

Executive Summary

This Environmental Impact Report (EIR) has been prepared in compliance with the California Environmental Quality Act (CEQA) Public Resources Code [PRC] Section 21000 et seq., the CEQA Guidelines (Section 15000 et seq.) as promulgated by the California Resources Agency and the Governor’s Office of Planning and Research (OPR). The purpose of this environmental document is to assess the potential environmental effects associated with the Wister Solar Energy Facility Project and to propose mitigation measures, where required, to reduce significant impacts.

Project Overview

The Wister Solar Energy Facility Project is located on Assessor Parcel No. 003-240-001. The proposed solar energy facility consists of three primary components: 1) solar energy generation equipment and associated facilities including a substation and access roads (herein referred to as “solar energy facility”); 2) gen-tie line that would connect the proposed on-site substation to the Point of Interconnection (POI) at the existing Imperial Irrigation District’s (IID) 92-kilovolt (kV) “K” line; and, 3) fiberoptic cable. These components are collectively referred to as the “proposed project” or “project.”

The proposed project involves the construction and operation of a 20 Megawatt (MW) photovoltaic (PV) solar energy facility on approximately 100 acres of privately-owned land north of Niland. The proposed project would be comprised of solar PV panels on single-axis horizontal trackers, an on-site substation and inverters, transformers, and underground electrical cables. The proposed project also includes approximately two-miles of fiberoptic line from the proposed on-site substation to the existing Niland Substation to connect the proposed Wister Substation to the region’s telecommunications system.

The power produced by the proposed project would be conveyed to the local power grid via an on-site 92-kV substation, which will be tied directly to IID’s 92-kV transmission line. A gen-tie line would connect the Wister substation to the POI at the existing IID 92-kV “K” line. The project applicant has secured a Power Purchase Agreement with San Diego Gas and Electric for the sale of power from the project.

The proposed project may utilize groundwater available at the project site for project construction, and potentially limited operational activities. A groundwater well would be constructed and operated near the existing geothermal well pad (and proposed project construction staging area) located in the north-western portion of the project site.

Purpose of an EIR

The purpose of an EIR is to analyze the potential environmental impacts associated with a project. CEQA (Section 15002) states that the purpose of CEQA is to: (1) inform the public and governmental decision makers of the potential significant environmental impacts of a project; (2) identify the ways that environmental damage can be avoided or significantly reduced; (3) prevent significant avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and (4) disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Eliminated from Further Review in Notice of Preparation

Based on the Initial Study and Notice of Preparation (IS/NOP) prepared for the proposed project (Appendix A of this EIR), Imperial County (County) has determined that the proposed project would not have the potential to cause significant adverse effects associated with the topics identified below. Therefore, these topics are not addressed in this EIR. However, the rationale for eliminating these topics is briefly discussed below.

Agriculture Resources

According to the farmland maps prepared by the California Department of Conservation (2017), the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation 2017). The proposed project would not convert Important Farmland to non-agricultural uses.

The project site is currently designated by the General Plan as “Recreation” and is zoned “Open Space/Preservation” with a Geothermal Overlay (S-2-G). 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 within Williamson Act contracted land (California Department of Conservation 2016). The proposed project has no potential to conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, implementation of the proposed project would not impact agriculture resources.

Forestry Resources

No portion of the project site or the immediate vicinity is zoned or designated as forest lands, timberlands, or timberland production. As such, the proposed project would not result in a conflict with existing zoning or cause the need for a zone change. Therefore, implementation of the proposed project would not impact forestry resources.

Energy

The use of energy associated with the project includes both construction and operational activities. Construction activities consume energy through the use of heavy construction equipment and truck and worker traffic. The proposed project will use energy-conserving construction equipment, including standard mitigation measures for construction combustion equipment recommended in the Imperial County Air Pollution Control District (ICAPCD) CEQA Air Quality Handbook (ICAPCD 2017). The use of better engine technology, in conjunction with the ICAPCD’s standard mitigation measures will reduce the amount of energy used for the project.



Implementation and operation of the proposed project would promote the use of renewable energy and contribute incrementally to the reduction in demand for fossil fuel use for electricity-generating purposes. The project would generate renewable energy resources and is considered a beneficial effect. Based on these considerations, the proposed project would not result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

The project will help California meet its Renewable Portfolio Standard of 50 percent of retail electricity sales from renewable sources by the end of 2030. The electricity generation process associated with the project would utilize solar technology to convert sunlight directly into electricity. Solar PV technology is consistent with the definition of an “eligible renewable energy resource” in Section 399.12 of the California Public Utilities Code and the definition of “in-state renewable electricity generation facility” in Section 25741 of the California Public Resources Code (PRC). The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The proposed project would result in a less than significant impact related to energy.

Hazards and Hazardous Materials

Construction of the proposed 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. Based on these considerations, a less than significant impact would occur.

The project site is not located within 0.25 mile of an existing or proposed school. Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur.

Based on a review of the Cortese List conducted in November 2019, the project site is not listed as a hazardous materials site. Therefore, the proposed project would not create a significant hazard to the public or the environment and no impact would occur.

The project site is not located within two miles of a public airport or public use airport. Therefore, the proposed project would not result in airport hazards for people residing or working in the project area and no impact would occur.

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.

Mineral Resources

The project site is not used for mineral resource production and the applicant is not proposing any form of mineral extraction. According to Figure 8: Imperial County Existing Mineral Resources of the Conservation and Open Space Element of the General Plan (County of Imperial 2016), 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.

