

# **EXECUTIVE SUMMARY**

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## **ES.1 PROJECT BACKGROUND**

In 2002, California established a Renewable Portfolio Standard (RPS) requiring electric utilities in the State to increase procurement of eligible renewable energy resources to achieve a target of 20 percent of their annual retail sales by the year 2010. In 2008, by Executive Order (S-14-08), then Governor Arnold Schwarzenegger increased that target to 33 percent by the year 2020. In 2011, Governor Jerry Brown signed Senate Bill (SB) X1-2 into law. The Bill requires all California utilities, including independently owned utilities (IOUs), energy service providers, and community choice aggregators (CCAs), to generate electricity from renewable sources over a three-stage compliance period.

One form of renewable energy is solar energy as harnessed through photovoltaic (PV) technology. PV power systems convert sunlight into electricity. For PV technology, the process begins with individual PV cells that combine to form PV modules. The modules are sealed and connected to each other with wires to form a PV array. The PV arrays convert solar radiation into direct current (DC) electricity. The direct current from the PV array is collected at an inverter and converted to alternating current (AC). AC electricity is consistent with the current flowing through the electrical grid.

The Seville 4 Solar Project (proposed Project) is a solar generation facility put forth by Titan Solar II, LLC (hereafter referred to as “Applicant”). The facility would use either thin film or crystalline solar PV technology modules mounted either on fixed frames or horizontal single-axis tracker (HSAT) systems. One hundred percent of the electricity generated by the proposed Project will be eligible for use by California electric utilities to satisfy procurement obligations under the State’s RPS program.

On April 13, 2017, the Applicant submitted the following to the Imperial County Department of Planning and Development Services (ICPDS):

- One General Plan Amendment (GPA) to change the land use to the Renewable Energy “RE” Overlay Zone designation; and
- One Zone Change from “A-2” General Agriculture to the “RE” Renewable Energy Overlay Zone.
- One Conditional Use Permit (CUP) application that will allow for the construction and operation of a PV generating solar facility

The Project is also assumed to include internal access roads and infrastructure similar to the adjacent Seville Solar Farm Complex (i.e. PV modules, inverters, a substation, internal transmission lines, security fence, etc.). Additionally, the Project would require construction of or 34.5-kilovolt (kV) generator intertie (gen-tie) line located on common development internet Lot A of Tract Map No. 009988 and delivered to the proposed Project substation.

A Notice of Preparation (NOP) for the Seville 4 Solar Project Draft Environmental Impact Report was issued by the ICPDS on June 22, 2017. The NOP is included in **Appendix A** of this EIR.

## **ES.2 PROJECT OVERVIEW**

The Seville 4 Solar Project proposes development of a portion of Imperial County Assessor Parcel 018-170-057-000, Lot 8 of Tract Map No. 00988. The Seville Solar Farm Complex covered approximately 1,235 acres of the 2,440-acre Allegretti Farms property. Lot 8 was created as part of the major subdivision/tract map for the Seville Solar Farm Complex, adjacent to the southern and eastern boundaries of Lot 3.

The Applicant, Titan Solar II, LLC, proposes to develop 174 acres (Horizontal Single-Axis Tracker Configuration) or 146 acres (Fixed-Frame Configuration) of the 572.10 acres comprising Lot 8 in order to construct and operate an approximate 20-megawatt (MW) solar photovoltaic (PV) project.

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The Project area is located in west-central Imperial County, California, approximately eight miles west of the junction of SR 78 and SR 86, and approximately three miles east of the San Diego County line. The Project area is also approximately 14 miles from the southern tip of the Salton Sea and one-half mile west of Pole Line Road.

The Project would use the existing private access road extending south from State Route (SR) 78 to the Seville 4 Solar Project. The Project is also assumed to include internal access roads and infrastructure similar to the adjacent Seville Solar Farm Complex (i.e. PV modules, inverters, a substation, internal transmission lines, security fence, etc.). Additionally, the Project would require construction of 12.5-kilovolt (kV) or 34.5-kV generator intertie (gen-tie) line located on common development internet Lot A of Tract Map No. 009988 and delivered to the proposed Project substation.

### **ES.3 PROPOSED PROJECT**

The proposed Project is the construction, operation, and reclamation of 20 MW solar generation facility. The Project proposes to use either thin film or crystalline solar photovoltaic (PV) technology modules mounted on either fixed frames or horizontal single-axis tracker (HSAT) systems. The Fixed-Frame Configuration would occupy 146 acres including 128 acres of panels and an 18-acre retention basin in the southeast portion of the Project site. The HSAT Configuration would occupy 174 acres including 156 acres of panels and six retention basins totaling 18-acres.

