is the lead agency's discretion to determine whether or not the alternative merely impedes the Project objectives to "some degree" or is infeasible based on the alternative's inconsistency with fundamental Project objectives.

Comparative Impacts

Aesthetics

No potentially significant impacts to aesthetics, including light and glare, would occur in association with implementation of the proposed Project. The same would be true for the Reduced Size Solar Generation Facility Alternative. Under the Reduced Size Solar Generation Facility Alternative, the aesthetic condition of the solar field site parcels would be altered in association with development of up to 16 individual CUP areas with solar array fields and supporting facilities identical to the proposed Project, minus CUP 13-0047. The solar field site parcels associated with CUPs 13-0036 thru 13-0046 and 13-0048 thru 13-0052 would be developed with PV or CPV panels, inverters, transformers, electric collector lines, and connect to the Mount Signal Solar Farm Project Gen-Tie line. No residences are located adjacent to CUP 13-0047, so elimination of this CUP in association with the Reduced Size Solar Generation Facility Alternative would not result in a change in residential views as compared to the proposed Project.

CUP 13-0047 is located approximately three miles south of I-8 and is bounded by Wahl Road on the south, and bisected north to south by Rockwood Road. Under the Reduced Size Solar Generation Facility Alternative, travelers along Wahl Road and Rockwood Road would see active agriculture fields similar to existing conditions at the location of CUP 13-0047, as opposed to solar array fields. Therefore, the Reduced Size Solar Generation Facility Alternative may result in a slightly better visual impact to roadway travelers in the vicinity of CUP 13-0047 as compared to the proposed Project. Under the Reduced Size Solar Generation Facility Alternative, no new sources of light and glare would be introduced at CUP 13-0047; however, Applicant proposed Measures/Project Design Features intended to reduce light and glare would be implemented throughout the smaller footprint of the Solar Energy Center. None of the solar field site parcels comprising CUP 13-0047 or CUPs 13-0036 thru 13-0046 and 13-0048 thru 13-0052 are located within an area designated as a scenic viewshed. Therefore, less than impacts to aesthetics would be similar for both the Reduced Size Solar Generation Facility Alternative and the proposed Project.

Land Use

Under both the Reduced Size Solar Generation Facility Alternative and the proposed Project, the solar field site parcels would be temporarily converted from actively cultivated agricultural land to a solar energy generation facility with the exception that CUP 13-0047 would not be developed as part of Reduced Size Solar Generation Facility Alternative. Both the Reduced Size Solar Generation Facility Alternative and the proposed Project would provide a beneficial use of the land by creating local jobs during Project construction and to a lesser degree during operation. The land use and zoning designations, policies and regulations applicable to proposed Project and the Reduced Size Solar Generation Facility Alternative are similar throughout all of the proposed CUP areas; proposed uses throughout the solar field site parcels are also very similar for each CUP (i.e. O&M structures, solar generation and electric collector facilities). No change in land use or zoning designations would be required under either the proposed Project or the Reduced Size Solar Generation Facility Alternative. Solar energy generation facilities are conditionally allowed within the existing agricultural zoning (A-2, A-2-R and A-3) of the solar field site parcels. Under both the proposed Project and the Reduced Size Solar

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Generation Facility Alternative, a height limit of 120 feet applies to the solar field site parcels. Because the Reduced Size Solar Generation Facility Alternative would develop one less CUP area, the number of required CUP applications and height variance requests would be reduced to 16, as compared to 17 associated with the proposed Project. While the temporary conversion of agricultural land for renewable energy generation facilities represents a temporary conversion of agricultural soils, mitigation measure MM 4.9.1b requires both the Reduced Size Solar Generation Facility Alternative and the proposed Project to reclaim soils on each CUP to pre-Project conditions at the end of each CUP's operational life. Therefore, similar less than significant impacts to land use would occur for both the Reduced Size Solar Generation Facility Alternative and the proposed Project.

Transportation and Circulation

No potentially significant impacts to land use would occur in association with implementation of the proposed Project. Under the Reduced Size Solar Generation Facility Alternative, the same Project study area roadways would be impacted with slightly lower volumes anticipated on Wahl Road and Brockman Road in the vicinity of eliminated CUP 13-0047. In addition, mitigation measure MM 4.6.3c regarding roadway improvements for CUP 13-0047 (Micro-grind and Asphalt Rubber Asphalt Membrane (ARAM) resurfacing along Brockman Road from SR-98 to Lyons Road for approximately 2.5 miles and 1 mile of 3-inch asphalt concrete overlay and 3-inch thick aggregate base shoulder backing on Lyons Road east of Brockman Road; then on-site haul road through CUP 13-0046) would not be needed if the Reduced Size Solar Generation Facility is implemented. As the proposed Project would not exceed LOS C on any Project study area intersections, roadway segments or freeway segments under any scenario modeled (both Project-specific and Cumulative Conditions for Existing Year 2013, Near-Term Year 2016, Mid-Term Year 2019, Long-Term Year 2024), likewise construction traffic from the Reduced Size Solar Generation Facility Alternative would result in less than significant impacts. However, elimination of CUP 13-0047 would correspondingly result in slightly lower traffic volumes on Project study area roadways. Therefore, overall construction traffic impacts to Project study area intersections, roadway segments or freeway segments would be slightly better under the Reduced Size Solar Generation Facility Alternative compared to the proposed Project, especially in the vicinity of CUP 13-0047. Roadway damage resulting from construction of the Reduced Size Solar Generation Facility Alternative would be mitigated using the same measures identified for the proposed Project (mitigation measures MM 4.3.6a, MM 4.3.6b, MM 4.3.6c and MM 4.3.6d) with the exception of the need for micro-grind and Asphalt Rubber Asphalt Membrane (ARAM) resurfacing along Brockman Road from SR-98 to Lyons Road for approximately 2.5 miles and 1 mile of 3-inch asphalt concrete overlay and 3-inch thick aggregate base shoulder backing on Lyons Road east of Brockman Road; then on-site haul road through CUP 13-0046. Because Project study area intersections, roadway segments or freeway segments, under any scenario modeled (both Project-specific and Cumulative Conditions for Existing Year 2013, Near-Term Year 2016, Mid-Term Year 2019, Long-Term Year 2024) would result in less than significant impacts for the Proposed Project, the reduction in roadway damage would result in overall better impacts in association with implementation of the Reduced Size Solar Generation Facility Alternative compared to the proposed Project.

