Appendix A

Initial Study and Notice of Preparation and Responses

Notice of Preparation

Imperial County
Planning & Development Services Department

NOTICE OF PREPARATION OF DRAFT EIR FOR CITIZENS IMPERIAL SOLAR, LLC PROJECT AND NOTICE OF PUBLIC EIR SCOPING MEETING

The Imperial County Planning & Development Services Department intends to prepare an Environmental Impact Report (EIR) for the proposed Citizens Imperial Solar, LLC Project as described below. A public scoping meeting for the proposed EIR will be held by the Imperial County Planning & Development Services Department on May 10 at 6:00PM. The scoping meeting will be held at the Board of Supervisors Chambers, 2nd Floor, County Administration Center located at 940 Main Street, El Centro, CA 92243. Comments regarding the scope of the EIR will be accepted at this meeting.

SUBJECT: Citizens Imperial Solar, LLC Project EIR

BOARD OF SUPERVISORS CONSIDERATION: To Be Determined.

PROJECT LOCATION: The proposed Citizens Imperial Solar, LLC Project is located approximately 6 miles northeast of the City of Calipatria and 5 miles southeast of Niland, a census-designated place, in the unincorporated area of Imperial County. The project site encompasses approximately 223 acres, comprised of two parcels of land identified as Assessor Parcel Numbers 025-260-024 (northern parcel) and 025-280-003 (southern parcel).The East Highline Canal is located on the project site's eastern boundary, with desert lands immediately beyond. The project site is surrounded to the north, west, and south by privately-owned agricultural lands. Adjacent roadways, which are currently developed for agricultural uses, include Merkley Road and Simpson Road. The project site is located entirely within the County's Renewable Energy Overlay Zone.

PROJECT DESCRIPTION: The Citizens Imperial Solar, LLC Project involves the construction of a 30 megawatt photovoltaic (PV) solar energy facility on approximately 223 acres of land. The project would include a ground mounted PV solar power generating system, supporting structures, on-site substation, access driveways, and transmission structures. The project will interconnect with the Imperial Irrigation District's system at the existing Midway Substation, located on the northern parcel of the project site.

Project Applicant: Citizens Enterprises Corporation

URBAN AREA PLAN: None, located in unincorporated area of County of Imperial

BOARD OF SUPERVISORS DISTRICT: District 4, Supervisor Ryan E. Kelley

ANTICIPATED SIGNIFICANT EFFECTS: The EIR will analyze potential impacts associated with the following: Aesthetics; Agricultural Resources; Air Quality; Biological Resources; Cultural Resources; Paleontological Resources; Tribal Cultural Resources; Cumulative Impacts; Geology/Soils; Greenhouse Gas Emissions/Climate Change; Growth-inducing Impacts; Hazards/Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Public Services; Transportation/Traffic; and Utilities and Service Systems including water supply and energy.

COMMENTS REQUESTED: The Imperial County Planning & Development Services Department would like to know your ideas about the effects this project might have on the environment and your suggestions as to mitigation or ways the project may be revised to reduce or avoid any significant environmental impacts. Your comments will guide the scope and content of environmental issues to be examined in the EIR. Your comments may be submitted in writing to Patricia Valenzuela, Imperial County Planning & Development Services Department, 801 Main Street, El Centro, CA 92243. Available project information may be reviewed at this location.

NOTICE OF PREPARATION REVIEW PERIOD: April 24, 2018 through May 29, 2018

Initial Study and Project Description

Initial Study and NOP

Citizens Imperial Solar, LLC Project

Conditional Use Permit: 18-0006

IS #18-0003

Imperial County CA

April 2018

Reviewed by:

County of Imperial
Planning & Development
Street Department
801 Main Street
El Centro, CA 92243

Prepared by:

HDR Engineering, Inc.
8690 Balboa Avenue,
Suite 200
San Diego, CA 92123

Contents

Figures

This page is intentionally blank.

Section I Introduction

A. Purpose

This document is a ☐ policy-level; ☒ project-level Initial Study for evaluation of potential environmental impacts resulting with the proposed Citizens Imperial Solar, LLC Project.

B. CEQA Requirements and the Imperial County's Rules and Regulations for Implementing CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's Rules and Regulations for Implementing CEQA, an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

☒ According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

☐ According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.

☐ According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study has determined that the proposed applications will result in potentially significant environmental impacts and therefore, an Environmental Impact Report is deemed as the appropriate document to provide necessary environmental evaluations and clearance for the proposed project.

This Initial Study and Notice of Preparation are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); the State CEQA Guidelines & County of Imperial's CEQA Regulations, Guidelines for the Implementation of CEQA; applicable requirements of the

County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial's CEQA Regulations, Guidelines for the Implementation of CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. Intended Uses of Initial Study and Notice of Preparation

This Initial Study and Notice of Preparation are informational documents which are intended to inform County of Imperial decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study and Notice of Preparation, prepared for the project will be circulated for a period of no less than 30 days for public and agency review and comments.

D. Contents of Initial Study and Notice of Preparation

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed applications.

SECTION 1

I. INTRODUCTION presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a significant impact, potentially significant impact, or no impact.

PROJECT SUMMARY, LOCATION AND ENVIRONMENTAL SETTINGS describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

SECTION 3

III. MANDATORY FINDINGS presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

E. Scope of Environmental Analysis

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. No Impact: A "No Impact" response is adequately supported if the impact simply does not apply to the proposed applications.
2. Less Than Significant Impact: The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.
3. Less Than Significant With Mitigation Incorporated: This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact."
4. Potentially Significant Impact: The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. Policy-Level or Project-Level Environmental Analysis

This Initial Study will be conducted under a ☐ policy-level, ☒project-level analysis.

Regarding mitigation measures, it is not the intent of this document to "overlap" or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County's jurisdiction, are also not considered mitigation measures, and therefore, will not be identified in this document.

G. Tiered Documents and Incorporation by Reference

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

1. Tiered Documents

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. Tiering is defined as follows:

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

"Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

Further, Section 15152(d) of the CEQA Guidelines states:

"Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation by Reference

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]).

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR is available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1735.
- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243, Ph. (442) 265-1735.
- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.
- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the 'County of Imperial General Plan EIR is SCH #93011023.

The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]).

Section II Environmental Checklist

1. **Project Title:** Citizens Imperial Solar, LLC Project
2. **Lead Agency:** Imperial County Planning & Development Services Department
3. **Contact person and phone number:** Patricia Valenzuela, Planner IV, 442-265-1749
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** PatriciaValenzuela@co.imperial.ca.us
6. **Project location:** The proposed Citizens Imperial Solar, LLC Project is located approximately 6 miles northeast of the City of Calipatria and 5 miles southeast of Niland, a census-designated place, in the unincorporated area of Imperial County (Figure 1). The project site encompasses approximately 223 acres, comprised of two parcels of land identified as Assessor Parcel Numbers 025-260-024 (northern parcel) and 025-280-003 (southern parcel). The East Highline Canal is located on the project site's eastern boundary. Adjacent roadways, which are currently developed for agricultural uses, include Merkley Road and Simpson Road. As shown on Figure 1, the project site is located entirely within the County's Renewable Energy Overlay Zone.
7. **Project sponsor's name and address:** Citizens Enterprises Corporation
8. **General Plan designation:** Agriculture
9. **Zoning:** A-3 (Heavy Agriculture)
10. **Description of project:** The Citizens Imperial Solar, LLC Project involves the construction of a 30 megawatt photovoltaic (PV) solar energy facility on approximately 223 acres of land. The project would include a ground mounted PV solar power generating system, supporting structures, on-site substation, access driveways, and transmission structures. The project will interconnect with the Imperial Irrigation District's system at the existing Midway Substation, located on the northern parcel of the project site (Figure 2).
11. **Surrounding land uses and setting: Briefly describe the project's surroundings:** The East Highline Canal is located on the project site's eastern boundary, with desert lands immediately beyond. The project site is surrounded to the north, west, and south by privately-owned agricultural lands. The existing Midway Substation is located on the northern parcel of the project site.
12. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):**
    - Department of Public Works – Ministerial permits (building, grading, encroachment)
    - Imperial County Air Pollution Control District – Fugitive dust control plan, Authority to construct

- Imperial Irrigation District – Water supply agreement/permit for water use lease agreement

Environmental Factors Potentially Affected

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

☒	Aesthetics	☒	Agriculture and Forestry Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural Resources	☒	Paleontological Resources
☐	Tribal Cultural Resources	☒	Geology /Soils	☒	Greenhouse Gas Emissions
☒	Hazards & Hazardous Materials	☒	Hydrology / Water Quality	☐	Land Use / Planning
☐	Mineral Resources	☐	Noise	☐	Population / Housing
☒	Public Services	☐	Recreation	☒	Transportation/Traffic
☒	Utilities / Service Systems	☒	Mandatory Findings of Significance		

Environmental Evaluation Committee Determination

After Review of the Initial Study, the Environmental Evaluation Committee (EEC) has:

☐ Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Found that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or

NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

CALIFORNIA DEPARTMENT OF FISH AND GAME DE MINIMIS IMPACT FINDING:

☐Yes ☐No

EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	☐	☐	☐
ENVIRONMENTAL HEALTH	☐	☐	☐
OFFICE EMERGENCY SERVICES	☐	☐	☐
APCD	☐	☐	☐
AG	☐	☐	☐
SHERIFF DEPARTMENT	☐	☐	☐
ICPDS	☐	☐	☐

Michael Abraham, AICP

Assistant Planning & Development Services Director

Date:

Project Summary

A. Project Location

The proposed Citizens Imperial Solar, LLC Project is located approximately 6 miles northeast of the City of Calipatria and 5 miles southeast of Niland, a census-designated place, in the unincorporated area of Imperial County (Figure 1). The project site encompasses approximately 223 acres, comprised of two parcels of land identified as Assessor Parcel Numbers 025-260-024 (northern parcel) and 025-280-003 (southern parcel). The East Highline Canal is located on the project site's eastern boundary, with desert lands immediately beyond. The project site is surrounded to the north, west, and south by privately-owned agricultural lands. Adjacent roadways, which are currently developed for agricultural uses, include Merkley Road and Simpson Road. As shown on Figure 1, the project site is located entirely within the County's Renewable Energy Overlay Zone.

B. Project Summary

The Citizens Imperial Solar, LLC Project involves the construction of a 30 megawatt PV solar energy facility on approximately 223 acres of land. The project would include a ground mounted PV solar power generating system, supporting structures, on-site substation, access driveways, and transmission structures. The project will interconnect with the Imperial Irrigation District's system at the existing Midway Substation, located on the northern parcel of the project site (Figure 2).

C. Environmental Setting

The project site is surrounded to the north, west, and south by privately-owned agricultural lands. The East Highline Canal is located on the project site's eastern boundary, with desert lands immediately beyond. The existing Midway Substation is located on the northern parcel of the project site.

D. General Plan Consistency

The project is located within the unincorporated area of Imperial County. The existing General Plan land use designation is "Agriculture." The project site is currently zoned A-A-3 (Heavy-Agriculture). Construction of a solar facility would be allowed within the existing zoning under a conditional use permit.