Electricity generated by the PV modules would be collected by a direct current (DC) collection system routed underground in trenches. The electrical energy produced by the Seville 4 Solar Project would be conducted to the proposed Seville 4 Substation from the Project collection station via the proposed above-ground 34.5-kV gen-tie line located on common development interest Lot A of Tract Map No. 00988. A new Project substation would be constructed in common development interest Lot D of Tract Map No. 00988. This substation would take delivery of the 34.5-kV power from the Project collection station gen-tie line and increase the voltage of the electricity to 92 kV for metering and delivery to the IID electric grid.

Eight-foot-high security fencing would be installed around the perimeter of the Project site. Primary access to the Property, including Lot 8, is available via an existing private access road from the north off SR 78. Internal to the Project site, nominal 20-foot wide roads would be developed between the PV arrays as well as around the perimeter of the Project site inside the perimeter security fence. These roads would provide access to all areas for maintenance and emergency vehicles.

### **ES.4 PURPOSE AND NEED**

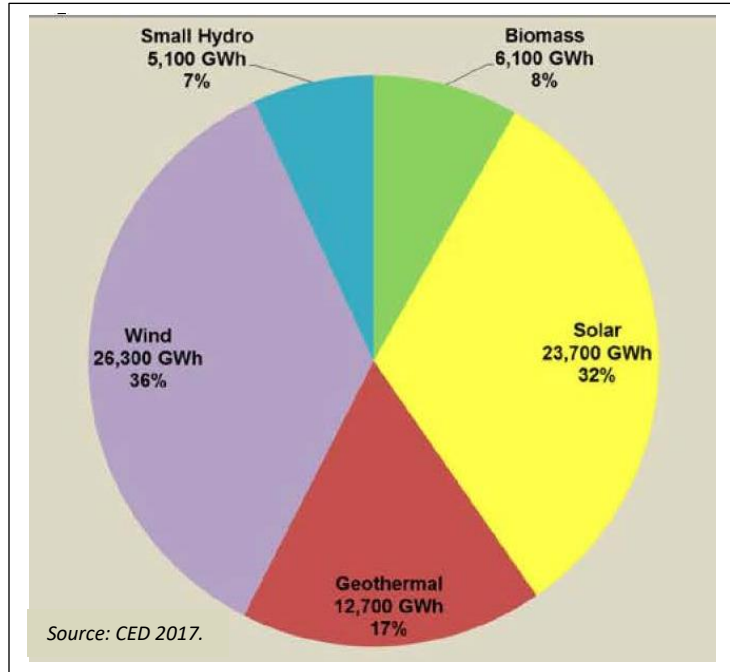
Pursuant to CEQA the following objectives have been identified for the proposed project. Section 15124 of the CEQA Guidelines requires that the EIR include a statement of objectives sought by the proposed project. These objectives identify the overall purpose of the project and provide a basis for identification of alternatives evaluated in the EIR. A clearly written statement of objectives allows the lead agency to develop a reasonable range of alternatives to evaluate in the EIR and aids the decision-makers in preparing findings or a statement of overriding considerations, if necessary.

Demand for new forms of renewable electric energy continues to grow based on three factors. First, total electricity demand continues to increase from population growth, economic growth and new applications offset, only in part, by energy efficiency programs. The 2010 United States Energy Information Administration (EIA) Annual Energy Outlook (“reference case”) forecast is for a 30 percent increase in total demand (from 3,873 billion kilowatt hours to 5,021 billion kilowatt hours, annually), between the years 2008 and 2035. Second, new generation facilities are required to not only meet this demand, but to replace the output of aging generation facilities which are to be retired during this period. Third, driven

by federal incentives, regional greenhouse gas (GHG) reduction targets, state renewable energy portfolio standards (RPS) requirements, and potential legislation, an increasingly greater portion of new generation will need to be supplied in the form of renewable energy. The EIA forecast for the period from 2008 to 2035 is for 41 percent of growth in generation to come from non-hydro renewables.

This national trend is particularly evident in the West, the fastest growing region in the United States (U.S.). Many Western states have adopted renewable energy standards and GHG reduction goals.

California is a national leader in requiring a significant proportion of electricity to come from renewable sources. The 2010 requirement that 20 percent of electricity sales come from renewable energy was increased to 33 percent by 2020 and 50 percent by 2030. With California’s 33 percent mandate, combined with other mandated RPS requirements and regional sales growth, the total renewable energy sales for the U.S. portion of the Western Electricity Coordinating Council region has been estimated at close to 150,000 Gigawatt hours (Gwh) by 2020 (not including Idaho, Utah and Wyoming). The California Energy Commission (CEC) estimates that approximately 29 percent of the State’s retail sales in 2016 were served by renewable energy (wind, solar, geothermal, biomass and small hydroelectric).



As shown in Figure 1, the largest portion of renewable energy in California comes from solar closely followed by wind energy. At the current rate, California is ahead of schedule for meeting its renewable energy targets (CEC 2017). The proposed Project will help California meet its statutory and regulatory goals for increasing renewable power generation and use.