Based on a review of the California Department Division of Oil, Gas, and Geothermal Resources Well Finder, there is one idle geothermal well (Well No. 02591491) located in the northwest quarter of the project parcel (California Department of Oil, Gas, and Geothermal Resources n.d). This geothermal well would be avoided by the proposed project. Implementation of the proposed project would not impact geothermal wells.

Noise and Vibration

The Imperial County Title 9 Land Use Ordinance, Division 7, Chapter 2, Section 90702.00 - Sound level limits, establishes one-hour average sound level limits for the County's land use zones. 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. on Saturdays. Compliance with Imperial County's standards for construction noise levels would result in less than significant noise impacts during project construction.

Groundborne vibration and groundborne noise could originate from earth movement during the construction phase of the proposed project. Construction of the proposed project may require post driving and vibratory rollers and has the potential to result in temporary vibration impacts on structures and humans. However, the project site is in a generally rural area and surrounded by relatively undisturbed desert lands. Sensitive receptors located within one mile of the project site consist of a few scattered rural homes west of the site. There are no sensitive receptors within 1,500 feet of the project site boundary. 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.

The project site is not located within two miles of a public airport or private airstrip. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels and no impact would occur.

Population and Housing

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 housing exists within the project site and no people reside within the project site. Therefore, the proposed project would not displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere. The proposed project would result in no impact to population and housing.

Public Services

Fire Protection. Fire protection and emergency medical services in the area are provided by the Imperial County Fire Department. The project site is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan (County of Imperial 1997), the potential for a major fire in the unincorporated areas of the County is generally low. 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). Based on these considerations, the project would not result in a need for fire facility expansion and a less than significant impact would occur.

Police Protection. 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. However, the project site would be fenced with a 6-foot high chain link security fence topped with barbed wire and points of ingress/egress would be accessed via locked gates. In addition, periodic on-site personnel visitations for security would occur during operations and maintenance of the proposed project, thereby minimizing the need for police surveillance. This is considered a less than significant impact.

Schools. 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.

Parks and Other Public Facilities. 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 are not expected. The project is not expected to have an impact on parks, libraries, and other public facilities.

Recreation

The project site is not used for formal recreational purposes. Also, 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. Therefore, no impact is identified for recreation.

Utilities and Service Systems

Wastewater Facilities. The 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 Operations & Maintenance (O&M) buildings. Therefore, there would be no wastewater generation from the proposed project. The proposed project would not require or result in the relocation or construction of new or expanded wastewater facilities.

Storm Water Facilities. The proposed project will involve the construction of storm water drainage control facilities within the project site, which are identified in the project site plan, and included in the project impact footprint, of which environmental impacts have been evaluated. Otherwise, the 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. The proposed project would not require or result in the relocation or construction of new or expanded storm water facilities.

Water Facilities. The proposed project is not anticipated to result in a significant increase in water demand/use during operation; however, water will be needed for solar panel washing and dust suppression. During operation, water would either be obtained from the proposed on-site groundwater well, or would be trucked to the project site from a local water source. Therefore, the proposed project would not require or result in the relocation or construction of new or expanded water facilities.

Power, Natural Gas, and Telecommunication Facilities. The proposed project would involve construction of power facilities, and would include a fiber optic connection. These components of the project have been evaluated in the EIR and would not generate the demand for, or require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities that would in turn, result in a significant impact to the environment.

Solid Waste Facilities. Solid waste generation would be minor for the construction and operation of the project. Solid waste would 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, the project would 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 CUP would contain provisions for recycling and diversion of Imperial County's construction waste policies.

Further, when the proposed project reaches the end of its operational life, the components would be decommissioned and deconstructed. 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. Commercially reasonable efforts would be used to recycle or reuse materials from the decommissioning. All other materials would be disposed of at a licensed facility. Therefore, a less than significant impact is identified for this issue.

Wildfire

According to the Draft Fire Hazard Severity Zone Map for Imperial County prepared by the California Department of Forestry and Fire Protection, the project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). Therefore, no impact is identified for wildfire.

Summary of Significant Impacts and Mitigation Measures that Reduce or Avoid the Significant Impacts

Based on the analysis presented in the IS/NOP and the information provided in the comments to the IS/NOP, the following environmental topics are analyzed in this EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources (includes Tribal Cultural Resources)
- Geology and Soils
- GHG Emissions
- Hydrology/Water Quality
- Land Use Planning
- Transportation/Traffic
- Utilities/Service Systems

Table ES-1 summarizes existing environmental impacts that were determined to be potentially significant, mitigation measures, and level of significance after mitigation associated with the project.

Areas of Controversy and Issues to be Resolved

Areas of Concern

Section 15123(b)(2) of the CEQA Guidelines requires that an EIR identify areas of controversy as well as issues to be resolved known to the Lead Agency, including issues raised by other agencies and the public. A primary issue associated with this solar farm project, and other solar facility projects that are proposed in the County, is the corresponding land use compatibility and fiscal/economic impacts to the County. Through the environmental review process for this project, other areas of concern and issues to be resolved include groundwater supply; relocation, modification, or reconstruction of IID facilities; and access.

Detailed analyses of these topics are included within each corresponding section contained within this document.