Figure 1. Regional Location

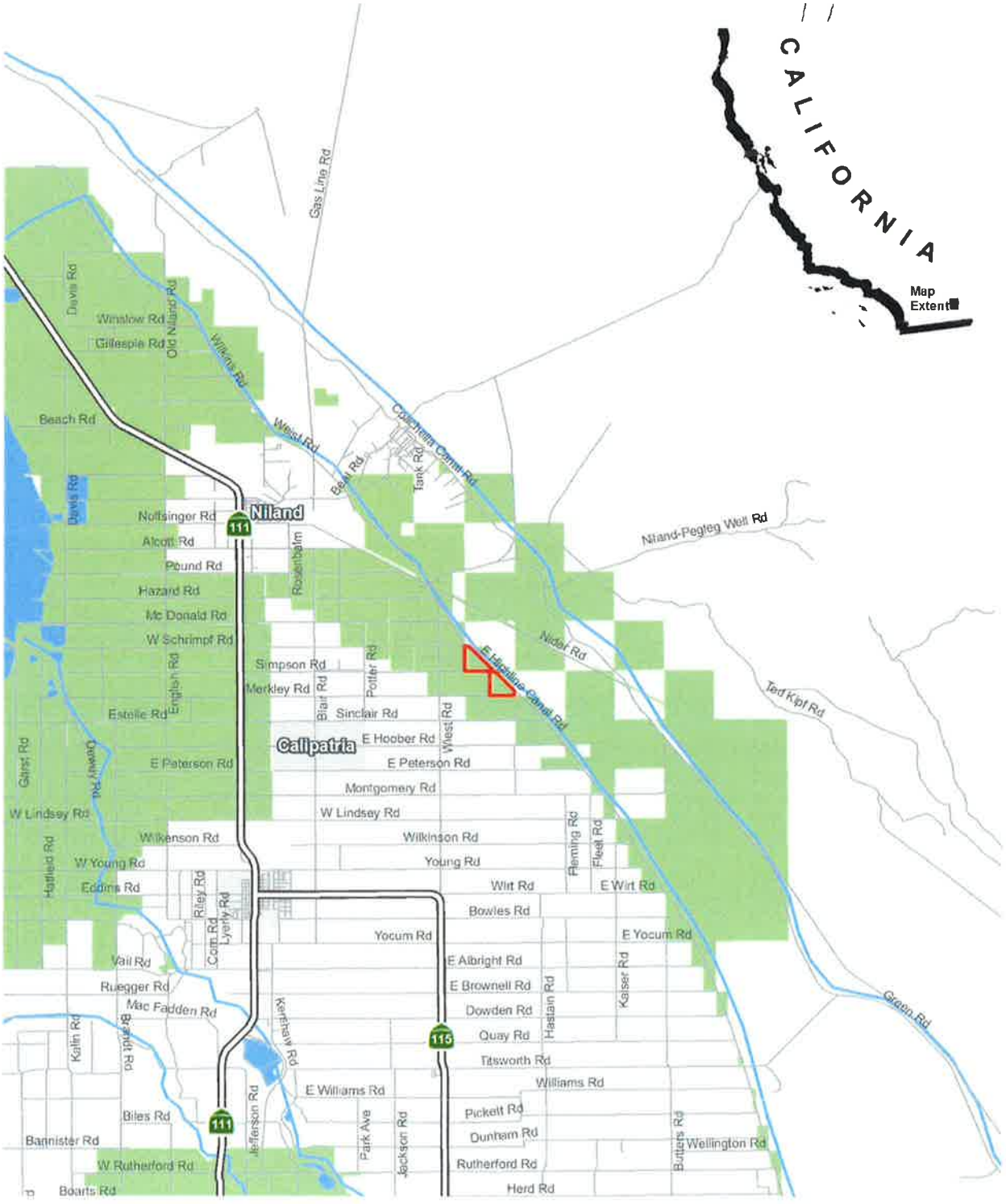


Figure 2. Project Site

Evaluation of Environmental Impacts

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

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significance.

I. Aesthetics

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Have a substantial adverse effect on a scenic vista or scenic highway?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☒	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

a) **No Impact.** The project site is not located within an area that has been formally identified as a federal, state, or county scenic vista. No scenic vistas or areas with high visual quality would be disrupted. Thus, no impact is identified for this issue area.

b) **No Impact.** According to the Caltrans California Scenic Highway Mapping System (Caltrans 2011), the project site is not located within a state scenic highway corridor, nor are there any state scenic highways located in proximity to the project site.

c) **Potentially Significant Impact.** Although the project is not located near a scenic highway or designated scenic vista, the project may result in a change to the look and rural character of the area. A potentially significant impact is identified, and this issue will be addressed in the EIR.

d) **Potentially Significant Impact.** Minimal lighting is required for project operation and is limited to safety and security functions. All lighting will be directed away from any public right-of-way. The solar panels will be constructed of low reflective materials; therefore, it is not anticipated that they would result in creating a glare. The project is located in a rural undeveloped area of Imperial County. There are no established residential neighborhoods immediately adjacent to the project site. Although the proposed project is not expected to create a new source of substantial light or glare affecting day or nighttime views, this issue will be analyzed further in the EIR. Therefore, a potentially significant impact is identified for this issue area.

II. Agricultural Resources

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.				
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☒	☐	☐	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

II. Agricultural Resources

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

a,e) **No Impact.** According to the farmland maps prepared by the California Department of Conservation (2016), the project site is designated as farmland of local importance. Farmland of local importance is not considered an "agricultural land" per CEQA Statute Section 21060.1(a). Furthermore, the project site does not contain prime farmland, farmland of statewide importance, or unique farmland. Therefore, no impact would result from the conversion of prime farmland, farmland of statewide importance, or unique farmland to non-agricultural use.

b) **Potentially Significant Impact.** The project site is currently designated by the General Plan as "Agriculture" and is zoned A-3 (Heavy Agriculture). Pursuant to Title 9, Division 5, Chapter 9, "Solar Energy Plants" and "Transmission lines, including supporting towers, poles, microwave towers, utility substations" are uses that are permitted in the A-3 Zone, subject to approval of a conditional use permit. Because the project site is located on lands designated for agricultural uses, this issue will be analyzed in further detail. A Land Evaluation Site Assessment will be prepared for the project and this issue will be addressed in the EIR.

According to the 2016/2017 Imperial County Williamson Act Map produced by the California Department of Conservation's Division of Land Resource Protection, the project site is not located on Williamson Act contracted land. Therefore, the proposed project would not conflict with a Williamson Act contract and no impact would occur.

c) **No Impact.** There are no existing forest lands, timberlands, or timberland zoned "Timberland Production" either on site or in the immediate vicinity that would conflict with existing zoning or cause rezoning. Therefore, no impact is identified for this issue area.

d) **No Impact.** There are no existing forest lands either on site or in the immediate vicinity of the project site. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area.

III. Air Quality

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

III. Air Quality

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

a) **Potentially Significant Impact.** The project site is located within the jurisdiction of Imperial County Air Pollution Control District in the Salton Sea Air Basin. Construction of the project would create temporary emissions of dust, fumes, equipment exhaust, and other air contaminants that may conflict with the Imperial County Air Pollution Control District's rules and regulations. No station source emissions are proposed from the project; however, temporary construction emissions have the potential to result in a significant air quality impact.

b) **Potentially Significant Impact.** Currently, the Salton Sea Air Basin is either in attainment or unclassified for all federal and state air pollutant standards, with the exception of O_3 (8-hour) and PM_{10} (total suspended particulate matter less than 10 microns in diameter). Air pollutants transported into the Salton Sea Air Basin from the adjacent South Coast Air Basin (Los Angeles County, San Bernardino County, Orange County, and Riverside County) and Mexicali (Mexico) substantially contribute to the non-attainment conditions in the Salton Sea Air Basin. A potentially significant impact is identified for this issue area. An air quality impact study that will address the proposed project's potential air quality impacts will be prepared and included in the EIR analysis.

c) **Potentially Significant Impact.** Construction of the proposed project may result in a cumulatively considerable net increase of one or more criteria pollutants as a result of point, and non-point source emissions, for which the project region is in non-attainment under applicable federal and state ambient air quality standards. Thus, a potentially significant impact is identified for this issue area. An air quality impact study that will address the proposed project's potential air quality impacts will be prepared and included in the EIR analysis.

d) **Potentially Significant Impact.** The project site is located in a rural agricultural area of Imperial County. There appears to be an offsite rural residence located along Simpson Road. This issue will be addressed in the air quality impact study and EIR analysis.

e) **No Impact.** Land uses commonly considered to be potential sources of odorous emissions include wastewater treatment plants, sanitary landfills, food processing facilities, chemical manufacturing plants, rendering plants, paint/coating operations, and concentrated agricultural feeding operations and dairies. The construction and operation of a solar facility is not an odor producer and the project site is not located near an odor producer. No impact is identified for this issue area.

IV. Biological Resources

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

IV. Biological Resources

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

a,b,d,e)

Potentially Significant Impact. The project site is located on undeveloped agricultural land and, although previously-disturbed, has the potential to support native habitats and/or sensitive species. The project site has the potential to be used as burrowing owl foraging habitat. Burrowing owls and burrows are commonly found along canals and drains. Although there are no IID canals or drainage structures located within the project site, IID right-of-way, access roads, canals, and other drainages are located immediately adjacent to the project site. Thus, a potentially significant impact is identified for this issue area. A biological resources technical study that will address the proposed project's potential impacts on biological resources will be prepared and included in the EIR analysis.

c) **No Impact.** The vegetation community type identified for the project site is agricultural. No IID canal or drain structures will be removed or relocated, no washes are found within the project site, and impacts to the adjacent East Highline Canal are not proposed. Therefore, U.S. Army Corps of Engineers, California Department of Fish and Wildlife, or Regional Water Quality Control Board resources are not anticipated to be affected with implementation of the proposed project.

f) **No Impact.** The project site is not located in a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact is identified for this issue area.

V. Cultural Resources

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐

a,b) **Potentially Significant Impact.** The project parcels have been disturbed by past farming and/or off-road vehicles. Thus, the presence of significant or undamaged cultural resources on the site is unlikely. Although the proposed project is not expected to cause a substantial adverse change in the significance of a historical resource or archaeological resource, this issue will be analyzed further in the EIR. Therefore, a potentially significant impact is identified for this issue area. A cultural resources report that will address the proposed project's potential impacts on historic and prehistoric resources will be prepared and included in the EIR analysis.

c) **Potentially Significant Impact.** Although unlikely, there is a potential for unknown human remains to be unearthed during earthwork activities. This issue is potentially significant and will be discussed in the EIR.

VI. Paleontological Resources

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

a) **Potentially Significant Impact.** Many paleontological fossil sites are recorded in Imperial County and have been discovered during construction activities. Paleontological resources are typically impacted when earthwork activities, such as mass excavation cut into geological deposits (formations) with buried fossils. It is not known if any paleontological resources are located on the project site. The project's potential to impact paleontological resources will be addressed in the EIR.

VII. Tribal Cultural Resources

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resources as defined in §21074?	☐	☐	☐	☐

a) **XXXX.** Assembly Bill 52 was passed in 2014 and took effect July 1, 2015. It established a new category of environmental resources that must be considered under CEQA called tribal cultural resources (Public Resources Code 21074) and established a process for consulting with Native American tribes and groups regarding those resources. Assembly Bill 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. Imperial County has consulted with appropriate tribes with the potential for interest in the region. Based on this consultation, the project site is not located in an area identified as having the potential for a tribal cultural resource.

VIII. Geology and Soils

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

VIII. Geology and Soils

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

a1) **No Impact.** The project site is not located within a State of California, Alquist-Priolo Earthquake Fault Zone. Therefore, no impact is identified for this issue area.

a2) **Potentially Significant Impact.** The project site is located in the seismically-active Imperial Valley in Southern California and considered likely to be subjected to moderate to strong ground motion from earthquakes in the region. The project site could be affected by the occurrence of seismic activity to some degree but no more than the surrounding properties. A potentially significant impact has been identified for this issue, and it will be evaluated in the EIR.

a3) **Potentially Significant Impact.** Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as produced by earthquakes. With strong ground shaking, an increase in pore water pressure develops as the soil tends to reduce in volume. If the increase in pore water pressure is sufficient to reduce the vertical effective stress (suspending the soil particles in water), the soil strength decreases, and the soil behaves as a liquid (similar to quicksand). Liquefaction can produce excessive settlement, ground rupture, lateral spreading, or failure of shallow bearing foundations.