The existing 92-kV transmission line constructed as part of the Seville Solar Farm Complex would provide the needed transmission capacity to connect the Seville 4 Solar Project with the Anza Substation. Renewable energy generated by the Project would be conveyed to areas of demand.

The Seville 4 Solar Project qualifies as an Eligible Renewable Energy Resource as defined by the California Public Utilities Code and would assist the state in meeting current and planned goals for renewable energy development and use. The Seville Solar Farm Complex was approved as a renewable energy project from the California Energy Commission (CEC) on December 30, 2013. Phase I of the proposed Seville Solar Farm Complex was assigned CEC RPS identification number 62562C.

**ES.5 OBJECTIVES**

The proposed Seville 4 Solar Project has the following objectives:

- Produce a minimum of 20 MWAC, on-peak, renewable power to the electrical grid in California.
- Assist California in meeting its current and future Renewable Portfolio Standard goals.
- Support the greenhouse gas reduction goals of Assembly Bill 32 (California Global Warming Solutions Act of 2006).

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- Site the Project in an area with excellent solar energy resources in order to maximize productivity from the PV panels.
- Use a proven and available solar PV technology to reliably and economically produce electricity during daylight hours.
- Locate the solar power facility as near as possible to the Imperial Irrigation District's (IID) existing electrical transmission facilities with anticipated capacity.
- Minimize environmental impacts by constructing and operating the solar power facility adjacent to existing and approved solar facilities and existing supporting infrastructure (transmission lines and roads).
- Construct and operate a solar power facility that would reduce the historic groundwater use on the Project site.
- Create additional employment and project-related expenditures for local businesses.

### ES.6 ALTERNATIVES

This EIR considered two alternatives in addition to the proposed Project:

#### **ALTERNATIVE 1 – ENVIRONMENTALLY SENSITIVE AVOIDANCE ALTERNATIVE**

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

#### **ALTERNATIVE 2 - NO ACTION ALTERNATIVE**

Under the No Action Alternative, the proposed Seville 4 Solar Project would not be developed. No, General Plan Amendment, Zone Change or CUP would be approved; the Project site could remain in its existing conditions as desert lands or idle farmland, or could be reestablished as active agriculture to the extent that sufficient groundwater could be pumped from the aquifer.

### ES.7 SUMMARY OF IMPACTS

**Table ES-1** summarizes the environmental impacts resulting from the proposed project pursuant to CEQA Guidelines Section 15123(b)(1).

**TABLE ES-1  
SUMMARY OF IMPACTS**

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

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<p><b>New Source of Substantial Light or Glare</b>  <b>Impact 4.1.3</b> The Project proposes to use either thin film or crystalline solar PV technology modules mounted on either fixed frames or HSAT systems. No lighting is proposed on the Project site. Glare modeling determined that there would be no substantial or prolonged period of glare created by either the fixed-frame configuration or the HSAT configuration. Therefore, impacts associated with creation of substantial light and glare are considered <b>less than significant</b>.</p>	LTS	None required.	LTS

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<p><b>Cumulative Visual Impacts</b>  <b>Impact 4.1.4</b> Implementation of the proposed Project, in conjunction with large scale proposed, approved and reasonably foreseeable renewable energy projects in the Imperial Valley and the Ocotillo Wells Solar Project to the west in San Diego County, would alter the visual character of the region, resulting in a change to public views as well as increased daytime glare and nighttime lighting levels. Such impacts are typically addressed on a project-by-project basis. Therefore, cumulative impacts to visual resources are considered <b>less than cumulatively considerable</b>.</p>	<p>LCC</p>	<p>Implement mitigation measure MM 4.1.3a and MM 4.1.3b.</p>	<p>LCC</p>

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

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

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

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

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

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		<p><b>MM 4.4.1b</b> To reduce fugitive dust, water shall be applied to the all-weather private road at least three times per day and speeds shall be limited to 25 mph during construction.</p> <p><b>MM 4.4.1c</b> Actively disturbed areas on the Project site would also be watered at least three times a day as necessary to reduce fugitive dust emissions during grading, racking installation, panel installation, system wiring and trenching and inverter installation.</p>	
<p><b>Expose Sensitive Receptors to Substantial Pollutant Concentrations</b>  <b>Impact 4.4.2</b> Exhaust generated by diesel equipment during construction, operation and maintenance, and reclamation could result in elevated levels of diesel particulate matter emissions. However, the nearest sensitive receptors are over 2.5 miles from Project site. Therefore, exposure of sensitive receptors to substantial pollutant concentrations is considered a <b>less than significant impact</b>.</p>	LTS	None required.	LTS

