2.0 PROJECT DESCRIPTION

2.1 Introduction

This chapter of the Draft SEIR describes the Project proposed by the Applicant. The Applicant proposes to construct, operate and maintain a utility-scale BESS capable of storing 125 MW of electric energy incorporating traditional lithium-ion batteries located entirely within the footprint of the existing CSE facility. CSE and the Applicant are affiliates of LS Power Development, LLC. Project information identified in this chapter is based on technical studies, figures, geographic information system (GIS) research, and the CUP application provided by the Applicant.

This SEIR is intended to supplement the previously certified 2011 FEIR (State Clearinghouse No. 2010111056). The 2011 FEIR evaluated the construction and operation of a solar photovoltaic electric generation facility on privately owned land [Centinela Solar Energy Facility (CSE facility)] which is under the jurisdiction of Imperial County. The purpose of this Draft SEIR is to supplement the 2011 FEIR with information about the Project. The focus of this Draft SEIR is to determine if the environmental impacts of the construction and operation of the proposed Project creates any significant new or substantially more severe environmental impact than were identified and analyzed in the 2011 FEIR. Preparation of this Draft SEIR does not "re-open" the previously certified FEIR; the analysis is limited to whether the Project results in new or different incremental impacts.

Information referring to land disturbance, equipment, schedule, and workforce is based on the most up-to-date engineering available from the Applicant and generally represent conservative estimates. The Project configuration may change based on final engineering and permit conditions or requirements.

2.1.1 Overview of Battery Energy Storage Technology

Utility-scale energy storage is a collection of technologies used to store electrical energy on a large scale within an electrical power grid. The recent increase in solar and wind generating capacity has led to a strong push for the development of energy storage technologies. Energy storage involves storing excess electrical energy when electricity production exceeds demand and returning this electricity to the grid at a later time when demand is high. If implemented on a large scale, energy storage could assist in resolving the intermittency and overgeneration of solar and other renewable energy and allow greater penetration of renewable energy on the grid. Energy storage systems cannot create electricity, but can receive, store, and return electricity to the grid.

A battery is an electrochemical device that stores and delivers energy. A BESS can dispatch stored energy in a highly responsive and reliable manner, which is important for grid operators to efficiently manage the grid. The major components of a typical BESS are listed below in Section 2.6.

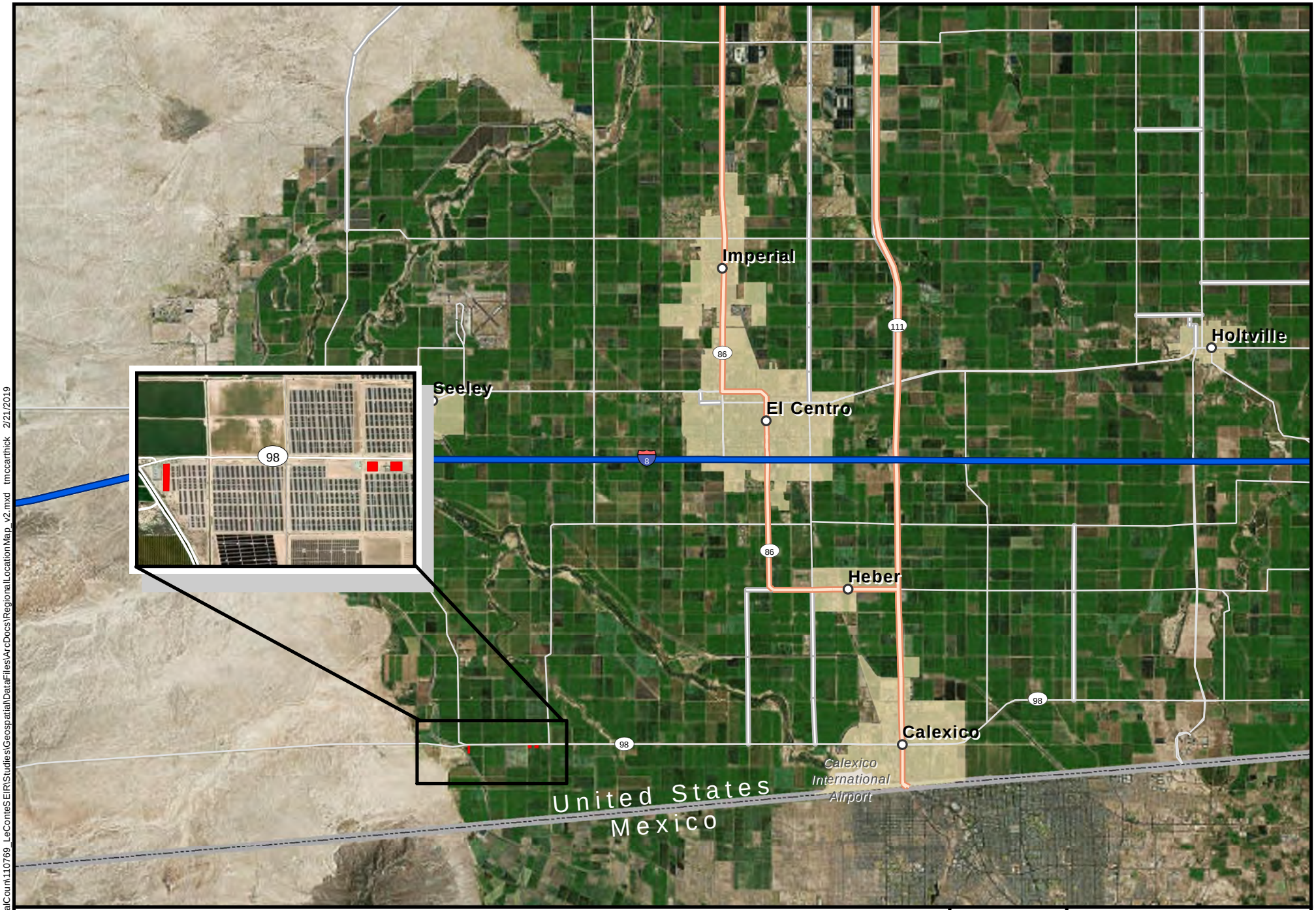
There are several types of batteries available for large-scale stationary storage. This Project will use lithium-ion battery technology because it offers the best mix of performance specifications, such as high charge and discharge efficiency, low self-discharge, high energy density, and long cycle life.