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Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
Air Quality			
Impact 3.3-1: Conflict with or obstruct implementation of the applicable air quality plan	Less than Significant	<p>AQ-1 Construction Equipment. Construction equipment shall be equipped with an engine designation of EPA Tier 2 or better (Tier 2+). A list of the construction equipment, including all off-road equipment utilized at each of the projects by make, model, year, horsepower and expected/actual hours of use, and the associated EPA Tier shall be submitted to the County Planning and Development Services Department and ICAPCD prior to the issuance of a grading permit. The equipment list shall be submitted periodically to ICAPCD to perform a NOx analysis. ICAPCD shall utilize this list to calculate air emissions to verify that equipment use does not exceed significance thresholds. The Planning and Development Services Department and ICAPCD shall verify implementation of this measure.</p> <p>AQ-2 Fugitive Dust Control. Pursuant to ICAPCD, all construction sites, regardless of size, must comply with the requirements contained within Regulation VIII – Fugitive Dust Control Measures. Whereas these Regulation VIII measures are mandatory and are not considered project environmental mitigation measures, the ICAPCD CEQA Handbook’s required additional standard and enhanced mitigation measures listed below shall be implemented prior to and during construction. ICAPCD will verify implementation and compliance with these measures as part of the grading permit review/approval process.</p> <p>ICAPCD Standard Measures for Fugitive Dust (PM10) Control</p> <ul style="list-style-type: none"> ▪ All disturbed areas, including bulk material storage, which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, 	Less than Significant

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		<p>tarps, or other suitable material, such as vegetative ground cover.</p> <ul style="list-style-type: none"> ▪ All on-site and offsite unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering. ▪ All unpaved traffic areas 1 acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering. ▪ The transport of bulk materials shall be completely covered unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks is to be cleaned and/or washed at delivery site after removal of bulk material. ▪ All track-out or carry-out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area. ▪ Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line. ▪ The construction of any new unpaved road is prohibited within any area with a population of 500 or more unless the road meets the definition of a temporary unpaved road. Any temporary unpaved 	



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		<p>road shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emission by paving, chemical stabilizers, dust suppressants, and/or watering.</p> <p>ICAPCD “Discretionary” Measures for Fugitive Dust (PM10) Control</p> <ul style="list-style-type: none"> ▪ Water exposed soil only in those areas where active grading and vehicle movement occurs with adequate frequency to control dust. ▪ Replace ground cover in disturbed areas as quickly as possible. ▪ Automatic sprinkler system installed on all soil piles. ▪ Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site. ▪ Develop a trip reduction plan to achieve a 1.5 average vehicle ridership for construction employees. ▪ Implement a shuttle service to and from retail services and food establishments during lunch hours. <p>Standard Mitigation Measures for Construction Combustion Equipment</p> <ul style="list-style-type: none"> ▪ Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel powered equipment. ▪ Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum. 	

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		<ul style="list-style-type: none"> ▪ Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use. ▪ Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). <p>Enhanced Mitigation Measures for Construction Equipment</p> <p>To help provide a greater degree of reduction of PM emissions from construction combustion equipment, ICAPCD recommends the following enhanced measures.</p> <ul style="list-style-type: none"> ▪ Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways. ▪ Implement activity management (e.g., rescheduling activities to reduce short-term impacts). <p>AQ-3 Dust Suppression. The project applicant shall employ a method of dust suppression (such as water or chemical stabilization) approved by ICAPCD. The project applicant shall apply chemical stabilization as directed by the product manufacturer to control dust between the panels as approved by ICAPCD, and other non-used areas (exceptions will be the paved entrance and parking area, and Fire Department access/emergency entry/exit points as approved by Fire/Office of Emergency Services [OES] Department).</p> <p>AQ-4 Dust Suppression Management Plan. Prior to any earthmoving activity, the applicant shall submit a construction dust control plan and obtain ICAPCD and Imperial County Planning and Development Services Department (ICPDS) approval.</p>	



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		<p>AQ-5 Operational Dust Control Plan. Prior to issuance of a Certificate of Occupancy, the applicant shall submit an operations dust control plan and obtain ICAPCD and ICPDS approval.</p> <p>ICAPCD Rule 301 Operational Fees apply to any project applying for a building permit. At the time that building permits are submitted for the proposed project, ICAPCD shall review the project to determine if Rule 310 fees are applicable to the project.</p>	
Biological Resources			
Impact 3.4-1: Potential impacts on special-status species	Potentially Significant	<p>BIO-1 Pre-Construction Plant Survey. Prior to initiating ground disturbance, a focused survey for Harwood’s milkvetch shall occur during its blooming period. A reference population shall be identified and confirmed to be blooming at the time that surveys are conducted on the project site.</p> <p>Should Harwood’s milkvetch be present on site, project design will be evaluated to determine if modifications can be made to avoid at least 90-percent of the observed individuals or compensatory mitigation shall be provided through off-site preservation of an equivalent population.</p> <p>BIO-2 General Impact Avoidance and Minimization Measures. The following measures will be applicable throughout the life of the project:</p> <ul style="list-style-type: none"> ▪ To reduce the potential indirect impact on migratory birds, bats and raptors, the project will comply with the APLIC 2012 Guidelines for overhead utilities, as appropriate, to minimize avian collisions with transmission facilities (APLIC 2012) ▪ All electrical components on the project site shall be either undergrounded or protected so that there will be 	Less than Significant