Four conditions are generally required for liquefaction to occur:

(1) The soil must be saturated (relatively shallow groundwater).
(2) The soil must be loosely packed (low to medium relative density).
(3) The soil must be relatively cohesionless (not clayey).
(4) Groundshaking of sufficient intensity must occur to function as a trigger mechanism.

All these conditions may exist to some degree at the project site. Therefore, there is a potentially significant impact associated with liquefaction.

a4) **No Impact.** According to Figure 2: Landslide Activity in the Seismic and Public Safety Element of the General Plan, the project site is not located in an area that is prone to landslide hazards. Furthermore, the project site and surrounding area is relatively flat. Therefore, no impact is identified for this issue area.

b) **Less than Significant Impact.** Soil erosion can result during construction as grading and construction can loosen surface soils and make soils susceptible to wind and water movement across the surface. Impacts are not considered significant because erosion would be controlled on-site in accordance with Imperial County standards including preparation, review, and approval of a grading plan by the Imperial County Engineer. Implementation of Imperial County standards would reduce the potential impacts to below a level of significance.

c) **Potentially Significant Impact.** Near surface soils within the project site will need to be identified to determine if the soils are unstable. This is a potentially significant impact. This issue will be analyzed in the EIR.

d) **Potentially Significant Impact.** Near surface soils within the project site will need to be identified to determine if they consist of soils having expansion potential. This is a potentially significant impact. This issue will be analyzed in the EIR.

e) **No Impact.** The proposed project would not require an operations and maintenance building. The proposed solar facility would be remotely operated, controlled and monitored and with no requirement for daily on-site employees. Therefore, no impact is identified for this issue area.

IX. Greenhouse Gas Emissions

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have an adverse effect on the environment?	☒	☐	☐	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

a,b) **Potentially Significant Impact.** The proposed project has the potential to generate greenhouse gas emissions during construction, in addition to construction worker trips to and from the project site. A potentially significant impact is identified and will be evaluated in the EIR. In the long-term, the project is expected to provide a benefit with respect to reduction of greenhouse gas emissions. A greenhouse gas emissions/climate change technical report will be prepared for the proposed project, and this issue will be addressed in the EIR.

X. Hazards and Hazardous Materials

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☒	☐	☐	☐

X. Hazards and Hazardous Materials

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

a,b) **Less than Significant Impact.** Construction of the project will involve the limited use of hazardous materials, such as fuels and greases to fuel and service construction equipment. No extremely hazardous substances are anticipated to be produced, used, stored, transported, or disposed of as a result of project construction. No operations and maintenance facilities, or habitable structures are proposed on-site. Operation of the project will be conducted remotely. Regular, routine maintenance of the project may result in the potential to handle hazardous materials. However, the hazardous materials handled on-site would be limited to small amounts of everyday use cleaners and common chemicals used for maintenance. The applicant will be required to comply with State laws and County Ordinance restrictions, which regulate and control hazardous materials handled on-site. Such hazardous wastes would be transported off-site for disposal according to applicable State and County restrictions and laws governing the disposal of hazardous waste during construction and operation of the project. Therefore, this is considered a less than significant impact.

c) **No Impact.** The project site is not located within 0.25 mile of an existing or proposed school. No impact is identified for this issue area.

d) **No Impact.** Based on a review of the Cortese List conducted in April 2018, the project site is not listed as a hazardous materials site. No impact is identified for this issue area.

e,f) **No Impact.** The project site is not located within 2 miles of a public airport or a private airstrip. The nearest airport to the project site is the Cliff Hatfield Memorial Airport, located approximately 7 miles southwest of the project site. Therefore, no impact associated with airport hazards would occur with implementation of the proposed project.

g) **Less than Significant Impact.** The proposed project is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project applicant will be required, through the conditions of approval, to prepare a street improvement plan for the project that will include emergency access points and safe vehicular travel. In addition, local building codes would be followed to minimize flood, seismic, and fire hazard. Therefore, the proposed project would result in a less than significant impact associated with the possible impediment to emergency plans.

h) **Potentially Significant Impact.** According to the Draft Cal Fire Hazard Severity Zones in Imperial County Land Responsibility Area Map (2007), the project site is located within a local responsibility area, which is identified as a "moderate" risk area for wildland fires. Therefore, the proposed project has the potential to expose people or structures to a significant risk of loss, injury, or death involving wildland fire. This is considered a potentially significant impact and will be evaluated in the EIR.

XI. Hydrology and Water Quality

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☒	☐	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☒	☐	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒

XI. Hydrology and Water Quality

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

a,f) **Potentially Significant Impact.** The proposed project has the potential to create urban non-point source discharge (e.g., synthetic/organic chemicals). Potentially significant water quality impacts have been identified and will be addressed in the EIR.

b) **Less than Significant Impact.** During construction, potable water would be brought to the site for drinking and domestic needs, while construction water would be brought to the site for soil conditioning and dust suppression. During operations, potable water would be trucked onto the project site. Because the solar panels will be pole-mounted above ground, they are not considered "hardscape", such as roads, building foundations, or parking areas, as they do not require a substantial amount of impervious material. The panels and their mounting foundation would not impede groundwater recharge. Impacts would be less than significant.

c,d,e) **Less than Significant Impact.** The proposed project is not anticipated to generate a significant increase in the amount of runoff water from water use involving solar panel washing. Water will continue to percolate through the ground, as a majority of the surfaces on the project site will remain pervious. The proposed project would not substantially alter the existing drainage pattern of the site, substantially increase the rate of runoff, or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems. No IID drains or canals will be removed or relocated, and no washes were found within the project site. A less than significant impact is identified for these issue areas.

g,h) **No Impact.** According to the Federal Emergency Management Agency Flood Insurance Rate Map (Panel 06025C0750C), the project site is located in Zone X, which is an area determined to be outside of the 0.2 percent annual chance of a flood. The project does not propose the placement of housing or structures within a 100-year flood hazard area. Therefore, no impact is identified for these issue areas.

i) **No Impact.** There are no dams or levees in the vicinity of the project site. Furthermore, the project does not proposed the placement of habitat structures on the project site. Therefore, no impact is identified for this issue area.

j) **No Impact.** The project site is not located near any large bodies of water. The Salton Sea is located approximately 10 miles west of the project site. Furthermore, the project site is over 100 miles inland from the Pacific Ocean. In addition, the project site is relatively flat. Therefore, there is no potential for the project site to be inundated by seiches, tsunamis, or mudflows. Thus, no impact is identified for these issue areas.

XII. Land Use and Planning

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

a) **No Impact.** The project site is located in a sparsely populated, agriculturally zoned portion of Imperial County. There are no established residential communities located within or in the vicinity of the project site. Therefore, implementation of the proposed project would not divide an established community and no impact would occur.

b) **Less than Significant Impact.** The project site is currently designated by the General Plan as "Agriculture" and is zoned A-3 (Heavy Agriculture). Pursuant to Title 9, Division 5, Chapter 9, "Solar Energy Plants" and "Transmission lines, including supporting towers, poles, microwave towers, utility substations" are uses that are permitted in the A-3 Zone, subject to approval of a conditional use permit.

The County Land Use Ordinance, Division 17, includes the Renewable Energy Overlay Zone, which authorizes the development and operation of renewable energy projects, with an approved conditional use permit. As shown on Figure 1, the project site is located entirely within the County's Renewable Energy Overlay Zone. With approval of a conditional use permit, the proposed solar facility would be consistent with the Imperial County Land Use Ordinance.

Based on these considerations, the proposed project would not conflict with any applicable land use plan, policy, or regulation. This is considered a less than significant impact.

c) **No Impact.** The project site is not located in a Habitat Conservation Plan or Natural Community Conservation Plan. Therefore, the proposed project would not result in a conflict with any applicable conservation plan or natural community conservation plan. No impact is identified for this issue area.

XIII. Mineral Resources

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

a,b) **No Impact.** The project site is not used for mineral resource production. According to the Conservation and Open Space Element of the General Plan, no known mineral resources occur within the project site nor does the project site contain mapped mineral resources. Therefore, the proposed project would not result in the loss of availability of any known mineral resources that would be of value to the region and the residents of California nor would the proposed project result in the loss of availability of a locally important mineral resource.

XIV. Noise

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

XIV. Noise

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

a,c,d) **Less than Significant Impact.** The Imperial County Code of Ordinances, Chapter 2, Section 90702.00 - Sound level limits, establishes one-hour average sound level limits for the County's land use zones. Agricultural/industrial operations are required to comply with the noise levels prescribed under the general industrial zones. Therefore, the project is required to maintain noise levels below 75 decibels (dB) (averaged over one hour) during any time of day. The project would be expected to comply with the Noise Element of the General Plan which states that construction noise, from a single piece of equipment or a combination of equipment, shall not exceed 75 dB, when averaged over an eight hour period, and measured at the nearest sensitive receptor. Construction equipment operation is also limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. Nevertheless, the project will result in the increase in ambient noise levels during construction. This issue will be addressed in the EIR.

b) **Less than Significant Impact.** Groundborne vibration and groundborne noise could originate from earth movement during the construction phase of the proposed project. However, significant vibration is typically associated with activities such as blasting or the use of pile drivers, neither of which would be required during project construction. The project would be expected to comply with all applicable requirements for long-term operation, as well as with measures to reduce excessive groundborne vibration and noise to ensure that the project would not expose persons or structures to excessive groundborne vibration. No further analysis is warranted.

e,f) **No Impact. The** project site is not located within two miles of a public airport or a private airstrip. The nearest airport to the project site is the Cliff Hatfield Memorial Airport, located approximately 7 miles southwest of the project site. No further analysis is warranted.

XV. Population and Housing

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a,b,c) **No Impact.** The project site has been historically used for agricultural production. Development of housing is not proposed as part of the project. No full-time employees are required to operate the project. The project facility will be monitored remotely. It is anticipated that maintenance of the facility will require minimal site presence to perform periodic visual inspections and minor repairs. On intermittent occasions, the presence of additional workers may be required for repairs or replacement of equipment and panel cleaning; however, due to the nature of the facility, such actions will likely occur infrequently. Therefore, the proposed project would not result in a substantial growth in the area, as the number of employees required to operate and maintain the facility is minimal. No impact is identified for population and housing.

XVI. Public Services

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire Protection?	☒	☐	☐	☐
ii. Police Protection?	☒	☐	☐	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

XVI. Public Services

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

i) **Potentially Significant Impact.** Fire protection and emergency medical services in the area are provided by the Imperial County Fire Department. The proposed project would be required to comply with all existing regulations and requirements of the Imperial County Fire Department and would be reviewed for adherence to prevention measures for wildland fires. According to the Draft Cal Fire Hazard Severity Zones in Imperial County Land Responsibility Area Map (2007), the project site is located within a local responsibility area, which is identified as a "moderate" risk area for wildland fires. Construction and operation activities may result in an increased need for fire-fighting personnel and facilities in the area. Therefore, the potential impact on fire services from construction and operation of the proposed project will be further evaluated in the EIR.

ii) **Potentially Significant Impact.** Police protection services in the project area is provided by the Imperial County Sheriff's Department. Although the potential is low, the proposed project may attract vandals or other security risks. The increase in construction related traffic could increase demand on law enforcement services. On-site security would be provided and access would be limited to the areas surrounding the project site during construction and operation, thereby minimizing the need for police surveillance. However, the project's impacts on sheriff services will be further evaluated in the EIR.

iii) **No Impact.** The proposed project does not include the development of residential land uses that would result in an increase in population or student generation. Construction of the proposed project would not result in an increase in student population within the Imperial County's School District since it is anticipated that construction workers would commute in during construction operations. The proposed project would have no impact on Imperial County schools. No further analysis is warranted.

iv,v) **No Impact.** No full-time employees are required to operate the project. The project facility will be monitored remotely. It is anticipated that maintenance of the facility will require minimal site presence to perform periodic visual inspections and minor repairs. Therefore, substantial permanent increases in population that would adversely affect local parks, libraries and other public facilities (such as post offices) are not expected. The project is not expected to have an impact on parks and other public facilities such as post offices, and libraries. Therefore, no further analysis of these issue areas is warranted.