2.1.2 Project Background

The existing CSE facility consists of a 170 MW PV solar project located on approximately 1,600 acres. The CSE facility is situated in unincorporated western Imperial County southeast of the Imperial Valley Substation and south of Seeley, California, near Mount Signal and approximately eight miles southwest of the City of El Centro. **Figure 2-1** depicts the regional location of the property.

In December 2011, the County of Imperial Board of Supervisors certified the Final Environmental Impact Report (State Clearinghouse Number 2010111056) for the Centinela Solar Energy Project; approved a CUP (CUP 10-0007) to construct and operate a 275 MW project on parcels zoned for agriculture (i.e., A-2, A-2-R and A-3); approved a Variance (V11-0003) to allow the transmission towers to exceed the 120-foot height limit within the A-2-R and A-3 zones; and approved other associated discretionary actions. CSE was place into commercial operation in August 2014.

On June 22, 2018, the Applicant submitted an application for a CUP (CUP # 18-0018) to Imperial County Planning and Development Services (ICPDS). The CUP application was submitted to allow installation and operation of: one or more buildings, totaling approximately 85,000 square feet, to contain electrochemical batteries, racks and related building and electrical control systems; inverters, an on-site substation and an overhead 230 kilovolt (kV) electric line; all located within the existing CSE site.



Proposed Battery Energy Storage System
Interstate
Major Highway
Major Road
Airport
National Boundary

N

4 0 4
Miles

BURNS McDONNELL

Figure 2-1
Regional Location Map
Imperial County, California

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This Draft SEIR is being prepared to analyze the potential environmental impacts of the proposed Project and fulfill the requirements of CEQA.

2.2 Proposed Project Overview

The proposed Project consists of the construction and operation of a BESS with up to 125 MW of electrical storage capacity to receive and store excess energy and to return this electricity to the grid at a later time when needed. The Project will be situated on approximately three to five acres within the fence line of the existing CSE site, located at 319 Brockman Road, Calexico, CA (**Figure 2-2**). Construction activities are expected to take approximately 12 months. Major Project components include the following: up to two buildings totaling 85,000 square feet in size; batteries and enclosures; power conversion systems; substation and overhead electric tie line; and ancillary systems. The Project's characteristics are described in more detail in Section 2.6.

2.3 Project Objectives

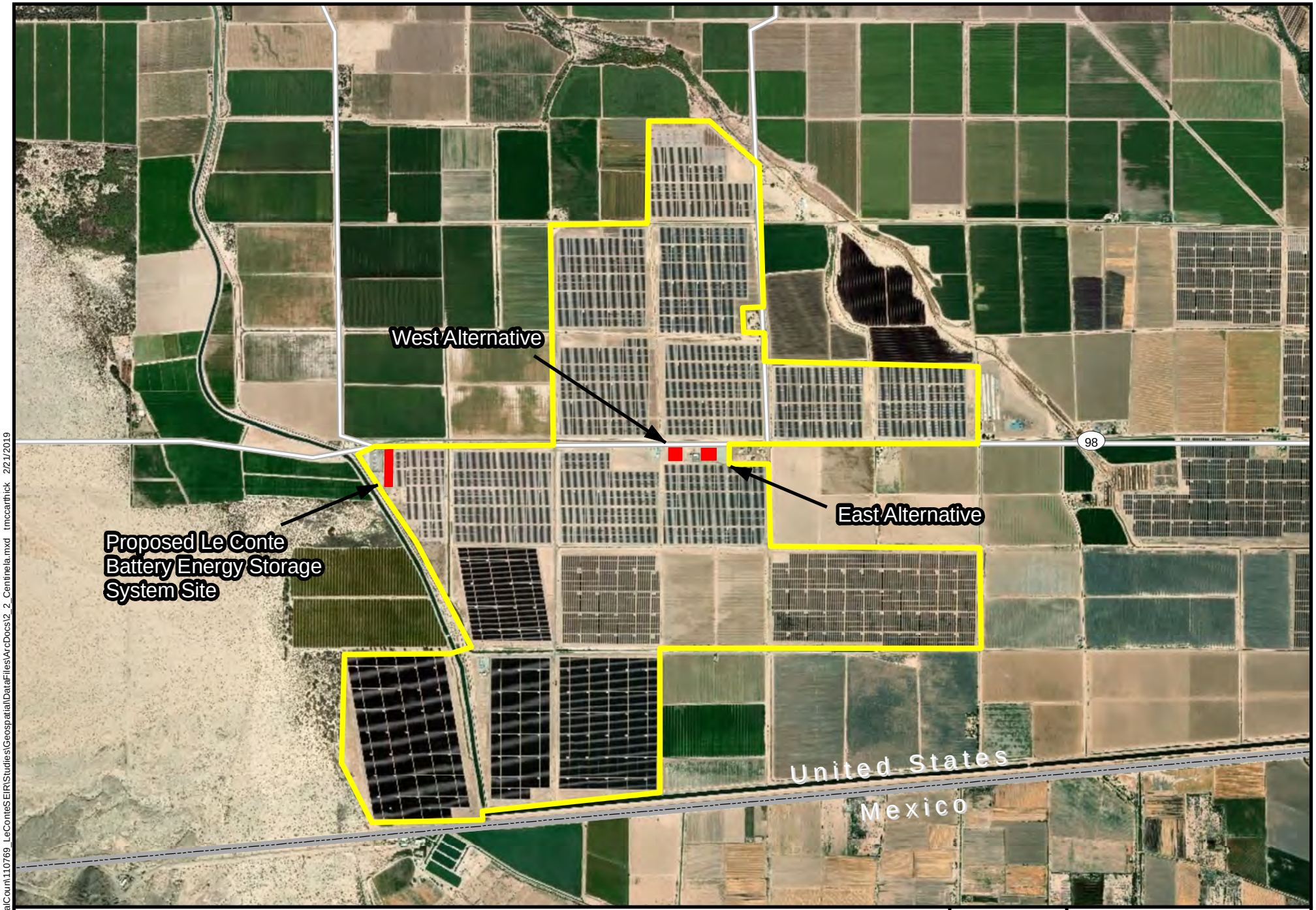
The primary purpose of the Project is to reliably and economically receive, store and return up to 125 MW of electric energy to the electric grid. Charging energy will be provided from the electric grid which will include solar energy currently produced by projects interconnected at the Drew and IV substations. The Project will electrically connect to the adjacent San Diego Gas & Electric (SDG&E) Drew Switchyard which is directly connected to the Imperial Valley substation.