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Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>no exposure to wildlife and therefore no potential for electrocution.</p> <ul style="list-style-type: none"> <li data-bbox="1018 443 1642 1036">▪ The Project proponent shall will designate a Project Biologist who shall be responsible for overseeing compliance with protective measures for the biological resources during vegetation clearing and work activities within and adjacent to areas of native habitat. The Project Biologist will be familiar with the local habitats, plants, and wildlife. The Project Biologist will also maintain communications with the Contractor to ensure that issues relating to biological resources are appropriately and lawfully managed and monitor construction. The Project Biologist will monitor activities within construction areas during critical times, such as vegetation removal, the implementation of Best Management Practices (BMP), and installation of security fencing to protect native species. The Project Biologist will ensure that all wildlife and regulatory agency permit requirements, conservation measures, and general avoidance and minimization measures are properly implemented and followed. <li data-bbox="1018 1057 1642 1273">▪ The boundaries of all areas to be newly disturbed (including solar facility areas, staging areas, access roads, and sites for temporary placement of construction materials and spoils) will be delineated with stakes and flagging prior to disturbance. All disturbances, vehicles, and equipment will be confined to the flagged areas. <li data-bbox="1018 1294 1642 1443">▪ No potential wildlife entrapments (e.g., trenches, bores) will be left uncovered overnight. Any uncovered pitfalls will be excavated to 3:1 slopes at the ends to provide wildlife escape ramps. Alternatively, man-made ramps may be installed. Covered pitfalls 	



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		<p>will be covered completely to prevent access by small mammals or reptiles.</p> <ul style="list-style-type: none"> ▪ To avoid wildlife entrapment (including birds), all pipes or other construction materials or supplies will be covered or capped in storage or laydown area, and at the end of each work day in construction, quarrying and processing/handling areas. No pipes or tubing of sizes or inside diameters ranging from 1 to 10 inches will be left open either temporarily or permanently. ▪ No anticoagulant rodenticides, such as Warfarin and related compounds (indandiones and hydroxycoumarins), may be used within the project site, on off-site project facilities and activities, or in support of any other project activities. ▪ Avoid wildlife attractants. All trash and food-related waste shall be placed in self-closing containers and removed regularly from the site to prevent overflow. Workers shall not feed wildlife. Water applied to dirt roads and construction areas for dust abatement shall use the minimal amount needed to meet safety and air quality standards to prevent the formation of puddles, which could attract wildlife. Pooled rainwater or floodwater within retention basins will be removed to avoid attracting wildlife to the active work areas. ▪ To minimize the likelihood for vehicle strikes on wildlife, speed limits will not exceed 15 miles per hour when driving on access roads. All vehicles required for O&M must remain on designated access/maintenance roads. ▪ Avoid night-time construction lighting or if nighttime construction cannot be avoided use shielded directional lighting pointed downward and towards the 	

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		<p>interior of the project site, thereby avoiding illumination of adjacent natural areas and the night sky.</p> <ul style="list-style-type: none"> ▪ All construction equipment used for the Project will be equipped with properly operating and maintained mufflers. ▪ Hazardous materials and equipment stored overnight, including small amounts of fuel to refuel hand-held equipment, will be stored within secondary containment when within 50 feet of open water to the fullest extent practicable. Secondary containment will consist of a ring of sand bags around each piece of stored equipment/structure. A plastic tarp/visqueen lining with no seams shall be placed under the equipment and over the edges of the sandbags, or a plastic hazardous materials secondary containment unit shall be utilized by the Contractor. ▪ The Contractor will be required to conduct vehicle refueling in upland areas where fuel cannot enter waters of the U.S. and in areas that do not have potential to support federally threatened or endangered species. Any fuel containers, repair materials, including creosote-treated wood, and/or stockpiled material that is left on site overnight, will be secured in secondary containment within the work area and staging/assembly area and covered with plastic at the end of each work day. ▪ In the event that no activity is to occur in the work area for the weekend and/or a period of time greater than 48 hours, the Contractor will ensure that all portable fuel containers are removed from the project site. ▪ All equipment will be maintained in accordance with manufacturer’s recommendations and requirements. 	



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		<ul style="list-style-type: none"> ▪ Equipment and containers will be inspected daily for leaks. Should a leak occur, contaminated soils and surfaces will be cleaned up and disposed of following the guidelines identified in the Stormwater Pollution Prevention Plan or equivalent, Materials Safety Data Sheets, and any specifications required by other permits issued for the project. ▪ The Contractor will utilize off-site maintenance and repair shops as much as possible for maintenance and repair of equipment. ▪ If maintenance of equipment must occur onsite, fuel/oil pans, absorbent pads, or appropriate containment will be used to capture spills/leaks within all areas. Where feasible, maintenance of equipment will occur in upland areas where fuel cannot enter waters of the U.S. and in areas that do not have potential to support federally threatened or endangered species. ▪ Appropriate BMPs will be used by the Contractor to control erosion and sedimentation and to capture debris and contaminants from bridge construction to prevent their deposition in waterways. No sediment or debris will be allowed to enter the creek or other drainages. All debris from construction of the bridge will be contained so that it does not fall into channel. Appropriate BMPs will be used by the Contractor during construction to limit the spread of resuspended sediment and to contain debris. ▪ Erosion and sediment control devices used for the proposed project, including fiber rolls and bonded fiber matrix, will be made from biodegradable materials such as jute, with no plastic mesh, to avoid creating a wildlife entanglement hazard. 	