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<p><b>Create Objectionable Odors Affecting a Substantial Number of People</b>  <b>Impact 4.4.3</b> Use of diesel equipment during construction, operation, and reclamation activities could result in temporary emissions of adverse odors. This is considered a <b>less than significant impact</b>.</p>	LTS	None required.	LTS
<p><b>Violate Air Quality Standard/Cause Air Quality Violation</b>  <b>Impact 4.4.4</b> The proposed Project would generate criteria pollutant emissions during construction. However, the short-term construction emissions exceedances of ICAPCD thresholds would be mitigated with implementation of mitigation measures. Operational emissions would not exceed ICAPCD thresholds but would still incorporate Applicant-proposed measures to reduce dust. Therefore, the proposed Project would result in a <b>less than cumulatively considerable impact</b> with regard to violating an air quality standard.</p>	LCC	Implement mitigation measures MM 4.4.1a and MM 4.4.1b	LCC

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<b>CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS</b>			
<p><b>Generation of Greenhouse Gas Emissions</b>  <b>Impact 4.5.1</b> The proposed Project would generate GHG emissions during construction and reclamation activities, primarily related to emissions from construction equipment. Operational emissions would occur to a lesser degree in relation to the use of maintenance equipment. This impact is considered <b>less than significant</b>.</p>	LTS	None required.	LTS
<p><b>Conflict with an Applicable Plan, Policy, or Regulation Adopted to Reduce Greenhouse Gas Emissions</b>  <b>Impact 4.5.2</b> The proposed Project would not conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions. <b>No impact</b> would occur.</p>	LTS	None required.	LTS
<b>GEOLOGY AND SOILS</b>			
<p><b>Strong Seismic Ground Shaking</b>  <b>Impact 4.6.1</b> The primary seismic hazard at the Project area has the potential for strong ground shaking during earthquakes along the San Jacinto-Borrego fault. This is considered a <b>potentially significant impact</b>.</p>	PS	<p><b>MM 4.6.1</b> Structures with the Project area shall be designed and constructed in accordance with the 2016 California Building Code (CBC) and ASCE 7-10 Seismic Parameters.</p>	LTS

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<p><b>Liquefaction Impact 4.6.2</b> Sand and silty sand are the predominant soils on the Project site. Based on these soil types, the risk of liquefaction induced settlement on the Project site is very low. Therefore, liquefaction is considered a <b>less than significant impact</b>.</p>	LTS	None required.	LTS
<p><b>Unstable Soils – Seismic/Differential Settlement Impact 4.6.3</b> Potential for seismic settlement across the Project site is 0.35 inch or less. This is considered minimal and would be addressed through design to address differential movement. Therefore, seismic settlement is considered a <b>less than significant impact</b>.</p>	LTS	None required.	LTS
<p><b>Erosion Impact 4.6.4</b> Surface soils on the Project site are generally classified as AASHTO Group A1 and A3, which are highly erodible. Construction, operation, and reclamation activities could result in erosion and loss of top soil on the Project site. Therefore, erosion is considered a <b>potentially significant impact</b>.</p>	PS	<p><b>MM 4.6.4a</b> All permanent slopes shall not be steeper than 3:1 to reduce wind and rain erosion. Protected slopes with ground cover may be as steep as 2:1. Note: Maintenance with motorized equipment may not be possible at this inclination.</p> <p><b>MM 4.6.4b</b> Low slope angles (less than 3H:1V) shall be used for unprotected slopes. Where significant exposure is expected, addition of cement to the soil or concrete filled rock facing shall be</p>	LTS

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		employed to create a cemented mass that is resistant to water movement. <b>MM 4.6.4c</b> Dressing (fine grading and compacting) of the slopes shall be implemented periodically to fill small rivulets caused by direct rainfall onto the slopes. Surface soils coagulants shall also be considered for wind erosion control of the sandy ground surface	
<b>Expansive Soils</b> <b>Impact 4.6.5</b> The near surface soils in the Project site are silty sand and sandy silts. These soils are considered non-expansive. Therefore, impacts associated with expansive soils are considered <b>less than significant</b> .	LTS	None required.	LTS
<b>Soil Corrosivity</b> <b>Impact 4.6.6</b> Soils within the Project site are corrosive to concrete and metals. This is considered a <b>potentially significant impact</b> .	PS	<b>MM 4.6.6</b> The Project shall implement the recommendations of the Geotechnical Report regarding structural concrete, non-structural concrete, concrete mixes and corrosivity, driven pile design criteria, settlement, excavations, stormwater detention basin berms, lateral earth pressures, seismic design, soil erosion factors for SWPPP, and all-weather access roadways.	LCC