The Project is consistent with the goals and policies of the County General Plan and is consistent with the purpose of the zone in which it will be sited. The County General Plan's goals include:

"…support[ing] the safe and orderly development of renewable energy while providing for the protection of environmental resources" and "support[ing] development of renewable energy resources that will contribute to and enhance the economic vitality of Imperial County[.]" (Imperial County Renewable Energy Transmission Element, 2015)

The Project will help achieve these goals by making renewable energy projects more efficient by capturing and transmitting energy that might otherwise go unused. The following objectives have been identified for the proposed Project:

- Assist the State in achieving the Renewable Portfolio Standard (RPS) and greenhouse gas (GHG) emissions reduction objectives by constructing a BESS;
- Provide a new economic and reliable means of capturing, storing and managing renewable energy (up to 125 MW) that would otherwise be lost;



Centinela Solar Energy Site

Proposed Battery Energy Storage System

Major Road

National Boundary

N

3,900 0 3,900

Scale in Feet

BURNS McDONNELL

Figure 2-2
Centinela Solar Energy Site
Imperial County, California

Issued: 2/21/2019

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- Provide benefits to Imperial County, the region and the State of California including construction jobs, property and sales taxes, and increased energy efficiency;
- Receive solar-generated electricity during times of excess generation or times of low energy demand and store that power for release when the customer deems it to be more valuable thus increasing the effectiveness of Imperial County renewable energy projects; and
- Locate the Project on available land previously disturbed during construction of the CSE project, therefore minimizing environmental and land impacts.

2.4 Project Location

The Project will be located within the boundary of the CSE site on land wholly owned by CSE (APN 052-190-041). **Figure 2-3** provides an overview of the Project site plan and the immediate surrounding area and site location are shown on **Figure 2-4**. The Project is proposed to be located immediately adjacent to the east side of the existing SDG&E Drew Switchyard (**Figure 2-5**) within the western portion of the overall CSE facility site just south of SR 98, and west of the existing CSE solar panels. The CSE site is bounded by Fisher Road to the north, Mandrapa Road and Westside Main Canal on the west, Rockwood Road to the east, and the Woodbine Lateral Four sits just south of the CSE southern limits. California State Route (SR 98) bisects the overall CSE site from east to west and Brockman Road bisects the site from north to south.

2.5 Environmental Setting

The topography of the Imperial Valley is relatively flat. The valley floor slopes gently to the north (less than 0.5 percent) from an elevation of sea level at Calexico to approximately 225 feet below sea level at the Salton Sea. The Project area is located in the Colorado Desert Physiographic province of southern California. The dominant feature of the Colorado Desert province is the Salton Trough, a geologic structural depression resulting from large-scale regional faulting. The trough is bounded on the northeast by the San Andreas Fault and the southwest by faults of the San Jacinto Fault Zone. Annual rainfall in this arid region is less than 3 inches per year with four months of average summertime temperatures above 100ºF. Winters temperatures are mild, seldom reaching freezing. The CSE facility site is located on the western and southern fringe of developed agricultural lands in the County.