XVII. Recreation

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a,b) **No Impact.** The proposed project would not generate new employment on a long-term basis. As such, the project would not significantly increase the use or accelerate the deterioration of regional parks or other recreational facilities. The temporary increase of population during construction that might be caused by an influx of workers would be minimal and not cause a detectable increase in the use of parks. Additionally, the project does not include or require the expansion of recreational facilities. No impact will occur and no further analysis is warranted.

XVIII. Transportation/Traffic

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

XVIII. Transportation/Traffic

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

a,b) **Potentially Significant Impact.** Construction of the project would result in a small increase of traffic to the area, which may result in a potentially significant impact. This issue will be addressed in the EIR.

c) **No Impact.** The proposed project would utilize PV panels or modules on mounting frameworks to convert sunlight into electricity. The panels will be tracking and will be no more than 15 feet high at the high end (at maximum rotation angle). Fixed-tilt racking could also be utilized in areas not suited for tracking equipment, maximum height will still not exceed 15 feet. The proposed solar panels would not be at a height that would interfere with air traffic patterns. Therefore, no impact is identified for this issue area.

d) **No Impact.** To accommodate emergency access, PV panels would be spaced to maintain proper clearance. A 20-foot wide access road would be constructed along the perimeter fence and solar panels to facilitate vehicle access and maneuverability for emergency unit vehicles. The internal access road would be graded and compacted (native soils) as required for construction, operations, maintenance, and emergency vehicle access. These access roads would not increase hazards because of design features or incompatible uses and no impact is identified.

e) **Less than Significant Impact.** To accommodate emergency access, PV panels would be spaced to maintain proper clearance. A 20-foot wide access road would be constructed along the perimeter fence and solar panels to facilitate vehicle access and maneuverability for emergency unit vehicles. The internal access road would be graded and compacted (native soils) as required for construction, operations, maintenance, and emergency vehicle access. The access and service roads would also have turnaround areas at any dead-end to allow clearance for fire trucks per fire department standards (70 feet by 70 feet, and 20-foot-wide access road). Based on this context, impacts are considered less than significant.

f) **No Impact.** There are currently no pedestrian or bicycle right-of-way within the project site that the project would interfere with. There are currently no bus stops located within the project's boundaries or surrounding area, and the proposed project does not include changes to the existing county roadway network. Based on these considerations, the proposed project would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Thus, no impact is identified for this issue area.

XIX. Utilities and Service Systems

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

XIX. Utilities and Service Systems

Environmental Issue Area:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

a,e) **Less than Significant Impact.** The proposed project would generate a minimal volume of wastewater during construction. During construction activities, wastewater would be contained within portable toilet facilities and disposed of at an approved site. No habitable structures are proposed on the project site (such as O&M buildings); therefore, there would be no wastewater generation from the proposed project. The proposed project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board. A less than significant impact is identified for this issue area.

b,d) **Potentially Significant Impact.** The proposed project is not anticipated to result in a significant increase in water demand/use; however, water will be needed for solar panel washing and fire protection (on site storage) once the project is fully operational. Water required for operations and maintenance of the project will be provided by IID. During operations, potable water will be trucked onto the site. This issue will be addressed in the EIR.

c) **Less than Significant Impact.** The proposed project does not require expanded or new storm drainage facilities because the proposed solar facility would not generate a significant increase in the amount of impervious surfaces that would increase runoff during storm events. Water from solar panel washing would continue to percolate through the ground, as a majority of the surfaces within the project site would remain pervious.

f,g) **Less than Significant Impact.** Solid waste generation would be minor for the construction and operation of the project. Solid waste will be disposed of using a locally-licensed waste hauling service, most likely Allied Waste. Trash would likely be hauled to the Niland Solid Waste Site (13-AA-0009) located in Niland. The Niland Solid Waste Site has approximately 318,669 cubic yards of remaining capacity and is estimated to remain in operation through 2056 (CalRecycle n.d.). Therefore, there is ample landfill capacity in the County to receive the minor amount of solid waste generated by construction and operation of the project.

Additionally, because the proposed project would generate solid waste during construction and operation, they will be required to comply with state and local requirements for waste reduction and recycling; including the 1989 California Integrated Waste Management Act and the 1991 California Solid Waste Reuse and Recycling Access Act of 1991. Also, conditions of the conditional use permit will contain provisions for recycling and diversion of Imperial County construction waste policies. A less than significant impact is identified for this issue area.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Revised 2009- CEQA

Revised 2011- ICPDS

Section III Mandatory Findings of Significance

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

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

a,b,c) **Potentially Significant Impact.** The proposed project has the potential to result in significant environmental effects, which could directly or indirectly cause adverse effects on human beings and or the environment. Implementation of the proposed project has the potential to result in impacts related to: aesthetics, agricultural resources, air quality, sensitive biological resources, cultural resources, paleontological resources, geology/soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, public services, transportation/circulation impacts, and water supply. These issues will be further evaluated in the EIR. In addition, the proposed project has the potential to result in cumulative impacts with regards to the identified issue areas. Cumulative impacts will be discussed and further analyzed in the EIR.

This page is intentionally blank.

3 Project Description

Chapter 3 provides a description of the Citizens Imperial Solar, LLC Project. This chapter also defines the goals and objectives of the proposed project, provides details regarding the individual components that together comprise the project, and identifies the discretionary approvals required for project implementation.

3.1 Project Location

The proposed project is located approximately 6 miles northeast of the City of Calipatria and 5 miles southeast of Niland, a census-designated place, in the unincorporated area of Imperial County (Figure 3-1). The East Highline Canal is located on the project site's eastern boundary, with desert lands immediately beyond. The project site is surrounded to the north, west, and south by privately-owned agricultural lands. Adjacent roadways, which are currently developed for agricultural uses, include Merkley Road and Simpson Road.

The project site encompasses approximately 223 acres, comprised of two parcels of land identified as Assessor Parcel Numbers (APNs) 025-260-024 (northern parcel) and 025-280-003 (southern parcel). Table 3-1 identifies the APNs, size, and zoning of the project parcels. The location of the project site is shown on Figure 3-2.

Table 3-1. Project Assessor Parcel Numbers, Acreages, and Zoning

APN	Zoning	Acres
025-260-024	A-3	106
025-280-003	A-3	117
	Total	**223**

3.1.1 Renewable Energy Overlay Zone

In 2016, the County adopted the Imperial County Renewable Energy and Transmission Element, which includes a RE Zone (RE Overlay Map). This General Plan element was created as part of the California Energy Commission Renewable Energy Grant Program to amend and update the County's General Plan to facilitate future development of renewable energy projects.

The County Land Use Ordinance, Division 17, includes the RE Overlay Zone, which authorizes the development and operation of renewable energy projects with an approved CUP. The RE Overlay Zone is concentrated in areas determined to be the most suitable for the development of renewable energy facilities while minimizing the impact on other established uses. As shown on Figure 3-1, the project site is located within the RE Overlay Zone.

Figure 3-1. Regional Location

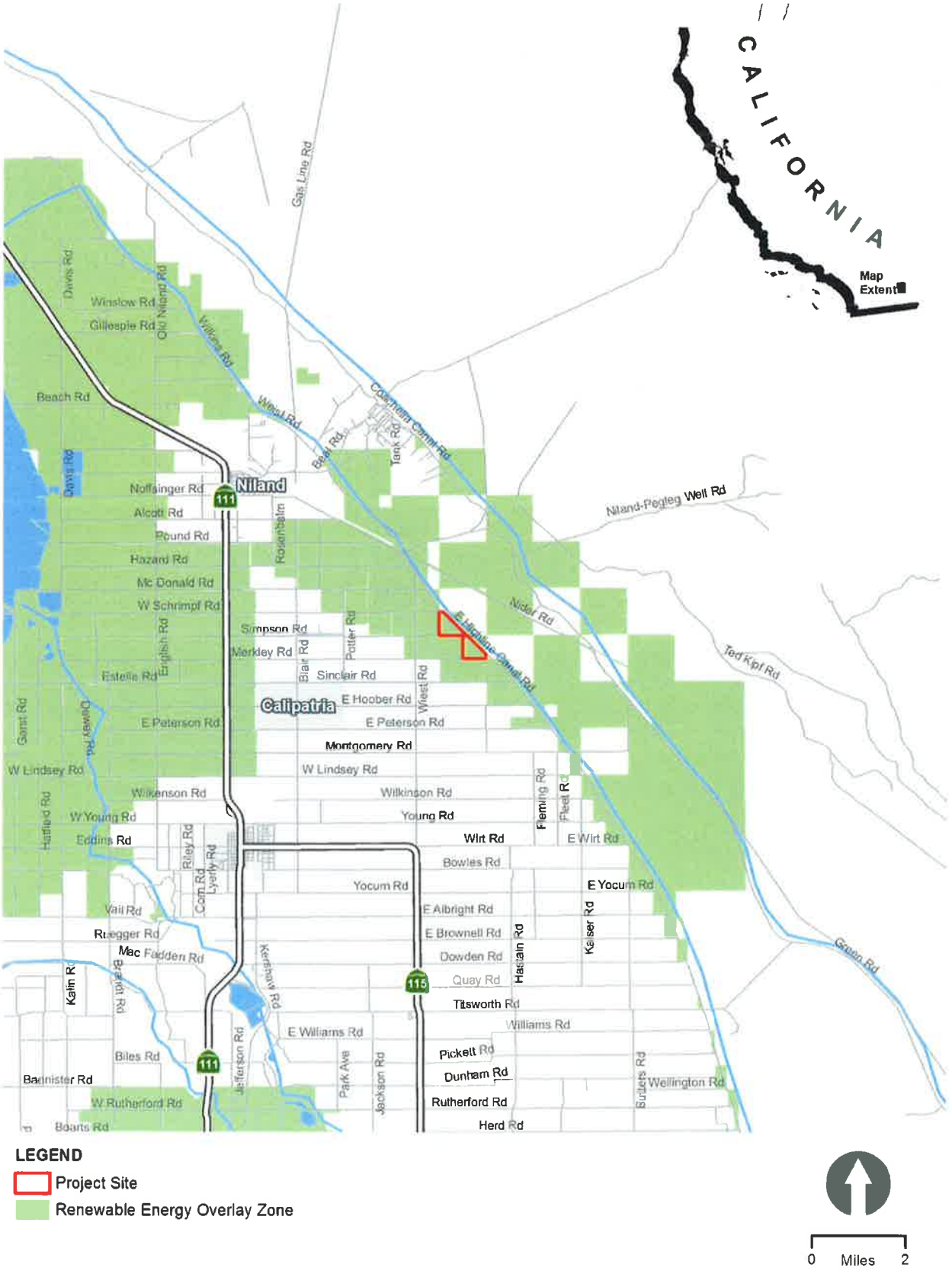


Figure 3-2. Project Site

3.2 Project Objectives

The primary objective of the project is to deliver cost-effective, renewable energy that maximizes the use of existing transmission infrastructure and relies on highly-efficient, proven technology to realize federal and State energy goals.