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<p><b>Cumulative Exposure to Geologic and Seismic Impacts</b>  <b>Impact 4.6.7</b> Implementation of the proposed Project, in combination with existing, approved, proposed, and reasonably foreseeable development, may result in cumulative exposure to geologic and seismic hazards. This is considered a <b>less than cumulatively considerable impact</b>.</p>	LCC	Implement mitigation measures MM 4.6.1, MM 4.6.4a, MM 4.6.4b, MM 4.6.4c, and MM 4.6.6, as well as MM 4.4.1a and MM 4.4.1b	LCC
<b>CULTURAL RESOURCES, TRIBAL CULTURAL RESOURCES AND PALEONTOLOGICAL RESOURCES</b>			
<p><b>Impacts to Historical Resources</b>  <b>Impact 4.7.1</b> No historic resources were identified in the survey area. Therefore, <b>no impact</b> to a historic resource would occur as a result of development of the proposed Project.</p>	NI	None required.	NI
<p><b>Impacts to Archaeological Resources - Prehistoric Isolates</b>  <b>Impact 4.7.2</b> A total of five prehistoric isolates were identified during field surveys of the survey area. As isolates they are ineligible to the CRHR and not significant under CEQA. Therefore, <b>no impact</b> would occur with regard to prehistoric isolates.</p>	NI	None required.	NI

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SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/SIGNIFICANCE AFTER MITIGATION
<p><b>Impacts to Archaeological Resources Potentially Eligible for the CRHR</b></p> <p><b>Impact 4.7.3</b> Thirteen archaeological sites were identified during field surveys of the Project area. These archaeological sites have not been previously evaluated for eligibility for the CRHR or for significance under CEQA. Therefore, impacts these archeological sites are considered <b>potentially significant</b>.</p>	<p>PS</p>	<p><b>MM 4.7.3a</b> If avoidance of archaeological sites P-13-008029 (subsumed 08587)/CA-IMP-1266 (subsumed 8010), P-13-008586/CA-IMP-8009, P-13-008606/CA-IMP-8089, P-13-009941/CA-IMP-10004, P-13-009942/CA-IMP-10005, P-13-014438, JL_S_1, JL_S_2, JL_S_3, JL_S_4, JL_S_5, JL_S_6, JL_S_7, JL_S_8, JL_I_3, JL_I_4, JL_I_6A and JL_I_6B is not possible, a formal evaluation for eligibility for the CRHR under CEQA Guidelines and the Imperial County General Plan Renewable Energy and Transmission Element MMRP CUL-1d (Site Characterization, Sitting and Design and Construction) shall be undertaken. Evaluation shall include a combination of surface mapping and collection, excavation, and special analyses designed to understand site formation and human habitation of the resource in a regional context.</p> <p><b>MM 4.7.3b</b> In keeping with mitigation measures CUL-1d and CUL-3 of the MMRP for the Final Programmatic Environmental Impact Report for the Imperial County Renewable Energy and Transmission Element Update, Imperial County, California, construction monitoring by a qualified archaeologist and a local Native American monitor of all ground disturbance is recommended due to the presence of numerous prehistoric cultural resources within the survey area and 1-mile record search radius.</p>	<p>LTS</p>

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

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

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

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<p><b>Impacts to Unknown Fossil Remains</b>  <b>Impact 4.7.6</b> Unknown fossil remains, if discovered in the Project area, could be destroyed by excavation and other earth-moving activities occurring during construction. This is considered a <b>potentially significant impact</b>.</p>	<p>PS</p>	<p>Monitors are empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Fossil specimens shall be curated by accessioning them into an established, accredited museum repository with permanent retrievable paleontological storage. A report of findings with an appended itemized inventory of specimens will be prepared. The report and inventory, when submitted to the Imperial County Department of Planning and Development Services, along with confirmation of the curation of recovered specimens into an established, accredited museum repository, will signify completion of the program to mitigate impacts to paleontological resources.</p> <p>In general, a paleontological monitor will not be required after possible fossil bearing sediments have been fully explored.</p>	<p>LTS</p>

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<p><b>Cumulative Impacts to Archaeological and Historic Resources</b>  <b>Impact 4.7.7</b> Implementation of the proposed Project, in combination with large-scale proposed, approved and reasonably foreseeable renewable energy projects in the region, has the potential to result in impacts to archaeological and historic resources. However, impacts are addressed on a project-by-project basis. Therefore, this is considered a <b>less than cumulatively considerable impact</b>.</p>	LCC	Implement mitigation measures MM 4.7.6a and MM 4.7.6b.	LCC
<b>NOISE</b>			
<p><b>Noise Levels in Excess of Standards/Substantial Temporary Noise Increase</b>  <b>Impact 4.8.1</b> Activities associated with construction would increase short-term noise levels on the Project site and in the vicinity of the Project area. However, no County of Imperial noise standards would be exceeded during construction. Therefore, a <b>less than significant</b> impact would occur in association with temporary noise increases.</p>	LTS	None required.	LTS