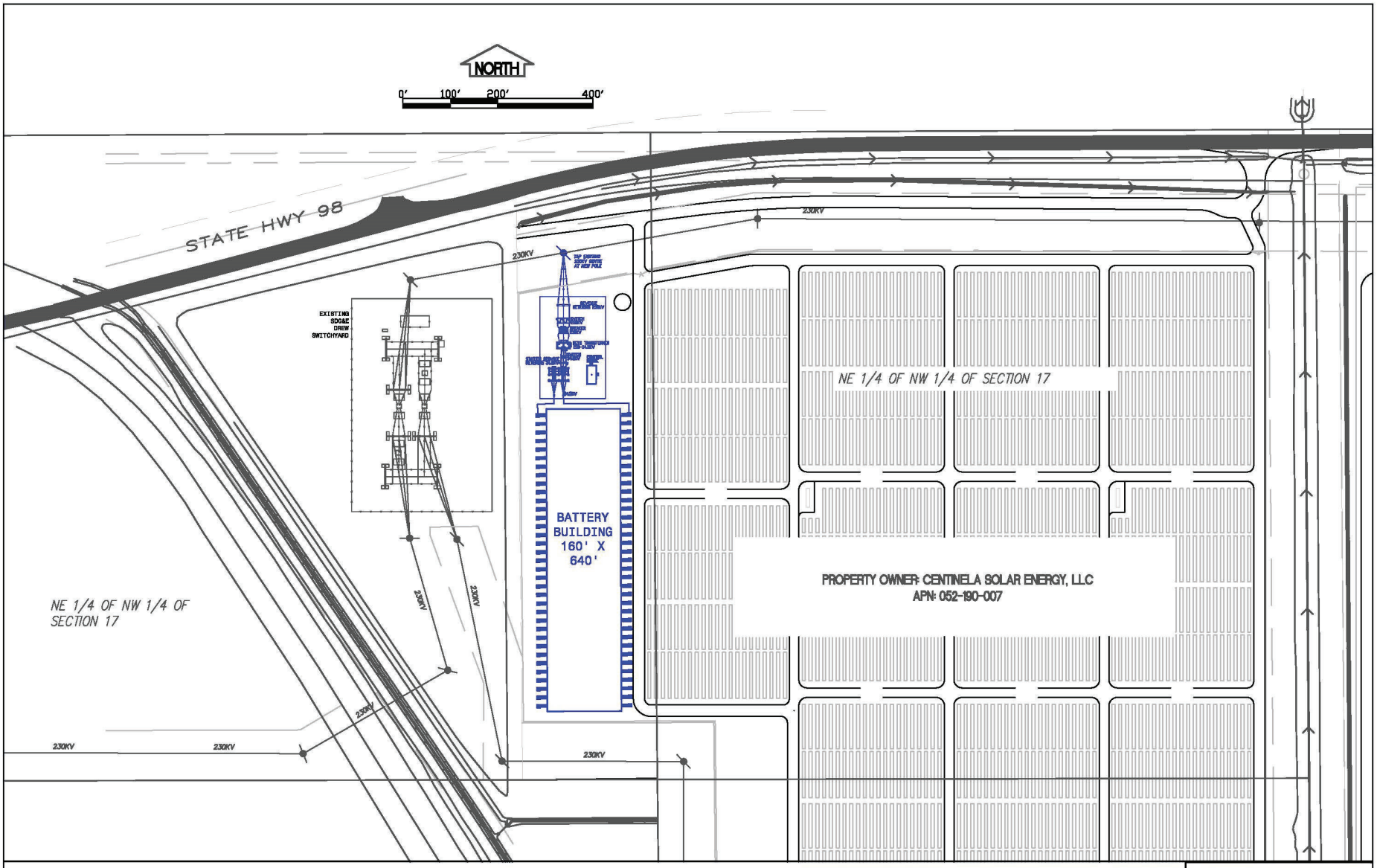


Figure 2-3
Proposed Le Conte
Battery Energy Storage
System Site Plan

BURNS McDONNELL

Figure 2-4
Proposed Project Site

BURNS McDONNELL

Figure 2-5
Existing SDG&E
Drew Switchyard

Land uses surrounding the CSE facility site include existing solar development, agricultural lands and the U.S. International Border with Mexico located approximately one mile to the south; the BLM California Desert Conservation Area Plan Utility Corridor N within the Yuha Basin, agricultural lands, and Westside Main Canal to the west; agricultural lands with a few rural residences, mobile homes and Mount Signal Slough are located approximately 500 feet to the east; and agricultural lands, the abandoned Mt. Signal Café, a few mobile homes and abandoned farm labor camp housing are located to the north along SR 98 and Brockman Road. SR 98 aligns east-west through the overall CSE site dividing the northern parcels from the southernmost parcels on the CSE facility.

2.6 Project Characteristics

As described above, the Project will be located on land previously disturbed and entirely within the boundary of the existing CSE facility. The proposed Project represents a complementary use to the CSE project. The Project will allow for efficient storage of energy available on the wholesale power grid, including renewable energy generated in the County so that it is available when needed most. The Project will use battery energy storage technology to absorb and discharge electrical energy onto the SDG&E owned power grid, which is controlled by the California Independent System Operator (CAISO). The Project's energy storage system will be similar in layout and appearance to a data center or "server farm" with rows of rack- mounted batteries housed inside one or more enclosures and consist of the following general components:

- *Batteries and Enclosures:* Banks of electrochemical batteries connected in series and parallel to provide the total energy storage capacity including associated electronics for monitoring and managing the batteries to ensure safety and the design life of the system.
- *Power Conversion Systems (PCS):* Each PCS will consist of bi-directional inverters with 480V AC output, and a medium voltage (MV) transformer which steps the voltage up to 34.5kV.
- *Substation:* AC energy from the MV transformers are aggregated at the Project substation and stepped up to 230-kV by high-voltage transformer(s) and then delivered to the Drew Switchyard.
- *Ancillary Systems:* The plant ancillary systems control, protect and support the Project and its operation. They include fencing; security; lighting; fire protection; and heating, venting, and air conditioning (HVAC).

Centinela Solar Energy, LLC, the owner of the Project site and the existing CSE facility, will lease the Project site to the Applicant. The Applicant will construct, own, and operate only the proposed

Project.[1] The Project will utilize certain components of the existing CSE improvements, including: a portion of the CSE Project site, rights of access, drainage features, physical security, as well as obtaining from CSE, the right to use a portion of the 230-kV tie line owned by CSE to connect to the SDG&E Drew Switchyard.

2.6.1 Security

As previously described, the Project will be located within the boundary of the existing CSE facility site; as such, the Project will operate within this secured location. The batteries and related control systems will be housed within up to two buildings totaling 85,000 square feet in size. The inverters, the on-site substation and the associated overhead electric tie-line will be located outdoors.

An existing perimeter fence 6-feet in height and constructed of 2-inch chain link diamond mesh with line posts a maximum of 10 feet apart currently surrounds the entire perimeter of the CSE facility site. The CSE facility substation has a separate interior fence. Each fenced parcel on the CSE site has two entrances secured by locking gates. The main business entrance at the common services area (south of SR 98 off Brockman Roads) has an access-controlled security gate and a hard-surfaced road leading to the common services area buildings. Emergency services have 24-hour access to enter through gates at each access point.

2.6.2 Lighting

The proposed Project will only include the installation of lighting required for safety and prudent operations. Any lighting will be installed consistent with applicable County lighting standards and other requirements.

2.6.3 Construction

Construction of the proposed Project is anticipated to begin after receipt of all required approvals and will continue for approximately 12 months. The Project may be constructed in phases if two buildings are selected. The construction workers employed for the project will consist of laborers, electricians, supervisory, support, and management personnel. The on-site assembly and construction workforce is expected to reach a maximum of 50 workers. Grading of the Project site will occur over approximately

[1] The California Subdivision Map Act is not applicable to the lease. Cal. Gov. Code § 66412.1 (the Subdivision Map Act is not applicable to the "leasing of any parcel of land, or any portion thereof, in conjunction with the construction of commercial or industrial buildings on a single parcel, unless the project is not subject to review under other local agency ordinances regulating design and improvement"). Here, the Project is subject to review and approval by ICPDS.

three weeks. Disturbed surfaces that are not stabilized will be watered, as needed, for dust control. Most of the equipment will arrive at the site pre-assembled. Overall building construction activities include:

- Mobilization (including surveying/staking, installation of environmental BMPs, grading);
- Civil and foundation work (including conduit, equipment pads, concrete foundations);
- Building(s) fabrication (form and pour slab) framing, sheathing, roofing, mechanical [HVAC], lighting and electrical, fire suppression);
- Equipment installation; batteries (install batteries and racks, install batteries in racks); electrical works including inverters (pull and test cable, set and test equipment, point of interconnection work); and
- Commissioning and testing.

Construction crews are expected to be present no more than six days per week. The construction work hours are anticipated to occur from 8:00 a.m. to 5:00 p.m. If construction occurs during the weekend, it would take place between 9:00 a.m. to 5:00 p.m. on Saturday.

2.6.3.1 Construction Equipment

Typical construction equipment will be used for site preparation (including grading), digging foundations, excavating trenches, and for conduit installation. A cement truck will also be utilized during construction activities to pour concrete foundations. All on-site equipment is expected to be Tier 2 compliant. Disturbed surfaces that are not stabilized will be watered as needed for dust control. Anticipated construction equipment during the grading phase has been provided in Table 2-1 below.

Table 2-1: Anticipated Construction Equipment During Grading Phase

Equipment	Power	Anticipated Usage	Quantity
Bulldozer	247 Horsepower	6 hours per day	1
Grader	187 Horsepower	6 hours per day	1
Scrapers	367 Horsepower	6 hours per day	2
Water Truck	402 Horsepower	6 hours per day	1
Self-Propelled Compactor	80 Horsepower	6 hours per day	1
Dump Truck	402 Horsepower	6 hours per day	1
Tractor/Loader/Backhoe	97 Horsepower	6 hours per day	1
Bobcat	65 Horsepower	6 hours per day	1

2.6.3.2 Grading and Excavation

The Project will be located on property previously graded for the existing CSE facility. Only minimal grading will be necessary for the Project because the project site was previously graded and compacted.