Air Quality

Under the Reduced Size Solar Generation Facility Alternative, fugitive dust (PM₁₀), NO_x, and DPM emissions would be less than the amount generated in association with the proposed Project prior to mitigation because 130 fewer acres would be disturbed for construction, operation and decommissioning activities associated with CUP 13-0047. Under the Reduced Size Solar Generation Facility Alternative, the solar field site parcels associated with CUP 13-0047 would continue to function as active farmland generating dust and DPM during cultivation and harvesting activities as part of on-going operations subject to ICAPCD Rule 800 (General Requirements for Control of Fine Particulate Matter [PM-10]). Under both the Reduced Size Solar Generation Facility Alternative and the proposed

Project, similar equipment use and activities would occur, and applicable mitigation measures (MM 4.4.1a, MM 4.4.1b, MM 4.4.1c and MM 4.4.1d) and regulatory compliance requirements to reduce emissions would remain the same. No sensitive receptors were identified directly adjacent to CUP 13-0047, and as such, the removal of this CUP would not result in an improvement to sensitive air quality receptors as compared to the proposed Project. Although slightly less fugitive dust (PM₁₀), NO_x, and DPM emissions would be generated in association with the Reduced Size Solar Generation Facility Alternative, the same mitigation applicable to the proposed Project would be required to render air quality impacts insignificant. Overall, based on the reduction of 130 acres, impacts to air quality would be slightly better in association with the Reduced Size Solar Generation Facility Alternative as compared to the proposed Project, both as mitigated.

Climate Change and Greenhouse Gases

No potentially significant impacts with regard to GHG and GCC would occur in association with implementation of the proposed Project. Under the Reduced Size Solar Generation Facility Alternative, short-term construction, operation, and decommissioning GHG/GCC impacts are anticipated to be slightly less than the proposed Project. The Reduced Size Solar Generation Facility Alternative has the potential for slightly lower GHG emissions because slightly fewer vehicle trips and construction equipment emissions would be generated in association with construction, operation and decommissioning of the 130 fewer acres of solar field array sites. However, the development of one less CUP would result in the generation of less renewable energy towards meeting County and State RPS goals. This would result in the indirect impact of causing the need for more non-renewable energy GHG emitting energy sources. In addition, the total amount of carbon savings from implementation of typical CUP area is estimated at 30,026 MT CO₂e per year. Therefore, the Reduced Size Solar Generation Facility Alternative would result in approximately 30,026 MT CO₂e less carbon savings than the proposed Project. Overall, the Reduced Size Solar Generation Facility Alternative would result in slightly better direct GHG emissions/GCC impacts (through less construction, operation and decommissioning emissions) and slightly worse indirect GHG emissions/GCC impacts (through more fossil fuel-based energy generation) as compared to the proposed Project. Because indirect impacts have the potential for greater CO₂e over the long-term compared to direct impacts, the Reduced Size Solar Generation Facility Alternative would result in worse GHG emissions impacts than the proposed Project.

Geology and Soils

Under the Reduced Size Solar Generation Facility Alternative, the geographic footprint of the Solar Energy Center would be 130 acres smaller than the proposed Project, but would result in exposure to similar geologic and seismic hazards as the proposed Project (seismic exposure, liquefaction, landslides, expansive soils, septic-capable soils, and corrosive soils). Because the Reduced Size Solar Generation Facility Alternative would not develop CUP 13-0047, potential seismically-induced liquefaction settlement/ground fissures and landslides along the New River flood channel causing damage to solar facilities at CUP 13-0047 would not occur. Further, development of 130 fewer acres under the Reduced Size Solar Generation Facility Alternative would result in less potential for soil erosion associated with Solar Energy Center and Electric Collector Line Corridor during construction, operation and decommissioning activities. However, the Reduced Size Solar Generation Facility Alternative would be subject to compliance with the same regulatory framework and mitigation measures (MM 4.6.1, MM 4.6.2a, MM 4.6.2b, MM 4.6.4, MM 4.6.6, MM 4.6.7, MM 4.6.8 and MM 4.6.9), as the proposed Project in order to reduce impacts to less than significant. Therefore, while specific impacts occurring at CUP 13-0047 would be avoided, overall geology and soils impacts would be similar for both the Reduced Size Solar Generation Facility Alternative and proposed Project, as mitigated.

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Cultural and Paleontological Resources

Under the Reduced Size Solar Generation Facility Alternative, potential to disturb previously unknown subsurface archaeological resources, human remains or paleontological resources would be slightly less than would occur in association with implementation of the proposed Project due the elimination of CUP 13-0047. However, because all CUPs, including CUP 13-0047, consist of land actively disturbed for agricultural activities, the likelihood of encountering cultural resources is considered low under both the Reduced Size Solar Generation Facility Alternative and proposed Project scenario. During cultural/archeological field surveys of the Cultural Resource Survey Area (i.e., all 32 parcels/17 CUPs plus a one-mile radius around the perimeter of the “solar field site parcels”), no resources were identified at CUP 13-0047. As such, removal of CUP 13-0047 would not decrease potential impacts to unevaluated archeological sites as compared to proposed Project. Potential impacts related to unrecorded archeological resources, paleontological resources, or human remains for both the Reduced Size Solar Generation Facility Alternative and the proposed Project would be subject to the same regulatory framework and mitigation measures (MM 4.7.1a, MM 4.7.1b and MM 4.7.3). Therefore, potential impacts to cultural resources would be similar for both the Reduced Size Solar Generation Facility Alternative and the proposed Project.

Noise

No potentially significant noise impacts requiring mitigation were identified in association with the proposed Project. Under the Reduced Size Solar Generation Facility Alternative noise impacts are anticipated to be slightly better than would occur if the proposed Project were implemented because CUP 13-0047 would be eliminated resulting in 130 fewer acres requiring construction and decommissioning. Operational traffic noise and stationary noise impacts would also be slightly better under the Reduced Size Solar Generation Facility Alternative, as operation of 130 acre smaller Solar Energy Center would require less maintenance trips and activities as compared to the proposed Project. However, no sensitive noise receptors were identified adjacent to CUPs 13-0047. As such, noise and groundborne vibration impacts would be similar for both the Reduced Size Solar Generation Facility Alternative and proposed Project.