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> ▪ Firearms, open fires, and pets would be prohibited at all work locations and access roads. Smoking would be prohibited along the Project alignment. ▪ Cross-country vehicle and equipment use outside of approved designated work areas and access roads shall be prohibited to prevent unnecessary ground and vegetation disturbance. ▪ Any injured or dead wildlife encountered during project-related activities shall be reported to the project biologist, biological monitor, CDFW, or a CDFW-approved veterinary facility as soon as possible to report the observation and determine the best course of action. For special-status species, the Project Biologist shall notify the County, USFWS, and/or CDFW, as appropriate, within 24 hours of the discovery. ▪ Stockpiling of material will be allowed only within established work areas. ▪ Actively manage the spread of noxious weeds (See Mitigation Measure BIO-5) ▪ The ground beneath all parked equipment and vehicles shall be inspected for wildlife before moving. <p>BIO-3 Worker Environmental Awareness Program. Prior to project construction, a Worker Environmental Awareness Program shall be developed and implemented by a qualified biologist, and shall be available in both English and Spanish. Handouts summarizing potential impacts to special-status biological resources and the potential penalties for impacts to these resources shall be provided to all construction personnel. At a minimum, the education program shall including the following:</p> <ul style="list-style-type: none"> ▪ the purpose for resource protection; 	



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> ▪ a description of special status species including representative photographs and general ecology; ▪ occurrences of USACE, RWQCB, and CDFW regulated features in the Project study area; ▪ regulatory framework for biological resource protection and consequences if violated; ▪ sensitivity of the species to human activities; ▪ avoidance and minimization measures designed to reduce the impacts to special-status biological resources; ▪ environmentally responsible construction practices; ▪ reporting requirements; ▪ the protocol to resolve conflicts that may arise at any time during the construction process; and ▪ workers sign acknowledgement form indicating that the Environmental Awareness Training and Education Program that has been completed and would be kept on record. <p>BIO-4 Desert Tortoise Avoidance and Minimization A qualified biologist shall conduct focused presence/absence surveys for Desert Tortoise for 100-percent of the project footprint pursuant to the October 19, 2019 Version of the USFWS Desert Tortoise Survey Protocol. If no live desert tortoise or sign of active desert tortoise is detected, no further avoidance and minimization is required.</p> <p>If live desert tortoise or sign of active desert tortoise is detected, the project proponent shall initiate consultation with USFWS and CDFW to obtain the necessary federal and state ESA</p>	

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>authorizations and the following avoidance, minimization and compensatory mitigation measures will be implemented:</p> <ul style="list-style-type: none"> ▪ Permanent tortoise-proof fencing shall be along the perimeter of the project site. Fencing shall be installed, inspected, and maintained according to specifications in the current USFWS <i>Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii)</i>. An authorized desert tortoise biologist shall conduct pre-construction clearance surveys for the project site no more than 14-days prior to the initiation of fence installation. All potentially active burrows shall be identified for hand excavation. Pre-construction clearance surveys shall be repeated within the fenced impact area after fence installation is complete. If desert tortoise are observed they shall be relocated from within the work area to outside the fenced area by a permitted biologist. ▪ The authorized biologist shall conduct desert tortoise pre-construction clearance surveys along all existing and new dirt access road alignments, and the Gen-tie alignment before any ground disturbing activities are initiated and prior to the start of construction activities each day during ground-disturbing activities and weekly thereafter. Relocate desert tortoises as necessary. Any handling of special-status species must be approved by the appropriate Federal and State agencies and be done in accordance with species-specific handling protocols. ▪ Where burrows would be unavoidably destroyed, they would be excavated carefully using hand tools under the supervision of the authorized biologists with demonstrated prior experience with this species. 	



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> ▪ Inspect construction pipes, culverts, or similar structures: (a) with a diameter greater than 3 inches, (b) stored for one or more nights, (c) less than 8 inches aboveground and (d) within desert tortoise habitat, before the materials are moved, buried, or capped. ▪ Incorporate Raven Management into the Pest Control Plan (See BIO-5) ▪ Inspect the ground under vehicles and equipment for the presence of desert tortoise any time a vehicle or construction equipment is parked in desert tortoise habitat. If a desert tortoise is seen, it may move on its own. If it does not move within 15 minutes, an authorized biologist or biological monitor under the direction of the authorized biologist may remove and relocate the animal to a safe location. ▪ All culverts for access roads or other barriers will be designed to allow unrestricted access by desert tortoises and will be large enough that desert tortoises are unlikely to use them as shelter sites (e.g., 36 inches in diameter or larger). Desert tortoise exclusion fencing may be utilized to direct tortoise use of culverts and other passages. If possible, pipes and culverts greater than 3 inches in diameter would be stored on dunnage to prevent wildlife from taking refuge in them, to the extent feasible. ▪ To fully mitigate for habitat loss and potential take of the Mojave desert tortoise, the Applicant will provide compensatory mitigation at a ratio of 3:1. For the purposes of this measure, the project site (i.e., footprint) means all Project areas with new direct ground disturbance during construction and operation of the Project. This includes all lands directly disturbed 	