The site may require some clearing to remove weeds. The soil surface will be smoothed and engineered to prepare the site for the concrete foundations.

Excavation and trenching will be required to install underground wiring, conduit and cables, for placement of electric poles, to prepare equipment pads and common areas.

2.6.3.3 Construction Staging

All equipment and material will be staged within the immediate boundary of the proposed the Project or existing CSE site.

2.6.3.4 Construction Parking

Construction employee parking needs will be minimal with an average approximately 15 people on-site and a peak of approximately 50 people. Construction parking will be provided in the area immediately to the east of the Project site.

2.6.3.5 Construction Access

Access to the site will be off Highway 98 via the existing encroachment and road used by CSE and SDG&E to access the Drew Substation (**Figure 2-6**). A Traffic Study (Appendix G) has been prepared as part of this Draft SEIR to assess potential equipment haul routes. Required Department of Transportation permits will be included in the scope of work for vendors delivering equipment.

2.6.3.6 Construction Workforce

The construction workforce will vary over the 12-month construction period. Employment is expected to peak at approximately 50 workers during the civil and building erection. The workforce will decrease as the proposed Project facilities are completed. The workforce will decline during the last four months of construction.

The on-site construction workforce will consist of laborers, craftspeople, supervisory personnel, and support personnel. Approximately 90% of the construction workforce is assumed to come from a combination of existing residents of the Imperial Valley and construction workers from outside areas that temporarily reside in the Imperial Valley during construction.

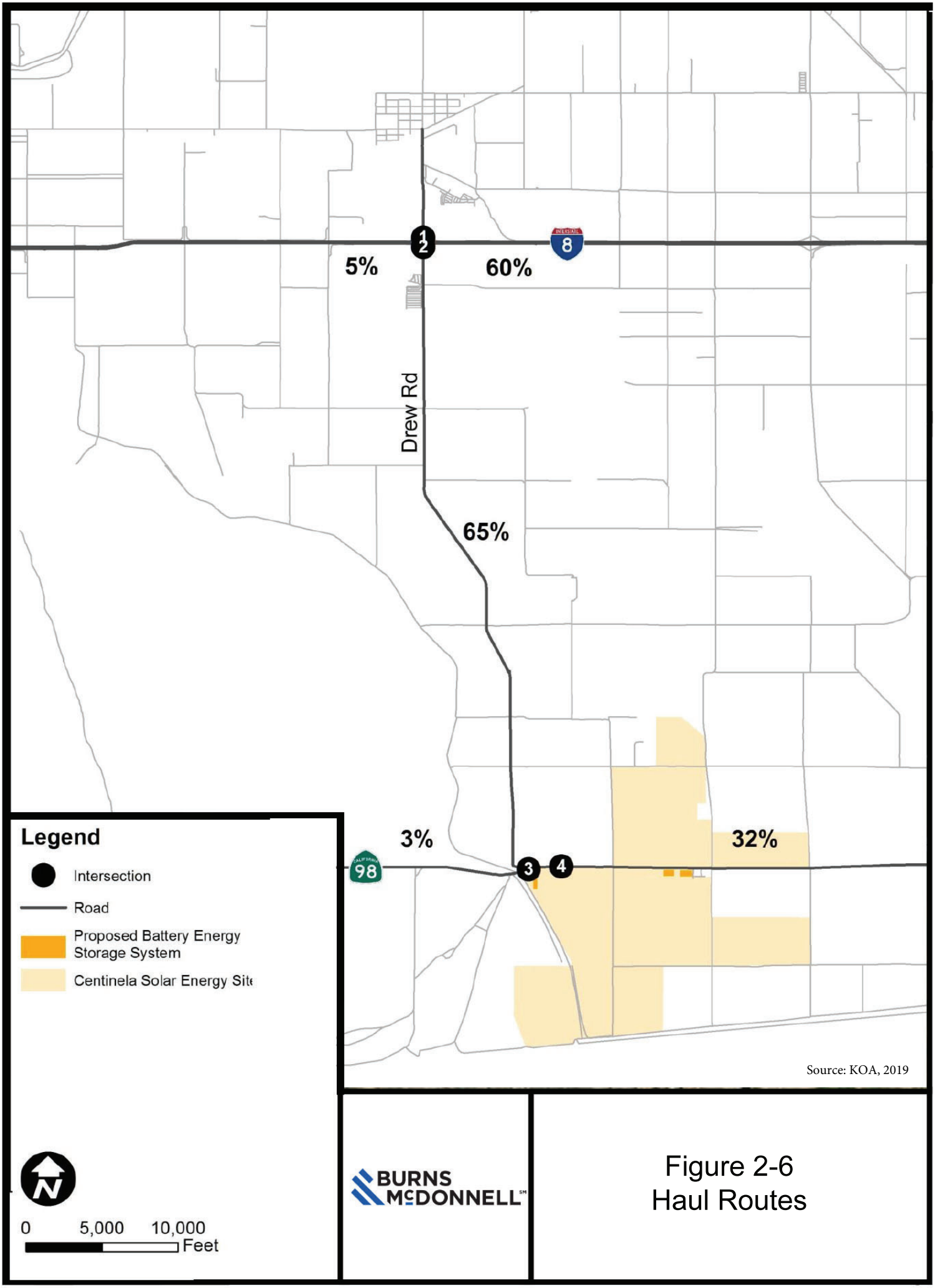


Figure 2-6
Haul Routes

2.6.3.7 Construction Fugitive Dust Control

During construction of the Project, surface disturbance has the potential to create fugitive particulate dust. As such, the Project will use water supplied by CSE for dust control during construction. Adherence to applicable Imperial County Air Pollution Control District (ICAPCD) Rules and implementation of CSE's dust control plan will minimize dust emissions. Measures to control dust will be implemented on all roads as determined by and in accordance with the applicable dust control plan requirements.

It is anticipated that one water truck will be used to apply water as necessary to disturbed areas during earthmoving activities. Construction water will be supplied by CSE through its existing water supply connection and will trucked to the site via internal CSE roads. Potable water provided to workers during construction will be in the form of bottled water.