Agricultural Resources

Potentially significant impacts associated with temporary conversion of agricultural land under the Reduced Size Solar Generation Facility Alternative would be better than those anticipated under the proposed Project because 436 acres of active farmland at CUP 13-0047 would not be developed as part of the Solar Energy Center. Under the Reduced Size Solar Generation Facility Alternative, 45.1 acres of land and soils designated as Prime Farmland, 0.2 acres of land and soils designated as Farmland of Statewide Importance, and 2.3 acres of land and soils designated as Unique Farmland would remain undisturbed at CUP 13-0047. Both the Reduced Size Solar Generation Facility Alternative and proposed Project would be subject to compliance with the same regulatory framework and mitigation measures (MM 4.9.1a, MM 4.9.1b). Under both the Reduced Size Solar Generation Facility Alternative and proposed Project, a Reclamation Plan (mitigation measure MM 4.9.1b) would be implemented at the end of the each CUP’s operational life to restore the soils temporarily disturbed by the Solar Energy Center and Electric Collector Line Corridor. A solar generation facility is an allowed use within the existing A-2, A-2-R and A-3 zoning designations for both the proposed Project and the Reduced Size Solar Generation Facility Alternative with approval of the 17 CUPs submitted to the County. Likewise, both the proposed Project and the Reduced Size Solar Generation Facility Alternative also require approval of 17 Variance applications associated with each parcel to allow Gen-Tie structures to exceed the 120-foot height limitation within these zones. In addition, one solar field site parcel is encumbered with a Williamson Act Contract for both the proposed Project and the Reduced Size Solar Generation Facility Alternative. The Applicant has filed a petition for the cancellation of the Williamson Act Contract

with the County. With approval of the of the 17 CUPs (13-0036 thru 13-0052), 17 Variances (V13-0002 thru V13-0018), and cancellation of Williamson Act Contract, both the proposed Project and the Reduced Size Solar Generation Facility Alternative would result the same less than significant impact with regard to conflicting with zoning and the existing Williamson Act Contract. Both the proposed Project and the Reduced Size Solar Generation Alternative would not involve other changes to the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use. Thus, indirect effects of the temporary conversion of farmland are considered less than significant and similar for both the proposed Project and the Reduced Size Solar Generation Alternative. However, based on the lower level of conversion of Prime Farmland, Farmland of Statewide Importance and Unique Farmland, the Reduced Size Solar Generation Alternative would result in better impacts to agricultural resources as compared to the proposed Project.

Hazards and Hazardous Materials

No potentially significant hazards or hazardous materials impacts requiring mitigation were identified in association with the proposed Project. Risks associated with hazards throughout all CUPs, including construction, operation and decommissioning activities throughout the solar field site parcels (e.g., soil disturbance, use of hazardous materials associated with construction activities) are anticipated to be similar for both the Reduced Size Solar Generation Facility Alternative and the proposed Project. Existing residual on-site hazards from on-going agricultural uses throughout the solar field site parcels would be similar for both the Reduced Size Solar Generation Facility Alternative and the proposed Project. Both the Reduced Size Solar Generation Facility Alternative and proposed Project would be subject to compliance with the same regulatory framework as well as federal, state and local requirements regarding transport, handling and disposal of hazardous materials. Further, risks associated with hazardous materials presence or release are generally addressed in the immediate vicinity of the specific hazard. Upon compliance with applicable regulations and mitigation measures, a less than significant impact is anticipated to occur in association with both the Reduced Size Solar Generation Facility Alternative and the proposed Project. Therefore, potential impacts to hazardous materials/risk of upset would be similar for both the Reduced Size Solar Generation Facility Alternative and the proposed Project.

Hydrology and Water Quality

Under the Reduced Size Solar Generation Facility Alternative, impacts associated with surface water quality from construction, operation, and decommissioning activities, increased impervious surfaces, and potentially higher levels of contaminants in runoff are anticipated to be similar to the proposed Project. However, under the Reduced Size Solar Generation Facility Alternative, the Solar Energy Center would be 130 acres smaller than under the proposed Project. Activities with potential to result in soil erosion or stormwater runoff would occur on 130 fewer acres under the Reduced Size Solar Generation Facility Alternative, and less development resulting in impervious surfaces would occur under the Reduced Size Solar Generation Facility Alternative. However, under both the Reduced Size Solar Generation Facility Alternative and proposed Project, small amounts of runoff would be produced during construction, operation, and decommissioning; potential for erosion and loss of top soil would occur; potential flooding could occur at CUPs 13-0038, 13-0039, and 13-0049; and workers and structures could be placed within FEMA Zone "A" during construction, operation and decommissioning. Likewise, detention facilities meeting County requirements would be implemented; compliance with State and local regulations would be required; implementation of the same Applicant proposed Measures/Project Design Features would occur; and compliance with the same mitigation measures (MM 4.11.1a, MM 4.11.1c, MM 4.11.1d, MM 4.11.4a, MM 4.11.4b MM 4.11.4c, MM 4.11.5a and MM 4.11.5b) would be required for both the Reduced Size Solar Generation Facility Alternative and the proposed Project. The 130 acre reduction in acreage to be developed in association with the Reduced

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Size Solar Generation Facility Alternative compared to the proposed Project is not anticipated to drastically change hydrology and water quality impacts, but would result in the placement of less people and structures in flood hazard areas. Potential impacts relating to Project development and activities in proximity to the 100-year Flood Zone at CUP 13-0047 would not occur under the Reduced Size Solar Generation Facility Alternative. Therefore, impacts to hydrology and water quality would be better in association with implementation of the Reduced Size Solar Generation Facility Alternative as compared to the proposed Project. Nevertheless, the Reduced Size Solar Generation Facility Alternative, as mitigated, and the proposed Project, as mitigated, have similar impacts.