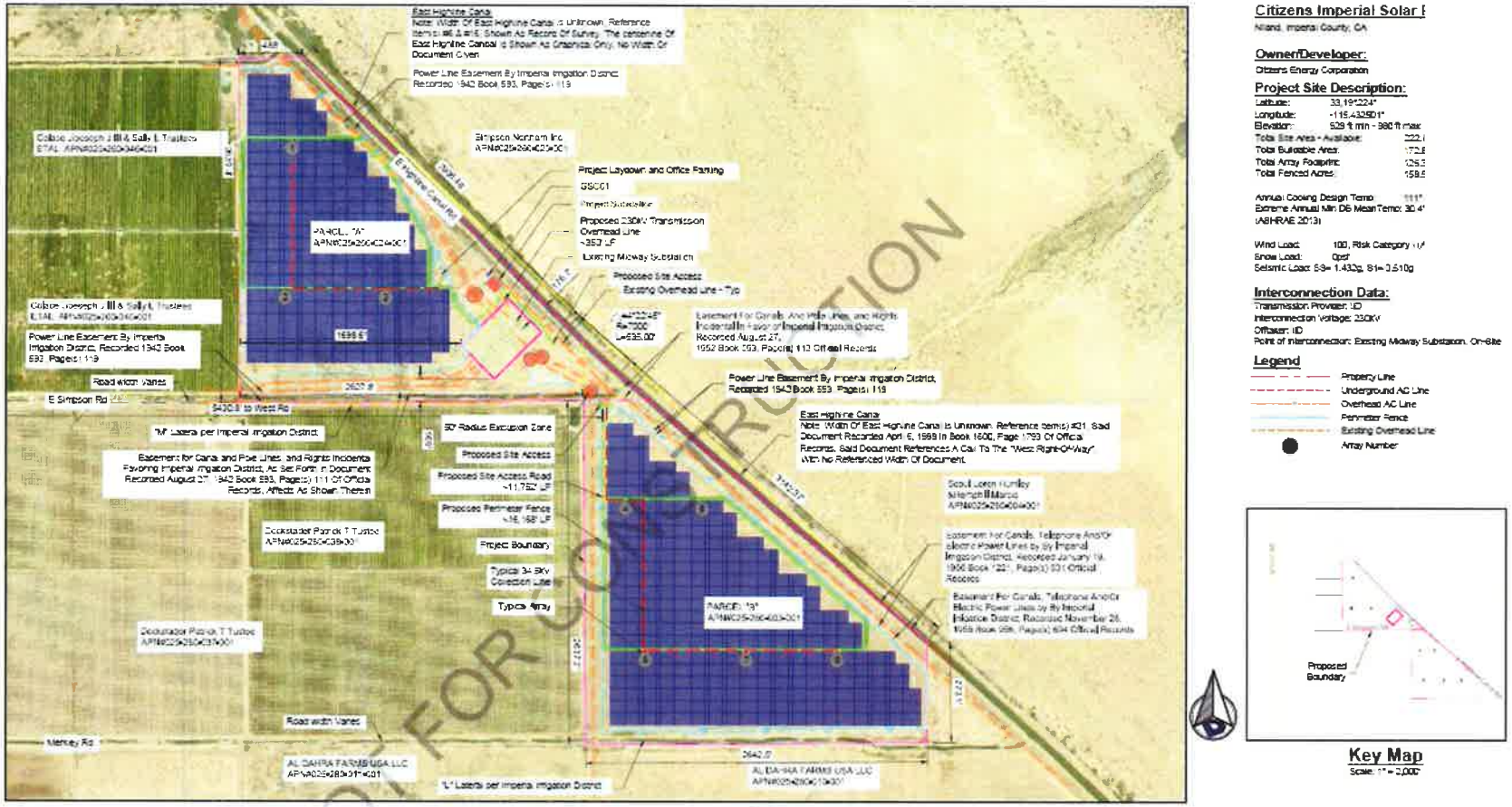
- To provide solar energy for the Imperial Irrigation District's (IID) eGreen low-income community solar program. This project will lower the electricity bills for the District's 15,000 qualified low-income customers from a local source of clean energy.
- To construct and operate a 30 megawatt (MW) solar photovoltaic (PV) energy facility using high-efficiency PV technology to provide a renewable and reliable source of electrical power to California utilities.
- To locate the project on private lands with high-solar insolation and relatively flat terrain and to minimize construction of new transmission infrastructure.
- To minimize environmental impacts and land disturbance by locating the project on fallowed agricultural lands.
- To assist California and its investor-owned utilities in meeting the State's RPS and greenhouse gas emission reduction requirements.
- To provide economic benefits to Imperial County, through new jobs, spending in local business, and additional sales tax revenue.

3.3 Project Characteristics

The Citizens Imperial Solar, LLC Project involves the construction of a 30 MW alternating current (AC) solar photovoltaic (PV) energy generating facility on approximately 223 acres of land owned by IID. Of the total 223 acres, approximately 159 acres (area within the fence line) would be developed with a ground mounted PV solar power generating system, supporting structures, on-site substation, access driveways, and transmission structures. Figure 3-3 depicts the proposed site plan.

The project would connect to the electric grid at the IID Midway Substation, located on the northern parcel of the project site (Figure 3-2). The project has a Power Purchase Agreement (PPA) with IID for the sale of power from the project. The lifespan of the project is expected to be 25 years. The project would provide lower-cost energy to low-income customers through the eGreen program administered by IID.

Figure 3-3. Preliminary Site Plan



Preliminary Site Plan
Scale: 1" = 400'

Information used to prepare this drawing		Date, Revision
Site Boundary	1723-001_CNST.dwg FuSpe	2/12/2018
CUP	None	N/A
Geotech	None	N/A
FEMA	Panel 06025C0750C	9/26/2008
Topographic Survey	1723-001_CNST.dwg FuSpe	2/12/2018
Hydrology	None	N/A
Wetlands	National Wetland Database	2018
POI Location	Existing IID Substation	N/A
Aerial Imagery	USGS via Bing Maps	N/A

*Files are based on State Plane Coordinate System NAD83

Citizens Imperial Solar F
Niland, Imperial County, CA

Owner/Developer:
Citizens Energy Corporation

Project Site Description:
Latitude: 33.1952224°
Longitude: -115.432501°
Elevation: 529 ft min - 980 ft max
Total Site Area - Available: 222.
Total Buildable Area: 172.
Total Array Footprint: 125.
Total Fenced Acres: 159.

Annual Cooling Design Temp: 111°
Extreme Annual Min DB Mean Temp: 30.4°
(ASHRAE 2013)

Wind Load: 100, Risk Category II
Snow Load: 0psf
Seismic Load: SS= 1.432g, S1= 0.510g

Interconnection Data:
Transmission Provider: IID
Interconnection Voltage: 230kV
Offtaker: IID
Point of Interconnection: Existing Midway Substation, On-Site

Legend
- Property Line
- Underground AC Line
- Overhead AC Line
- Perimeter Fence
- Existing Overhead Line
- Array Number

Key Map
Scale: 1" = 2,000'

3.3.1 Photovoltaic Panels/Solar Arrays

PV solar cells convert sunlight directly into (direct current) DC electricity. The process of converting light (photons) to electricity (voltage) in a solid state process is called the photovoltaic effect. A number of individual PV cells are electrically arranged and connected into solar PV modules, sometimes referred to as solar panels.

The PV cells would be made from thin film or crystalline silicon materials, which would be dark in color, have low reflectivity, and be highly absorptive of the sunlight that strikes their glass surfaces. PV modules would be wired together in a mixture of series and parallel configurations and connected to DC to AC inverters and transformers located within the project site.

PV Panel/Mounting Configuration. The project would include approximately 126 acres of tracking solar PV panels. The project would utilize single-axis tracking systems in rows running north-south, typical for projects in the region. The panels would be tracking and would be no more than 15 feet high at the high end (at maximum rotation angle). Fixed-tilt racking could also be utilized in areas not suited for tracking equipment. The maximum height would still not exceed 15 feet if fixed-tilt racking is utilized. Figure 3-4 provides a representative example of these types of systems.

As shown on Figure 3-3, the project would consist of 8 arrays, or grouping of trackers that are electrically optimized and located around a central inverter station.

Figure 3-4. Representative Examples of Photovoltaic Panel/Mounting Configuration

Typical Single-Axis Tracking Solar Panels

Typical Fixed-Tilt Mounting Structure

Typical Fixed-Tilt Solar Panel Rows

3.3.2 Inverter Station

PV energy would be delivered via cable to inverter stations, generally located near the center of each block. Central inverters would be enclosed within outdoor rated electrical equipment enclosures. The project would include 8 inverter stations that would be approximately 10 feet tall and 10 feet by 35 feet wide per station. Figure 3-5 provides representative examples of a typical inverter station. Central inverter stations would be 3.75 MWac on average. Each inverter station includes an inverter step-up transformer for connection to the 34.5 kV collection system. The inverters convert the DC electricity to AC electricity, which then flows to the transformer where it is stepped up to the appropriate voltage (34.5 kV).

3.3.3 Collection System

The project would include 34.5 kV underground cables and overhead, pole mounted conductors to connect each of the 8 inverter stations to the project substation. Overhead sections are typically on wood-poles with heights up to 40 feet and are used most commonly for crossing over roads, canals, and gas lines.

3.3.4 Substation

A project substation, developed and located in close coordination with IID, would be constructed to transform the collected 34.5 kV power generation to IID transmission system voltages. The substation would include a main power transformer, facility protection equipment, and a control enclosure. Substation structure maximum heights would be equal to or less than existing IID facility structures. A representative example of a substation is presented on Figure 3-6.

The purpose of the project substation is to convert the collection-level electricity (34.5 kV) to the voltage (230 kV) of the IID Midway Substation. All interconnection equipment would be installed aboveground and within the footprint of the project substation. The overall footprint of the project substation is anticipated to be approximately 130 by 180 feet and poles up to 50 feet in height.

The project substation would include a 45-kW emergency generator for use if the regional transmission system fails; this emergency generator would provide emergency power until the regional transmission system restores operations. The substation would be surrounded by a barbed wire chain-link fence to comply with electrical codes.

The project substation must have access to communication systems in the area to comply with utility monitoring and remote-control requirements. Compliance may be accomplished by underground lines, aboveground lines, or wireless solutions such as microwave or satellite.

Figure 3-5. Representative Examples of Typical Inverter Stations

Figure 3-6. Representative Example of Typical Substation Design

3.3.5 Transmission Line and Interconnection Facilities

The proposed project may require 2 to 3 transmission structures to connect the project substation to IID's existing Midway Substation. Such structures would be designed in cooperation with and per IIDs requirements, and crossing of exiting 230 kV transmission lines may be required. Final structure heights would be determined by IID, but typically would not exceed 120 feet.

3.3.6 Telecommunications

The project requires telecommunications connections for remote operations and utility telemetry. The region in which the project is proposed is known to be without significant fiber infrastructure or high-speed copper based telecommunication options. As is typical for facilities of this nature in the project region, microwave point to point service would likely be required. Satellite based solutions may also be considered, if such solutions can meet the project requirements. Microwave solutions do require the installation of a radio antenna pole or tower, typical ranging in height from 20 to 100 feet. Any such structure would be located immediately adjacent to the substation control enclosure.

3.3.7 Auxiliary Facilities

This section describes the auxiliary facilities that would be constructed and operated in conjunction with the solar facility.

3.3.7.1 Site Security and Fencing

The boundary of the project site would be secured by a 6-foot tall chain-link perimeter fence, topped by 1- foot-tall three-strands of barbed wire. Points of ingress/egress would be accessed via locked gates.