2.6.3.8 Construction Waste

All waste, including trash and litter, garbage, and other solid waste will be removed to a disposal facility authorized to accept such materials. Commercial garbage collection and hauling will be contracted to remove waste and recyclable materials. During construction, typical construction wastes such as wood, concrete, and miscellaneous packaging materials will be generated. Construction wastes will be disposed of in accordance with local, state and federal regulations, and recycling will be used to the greatest reasonable extent. Recycling of the lithium-ion batteries is further described below in section regarding Project decommissioning.

2.6.3.9 Hazardous Material Handling and Storage

The chemical composition of the lithium-ion batteries planned to be installed is cobalt oxide; manganese dioxide; nickel oxide; carbon; electrolyte; polyvinylidene fluoride; aluminum foil; copper foil; aluminum and inert materials. The CSE project Environmental Protection Plan will be updated to incorporate any hazardous materials associated with the Project.

2.6.4 Operation and Maintenance

When operating, the Project will be unmanned operate year-round, and available to receive or deliver energy 24 hours/day. During Operation the Project will not require the use of water. Routine maintenance activities, including equipment testing, monitoring, and repair will occur as needed. Only authorized personnel will be permitted on-site. Facility maintenance will include the periodic maintenance of structures and BESS components. Regular maintenance performed will consist of equipment inspection and replacement and occur primarily during daylight hours. Emergency maintenance could occur at any

time, as needed; however, maintenance and emergency service during daylight hours will be encouraged to maximize worker safety.

2.6.4.1 Fire Protection and Prevention Measures

Potential fire risks with traditional lithium-ion cells are predominantly associated with over-charging or through short circuiting, due to age. Fire risks associated with the Project will be addressed through implementation of a monitoring and fire suppression system, including water and or a suppression agent (eg FM-200, Novatech) with smoke detectors, control panel, alarm, piping and nozzles. The fire protection system will be designed by a certified fire protection engineer and installed by a fire protection system contractor licensed in California and in accordance with all relevant building and fire codes in effect in the County at the time of building permit submission.

The fire protection plan is anticipated to include a combination of prevention, suppression, and isolation methods and materials. The general approach to fire mitigation at the proposed Project site would be the following: 1) prevention of an incident; 2) isolation and control of an incident to the immediately affected equipment; 3) suppression of any fire with a clean agent so as to reduce damage to uninvolved equipment; and finally, 4) as necessary, fire mitigation – inclusive of manual suppression using water spray or mist. The Project will comply with all applicable fire codes. Current Underwriters Laboratories (UL) (safety organization) and National Fire Protection Association (UL-9540A) standards require that battery racks for BESS applications pass a destructive test. In order to pass the battery destructive test, a fire should not be propagated to any neighboring batteries after deliberately being set on fire while racked.

During the design review and permitting process, the Applicant will work closely with the Imperial County Fire Marshal to ensure that the design is compliant with all local codes and standards. An automatic smoke and fire detection and alarm system coupled with water-based suppression system and/or clean-agent based suppression system will be designed for a worst-case failure. A fire suppression system agreed upon by Imperial County will be installed to extinguish possible ignition.

The proposed Project BESS will be designed and built to the latest safety standards with multiple redundant forms of protection against electrical faults and fire events at every level of the system. Each cell and module will have redundant safety features including electrical fuses and overcharge protection. Every battery cell bank will be monitored for voltage, temperature, and current, and an automated control system will disconnect any battery with irregular behavior, which will be inspected before it will be returned to operation. Safety measurement points throughout each battery pack and within the system as a whole would alert the operations and maintenance organization if there is a deviation from normal

operating conditions. The battery modules will include high voltage DC isolation switches for separating each battery zone into low voltage blocks safe for maintenance. A hierarchical fusing system with protection at the zone, rack, module, and individual sell level will be used, offering system safety even if the software control system is not functional. These cells are designed to clear in the proper order under over-current and/or short circuit situations, preventing uncontrolled discharge of stored energy.

In comparison to automotive lithium-ion batteries, the likelihood of a stationary storage BESS getting crushed or penetrated through a collision with an exterior object would be comparatively less. As a fire could result if the battery is crushed or penetrated in such a way that the safety mechanisms are bypassed, this likelihood is greatly reduced with stationary battery storage projects. Nonetheless, the battery cells and modules used as part of the proposed Project BESS will have automotive grade anti-crush and anti-penetration safety technologies built in, designed to disable the battery cell in the event that the cell housing is damaged due to improper handling or any other type of accident.

2.7 Decommissioning

The design life of the Project is 25 years. At the end of battery life, battery modules will be removed from the racks and packaged for return transportation to the manufacturer or their approved Recycling Partner(s) for dismantling, material processing, and recovery. The recycling process takes place entirely off-site and is anticipated to recover approximately 95% of the material in a battery. The steps involve dismantling of the modules, smelting, and metal separation processes. Metals including copper and aluminum and metal alloys are recovered from the process. Hazardous chemicals are collected from the process. Any spent or surplus hazardous wastes would be transported off-site for disposal according to applicable State and County restrictions and laws governing the disposal of hazardous waste. This protocol would also apply to any used or spent hazardous materials requiring disposal during operation. Slag can be reused in construction or as aggregate for concrete.

2.8 Alternatives

CEQA Guidelines Section 15126.6(e)(1) requires that an environmental impact report 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. Consistent with CEQA Guidelines Section 15126.6(b), the discussion of alternatives in the Draft SEIR focused on those alternatives which are capable of avoiding or substantially lessening any significant effects of the project.

In accordance with the provisions of CEQA Guidelines Section 15126.6, the Draft SEIR considers three alternatives (Table 2-2) in addition to the proposed Project. The existing CSE facilities allow for flexibility in siting the Project's physical components described above (enclosure(s), substation and tie line) within the existing CSE site. Accordingly, the following (mutually exclusive) alternative site plans are included as described below.