Biological Resources

Construction of the proposed Project would disturb up to 2,793 acres and result in the direct removal of approximately 2,564 acres of vegetation community/land cover types as a result of grading, and installation of proposed Project components. Of this acreage, the proposed Project would result in the removal of 10.69 acres of Arrow Weed Scrub, 2.06 acres of drains and canals, 1.26 acres of open water, and 45.21 acres of tamarisk scrub which are considered sensitive vegetation communities. Under the Reduced Size Solar Generation Facility Alternative, 130 fewer acres associated with CUP 13-0047 would be developed thereby avoiding impacts to 7.72 acres of Arrow Weed Scrub, 0.15 acres of drains and canals, 1.26 acres of open water, and 42.13 acres of tamarisk scrub. Potentially significant direct impacts to sensitive vegetation communities would therefore be slightly better in association with the Reduced Size Solar Generation Facility Alternative based on a reduction in impacts to Arrow Weed Scrub (2.97 acres less), drains and canals (1.91 acres less), and tamarisk scrub (3.08 acres less). Potential for indirect impacts to vegetation communities associated with introduction of non-native plant species, creation of airborne dust, sedimentation and erosion, and jurisdictional waters would also be better under the Reduced Size Solar Generation Facility Alternative as a result of developing 130 fewer acres.

Potential for direct or indirect impacts to jurisdictional waters would be better under the Reduced Size Solar Generation Facility Alternative as well because elimination of CUP 13-0047 would avoid 27.640 acres of impacts to potential WUS and WS; 0.008 acres of impacts to non-WUS and WS; and 19.772 acres of impacts to riparian area jurisdictional to the CDFW. Additionally, permanent impacts from the grading and installation of the solar facilities within CUP 13-0047 would be avoided in association with implementation of the Reduced Size Solar Generation Facility Alternative.

Potential direct and indirect impacts to sensitive wildlife species utilizing on-site and adjacent vegetation communities for nesting, burrowing, foraging, and/or migratory habitat would also be better if the Reduced Size Solar Generation Facility Alternative were implemented because less burrowing/nesting/foraging habitat would be disturbed in association with construction, operation, and decommissioning activities on 130 fewer acres. Further, with 130 less acres developed under the Reduced Size Solar Generation Facility Alternative, sensitive wildlife species would be subject to less potential for collisions with equipment, PV or CPV panels, and electric collector lines/support structures than would occur if the proposed Project were implemented. Nevertheless, the Reduced Size Solar Generation Facility Alternative, as mitigated, and the proposed Project, as mitigated, have similar impacts.

Potential impacts to terrestrial wildlife movement would be similar for both the Reduced Size Solar Generation Facility Alternative and the proposed Project because individual fenced-off CUPs are not anticipated to interfere with larger wildlife routes along the New River, Greeson Drain, or within utility line corridors in the vicinity of the Solar Energy Center. Cumulative impacts are also anticipated to be similar for both the Reduced Size Solar Generation Facility Alternative and the proposed Project because impacts to biological resources would be mitigated to a level of less than significant at the Project-level with implementation of mitigation measures MM 4.12.1a, MM 4.12.1b, MM 4.12.1c, MM 4.12.1d, MM 4.12.1e, MM 4.12.1f (sensitive vegetation communities and habitat/loggerhead

shrike/yellow-headed blackbird/merlin/mountain plover/bats/American badger/wildlife movement); MM 4.12.2 (jurisdictional waters); MM 4.12.3 (special-status plant species); MM 4.12.4 (Southwestern Willow Flycatcher); MM 4.12.5 (Yuma Clapper Rail); MM 4.12.7 (BUOW habitat); MM 4.12.14a, MM 4.12.14b, MM 4.12.14c (nesting and migratory birds/loggerhead shrike/yellow-headed blackbird/merlin/mountain plover/bats/American badger/wildlife movement).

Public Services and Utilities

No potentially significant public services impacts requiring mitigation were identified in association with the proposed Project. The Reduced Size Solar Generation Facility Alternative would require public services similar to the proposed Project, even though 130 fewer acres would be developed. Specifically, under both the Reduced Size Solar Generation Facility Alternative and proposed Project, a similar increase in the demand for fire services and law enforcement services would occur because similar activities, structures, and infrastructure are proposed. Like the proposed Project, the Reduced Size Solar Generation Facility Alternative would not cause the need to expand fire or law enforcement public facilities. Therefore, under the Reduced Size Solar Generation Facility Alternative, impacts to public services would be similar to the proposed Project.

The Reduced Size Solar Generation Facility Alternative would also result in impacts to utilities similar to the proposed Project. Under the Reduced Size Solar Generation Facility Alternative, septic systems associated with a potential O&M building at CUP 13-0047 would not be constructed. However, potential impacts related to septic-capable soils are specific to the immediate septic system area. Therefore, a similar impact would occur under both the Reduced Size Solar Generation Facility Alternative and the proposed Project. The Reduced Size Solar Generation Facility Alternative would result in slightly less demand for solid waste service and landfill capacity, electrical service and facilities, potable water service, and telephone and internet service as a result of provision of these services to one less CUP. The Reduced Size Solar Generation Facility Alternative would generate less than 250 MW of renewable solar energy to contribute to the California electric grid because it would have one less CUP (approximately 20 MW) than the proposed Project. Therefore, impacts to demand for utilities, and availability of electricity supply would be worse in association with implementation of the Reduced Size Solar Generation Facility Alternative compared to the proposed Project.

The Reduced Size Solar Generation Facility Alternative would result in the need for 715 AF/Y more water (5.45 AF/A/Y x 130 acres = 708.5 AF/Y) for continued farming of 130 acres. Farming requires 5.45 AF/A/Y for compared to 3.5 AF/Y required for each CUP under the proposed Project for dust control, panel washing, and fire suppression supply related to the construction, operation, and decommissioning. Therefore, the Reduced Size Solar Generation Facility Alternative would result in the use of more water in association with continued farming on CUP 13-0047 compared to the proposed Project. Impacts to water supply would therefore be worse in association with the Reduced Size Solar Generation Facility Alternative.

6.4.3 ALTERNATIVE 3 - NO PROJECT ALTERNATIVE

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

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Characteristics

Under the No Project Alternative, the Wistaria Ranch Solar Energy Center Project would not be constructed. The solar field site parcels would remain in their existing state as cultivated agricultural fields separated by dirt roads and IID irrigation infrastructure surrounded by agricultural fields and other solar energy generation facilities. No CUP applications, variances or Williamson Act contract cancellation would be requested to develop the proposed Project.