3.3.7.2 Lighting System

Minimal lighting would be required for operations and would be limited to safety and security functions. Motion sensitive, directional security lights would be installed to provide adequate illumination at points of ingress/egress pursuant to County of Imperial Building Code Requirements (see Title 9, Division 3, Chapter 1: Special Development Standards, of the County's Zoning Ordinance). All lighting would be directed downward and shielded to focus illumination of the desired areas only and to minimize light trespass in accordance with applicable County requirements.

3.3.7.3 Access

The nearest paved road, Wiest Road, is approximately 0.5 miles from the western edge of the project site. The primary means of access (all public) is from Wiest Road, turning east onto Simpson Road. The southern project parcel would be accessed directly from Simpson Road. The northern parcel would be accessed from East Highline Canal Road. Secondary means of accessing the northern parcel could be achieved with surrounding property owner's permission, by utilizing private roads running east from Wiest Road, along existing canals. For all access to the site, active dust control mitigation measures would be utilized for all un-paved portions during construction of the facility.

To accommodate emergency access, PV panels would be spaced to maintain proper clearance. A 20-foot wide access road would be constructed along the perimeter fence and solar panels to facilitate vehicle access and maneuverability for emergency unit vehicles. The internal access road would be graded and compacted (native soils) as required for construction, operations, maintenance, and emergency vehicle access.

3.3.7.4 Fire Protection

The project is located within the jurisdiction of Imperial County Fire Department. A 10,000-gallon aboveground water storage tank(s) would be installed on the project site as required by the Imperial County Fire Department. The water tank(s) would be sized to meet the requirements of the County of Imperial to supply sufficient fire suppression water during operations.

Project facilities would be designed, constructed, and operated in accordance with applicable fire protection and other environmental, health, and safety requirements. The following steps will be taken to identify and control fires and similar emergencies:

- Electrical equipment that is part of the project will only be energized after the necessary inspection and approval, so there is minimal risk of any electrical fire during construction.
- Project staff will monitor fire risks during construction and operation to ensure that prompt measures are taken to mitigate identified risks.
- Transformers located on-site will be equipped with coolant that is non-flammable, biodegradable, and contains no polychlorinated biphenyls or other toxic compounds.

Furthermore, both the access and service roads (along the perimeter of the project facility) would have turnaround areas to allow clearance for fire trucks per fire department standards (70 feet by 70 feet, and 20-foot-wide access road).

3.3.7.5 Landscaping

The project applicant would address landscaping in the final project design. Given the size of the project and its location near agricultural properties, the project applicant would work with the County

to identify appropriate landscaping, if any, for this project that meets the intent of County landscaping ordinance requirements.

3.3.8 Dust Suppression and Erosion Control

The project would comply with all applicable air pollution control regulations. During the construction phase of the project, standard dust control measures would be used to mitigate emissions of fugitive dust. These may include watering or applying other dust palliatives to roadways and parking areas. Site entrances and parking areas would be graveled and/or have dust palliative applied.

3.3.9 Water Supply, Treatment, and Storage

Construction water usage rates and total requirements will vary depending on the length and intensity of each construction activity. The overall construction timeframe is estimated to be 23 weeks. During construction, water would be needed for dust control and soil compaction, with small amounts used for sanitary and other purposes. Total water demand during construction is estimated to be 80 acre-feet (or gallons).

Water for construction-related dust control and operations would be obtained from IID. The project applicant would work with IID on obtaining a permit for this water use and the water use associated with facility operation. During construction, restroom facilities would be provided by portable units to be serviced by licensed providers.

3.4 Project Construction

The proposed project is anticipated to take approximately 23 weeks from the commencement of the construction process to complete. The following sections provide details regarding the project timeline and construction process.

3.4.1 Solar Construction Process

Construction activities would include the installation of civil infrastructure (e.g., driveways, grading, fencing), mechanical infrastructure (e.g., piles, panel and inverter foundations), and electrical infrastructure (e.g., PV panels, cables). The following steps would be implemented.

Installation of Civil Infrastructure

- Pre-construction biological resources surveys and resource-related BMPs, as required
- Survey and project layout, including road, array, substation, and fence lines
- Driveway construction
- Temporary facilities, water storage (fire and dust control), parking, and staging areas
- Installation of temporary and permanent chain-link fence and gate
- Grading as required for arrays and SWPPP BMPs
- Substation pad

Installation of Mechanical and Electrical Infrastructure

- Excavation and installation of Power Conversion Station (PCS) pads

- Installation of steel piles and placement of racking system
- Setting of combiner boxes
- Trenching for buried wiring
- Installation of buried wiring (i.e. AC, DC, ground and fiber)
- Setting of PCS
- Installation of PV modules
- Installation of above ground DC wiring
- Terminations of required wiring
- Construction of the project substation
- Construction of the interconnection to the Midway Substation
- Telecommunications installation
- Installation of meteorological equipment

3.4.2 Site Preparation, Surveying, and Staking

Preconstruction survey work would consist of staking and flagging the following: 1) construction area boundaries, 2) work areas (permanent and short term), 3) cut and fill, 4) access and roads, 5) transmission structure centers, 6) foundation structures. Staking and flagging would be maintained until final cleanup.

Site Preparation

Site preparation activities include installation of fencing and completion of any required pre-construction surveys, preparing and constructing site access roads, establishing temporary construction trailers and sanitary facilities, and preparing a construction staging area.

Vegetation Removal/Clearing

Within the solar field and plant roadways, vegetation would be disced under, mulched or composted, and retained on site to assist in erosion control and limit waste disposal. Vegetation would be cleared for construction of any required drainage controls, including berms.

Grading

The project site is flat, nearly level, and requires minimal grading to allow for installation of the PV panels. Typical grading would consist of array grading as required by the PV racking system tolerance requirements, SWPPP compliance, substation, driveways, and other improvements. Access driveways would be constructed by placing two to four inches of decomposed granite or comparable material directly on the existing soil. Soil compaction, soil strengthening agents, or geo fabric may be used for access and circulation driveways. Compaction may also be required for grading, underground electrical trenches, inverter pads, substation, and driveways. Typical dust mitigation measures would be performed during construction.

3.4.3 Temporary Construction Facilities

A temporary construction staging area and an area for construction worker parking would be included within the project site. These areas would be utilized throughout the approximately 23-week project construction period and then decommissioned and/or replaced by solar arrays. Graded roads would be required in selected locations on or around the project site during construction to bring equipment and materials from the staging areas to the construction work areas, and for long-term project operation and maintenance.

The staging areas would include material laydown and storage areas and an equipment assembly area. During construction, the staging area would contain a guard shack, construction trailers, construction worker parking, and portable toilet facilities that would serve the project's sanitation needs during construction. Temporary construction fencing would surround this area and the guard shack would be manned to provide security during construction.

3.4.4 Construction Schedule and Workforce

Heavy construction work is expected to be from 6:00 a.m. to 5:00 p.m., Monday through Friday. However, to meet schedule demands, it may be necessary to work early morning, evening, or nights and on weekends during certain construction phases. Some activities may continue 24 hours, seven days per week. These activities include but are not limited to refueling equipment, staging material for the following day's construction activities, quality assurance/control, and commissioning. The work schedule may be modified throughout the construction period to account for changing weather conditions. If construction work takes place outside these typical hours, activities would comply with Imperial County standards for construction noise levels.

For safety reasons, certain construction tasks, including final electrical terminations, must be performed after dark when no energy is being produced. The project would use restricted nighttime task lighting during construction. No more lighting would be used than is needed to provide a safe workplace, and lights would be focused downward, shielded, and directed toward the interior of the site to minimize light exposure to areas outside the construction area.

During project construction, the workforce is expected to average approximately 80 employees over the 23-week construction period, with a peak workforce of approximately 200 employees. The project construction workforce would be recruited from within Imperial County and elsewhere in the surrounding region to the extent practicable.

3.4.5 Construction Equipment

Most construction equipment would be brought to the project site at the beginning of the construction process during construction mobilization and would remain on-site throughout the duration of the construction activities for which they were needed. Generally, the equipment would not be driven on public roads while in use for the project. In addition to construction worker commuting vehicles, construction traffic would include periodic truck deliveries of materials and supplies, recyclables, trash, and other truck shipments. Truck shipments would normally occur during daylight hours. However, offloading and transporting to the site may occur during evening hours. Table 3-2 presents the anticipated equipment by construction phase for the project.

Table 3-2. Construction Equipment and Trip Assumptions

Phase 1 – Site Preparation (~2 months; 55 working days)			
Off-Road Equipment Type	***Number***	***Horsepower***	***Hours/Day***
Rollers/Mowers	2	87	4
Rough Terrain Forklift	2	93	6
Dozers	2	357	6
Tractors/Loaders/Backhoes	3	108	5
Skid Steer Loader	4	61	6
Utility Vehicles	4	49	4
On-Road Trips	***Trips***	***Miles/Trip***	***Unpaved/Trip***
Employee Commute	1,100	30	1
Work Trucks	110	30	1
Heavy Haul Trucks (including off-road equipment delivery)	20	30	1
Water Truck	8	30	1
Fuel Truck	25	30	1
Phase 2 – Facility Installation (~3 months; 102 working days)			
Off-Road Equipment Type	***Number***	***Horsepower***	***Hours/Day***
Pile Driver Rigs12	4	50	8
Crane	1	399	4
Rough Terrain Forklift	3	93	6
Trencher/Loaders/Backhoes	3	108	6
Skid Steer Loader	2	61	6
Utility Vehicles	3	49	4
On-Road Trips	***Trips***	***Miles/Trip***	***Unpaved/Trip***
Employee Commute	5,225	30	1
Work Trucks	306	30	1
Heavy Haul Trucks (off-road equipment delivery/removal)	60	30	1
Heavy Haul Trucks (concrete)	36	30	1
Heavy Haul Trucks (other bulk materials)	70	30	1
Heavy Haul Trucks (panels and arrays)	430	60	1
Heavy Haul Trucks (balance of facility)	100	60	1
Miscellaneous Delivery Trips	130	30	1
Water Truck	4	30	1
Fuel Truck	60	30	1
Phase 3 – Commissioning/Finishing (~1 month; 20 working days)			
Off-Road Equipment Type	***Number***	***Horsepower***	***Hours/Day***

Utility Vehicles	2	49	4
Skid Steer Loader	2	61	6
Trencher/Loader/Backhoe	4	108	6
Rough Terrain Forklift	2	93	6
On-Road Trips	***Trips***	***Miles/Trip***	***Unpaved/Trip***
Employee Commute	200	30	1
Work Trucks	60	30	1
Heavy Haul Trucks (off-road equipment delivery/removal)	30	30	1
Heavy Haul Trucks (other/miscellaneous)	7	30	1
Water Truck	2	30	1
Fuel Truck	10	30	1

3.4.6 Construction Water Requirements

Construction water usage rates and total requirements would vary depending on the length and intensity of each construction activity. The overall construction timeframe is estimated to be 23 weeks. During construction, water would be needed for dust control and soil compaction, with small amounts used for sanitary and other purposes. Total water demand during construction is estimated to be 80 acre-feet (or gallons).

Water for construction-related dust control and operations would be obtained from IID. The project applicant would work with IID on obtaining a permit for this water use and the water use associated with facility operation. During construction, restroom facilities would be provided by portable units to be serviced by licensed providers.

3.4.7 Electrical Construction Activities

The design and work would be performed in accordance with the National Electrical Code requirements. Once all the solar panels are installed in a block, they can be electrically connected. Workers would walk behind each row and plug the wires from each module into a wiring harness that collects all power from each cable. Workers then terminate all harnesses to a combiner box. The combiner boxes then route underground or above ground DC cables to the inverters. The inverters convert the DC power to three-phase AC power which is fed into a step-up transformer. The AC cables from the transformers are routed underground or aboveground to the on-site substation. The on-site substation would step the power up for transmission via the interconnection line to the IID Midway Substation. Dust mitigation would be performed during the installation of underground cables.