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>that will no longer provide viable long-term habitat for the Mojave desert tortoise, such as the solar field, substation and new access roads. Areas within the gen-tie line corridor where no ground disturbance will occur are not included in the area to be mitigated through compensation. Compensatory mitigation could include agency-approved payment of an in-lieu fee; acquiring mitigation land or conservation easements; restoration or habitat enhancement activities on preservation lands; or a combination of the three.</p> <p>BIO-5 Prepare and Implement an Operation and Maintenance Worker Education Plan. An Operation and Maintenance Worker Education Plan shall be prepared to advise personnel on general operations measures. The Worker Education Plan shall be submitted to the County of Imperial Planning and Development Services Department for review and approval prior to issuance of building permits. The following provisions shall be included in the Worker Education Plan and implemented throughout the operational lifespan of the Project: Operation and maintenance personnel shall be prohibited from:</p> <ul style="list-style-type: none"> ▪ Exceeding nighttime and daytime vehicle speeds of 10 miles per hour and 25 miles per hour, respectively, within the facility, on access roads and within the Gen-Tie line corridor. Speed limit signs shall be posted throughout the project site to remind workers of travel speed restrictions. ▪ Harming, harassing, or feeding wildlife and/or collecting special-status plant or wildlife species. ▪ Disturbing active avian nests ▪ Traveling (either on foot or in a vehicle) outside of the Project footprint except on public roads. ▪ Littering on the Project area. 	



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> ▪ Allowing persons not employed at the facility to remain on site after daylight hours. ▪ Exceeding normal nighttime operational noise or lighting levels ▪ Bringing domestic pets and firearms to the site. <p>The Operation and Maintenance Worker Education Plan shall require that:</p> <ul style="list-style-type: none"> ▪ All operation and maintenance vehicles and equipment park in approved designated areas only. ▪ The project site and Gen-Tie line corridor be kept clear of trash and other litter to reduce the attraction of opportunistic predators such as common ravens, coyotes, and feral dogs that may prey on sensitive species. ▪ Operation and maintenance employees maintain Hazardous Materials Spill Kits on-site. All operation and maintenance staff shall be trained in how to use Hazardous Materials Spill Kits in the event of a spill. ▪ An approved Long-Term Maintenance Plan for the retention/detention basins be developed and implemented. ▪ Weed and Raven management shall be addressed in a project-specific pest management plan (See BIO-5) ▪ Maintain shielding on external lighting to direct down and towards the project site and away from adjacent undeveloped land. ▪ Workers sign acknowledgement form indicating that the Environmental Awareness Training and Education 	

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>Program that has been completed and would be kept on record</p> <ul style="list-style-type: none"> ▪ desert tortoise avoidance and minimization measures be implemented if desert tortoise is detected during pre-construction surveys ▪ The ground beneath all parked equipment and vehicles shall be inspected for wildlife before moving. ▪ Personnel are trained to avoid causing wildfires and manage them safely and promptly if necessary <p>BIO-6 Burrowing Owl Avoidance and Minimization. Take Avoidance (pre-construction) surveys for burrowing owl shall be completed prior to project construction. Surveys shall be conducted as detailed within Appendix D of the Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game [CDFG] 2012). If burrowing owl is not detected, construction may proceed.</p> <ul style="list-style-type: none"> ▪ If burrowing owl is identified during the non-breeding season (September 1 through January 31), then a 50 meter buffer will be established by the biological monitor. Construction within the buffer will be avoided until a qualified biologist determines that burrowing owl is no longer present or until a CDFW-approved exclusion plan has been implemented. The buffer distance may be reduced if noise attenuation buffers such as hay bales are placed between the occupied burrow and construction activities. ▪ If burrowing owl is identified during the breeding season (February 1 through August 31), then an appropriate buffer will be established by the biological monitor in accordance with the <i>Staff Report on Burrowing Owl Mitigation</i> (CDFG 2012). Construction within the buffer will be avoided until a qualified 	



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>biologist determines that burrowing owl is no longer present or until young have fledged. The buffer distance may be reduced in consultation with CDFW if noise attenuation buffers such as hay bales are placed between the occupied burrow and construction activities.</p> <p>BIO-7 Pre-Construction Nesting Bird Surveys. To the extent possible, construction shall occur outside the typical avian breeding season (February 15 through September 15). If construction must occur during the general avian breeding season, a pre-construction nest survey shall be conducted within the impact area and a 500-foot (150-meter) buffer by qualified biologist no more than 7 days prior to the start of vegetation clearing and/or ground disturbing construction activities in any given area of the Project footprint. Construction crews shall coordinate with the qualified biologist at least 7 days prior to the start of construction in a given area to ensure that the construction area has been adequately surveyed. A nest is defined as active once birds begin constructing or repairing the nest in readiness for egg-laying. A nest is no longer an “active nest” if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest. If no active nests are discovered, construction may proceed. If active nests are observed that could be disturbed by construction activities, these nests and an appropriately sized buffer (typically a 200-foot (61-meter) buffer for non-raptor species nests and at least a 500-foot (150-meter) buffer for raptor or federally listed species nests) would be avoided until the young have fledged. Final construction buffers or setback distances shall be determined by the qualified biologist in coordination with USFWS and CDFW on a case-by-case basis, depending on the species, season in which disturbance shall occur, the type of disturbance, and other factors that could influence susceptibility to disturbance (e.g., topography, vegetation, existing</p>	

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>disturbance levels, etc.). Active nests shall be avoided until the young have fledged and/or the monitor determines that no impacts are anticipated to the nesting birds or their young. If vegetation clearing and/or ground disturbing activities cease for 14 or more consecutive days during the nesting season in areas where suitable nesting habitat remains, repeat nesting bird surveys shall be required to ensure new nesting locations have not been established within the impact area and the defined buffers.</p> <p>BIO-8 Develop a Bird and Bat Conservation Strategy (BBCS). A BBCS shall be developed by the Project Applicant in coordination with the County of Imperial, USFWS, and CDFW.</p> <p>The BBCS will include the following components:</p> <ul style="list-style-type: none"> ▪ A description and assessment of the existing habitat and avian and bat species; ▪ An avian and bat risk assessment and specific measures to avoid, minimize, reduce, or eliminate avian and bat injury or mortality during all phases of the project. ▪ 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. ▪ An injured bird response plan that delineates care and curation of any and all injured birds. 	