Relationship to Project Objectives

Implementation of the No Project Alternative would fail to fulfill the Project's objectives to develop the Wistaria Ranch Solar Energy Center. Failure to construct the Project would forego development of a new source of renewable energy and forfeit locating a project of this size on previously disturbed land in a rural setting in proximity to the existing electric transmission infrastructure (i.e. the Mount Signal Solar Farm Project Gen-Tie line and IV Substation).

The solar field site parcels remaining in their existing state would not support the objectives of: supplying on-peak renewable power to the electrical grid in California; assisting California in meeting its current and future RPS goals; supporting the GHG reduction goals of AB 32 (California Global Warming Solutions Act of 2006); or assisting California in meeting its energy storage targets. The Applicant would not be able to meet its obligation to meet the terms and requirements of a PPA, and other Project objectives outlined under subsection 6.1, above, would not be achieved. Therefore, the No Project Alternative would not achieve even the basic objectives of the proposed Project.

Comparative Impacts

Aesthetics

Under the No Project Alternative, the aesthetic condition of the solar field site parcels, Electric Collector Line Corridor, and Mount Signal Solar Farm Project Gen-Tie corridor would remain as it currently exists and/or as permitted for development in relation to other projects. Alteration of the solar field site parcels from agriculture fields to a solar energy center would not occur, and the improvements to the Electric Collector Line Corridor and Mount Signal Solar Farm Project Gen-Tie corridor would not be needed. As such, there would be no new sources of light or glare introduced to the solar field site parcels. Likewise, no changes to the existing aesthetic condition of the solar field site parcels would occur. While impacts to aesthetics associated with the proposed Project were determined to be less than significant, changes in existing views would be avoided if the No Project Alternative were implemented. Therefore, aesthetic impacts would be better under the No Project Alternative compared to the proposed Project.

Land Use

The solar field site parcels have existing General Plan land use and zoning designations for agricultural uses. Solar energy electrical generators, electrical power generating plants, substations, and facilities for the transmission of electrical energy are allowed as conditional uses under the existing agricultural designations. The proposed Project would require approval of 17 CUP applications for each of the proposed CUP sites, and 17 variance requests for transmission line poles that may exceed the maximum allowable height limit of 120 feet. Under the No Project Alternative, no CUP applications or height variances would be required as the proposed Project would not be developed. The existing land use pattern would remain unchanged as agricultural land. Because the proposed and current land uses are permitted within the existing A-2, A-2-R and A-3 zones, potential impacts to land use are similar under the No Project Alternative and the proposed Project.

Transportation and Circulation

Under the No Project Alternative, no short-term Project construction or decommissioning traffic would be generated. Long-term operational traffic would also not be generated under the No Project Alternative. Traffic associated with on-going agricultural operations would continue to occur on Project study area intersections, roadway segments and intersections. This would not represent a change as compared to existing conditions. No major changes in traffic volumes or patterns would occur as a result of the No Project Alternative. Likewise, no change in hazard due to a design feature would occur in association with the No Project Alternative. Although the proposed Project would have a less than significant impact with regard to LOS impacts on Project study area intersections, roadway segments and freeway segments, the No Project Alternative would avoid construction traffic and associated damage to County-maintained roadways. Therefore, potential impacts to traffic and circulation would be better in association with implementation of the No Project Alternative compared to the proposed Project.

Air Quality

Short-term construction and decommissioning-related air quality impacts would not occur if the No Project Alternative were implemented as no construction would take place in the Project area, and therefore, no decommissioning would be required. Likewise, potential to conflict with or obstruct an air quality plan or violate an air quality standard as a result of construction and decommissioning activities would not occur. Under the No Project Alternative, the solar field site parcels would continue to be operated as active farmland, generating dust and DPM during cultivation and harvesting activities as part of on-going operations subject to ICAPCD Rule 800 (General Requirements for Control of Fine Particulate Matter [PM-10]). Therefore, construction, operation and decommissioning of the No Project Alternative and the proposed Project may result in overall similar air quality emissions impacts. However, the No Project Alternative would not result in the generation of up to 250 MW of renewable solar energy. This energy generation need could be met through non-renewable, air pollutant generating fossil fuels. Therefore, long-term air quality impacts would be worse if the No Project Alternative were implemented as compared to the proposed Project.

Climate Change and Greenhouse Gases

Short-term construction and decommissioning-related GHG/climate impacts would not occur under the No Project Alternative as no construction would take place in the Project area, and therefore, no decommissioning would be required. Under the No Project Alternative, GHGs would continue to be generated in association with the operation of farm equipment similar to existing conditions. However, the No Project Alternative would not result in the generation of up to 250 MW of renewable solar energy. This 250 MW energy generation need could be met through non-renewable, GHG emitting fossil fuels. Therefore, GHG/GCC impacts would be worse if the No Project Alternative were implemented as compared to the proposed Project.

Geology and Soils

Under the No Project Alternative, no new structures would be built on the solar field site parcels, Electric Collector Line Corridor, or Mount Signal Solar Farm Project Gen-Tie alignment. Under the No Project Alternative, impacts associated with geologic hazards (i.e. liquefaction, expansive, corrosive soils) would be avoided as none of the solar energy center structures (i.e. PV or CPV panels, switch yard, etc.), facilities (i.e. O&M buildings, water tanks), or electric collector/gen-tie support structures would be developed. The No Project Alternative would not result in any change regarding geologic or soils conditions compared to existing conditions. Therefore, geology and soils impacts would be better in association with the No Project Alternative compared to the proposed Project.

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Cultural and Paleontological Resources

Cultural resource impacts resulting from potential disturbance of undiscovered resources are not likely to occur under the No Project Alternative as the solar field site parcels would remain in their existing active agriculture condition. Construction activities required to install the Project (i.e. solar panel footing installation) would not occur. Potential to disturb previously unknown subsurface archaeological, human remains or fossils would continue to be unlikely, as no deep disturbance of soils layers would occur. Potential impacts to newly identified archaeological sites CA-IMP-12134, CA-IMP-12135, P-13-014393, CA-IMP-12136, P-13-014395, P-13-014396 could still occur under the No Project Alternative as a result of active agricultural operations. However, there would be no guarantee of avoidance or mitigation as is prescribed under the proposed Project. Overall, however, potential impacts to unknown cultural resources could be worse in association with implementation of the No Project Alternative compared to the proposed Project, because no mitigation (i.e. monitors) would be present to prevent destruction of any resources should they be disturbed.