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<p><b>Exposure to Groundborne Vibration</b>  <b>Impact 4.8.2</b> Ground-borne vibration levels associated with short-term Project construction and long-term operational activities would not exceed applicable groundborne vibration criterion at nearby land uses. This impact would be considered <b>less than significant</b>.</p>	LTS	None required.	LTS
<p><b>Long-Term Exposure to Increased Traffic Noise</b>  <b>Impact 4.8.3</b> Long-term operation of the proposed Project would not result in a substantial increase in traffic noise levels. This impact would be considered <b>less than significant</b>.</p>	LTS	None required.	LTS
<p><b>Long-Term Exposure to Increased Stationary-Source Noise</b>  <b>Impact 4.8.4</b> Long-term operation of the proposed Project is not anticipated to exceed applicable noise standards at the Project site’s property line. Therefore, long-term exposure to increased stationary-source noise is considered a <b>less than significant impact</b>.</p>	LTS	None required.	LTS
<p><b>Contribution to Cumulative Noise Levels</b>  <b>Impact 4.8.5</b> The proposed Project would not result in a substantial contribution to cumulative noise levels. Therefore, cumulative noise impacts would be considered <b>less than cumulatively considerable</b>.</p>	LCC	None required.	LCC

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

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

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

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

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

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

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

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

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<p><b>Impacts to Special Status Species – Loggerhead Shrike</b>  <b>Impact 4.12.4</b> Loggerhead shrike was observed during biological surveys of the Project area. Impacts to loggerhead shrike would be considered <b>potentially significant unless mitigation is incorporated.</b></p>	<p>PS</p>	<p>Project activities have the potential to cause nest failure. If an active nest is identified, a qualified biologist should establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities will need to be avoided within any disturbance limit buffer zones until the nest is deemed no longer active by the biologist.</p> <p><b>MM 4.12.4b</b> The Applicant shall develop and implement a Worker Environmental Awareness Program (WEAP) prior to the start of construction. The WEAP shall be submitted to the Imperial County Planning and Development Services Department for review and approval prior to the issuance of building permits. The WEAP training shall cover the following:</p> <ul style="list-style-type: none"> <li>• The potential presence and ecology of sensitive biological resources found on-site, such as loggerhead shrike, flat-tailed horned lizard, burrowing owl, potential jurisdictional waters, and nesting avian species;</li> <li>• Flagging/fencing of exclusion areas;</li> <li>• Proper implementation of protective measures to avoid impacts to special-status species and sensitive vegetation communities (i.e. mesquite series east of the Project site boundary);</li> </ul>	<p>LTS</p>

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<p><b>Impacts to Special Status Species – Loggerhead Shrike</b>  <b>Impact 4.12.4</b> Loggerhead shrike was observed during biological surveys of the Project area. Impacts to loggerhead shrike would be considered <b>potentially significant unless mitigation is incorporated.</b></p>	<p>PS</p>	<ul style="list-style-type: none"> <li>The reasons, need, and method by which employees should report on wildlife mortality, follow nest management protocols, disposal of carcasses, comply with applicable regulations (including the consequences of noncompliance), and the appropriate agencies (CDFW, USFWS) and personnel (ICPDS) that should be contacted after incidents; and</li> <li>Other permit requirements and environmental issues.</li> </ul> <p>All construction site personnel shall be required to attend the WEAP training in conjunction with hazard and safety training prior to working on-site.</p>	<p>LTS</p>

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<p><b>Impacts to Special Status Species – Burrowing Owl</b>  <b>Impact 4.12.5</b> The burrowing owl is a CDFW Species of Special Concern. The Project site provides marginally suitable foraging habitat although no owls were discovered during surveys conducted on the Project site. Nevertheless, this species is migratory and could be present during Project construction. Therefore, impacts to burrowing owl are considered <b>potentially significant</b>.</p>	PS	<p><b>MM 4.12.5</b> Pre-construction surveys for burrowing owl are recommended. The surveys should follow the methods described in the CDFW’s Staff Report on Burrowing Owl Mitigation (CDFW 2012). Two surveys should be conducted, with the first survey being scheduled between 30 and 14 days before initial ground disturbance (grading, grubbing, and construction), and second survey being conducted no more than 24-hours prior to initial ground disturbance. If burrowing owls and/or suitable burrowing owl burrows are identified on the Project site during the surveys, the Project should consult with CDFW and follow the methods listed in the CDFW’s Staff Report on Burrowing Owl Mitigation (CDFW 2012) for avoidance and/or passive relocation.</p>	LTS
<p><b>Impacts to Nesting and Migratory Birds</b>  <b>Impact 4.12.6</b> The proposed Project could result in direct impacts to avian nesting protected under California Fish and Wildlife Code and the MBTA. This is considered a <b>potentially significant impact</b>.</p>	PS	<p><b>MM 4.12.6</b> A Bird and Bat Conservation Strategy (BBCS) shall be developed by the Project Applicant in coordination with the County of Imperial, USFWS, and CDFW. The BBCS will include the following components:</p> <ul style="list-style-type: none"> <li>• A description and assessment of the existing habitat and avian and bat species;</li> <li>• An avian and bat risk assessment and specific measures to avoid, minimize, reduce, or eliminate</li> </ul>	LTS