If required, a cathodic protection system would be installed to protect steel structures from potentially corrosive soils on site.

3.4.8 Other Construction Activities

Health and Safety Program

A comprehensive health and safety program would be implemented consistent with all applicable State and Federal laws and industry best practices to ensure that the project is built and operated in a safe, responsible manner and presents a safe working environment for all employees. A Health and Safety

Plan would be used during construction. Familiarity and adherence to safety policies and procedures would be required of all employees, throughout the installation period and during site operations. In addition, participation in safety briefings and protocol review would be mandatory for all construction personnel.

Waste and Hazardous Materials Management

Construction of the project would involve the limited use of hazardous materials, such as fuels and greases to fuel and service construction equipment. The use, storage, transport, and disposal of hazardous materials used in construction of the facility would be carried out in accordance with federal, state, and County regulations. No extremely hazardous substances are anticipated to be produced, used, stored, transported, or disposed of as a result of project construction. Material Safety Data Sheets for all applicable materials present on-site would be made readily available to on-site personnel.

Construction materials would be sorted on-site throughout construction and transported to appropriate waste management facilities. Recyclable materials would be separated from non-recyclable items and stored until they could be transported to a designated recycling facility.

3.4.9 Spill Prevention and Containment

Spill response plans would be developed prior to project construction and operation or prior to the storage on-site of an excess of 55 gallons of hazardous materials, and personnel would be made aware of the procedures for spill cleanup and the procedures to report a spill. Spill cleanup materials and equipment appropriate to the type and quantity of chemicals and petroleum products expected would be located onsite and personnel shall be made aware of their location.

The small quantities of chemicals to be stored at the project site during construction include equipment and facilities maintenance chemicals. These materials would be stored in their appropriate containers in an enclosed and secured location such as portable outdoor hazardous materials storage cabinets equipped with secondary containment to prevent contact with rainwater. The portable chemical storage cabinets may be moved to different locations around the site as construction activity locations shift. The chemical storage area would not be located immediately adjacent to any drainage. Disposal of excess materials and wastes would be performed in accordance with local, State, and Federal regulations. Excess materials/waste would be recycled or reused to the maximum extent practicable.

3.5 Operations and Maintenance

The following describes the operational security and maintenance requirements of the proposed project.

3.5.1 Operational Security

The project facility would be monitored remotely by the project applicant or an affiliated company. Once constructed, the project would operate during daylight, seven days per week, 365 days per year. Security would be maintained through installation of a 6-foot tall wire fence topped by 1-foot-tall three-strands of barbed wire.

A security company would be contracted for security purposes during construction and operation. Should the security system detect the presence of unauthorized personnel, a security representative

would be dispatched to the facility, and appropriate local authorities would be notified. A box containing keys for the project facility would be installed to permit emergency access to the project site.

3.5.2 Operations Workforce and Equipment

It is anticipated that maintenance of the facilities would require minimal site presence to perform periodic visual inspections and minor repairs. On intermittent occasions, the presence of additional workers may be required for repairs or replacement of equipment and panel cleaning; however, due to the nature of the facilities, such actions would likely occur infrequently. Overall, minimal maintenance requirements are anticipated. Maintenance and other operational staff would use standard size pickup trucks and vehicles.

During operations, potable water would be trucked onto the site. The operation and maintenance workforce would generate small amounts of sanitary wastewater that would be handled by temporary facilities. Only limited deliveries would be necessary for replacement PV modules and equipment during project operation.

3.5.3 Maintenance Activities

Project maintenance activities generally include road maintenance; vegetation restoration and management; scheduled maintenance of inverters, transformers, and other electrical equipment; and occasional replacement of faulty modules or other site electrical equipment. The project's access roads would be regularly inspected, and any degradation due to weather or wear and tear would be repaired. A dust palliative may be applied on dirt access roads, if needed.

Panel Washing and Operational Water Needs

Water required for operations and maintenance of the project would be provided by IID. One water storage tank would be installed as required by the Imperial County Fire Department.

Water would be used for periodic cleaning of the solar PV panels. It is anticipated that the solar PV panels would be washed up to four times per year to ensure optimum solar absorption by removing dust particles and other buildup. Total water demand during operation, including panel washing and other domestic water needs, is estimated to be approximately 10 acre-feet per year.

One or two small above ground portable sanitary waste facilities may be installed to retain wastewater for employee use. If installed, these facilities would remain onsite for the duration of the project. These facilities would be installed in accordance with state requirements and emptied as needed by a contracted wastewater service vehicle. No wastewater would be generated during panel washing as water would continue to percolate through the ground, as a majority of the surfaces within the project site would remain pervious.

Operational Dust Control

The project would comply with all applicable air pollution control regulations during facility operation. The site region has minimal traffic, and no dust control measures are expected to be required. However, the project applicant would monitor traffic on dirt roads and would implement dust control include watering, bio-degradable chemical stabilization, and speed restrictions as needed. No air pollution control measures are proposed for operation of the facility, as native vegetation would be retained, and there would not be any emissions once construction has ceased.

Spill Prevention and Containment

If required by the County, a Spill Prevention Control and Countermeasure (SPCC) Plan would be implemented during operation. BMPs would be employed in the use and storage of all hazardous materials within the project, including the use of containment systems in appropriate locations. Appropriately sized and supplied spill containment kits would be maintained on-site, and employees would be trained on spill prevention, response, and containment procedures. The chemical storage area would not be located immediately adjacent to any drainage. In addition, in accordance with the Emergency Planning & Community Right to Know Act, the project applicant would supply the local emergency response agencies with a Hazardous Materials Management Plan and an associated emergency response plan and inventory, if required.

3.6 Facility Decommissioning

The expected lifetime of the project is 25 years. The generating facility and access roads would be used year-round. If at the end of the PPA term, no contract extension is available for a power purchaser, no other buyer of the energy emerges, or there is no further funding of the project, the project would be decommissioned and dismantled. When the project concludes operations, much of the wire, steel, and modules of which the system is comprised would be recycled to the extent feasible. The project components would be deconstructed and recycled or disposed of safely, and the site could be converted to other uses in accordance with applicable land use regulations in effect at the time of closure.

Consistent with County of Imperial and CEQA requirements, a Reclamation Plan would be developed in a manner that both protects public health and safety and is environmentally acceptable. The project applicant would employ a collection and recycling program to dispose of site materials. After closure, measures would be taken to stabilize disturbed areas once equipment and structures are decommissioned and removed from the project site. These measures would be outlined in the Reclamation Plan.

3.7 Required Project Approvals

3.7.1 Imperial County

The County would be required to approve the following pursuant to CEQA:

1. **Approval of CUP.** Implementation of the project would require the approval of a CUP by the County to allow for the construction and operation of the proposed solar facility and gentie line. The project site is located on two privately-owned legal parcels of land zoned A-3 (Heavy Agriculture). Pursuant to Title 9, Division 5, Chapter 9, "Solar Energy Plants" and "Transmission lines, including supporting towers, poles microwave towers, utility substations" are uses that are permitted in the A-3 Zone, subject to approval of a CUP.
2. **Certification of the EIR.** After the required public review for the Draft EIR, the County will respond to written comments, edit the document, and produce a Final EIR to be certified by the Planning Commission and Board of Supervisors prior to making a decision on the projects.

Subsequent ministerial approvals may include, but are not limited to:

- Grading and clearing permits
- Building permits

- Reclamation plan
- Encroachment permits

3.7.2 Discretionary Actions and Approvals by Other Agencies

Responsible Agencies are those agencies that have discretionary approval over one or more actions involved with development of the project. Trustee Agencies are state agencies that have discretionary approval or jurisdiction by law over natural resources affected by a project. These agencies may include, but are not limited to the following:

- IID – Water Supply Agreement, Permit for Water Use Lease Agreement
- Imperial County Fire Department – Approval of Final Design of the Proposed Fire System
- Imperial County Public Works Department – Encroachment Permit
- California Regional Water Quality Control Board – Notice of Intent for General Construction Permit
- California Department of Fish and Wildlife (CDFW) Service (Trustee Agency) – Endangered Species Act Compliance
- U.S. Fish and Wildlife Service – Endangered Species Act Compliance
- Imperial County Air Pollution Control District – Fugitive Dust Control Plan, Authority to Construct

This page is intentionally blank.

Comment Letters Received on Notice of Preparation

AUGUSTINE BAND OF CAHUILLA INDIANS

PO Box 846 84-481 Avenue 54 Coachella CA 92236
Telephone: (760) 398-4722
Fax (760) 369-7161
Tribal Chairperson: Amanda Vance
Tribal Vice-Chairperson: William Vance

April 9, 2018

Patricia Valenzuela
Imperial County California
Planning & Development Services
801 Main Street, El Centro, CA 92243

RE: **Project Name: Citizens Imperial Solar LLC**

Dear Ms. Valenzuela -

Thank you for the opportunity to offer input concerning the development of the above-identified project. We appreciate your sensitivity to the cultural resources that may be impacted by your project, and the importance of these cultural resources to the Native American peoples that have occupied the land surrounding the area of your project for thousands of years. Unfortunately, increased development and lack of sensitivity to cultural resources has resulted in many significant cultural resources being destroyed or substantially altered and impacted. Your invitation to consult on this project is greatly appreciated.

At this time we are unaware of specific cultural resources that may be affected by the proposed project. We encourage you to contact other Native American Tribes and individuals within the immediate vicinity of the project site that may have specific information concerning cultural resources that may be located in the area. We also encourage you to contract with a monitor who is qualified in Native American cultural resources identification and who is able to be present on-site full-time during the pre-construction and construction phase of the project. Please notify us immediately should you discover any cultural resources during the development of this project.

Very truly yours,

Amanda Vance
Tribal Chairperson

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710

Edmund G. Brown Jr., Governor

April 27, 2018

Patricia Valenzuela
Imperial County
801 Main Street
El Centro, CA 92243

Also sent by e-mail: patriciavalenzuela@co.imperial.ca.us

RE: SCH# 2018041058, Citizens Imperial Solar, LLC Project, Community of Niland; Imperial County, California

Dear Ms. Valenzuela:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws**.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
    a. A brief description of the project.
    b. The lead agency contact information.
    c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
    d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
    a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
    a. Alternatives to the project.
    b. Recommended mitigation measures.
    c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
    a. Type of environmental review necessary.
    b. Significance of the tribal cultural resources.
    c. Significance of the project's impacts on tribal cultural resources.
    d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
    a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
    b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
    a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
    b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
    a. Avoidance and preservation of the resources in place, including, but not limited to:
        i. Planning and construction to avoid the resources and protect the cultural and natural context.
        ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
        i. Protecting the cultural character and integrity of the resource.
        ii. Protecting the traditional use of the resource.
        iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

    This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have been already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst
(916) 373-3714

cc: State Clearinghouse

Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630

Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

May 14, 2018

Ms. Patricia Valenzuela, Planner IV
Imperial County Planning & Development Services Department
801 Main Street
El Centro, California 92243
PatriciaValenzuela@co.imperial.ca.us

NOTICE OF PREPARATION (NOP) OF AN ENVIRONMENTAL IMPACT REPORT (EIR) FOR CITIZENS IMPERIAL SOLAR, LLC PROJECT, LOCATED APPROXIMATELY SIX MILES NORTHEAST OF THE CITY OF CALIPATRIA AND FIVE MILES SOUTHEAST OF NILAND, IMPERIAL COUNTY (SCH# 2018041058)

Dear Ms. Valenzuela:

The Department of Toxic Substances Control (DTSC) has reviewed the subject NOP. The following project description is stated in the NOP: "The Citizens Imperial Solar, LLC Project involves the construction of a 30 megawatt photovoltaic (PV) solar energy facility on approximately 223 acres of land. The project would include a ground mounted PV solar power generating system, supporting structures, on-site substation, access driveways, and transmission structures. The project will interconnect with the Imperial Irrigation District's system at the existing Midway Substation, located on the northern parcel of the project site (Figure 2)."