Noise

Short-term construction-related noise impacts would not occur under the No Project Alternative. Although the Applicant proposed Measures/Project Design Features would prevent the Project from generating significant noise impacts, implementation of the No Project Alternative would result in lower noise levels compared to the proposed Project. Similarly, without development of the solar field site parcels, Electric Collector Line Corridor improvements and Mount Signal Solar Farm Project Gen-Tie line upgrades, operational noise levels would remain at current levels associated with active agricultural operations and no decommissioning noise would be generated. While the proposed Project would not generate any potentially significant noise impacts, the No Project Alternative would avoid generation of construction, operation and decommissioning noise. Therefore, noise impacts would be avoided and therefore better if the No Project Alternative were implemented as compared to the proposed Project.

Agricultural Resources

No impacts to agricultural resources would occur in association with the No Project Alternative as the solar field site parcels would continue to be in active agricultural operation similar to existing conditions. Prime Farmland, Unique Farmland, Farmland of Statewide Importance within the solar field site parcels would not be temporarily converted and would continue to be used for agricultural purposes. While the proposed Project has a temporary impact on agricultural soils, implementation of the Reclamation Plan (required as MM 4.9.1b) would prevent the permanent conversion of the valuable agricultural soils. Therefore, impacts to agricultural resources would be similar for both the No Project Alternative and the proposed Project, as mitigated.

Hazardous Materials/Risk of Upset

No potentially significant hazards or hazardous materials impacts requiring mitigation were identified in association with the proposed Project. Under the No Project Alternative, the solar field site parcels would remain in their current condition as active farmland. No change would occur with regard to pesticide use, existing pesticide residue in soils, or transport of hazardous materials. Both the No Project Alternative and the proposed Project must comply with all applicable local, state and federal laws for the handling and disposal of hazardous materials regardless of their nature (i.e. for construction or farming purposes). Therefore, potential impacts to hazardous materials/risk of upset would be similar for both the No Project Alternative and the proposed Project.

Hydrology and Water Quality

Implementation of the No Project Alternative would result in no changes to existing runoff rates or patterns. Without the introduction of a solar energy center, no new pervious surfaces or structures

would be developed on the solar field site parcels and stormwater runoff would continue to be allowed to percolate uninhibited over surface soils. The No Project Alternative would also avoid any potential for placing solar array field facilities within areas identified by FEMA as Zone A. Erosion and siltation associated with agricultural operations would continue to occur under the No Project Alternative. Therefore, on-site impacts to hydrology and water quality would be better in association with the No Project Alternative compared to the proposed Project. However, cumulative off-site water quality impacts would be worse under the No Project Alternative because watering of crops during farm operations would continue to leach salts out of the soil and transport them to the Salton Sea, further contributing to the Salton Sea's water quality impairment.

Biological and Natural Resources

Under the No Project Alternative, the solar field site parcels would remain in their current condition as active agricultural land thereby avoiding disturbance of up to 2,793 acres resulting in the direct removal of approximately 2,564 acres of vegetation community/land cover types as a result of grading, and installation of proposed Project components. The No Project would preserve 10.69 acres of Arrow Weed Scrub, 2.06 acres of drains and canals, 1.26 acres of open water, and 45.21 acres of tamarisk scrub which would otherwise be disturbed in association with implementation of the proposed Project.

Potential for direct or indirect impacts to jurisdictional waters would be better under the No Project Alternative as well because 27.725 acres of impacts to potential WUS and WS; 0.054 acres of impacts to non-WUS and WS; and 19.829 acres of impacts to riparian area jurisdictional to the CDFW would not be disturbed as would be the case if the proposed Project were implemented. Additionally, permanent impacts from the grading and installation of the solar facilities would be avoided in association with implementation of the proposed Project.

Potential direct and indirect impacts to sensitive wildlife species using on-site and adjacent vegetation communities for nesting, burrowing, foraging, and/or migratory habitat would also be better if the No Project Alternative were implemented because less burrowing/nesting/foraging habitat would be disturbed in association on-going agricultural operations compared to the proposed Project. Further, with continued agricultural activities on the proposed solar field site parcels under the No Project Alternative, sensitive wildlife species would be subject to less potential for collisions with equipment, PV or CPV panels, and electric collector lines/support structures than would occur under the proposed Project.

Nevertheless, the proposed Project, as mitigated, would have similar or even better impacts than the No Project Alternative based on the requirements of the mitigation measures (i.e. presence of on-site monitors to identify potential BUOW habitat; active nests; enforce avoidance, minimization and mitigation measures) which would otherwise not be required under the No Project Alternative.

Potential impacts to terrestrial wildlife movement would be similar for both No Project Alternative and the proposed Project because individual fenced-off CUPs are not anticipated to interfere with larger wildlife routes along the New River, Greens Drain, or within utility line corridors in the vicinity of the Solar Energy Center. Cumulative impacts would be similar for both the No Project Alternative and the proposed Project, or potentially worse for the No Project Alternative because impacts to biological resources would be mitigated to a level of less than significant at the Project level through mitigation measures MM 4.12.1a, MM 4.12.1b, MM 4.12.1c, MM 4.12.1d, MM 4.12.1e, MM 4.12.1f (sensitive vegetation communities and habitat/loggerhead shrike/yellow-headed blackbird/merlin/mountain plover/bats/American badger/wildlife movement); MM 4.12.2 (jurisdictional waters); MM 4.12.3 (special-status plant species); MM 4.12.4 (Southwestern Willow Flycatcher); MM 4.12.5 (Yuma Clapper Rail); MM 4.12.7 (BUOW habitat); MM 4.12.14a, MM 4.12.14b, MM 4.12.14c (nesting and migratory

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birds/loggerhead shrike/yellow-headed blackbird/merlin/mountain plover/bats/American badger/wildlife movement).