Table 2-2: Alternative Site Plans

Alternative	Project Area	Building Area	Electric Tie-Line
No Project Alternative	--	--	--
West Alternative (West of existing CSE Control Building)	3 acres + Tie Line (APN 052-190-010)	1 or 2 buildings totaling approximately 85,000 square feet	Shared with existing CSE + approximately 350 feet of new tie line
East Alternative (East of existing CSE Control Building)	3 acres + Tie Line (APN 052-190-010)	1 or 2 buildings totaling approximately 85,000 square feet	Shared with existing CSE + approximately 1,300 feet of new tie line

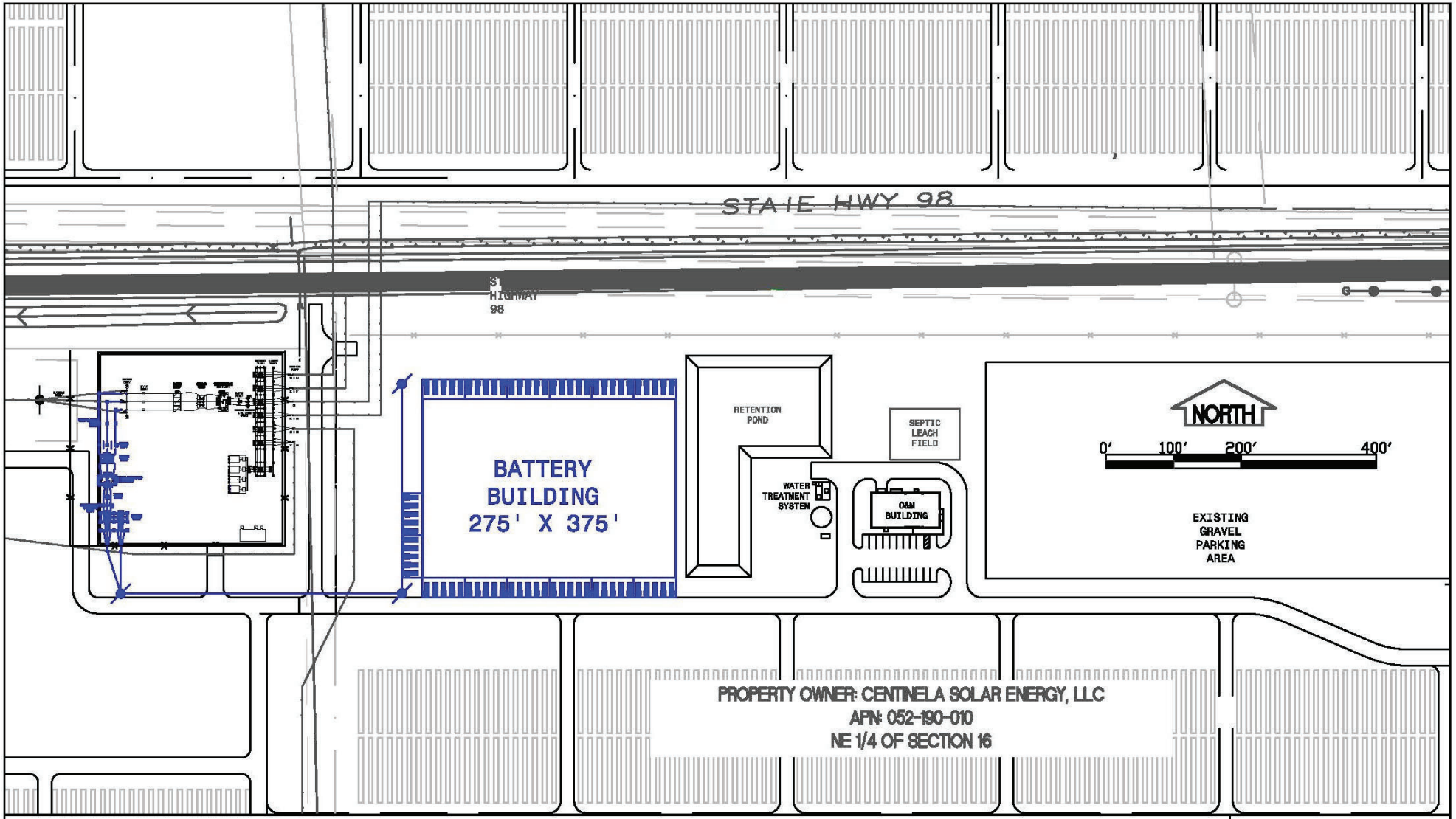
2.8.1 Alternative 1 – No Project Alternative

CEQA Guidelines Section 15126.6(e)(1) requires that a No Project Alternative be analyzed in order to allow the decision-makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. Under this alternative, the proposed BESS will not be constructed nor will a new CUP be requested. The Project site will remain in its existing state as undeveloped land within the CSE project site to the east of the Drew Switchyard.

2.8.2 Alternative 2 – West Alternative

Alternative 2 is located in the area immediately west of the existing CSE Control Building or Operations and Maintenance (O&M) Building (**Figure 2-7**), which serves as both an office for the CSE facility and a maintenance shop/warehouse.

This location (APN 052-190-010) will accommodate up to two BESS buildings totaling 85,000 square feet within the existing CSE site (**Figure 2-8**). If one building is ultimately constructed, the proposed single-story BESS footprint will measure approximately 275 feet by 375 feet. Existing gravel access roads within the CSE site will be used to access the Alternative 1 site. Wiring from the battery energy storage system will be connected to the existing CSE substation, located immediately south of SR 98, approximately mid-way between Pulliam Road and Brockman Road, via an overhead gen-tie line approximately 350 feet in length.



Proposed Battery Energy Storage System Facility

Figure 2-7
West Alternative

BURNS McDONNELL

Figure 2-8
Existing Site -
West Alternative

2.8.3 Alternative 3 – East Alternative

Alternative 3 is located in the area immediately east of the existing CSE O&M Building (**Figure 2-9**). This location (APN 052-190-010) will also accommodate up to two BESS buildings totaling 85,000 square feet within the existing CSE site (**Figure 2-10**). If one building is ultimately constructed, the proposed single-story BESS footprint will measure approximately 230 feet by 440 feet. Existing gravel access roads within the CSE site will be used to access the Alternative 2 site. Wiring from the battery energy storage system will be connected to the existing CSE substation, via an overhead gen-tie line approximately 1,300 feet in length. The gen-tie line will parallel the existing internal gravel road in route to the substation.

2.9 Intended Uses of the SEIR/Authorizing Actions

This Draft SEIR is an informational document for decision-makers. The CEQA Guidelines require that decision-makers review and consider the Draft SEIR in their consideration of the Project. The Draft SEIR provides additional information necessary to make the previously approved EIR adequate for the project as revised. This Draft SEIR is intended to serve as an informational document to be considered by the County in its permit considerations on the proposed Project. The Draft SEIR evaluates and, where appropriate, mitigates any potentially new or more severe impacts associated with the proposed Project that exceed the significance thresholds that were established in the 2011 FEIR, and explains how they differ from those of the Approved Project. to the greatest extent possible. This Draft SEIR, in accordance with CEQA Guidelines §15126, should be used as the primary environmental document to evaluate all planning and permitting actions associated with the Project. Construction and operation of the proposed projects may include, but not limited to, the following discretionary actions and approvals.