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> ▪ A nesting bird management strategy to outline actions to be taken for avian nests detected within the impact footprint during operation of the Project. ▪ A conceptual adaptive management and decision-making framework for reviewing, characterizing, and responding to monitoring results. ▪ 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 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 Global Positioning System), and condition of carcass. ▪ If any federal listed, state listed or fully protected avian carcasses or injured birds are found during construction or post-construction monitoring, the Project Applicant shall notify USFWS and CDFW within 24 hours via email or phone and work with the resource agencies to determine the appropriate course of action for these species. For such listed species, the 	

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>CUP owner shall obtain or retain a biologist with the appropriate USFWS Special Purpose Utility Permit(s) and CDFW Scientific Collecting Permit(s) to collect and salvage all dead and injured birds, and store/curate them in freezers for later disposition and analysis.</p> <p>BIO-9 Pre-Construction Surveys for American Badger. Preconstruction surveys shall be conducted by a qualified biologist for the presence of American badger dens within 14 days prior to commencement of construction activities. The surveys shall be conducted in areas of suitable habitat for American badger, which include desert scrub habitats. Surveys need not be conducted for all areas of suitable habitat at one time; they may be phased so that surveys occur within 14 days prior to that portion of the project site disturbed. If potential dens are observed and avoidance is feasible, the following buffer distances shall be established prior to construction activities:</p> <ul style="list-style-type: none"> ▪ American badger potential den: 30 feet. ▪ American badger active den: 100 feet. ▪ American badger natal den: 500 feet. ▪ If avoidance of the potential dens is not possible, the following measures are required to avoid potential adverse effects to the American badger ▪ Outside the reproductive season defined as February 1 through September 30 for American badger if the qualified Lead Biologist determines through camera monitoring for three consecutive days that potential dens are inactive, the biologist shall excavate these dens by hands with a shovel to prevent American badgers from re-using them during construction. ▪ Outside of the reproductive season defined as February 1 through September 30 for American badger 	



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		if the Lead Biologist determines that potential dens may be active, an onsite passive relocation program shall be implemented. This program shall consist of excluding American badgers from occupied burrows by installation of one-way doors at burrow entrances, monitoring of the burrow for seven days to confirm usage has discontinued, and excavation and collapse of the burrow to prevent reoccupation. After the qualified biologist determines that American badgers have stopped using the dens within the project boundary, the dens shall be hand-excavated with a shovel to prevent use during construction.	
Impact 3.4-2: Potential impacts on riparian habitat or sensitive vegetation	Potentially Significant	Implement Mitigation Measures BIO-2 and BIO-3 (as described above).	Less than Significant
Impact 3.4-4: Potential impacts on the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors	Potentially Significant	Implement Mitigation Measures BIO-5 and BIO-8 (as described above).	Less than Significant
Cultural Resources			
Impact 3.5-2: Impact on archaeological resources	Potentially Significant	CR-1 Pursuant to CEQA Guidelines §15064.5(f), in the event that previously unidentified unique archaeological resources are encountered during construction or operational repairs, archaeological monitors will be authorized to temporarily divert construction work within 100 feet of the area of discovery until significance and the appropriate mitigation measures are determined by a qualified archaeologist familiar with the resources of the region.	Less than Significant

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>Applicant shall notify the County within 24 hours. Applicant shall provide contingency funding sufficient to allow for implementation of avoidance measures or appropriate mitigation.</p> <p>CR-2</p> <p>In the event of the discovery of previously unidentified archaeological materials, the contractor shall immediately cease all work activities within approximately 100 feet of the discovery. After cessation of excavation, the contractor shall immediately contact the Imperial County Department of Planning and Development Services. Except in the case of cultural items that fall within the scope of the Native American Grave Protection and Repatriation Act, the discovery of any cultural resource within the project area shall not be grounds for a “stop work” notice or otherwise interfere with the project’s continuation except as set forth in this paragraph.</p> <p>In the event of an unanticipated discovery of archaeological materials during construction, the applicant shall retain the services of a qualified professional archaeologist, meeting the Secretary of the Interior’s Standards for a Qualified Archaeologist, to evaluate the significance of the materials prior to resuming any construction-related activities in the vicinity of the find. If the qualified archaeologist determines that the discovery constitutes a significant resource under CEQA and it cannot be avoided, the applicant shall implement an archaeological data recovery program.</p>	
Impact 3.5-3: Impact on Human Remains	Potentially Significant	<p>CR-3</p> <p>In the event that evidence of human remains is discovered, construction activities within 200 feet of the discovery will be halted or diverted and the Imperial County Coroner will be notified (Section 7050.5 of the HSC). If the Coroner determines that the remains are Native American, the Coroner will notify the NAHC, which will designate a MLD for the project (Section 5097.98 of the PRC). The designated MLD then has 48 hours from the time access to the property is granted to make</p>	Less than Significant