Public Services and Utilities

No potentially significant public services impacts requiring mitigation were identified in association with the proposed Project. Under the No Project Alternative the proposed Solar Energy Center, Electric Collector Line Corridor improvements, and Mount Signal Solar Farm Project Gen-Tie line improvements would not be constructed. Impacts to the ICFD and ICSO would be avoided; no wastewater would be generated; no change in the amount of solid waste pick-up or disposal would occur; no additional electrical infrastructure would need to be extended; and no telephone or internet service would be required. Under the No Project Alternative, water supply would be impacted more severely as compared to the proposed Project because active farmland requires more water (approximately 5.45 AF/A/Y x 2,589 net acres = 14,110 AF/Y) than would the Project’s solar array fields (60 AF/Y). Further, under the No Project Alternative, no new renewable energy would be generated on the solar field site parcels and distributed to the California electricity grid. Therefore, impacts related to utilities would be worse under the No Project Alternative as compared to the proposed Project.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based upon the evaluation described in this section, the No Project Alternative (Alternative 3) is considered to be the environmentally superior alternative as it would avoid most adverse impacts associated with the proposed Project. The No Project Alternative was determined to have less adverse environmental impacts than the proposed Project on most issues overall. However, the No Project Alternative would have a greater long-term impact on air quality and indirect impact on climate change/greenhouse gases than would the proposed Project, specifically with regard to continued agricultural dust and equipment emissions and continued reliance on fossil fuels for electricity rather than renewable energy created by the proposed Project.

Under CEQA Guidelines Section 15126.6 (e)(2), if the environmentally superior alternative is the No Project Alternative, another environmentally superior alternative must be selected from the other alternatives analyzed. After the No Project Alternative, the alternative with the least potential impacts would be the Reduced Size Solar Generation Facility Alternative. This alternative would avoid more potential impacts to biological resources than the Williamson Act Avoidance Alternative because the Reduced Size Solar Generation Facility Alternative is proximate to the New River and eliminating development of CUP 13-0047 would avoid impacts to a greater amount of sensitive vegetation and jurisdictional waters acreage. In addition, the Reduced Size Solar Generation Facility Alternative would avoid potentially significant impacts to floodplains contained in CUP 13-0047. Other than indirect impacts to GHG emissions/GCC, none of the impacts that would occur if the Reduced Size Solar Generation Facility Alternative were implemented would be worse than those of the proposed Project and many would be similar. Therefore, the Reduced Size Solar Generation Facility Alternative would be the environmentally superior alternative based on an analysis of avoiding potentially significant impacts. However, the Reduced Size Solar Generation Facility Alternative is only superior in that it requires less mitigation to achieve the same insignificant environmental impact as the proposed Project. Therefore, the County will have to exercise its discretion whether or not the reduced ability to achieve certain project objectives caused by Reduced Size Solar Generation Facility Alternative outweigh any benefit to merely requiring the proposed Project to provide more mitigation than the Reduced Size Solar Generation Facility Alternative.

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

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

ISSUE AREA/IMPACT	WILLIAMSON ACT AVOIDANCE ALTERNATIVE	REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE	NO PROJECT ALTERNATIVE
AESTHETICS			
Impact 4.1.1 Adverse Effect on Scenic Vista	S	S	B
Impact 4.1.2 Degrade Existing Visual Character or Quality of the Site	S	S	B
Impact 4.1.3 New Source of Substantial Light or Glare	S	S	B
Impact 4.1.4 Cumulative Visual Impacts	S	S	B
LAND USE			
Impact 4.2.1 Conflict With Any Applicable Land Use Plan, Policy, or Regulation	S	S	B
Impact 4.2.2 Cumulative Conflicts with Applicable Land Use Plans, Policies, or Regulations	S	S	B
TRANSPORTATION AND CIRCULATION			
Impact 4.3.1 Conflict with Applicable Plan/LOS Standard (Year 2013 With Project)	B	B	B
Impact 4.3.2 Conflict with Applicable Plan/LOS Standard (Near-Term Year 2016 With Project)	B	B	B
Impact 4.3.3 Conflict with Applicable Plan/LOS Standard (Mid-Term Year 2019 With Project)	B	B	B
Impact 4.3.4 Conflict with Applicable Plan/LOS Standard (Mid-Term Year 2019 With Project)	B	B	B
Impact 4.3.5 Increase Hazards Due to a Design Feature	S	S	B
Impact 4.3.6 Damage to County-maintained Roadways During Project Construction	B	B	B
Impact 4.3.7 Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS (Existing Year 2013 With Project Construction With Cumulative Conditions)	B	B	B
Impact 4.3.8 Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS (Near-Term Year 2016 With Project Construction With Cumulative Conditions)	B	B	B
Impact 4.3.9 Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS (Mid-Term Year 2019 With Project Construction With Cumulative Conditions)	B	B	B
Impact 4.3.10 Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS (Long-Term Year 2024 With Project Construction With Cumulative Conditions)	B	B	B
Impact 4.3.11 Cumulative Increase Hazards Due to a Design Feature	B	B	B
Impact 4.3.12 Cumulative Damage to County-maintained Roadways During Project Construction	B	B	B

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

ISSUE AREA/IMPACT	WILLIAMSON ACT AVOIDANCE ALTERNATIVE	REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE	NO PROJECT ALTERNATIVE
AIR QUALITY			
Impact 4.4.1 Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard	B	B	W
Impact 4.4.2 Expose Sensitive Receptors to Substantial Pollutant Concentrations	S	S	B
Impact 4.4.3 Create Objectionable Odors Affecting a Substantial Number of People	S	S	B
Impact 4.4.4 Cumulative - Violate Air Quality Standard/Cause Air Quality Violation	S	S	W
CLIMATE CHANGE AND GREENHOUSE GASES			
Impact 4.5.1 Generation of Greenhouse Gas Emissions	W	W	W
Impact 4.5.2 Conflict with an Applicable Plan, Policy, or Regulation Adopted to Reduce Greenhouse Gas Emissions	W	W	W
GEOLOGY AND SOILS			
Impact 4.6.1 Strong Seismic Ground Shaking	S	S	B
Impact 4.6.2 Liquefaction/Ground Failure	S	B	B
Impact 4.6.3 Seismically-Induced Flooding	B	S	B
Impact 4.6.4 Landslides	S	B	B
Impact 4.6.5 Soil Erosion	B	S	B
Impact 4.6.6 Expansive Soils	S	S	B
Impact 4.6.7 Soil Capability to Support Septic Systems	S	S	B
Impact 4.6.8 Soil Corrosivity	S	S	B
Impact 4.6.9 Cumulative Exposure to Geologic and Seismic Impacts	S	S	B
CULTURAL RESOURCES			
Impact 4.7.1 Impacts to Unevaluated Archaeological Sites	S	S	B
Impact 4.7.2 Impacts to Unrecorded Subsurface Archaeological Resources	S	S	W
Impact 4.7.3 Impacts to Previously Unknown Subsurface Human Remains	S	S	B
Impact 4.7.4 Impacts to Nonrenewable Fossil Remains	S	S	W
Impact 4.7.5 Cumulative Impacts to Archaeological and Historic Resources	S	S	W
Impact 4.7.6 Cumulative Impacts to Paleontological Resources	S	S	B