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<p><b>Impacts to Nesting and Migratory Birds</b>  <b>Impact 4.12.6</b> The proposed Project could result in direct impacts to avian nesting protected under California Fish and Wildlife Code and the MBTA. This is considered a <b>potentially significant impact</b>.</p>	<p>PS</p>	<p>avian and bat injury or mortality during all phases of the project.</p> <ul style="list-style-type: none"> <li>• A post-construction monitoring plan that will be implemented to assess impacts on avian and bat species resulting from the Project. The post-construction monitoring plan will include a description of standardized carcass searches, scavenger rate (i.e., carcass removal) trials, searcher efficiency trials, and reporting. Statistical methods will be used to estimate Project avian and bat fatalities if sufficient data is collected to support statistical analysis.</li> <li>• An injured bird response plan that delineates care and curation of any and all injured birds.</li> <li>• A nesting bird management strategy to outline actions to be taken for avian nests detected within the impact footprint during operation of the Project.</li> <li>• A conceptual adaptive management and decision-making framework for reviewing, characterizing, and responding to monitoring results.</li> <li>• Monitoring studies following commencement of commercial operation of each CUP area. Monitoring results will be reviewed annually by the Applicant and the County of Imperial, in</li> </ul>	<p>LTS</p>

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<p><b>Impacts to Nesting and Migratory Birds</b>  <b>Impact 4.12.6</b> The proposed Project could result in direct impacts to avian nesting protected under California Fish and Wildlife Code and the MBTA. This is considered a <b>potentially significant impact</b>.</p>	<p>PS</p>	<p>consultation with CDFW and USFWS, to inform adaptive management responses.                      During Project construction, incidental avian carcasses or injured birds found during construction shall be documented. Should a carcass be found by Project personnel, the carcass shall be photographed, the location shall be marked, the carcass shall not be moved, and a qualified biologist shall be contacted to examine the carcass. When a carcass is detected, the following data shall be recorded (to the extent possible): observer, date/time, species or most precise species group possible, sex, age, estimated time since death, potential cause of death or other pertinent information, distance and bearing to nearest structure (if any) that may have been associated with the mortality, location (recorded with a Global Positioning System [GPS]), and condition of carcass. Utility lines constructed above-ground shall conform to Avian Power Line Interaction Committee (APLIC) standards.                      Post-construction monitoring studies shall be conducted by a third-party independent contractor for at least 2 years following commencement of commercial operation of the Project. Monitoring</p>	<p>LTS</p>

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		results shall be reviewed annually by the Applicant and the County of Imperial, in consultation with CDFW and USFWS, to determine if and to what extent post-construction monitoring studies shall be continued in future years.	
<p><b>Impacts to Wildlife Movement</b>  <b>Impact 4.12.7</b> The proposed Project would be developed on a parcel that is a mixture of desert and idle agricultural land surrounded by open desert. Therefore, impacts of the proposed Project site on wildlife movement are considered <b>less than significant</b>.</p>	LTS	None required.	LTS
<p><b>Cumulative Impacts to Biological Resources</b>  <b>Impact 4.12.8</b> Implementation of the proposed Project in combination with other proposed, approved and reasonably foreseeable large-scale renewable energy projects, could have cumulative impacts on special status species, sensitive vegetation communities, and jurisdictional waters. However, impacts to biological resources are addressed and mitigated on a project-by-project basis. Therefore, cumulative impacts to biological resources are considered <b>less than cumulatively considerable</b>.</p>	LTS	None required.	LTS

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<b>PUBLIC UTILITIES</b>			
<p><b>Impacts to ICFD Services</b>  <b>Impact 4.13.1</b> The proposed Project would develop a solar generation facility on low gradient farmland and idle farmland in a remote area of Imperial County. The location of the facility and its size could result in increased demand on ICFD services. The lack of paved roads would inhibit the ICFD’s ability to serve the Project. Therefore, impacts to ICFD service are considered <b>potentially significant</b>.</p>	PS	<p><b>MM 4.13.1</b> The Project Applicant shall pay a fair share contribution towards capital purchases (e.g. specialized equipment) which may be required to assist in servicing the Project; costs for services during construction and the life of the Project; and/or training as negotiated with the ICFD.</p>	LTS
<p><b>Cumulative Impacts to ICFD Services</b>  <b>Impact 4.13.2</b> Development of the proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the ICFD service area, would increase demand for fire protection. However, each individual project would be required to incorporate fire safety features and worker safety protocols in compliance with all applicable fire and occupational safety standards and codes. Therefore, cumulative impacts to ICFD services are considered <b>less than cumulatively considerable</b>.</p>	LCC	Implement mitigation measure MM 4.13.1.	LCC