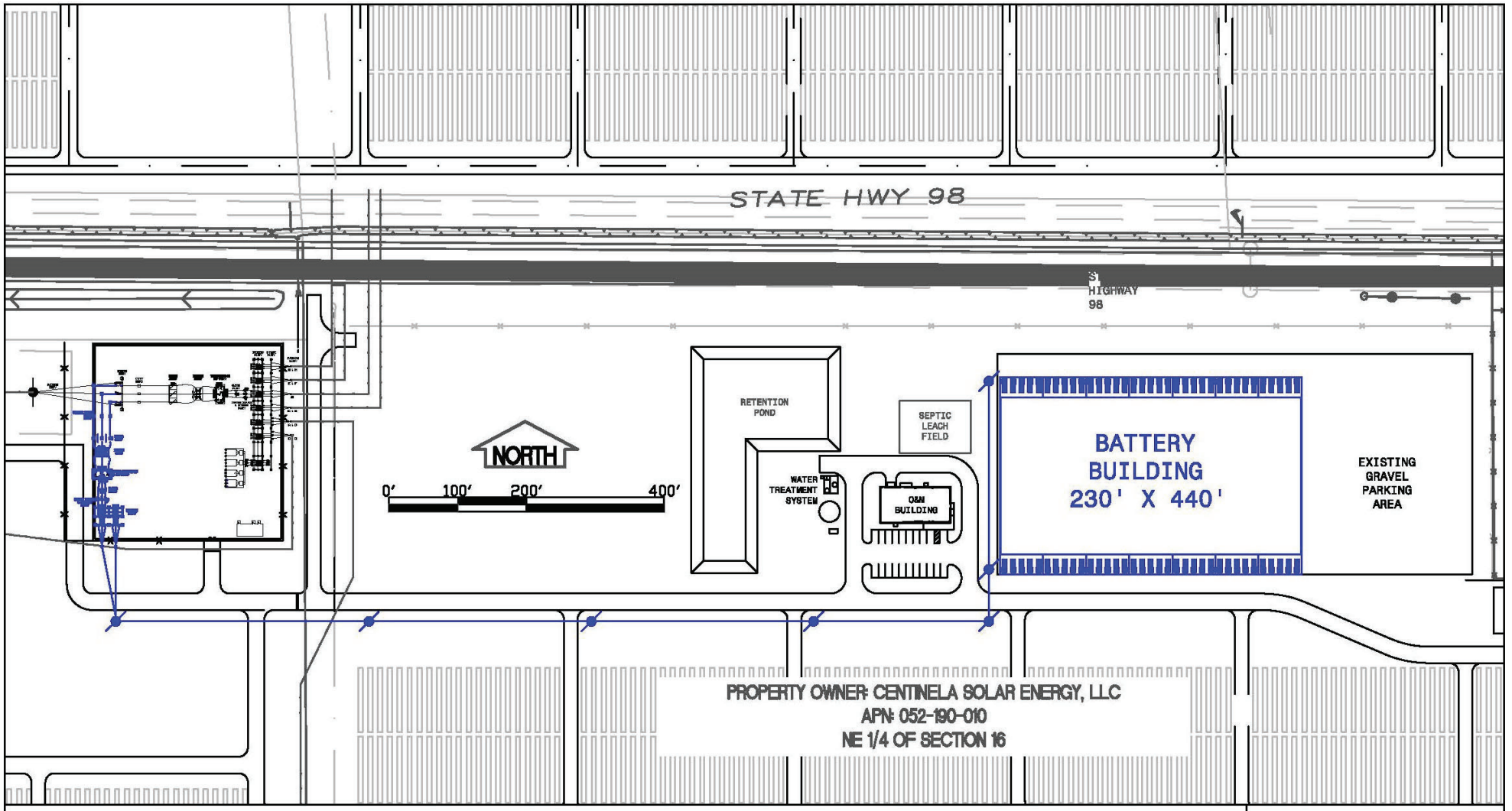
2.9.1 Discretionary Actions and Approvals

2.9.1.1 Certification of the Final SEIR

After the required public review for the Draft SEIR, ICPDS shall respond to written comments, edit the document, and produce a Final SEIR to be considered for certification by the Planning Commission and/or Board of Supervisors prior to making a decision on the Project.

2.9.1.2 Mitigation Monitoring and Reporting Program

A Mitigation Monitoring and Reporting Program (MMRP) shall be adopted as required by CEQA Guidelines Section 15097.



Proposed Battery Energy Storage System Facility

Figure 2-9
East Alternative

BURNS McDONNELL

Figure 2-10
Existing Site -
East Alternative

2.9.1.3 Conditional Use Permit (CUP #10-0018)

The proposed Project will require submittal of a CUP (CUP #10-0018) to ICPDS to allow construction and operation of the proposed Battery Energy Storage System at the proposed site.

2.9.1.4 Site Plan

Site Plan and Architectural Review is required for all non-residential projects.

2.9.2 Entitlements to Implement the Proposed Project

In addition to the CUP, additional entitlement actions and permits may be required from the County to implement the proposed Project. They are summarized below in Table 2-3:

Table 2-3: Entitlement Actions & Permits

Imperial County Planning & Development Services Department
• Grading Permit/Civil Engineering Plans
• Mechanical Engineering Documents and Plans
• Electrical Engineering Documents and Plans
• Generators (Permitted or Documented)
• Structural Engineering Documents and Plans (Foundations – Permit)
• Pre-Fabricated CA Certifications
• Architectural Plans
• Move-On Plan Permit
• Transportation Permit(s)
• Fire Suppression System Permit
• Haul Route Plan
• Fencing (Temporary Fencing to Protect While Under Construction, Security)
Imperial County Air Pollution Control District
• Haul Route Plan
• Rule 310 Compliance
• Construction Dust Control Plan
• Operational Specialty Dust Control Plan
• List of Construction Equipment
Environmental Health & Safety
• Project Review Building Plan Review (Applicant)
• Purchase Order for Portable Water – Dependent on water supply. Hauled or Point of Entry
• Purchase Order Septic Waste Removal

• Purchase Order Port-a-Potties
• Purchase Order for Above-Ground Septic System
Regional Water Quality Control Board
• SWPPP & all Associated Documents and Reports
• Construction NPDES Waiver

2.9.3 Other Responsible and Trustee Agencies

Please refer to Section 1.5 of Chapter 1 for further details regarding other responsible and trustee agencies.