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

ISSUE AREA/IMPACT	WILLIAMSON ACT AVOIDANCE ALTERNATIVE	REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE	NO PROJECT ALTERNATIVE
NOISE			
Impact 4.8.1 Noise Levels in Excess of Standards/Substantial Temporary Noise Increase	S	S	B
Impact 4.8.2 Noise Level Increases at Sensitive Receptors	S	S	B
Impact 4.8.3 Groundborne Vibration or Groundborne Noise Level Impacts	S	S	B
Impact 4.8.4 Airport-Related Noise Impacts	S	S	S
Impact 4.8.3 Cumulative Noise Increases	S	S	S
AGRICULTURAL RESOURCES			
Impact 4.9.1 Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance	B	B	B
Impact 4.9.2 Conflict with Zoning and Existing Williamson Act Contract	B	S	B
Impact 4.9.3 Indirect Environmental Effects of Conversion of Farmland	B	B	B
Impact 4.9.3 Cumulative Agricultural Resources Impacts	B	B	B
HAZARDS AND HAZARDOUS MATERIALS			
Impact 4.10.1 Hazardous Materials Transport, Use, Disposal and Accidental Release	S	S	B
Impact 4.10.2 Hazard Through Upset/Release of Hazardous Materials	S	S	B
Impact 4.10.3 Cumulative Hazards and Hazardous Materials Impact	S	S	B
HYDROLOGY AND WATER QUALITY			
Impact 4.11.1 Violate Water Quality Standards or Waste Discharge Requirements	S	S	B
Impact 4.11.2 Result in Depleted Groundwater Supplies or Interfere Substantially with Groundwater Recharge	S	S	B
Impact 4.11.3 Result in Substantial Erosion or Siltation On- or Off-site	B	B	B
Impact 4.11.4 Result in Substantial Flooding On- Or Off-Site/Create or Contribute Runoff Exceeding Capacity	S	S	B
Impact 4.11.5 Result in Placement of People or Structures within an Area Subject to Flood Hazards	B	B	B
Impact 4.11.6 Cumulative Impact to Hydrology and Water Quality	S	S	W

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

ISSUE AREA/IMPACT	WILLIAMSON ACT AVOIDANCE ALTERNATIVE	REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE	NO PROJECT ALTERNATIVE
BIOLOGICAL RESOURCES			
Impact 4.12.1 Impacts to Sensitive Vegetation Community/Land Cover Type	B	B	B
Impact 4.12.2 Impacts to Jurisdictional Areas	B	B	W
Impact 4.12.3 Impacts to Special Status Plant Species	B	B	W
Impact 4.12.4 Construction Impacts to Special Status Animal Species – Southwestern Willow Flycatcher	B	B	B
Impact 4.12.5 Construction Impacts to Special Status Animal Species with Potential to Occur in the Biological Study Area – Sandhill Crane	B	B	B
Impact 4.12.6 Impacts to Non-listed Special Status Animal Species – Burrowing Owl	B	B	W
Impact 4.12.7 Impacts to Non-listed Special Status Animal Species – Loggerhead Shrike	B	B	B
Impact 4.12.8 Impacts to Non-listed Special Status Animal Species - Yellow-headed Blackbird	B	B	B
Impact 4.12.9 Impacts to Non-listed Special Status Animal Species - Merlin	B	B	B
Impact 4.12.10 Impacts to Non-listed Special Status Animal Species – Mountain Plover	B	B	B
Impact 4.12.11 Impacts to Non-listed Special Status Animal Species – Bats	B	B	B
Impact 4.12.12 Impacts to Non-listed Special Status Animal Species – American Badger	B	B	B
Impact 4.12.13 Impacts to Nesting and Migratory Birds	B	B	B
Impact 4.12.14 Impacts to Wildlife Movement	S	S	B
Impact 4.12.15 Cumulative Impacts to Biological Resources	S	S	W
PUBLIC SERVICES AND UTILITIES			
Impact 4.13.1 Impacts to ICFD Services	S	S	B
Impact 4.13.2 Impacts to ICFD Accessibility	S	S	B
Impact 4.13.3 Cumulative Impacts to ICFD Fire Protection and Emergency Response	S	S	B
Impact 4.13.4 Impacts to Law Enforcement Services	S	S	B
Impact 4.13.5 Cumulative Law Enforcement Impacts	S	S	B
Impact 4.13.6 Impacts to Water Supply	W	W	W
Impact 4.13.7 Cumulative Water Supply Impacts	W	W	W

6.0 ALTERNATIVES

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

ISSUE AREA/IMPACT	WILLIAMSON ACT AVOIDANCE ALTERNATIVE	REDUCED SIZE SOLAR GENERATION FACILITY ALTERNATIVE	NO PROJECT ALTERNATIVE
Impact 4.13.8 Wastewater Treatment and Infrastructure	S	S	B
Impact 4.13.9 Cumulative Wastewater Impacts	S	S	B
Impact 4.13.10 Impacts to Solid Waste Service and Landfill Capacity	S	S	B
Impact 4.13.11 Cumulative Impacts to Solid Waste Service and Landfill Capacity	S	S	B
Impact 4.13.12 Impacts to Electrical Service and Facilities	W	W	W
Impact 4.13.13 Cumulative Impacts to Electric Service	W	W	W
Impact 4.13.14 Impacts to Telephone and Internet Service	S	S	B
Impact 4.13.15 Cumulative Impacts to Telephone and Internet Services	S	S	B

Notes: S = Similar Impact compared to the Proposed Project
 B = Better Impact compared to the Proposed Project
 W = Worse Impact compared to the Proposed Project.