Based on the review of the submitted document, DTSC has the following comments:

1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.

2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.

3. If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).

4. If planned activities include building modifications/demolitions, lead-based paints or products, mercury, and asbestos containing materials (ACMs) should be investigated and mitigated/disposed of in accordance with all applicable and relevant laws and regulations. In addition, evaluate whether polychlorinated biphenyls (PCBs) containing materials is present in onsite buildings and address as necessary to protect human health and the environment.

5. The NOP states, "The project site encompasses approximately 223 acres, comprised of two parcels of land identified as Assessor Parcel Numbers 025-260-024 (northern parcel) and 025-280-003 (southern parcel). The East Highline Canal is located on the project site's eastern boundary. Adjacent roadways, which are currently developed for agricultural uses, include Merkley Road and Simpson Road." If the site was used for agricultural or related activities, residual pesticides may be present in onsite soil. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from residual pesticides.

6. DTSC recommends evaluation, proper investigation and mitigation, if necessary, of onsite areas with current or historic PCB-containing transformers.

7. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if the project proposes to import soil to backfill the excavated areas, proper evaluation and/or sampling should be conducted to make sure that the imported soil is free of contamination.

8. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted and the appropriate government agency to provide regulatory oversight.

If you have any questions regarding this letter, please contact me at (714) 484-5380 or by email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,

Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program – Cypress

kl/sh/ja

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Unit Chief (via e-mail)
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program - Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2018041058

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
PLANNING DIVISION
4050 TAYLOR STREET, M.S. 240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711
www.dot.ca.gov

Making Conservation.
A California Way of Life

May 23, 2018

11-IMP-111
PM 37
NOP SCH 2018041058
Citizens Imperial Solar

Ms. Patricia Valenzuela
Imperial County
801 Main Street
El Centro, CA 92243

Dear Ms. Valenzuela:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process of the Notice of Preparation (NOP) for the Citizens Imperial Solar, project draft Environmental Impact Report (DEIR). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans would like to submit the following comments:

Any traffic control analysis on state facilities to address construction will require discretionary review and approval by Caltrans. An encroachment permit will be required for any work within the Caltrans right-of-way prior to construction.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or by visiting the website at http://www.dot.ca.gov/trafficops/ep/index.html. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions, please contact Roger Sanchez, of the Caltrans Development Review Branch, at (619) 688-6494.

Sincerely,

Jacob Armstrong, Chief
Local Development and Intergovernmental Review Branch

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

TELEPHONE: (442) 265-1800
FAX: (442) 265-1799

AIR POLLUTION CONTROL DISTRICT

May 29, 2018

Mr. Jim Minnick
Planning Director
801 Main Street
El Centro, CA 92243

SUBJECT: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Citizens Imperial Solar, LLC Project

Dear Mr. Minnick,

The NOP to prepare a Draft EIR for the Citizens Imperial Solar, LLC Project has been reviewed by the Imperial County Air Pollution Control District (Air District). As you know, the Air District's established programs help to keep the quality of air in Imperial County from declining. The programs and the Rules and Regulations of the Air District in conjunction with the California Environmental Quality Act (CEQA), the most current CEQA Air Quality Handbook for Imperial County (CEQA Handbook), the Air Districts State Implementation Plans (SIP's) for Ozone, $PM_{2.5}$ and PM_{10} work together to assure air quality improves or does no degrade. Currently, the non-attainment status of "moderate" for ozone, "serious" for PM_{10}, and "moderate" for $PM_{2.5}$ are the driving criteria in establishing the thresholds for NOx, ROG, PM_{10}, SOx and CO. These thresholds and their significance are explained under Section 6 of the CEQA handbook, which describes the preparation of an Air Quality Analysis for an Environmental Impact Report (EIR) for nonrenewable projects.

When exploring the impacts of renewable projects, it is a common misconception to believe that these types of projects are not a significant source of air pollution. While it is true that renewable projects are typically cleaner projects during their operational phases, in most cases construction and cumulative impacts still exist. PM_{10} and NO_x emissions are the primary pollutants of concern for the construction and operational phases of these types of projects. This is due to the shorter construction periods of these types of renewable projects, which tend to cause high levels of NO_x emissions because of the use of large amounts of construction equipment, as well as high levels of PM_{10} during earthmoving activities.

Therefore, a **Tier I Preliminary Analysis** should be conducted in order to assess the level of significance of potential impacts. This analysis should include an overview containing a complete description of the project in its current existing conditions, what the proposed development will be, how that will change the existing conditions, and

should also provide answers to the questions in the **White Paper**. These questions are designed to assess the project's level of significance before and after proposed mitigation, (White paper attached for your reference). Additionally, in order to identify NO_x emissions created during the construction phase of the renewable project, a **Construction Equipment List** detailing the equipment type, make, model, year, horsepower, hours of daily operation, date arrived onsite, and date removed from site should be provided to the Air District in Excel format. This is to ensure NO_x emissions during the construction period remained under the CEQA thresholds of significance.

In regards to cumulative impacts, which occur during the operational phase of renewable projects, PM_{10} is of main concern. Therefore, an **Operational Dust Control Plan (ODCP)** is required detailing how dust emissions will be controlled and maintained during the operational phase of the project. An initial site visit is required to confirm the elements of any draft ODCP before it can be finalized by the Air District. After this, continual site visits will typically occur on a yearly basis. Please note that an ODCP is intended to provide pertinent information specific to your operation for the reduction of fugitive dust emissions created by the ongoing operations at your facility.

Additionally, compliance with Regulation VIII is required for all construction activities, as well as notification 10 days prior to the commencement of all construction activities. Our rules and regulations can be found on our website at www.co.imperial.ca.us/AirPollution under the planning section. If any questions arise, please feel free to contact our office at (442) 265-1800.

Sincerely,

Axel Salas
APC Environmental Coordinator

COUNTY OF IMPERIAL

DEPARTMENT OF PUBLIC WORKS

155 S. 11th Street
El Centro, CA
92243

Tel: (442) 265-1818
Fax: (442) 265-1858

Follow Us:

www.facebook.com/ImperialCountyDPW/

https://twitter.com/CountyDpw/

Public Works works for the Public

ICDPW

July 13, 2018

RECEIVED
JUL 16 2018
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Imperial County Planning & Development Services
Mr. Jim Minnick, Director
801 Main Street
El Centro, CA 92243

Attention: David Black, Planner IV

SUBJECT: Initial Study and NOP of Citizens Imperial Solar, LLC; CUP 18-0006 IS 18-0003
Located approximately 6 miles northeast of the City of Calipatria and 5 miles southeast of Niland.
APN's 025-260-024 & 025-280-003

Dear Mr. Minnick:

This letter is in response to your submittal received by this Department on May 1, 2018 for the above mentioned project. The applicant proposes to construct a 30 megawatt photovoltaic (PV) solar energy facility on approximately 223 acres of land. The project would include a ground mounted PV solar power generating system, supporting structures, on-site substation, access driveways and transmission structures.

Department staff has reviewed the package information and the following comments shall be Conditions of Approval:

1. Simpson Road is classified as Local County (Residential) - two (2) lanes, requiring sixty feet (60) of right of way, being thirty (30) feet from existing centerline. It is required that sufficient right of way be provided to meet this road classification. **As directed by Imperial County Board of Supervisors per Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan).**

2. The applicant shall furnish a Drainage and Grading Plan/Study to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site properties. The Study/Plan shall be submitted to the Department of Public Works for review and approval. The applicant shall implement the approved plan. Employment of the appropriate Best Management Practices (BMP's) shall be included. (Per Imperial County Code of Ordinances, Chapter 12.10.020 B).

3. The Developer shall prepare a traffic study and submit it to this Department for review and approval. The traffic study shall be prepared in accordance to the County of Imperial Department of Public Works Traffic Study and Report Policy. The traffic study shall include any proposed traffic routes for employees, equipment, deliveries. The traffic study shall also include existing traffic volumes along the proposed routes (within

one year) as well as anticipated traffic volumes during construction (existing + employee, equipment, delivery volumes).

4. The Developer shall prepare a haul route study for this project. The haul route study shall include a traffic route plan for construction related traffic (deliveries, employees, construction equipment) as well as pictures, videos and/or other documents, to verify the existing conditions of the impacted County roads before construction begins. The haul route study shall evaluate the impacts to County roads due to construction and provide recommendations on improvements for those roads identified on the study as well as quantity and cost estimates for such improvements. The impacted roads shall include those County road sections bordering the site and used to connect the site to Caltrans routes.

5. The Developer will be required to repair any damages caused by construction traffic during construction and maintain them in safe conditions.

6. Access to the proposed site may be accomplished through unpaved roads. The Developer shall consult with the Department concerning PM-10 mitigation. It will be required to obtain existing traffic data from any unpaved road segments to monitor PM-10 trip thresholds. Early consultation with the Department is highly recommended.

7. The applicant for Encroachment Permits in County Roads and Right of Way is responsible for researching, protecting, and preserving survey monuments per the Professional Land Surveyor's Act (8771 (b)). This shall include a copy of the referenced survey map and tie card(s) (if applicable) for all monuments that may be impacted.

8. Any activity and/or work within Imperial County right-of-way shall be completed under a permit issued by this Department (encroachment permit) as per Chapter 12.12 - EXCAVATIONS ON OR NEAR A PUBLIC ROAD of the Imperial County Ordinance.

    a. Any activity and/or work may include, but not limited to, the installation of stabilized construction entrances, primary access driveways, fire access driveways, site fence installation, underground crossings, overhead crossings, road improvements, road dust mitigation, temporary traffic control, etc.

9. Each parcel created or affected by this project shall abut a maintained road and/or have legal and physical access to a public road before the project documents are recorded.

10. The applicant for grading plans and/or improvement plans is responsible for researching, protecting, and preserving survey monuments per the Professional Land Surveyor's Act (8771 (b)). This shall include a copy of the referenced survey map and tie card(s) (if applicable) for all monuments that may be impacted by the project whether it be on-site or off-site.

INFORMATIVE:

The following items are for informational purposes only. The applicant is responsible to determine if the enclosed items affect the subject project.

- All solid and hazardous waste shall be disposed of in approved solid waste disposal sites in accordance with existing County, State and Federal regulations **(Per Imperial County Code of Ordinances, Chapter 8.72).**

- All on-site traffic areas shall be hard surfaced to provide all weather access for fire protection vehicles. The surfacing shall meet the Department of Public Works and Fire/OES Standards as well as those of the Air Pollution Control District (APCD) **(Per Imperial County Code of ordinances, Chapter 12.10.020 A).**

- The project may require a National Pollutant Discharge Elimination System (NPDES) permit and Notice of Intent (NOI) from the Regional Water Quality Control Board (RWQCB) prior to County approval of onsite grading plan **(40 CFR 122.28).**

- A Transportation Permit may be required from road agency(s) having jurisdiction over the haul route(s) for any hauls of heavy equipment and/or large vehicles which impose greater than legal loads on riding surfaces, including bridges. **(Per Imperial County Code of Ordinances, Chapter 12.10.020 B).**

- As this project proceeds through the planning and the approval process, additional comments and/or requirements may apply as more information is received.

Should you have any questions, please do not hesitate to contact this office. Thank you for the opportunity to review and comment on this project.

Respectfully,

John A. Gay, PE
Director of Public Works

By: Manuel Ortiz

Manuel Ortiz
Assistant County Engineer

CY/JG