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<p><b>Impacts to ICSO Services</b>  <b>Impact 4.13.3</b> Implementation of the proposed Project may result in increased demands for service for the ISCO’s Salton City Substation during construction and operation. The ISCO does not have proper vehicles to access the site’s unpaved roads. Therefore, impacts to ICSO services are considered a <b>potentially significant</b>.</p>	PS	<p><b>MM 4.13.3</b> The Project Applicant shall pay a fair share contribution towards the purchase of a marked and equipped four-wheel drive patrol vehicle for the ISCO.</p>	LTS
<p><b>Cumulative Impacts to ICSO Services</b>  <b>Impact 4.13.4</b> Development of the proposed Project, in combination other large-scale proposed, approved and reasonably foreseeable renewable energy projects in Imperial County would result in an increased cumulative demand for law enforcement and strain current industry-standard service levels. Therefore, the proposed Project in combination with other cumulative projects would result in a <b>cumulatively considerable impact</b> to ICSO services.</p>	LCC	Implement mitigation measure MM 4.13.3.	LCC

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<p><b>Impacts to Groundwater Supply</b>  <b>Impact 4.13.5</b> The proposed Project will require groundwater in association with both construction and operation activities. The groundwater resources were found to be adequate to meet Project water demands. Therefore, impacts to groundwater supply are considered <b>less than significant</b>.</p>	LTS	None required.	LTS
<p><b>Water Distribution and Storage Impacts</b>  <b>Impact 4.13.6</b> The proposed Project would require water distribution and storage infrastructure. Any required improvements would occur within the Project site and would not disrupt any off-site areas. Therefore, impacts associated with water conveyance infrastructure are considered <b>less than significant</b>.</p>	LTS	None required.	LTS

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<p><b>Cumulative Groundwater Supply Impacts</b>  <b>Impact 4.13.7</b> Development of the proposed Project would result in a reduced demand for groundwater from the Ocotillo-Clark Valley Groundwater Basin compared to historical demand. The WSA prepared for Seville Solar Farm Complex, which includes the proposed Project, demonstrated that there is adequate groundwater to serve Project development over the next 20 years. No other projects were identified within the cumulative setting to affect groundwater supply. Therefore, cumulative groundwater supply impacts are considered <b>less than cumulatively considerable</b>.</p>	LCC	None required.	LCC
<p><b>Cumulative Water Distribution and Storage Impacts</b>  <b>Impact 4.13.8</b> The proposed Project would result in an increased demand for on-site water distribution and storage. No municipal water infrastructure is available on or in the vicinity of the Project area. The Project includes construction of the needed water distribution and storage facilities. Therefore, cumulative impacts to water distribution and storage are considered <b>less than cumulatively considerable</b>.</p>	LCC	None required.	LCC

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<p><b>Impacts to Solid Waste Service and Landfill Capacity</b>  <b>Impact 4.13.9</b> Solid waste would be generated during demolition, construction and reclamation of the proposed Project. Such materials would be picked up by a locally-licensed waste hauling service and disposed of at a local landfill with sufficient capacity to accept this waste. Thus, a <b>less than significant impact</b> is identified with regard to solid waste service and landfill capacity.</p>	LTS	None required.	LTS
<p><b>Cumulative Impacts to Solid Waste Service and Landfill Capacity</b>  <b>Impact 4.13.10</b> Implementation of the proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial, would result in cumulative demand for solid waste service and landfill capacity. However, the proposed Project would not generate a substantial quantity of waste, pick-up service is available to serve the Project and sufficient landfill capacity is available. Therefore, cumulative impacts to solid waste service and landfill capacity are considered <b>less than cumulatively considerable</b>.</p>	LCC	None required.	LCC

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<p><b>Impacts to Electrical Service and Infrastructure</b>  <b>Impact 4.13.11</b> The proposed Project would not increase the demand for electrical services from IID in association with construction or operation of the Fixed-Frame and HSAT Configurations. No new improvements are required to the IID infrastructure to serve the Project. Therefore, impacts to electrical service and infrastructure are considered <b>less than significant</b>.</p>	LTS	None required	LTS
<p><b>Cumulative Impacts to Electric Service</b>  <b>Impact 4.13.12</b> Implementation of the proposed Project, in combination with other large-scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial, would result in a minimal increase in the current use of IID electricity and a substantial increase in solar energy generation. Therefore, cumulative impacts to electrical service are considered <b>less than cumulatively considerable</b>.</p>	LCC	None required.	LCC

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<b>ENERGY RESOURCES</b>			
<p><b>Wasteful, Inefficient, and Unnecessary Consumption of Energy</b>  <b>Impact 7.1.1</b> The Project would not use energy in a wasteful manner. The impact would be <b>less than significant</b>.</p>	LTS	None required.	LTS
<p><b>Contribution to Cumulative Energy Usage</b>  <b>Impact 7.1.2</b> The proposed Project, combined with other large-scale proposed, approved and reasonably foreseeable renewable energy projects, would not develop land uses and patterns that cause wasteful, inefficient, and unnecessary consumption of energy or that would have excessive energy requirements for daily operation. Therefore, impacts to energy usage are <b>less than cumulatively considerable</b>.</p>	LCC	None required.	LCC

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