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		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 PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). 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).	
Geology and Soils			
Impact 3.6-2: Possible risks to people and structures caused by seismic ground shaking.	Potentially Significant	GEO-1 Prepare Geotechnical Report(s) as Part of Final Engineering for the Project and Implement Required Measures. Facility design for all project components shall comply with the site-specific design recommendations as provided by a licensed geotechnical or civil engineer to be retained by the project applicant. The final geotechnical and/or civil engineering report shall address and make recommendations on the following: <ul style="list-style-type: none"> ○ Site preparation ○ Soil bearing capacity ○ Appropriate sources and types of fill ○ Potential need for soil amendments ○ Structural foundations ○ Grading practices ○ Soil corrosion of concrete and steel ○ Erosion/winterization ○ Seismic ground shaking 	Less than Significant

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> ○ Liquefaction ○ Expansive/unstable soils <p>In addition to the recommendations for the conditions listed above, the geotechnical investigation shall include subsurface testing of soil and groundwater conditions, and shall determine appropriate foundation designs that are consistent with the version of the CBC that is applicable at the time building and grading permits are applied for. All recommendations contained in the final geotechnical engineering report shall be implemented by the project applicant. The final geotechnical and/or civil engineering report shall be submitted to Imperial County Public Works Department, Engineering Division for review and approval prior to issuance of building permits.</p>	
Impact 3.6-5: Substantial soil erosion or the loss of topsoil	Potentially Significant	Implement Mitigation Measure GEO-1 and Mitigation Measure HYD-1.	Less than Significant
Impact 3.6-9: Impact on paleontological resources	Potentially Significant	<p>GEO-2 Paleontological Resources. In the event that unanticipated paleontological resources or unique geologic resources are encountered during ground-disturbing activities, work must cease within 50 feet of the discovery and a paleontologist shall be hired to assess the scientific significance of the find. The consulting paleontologist shall have knowledge of local paleontology and the minimum levels of experience and expertise as defined by the Society of Vertebrate Paleontology’s Standard Procedures (2010) for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. If any paleontological resources or unique geologic features are found within the project site, the consulting paleontologist shall prepare a paleontological Treatment and Monitoring Plan to include the methods that will be used to protect paleontological resources that may exist within the project site, as well as procedures for monitoring, fossil preparation and identification,</p>	Less than Significant



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		curation of specimens into an accredited repository, and preparation of a report at the conclusion of the monitoring program.	
Hydrology/Water Quality			
Impact 3.8-1: Violation of water quality standards	Potentially Significant	<p>HYD-1 Prepare SWPPP and Implement BMPs Prior to Construction and Site Restoration. The project applicant or its contractor shall prepare a SWPPP specific to the project and be responsible for securing coverage under SWRCB's NPDES stormwater permit for general construction activity (Order 2009-0009-DWQ). The SWPPP shall identify specific actions and BMPs relating to the prevention of stormwater pollution from project-related construction sources by identifying a practical sequence for site restoration, BMP implementation, contingency measures, responsible parties, and agency contacts. The SWPPP shall reflect localized surface hydrological conditions and shall be reviewed and approved by the appropriate agency prior to commencement of work and shall be made conditions of the contract with the contractor selected to build and decommission the project. The SWPPP shall incorporate control measures in the following categories:</p> <ul style="list-style-type: none"> ▪ Soil stabilization and erosion control practices (e.g., hydroseeding, erosion control blankets, mulching) ▪ Sediment control practices (e.g., temporary sediment basins, fiber rolls) ▪ Temporary and post-construction on- and off-site runoff controls ▪ Special considerations and BMPs for water crossings and drainages ▪ Monitoring protocols for discharge(s) and receiving waters, with emphasis place on the following water 	Less than Significant

Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>quality objectives: dissolved oxygen, floating material, oil and grease, potential of hydrogen (pH), and turbidity</p> <ul style="list-style-type: none"> ▪ Waste management, handling, and disposal control practices ▪ Corrective action and spill contingency measures ▪ Agency and responsible party contact information ▪ Training procedures that shall be used to ensure that workers are aware of permit requirements and proper installation methods for BMPs specified in the SWPPP <p>The SWPPP shall be prepared by a Qualified SWPPP Practitioner and/or Qualified SWPPP Developer with BMPs selected to achieve maximum pollutant removal and that represent the best available technology that is economically achievable. Emphasis for BMPs shall be placed on controlling discharges of oxygen-depleting substances, floating material, oil and grease, acidic or caustic substances or compounds, and turbidity. BMPs for soil stabilization and erosion control practices and sediment control practices will also be required. Performance and effectiveness of these BMPs shall be determined either by visual means where applicable (i.e., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination, (inadvertent petroleum release) is required to determine adequacy of the measure.</p> <p>HYD-2 Incorporate Post-Construction Runoff BMPs into Project Drainage Plan. The project Drainage Plan shall adhere to the County’s Engineering Guidelines Manual, IID “Draft” Hydrology Manual, or other recognized source with approval by the County Engineer to control and manage the on- and off-site discharge of stormwater to existing drainage systems. Infiltration basins will be integrated into the Drainage Plan to the maximum extent practical. The Drainage Plan shall provide both short- and</p>	



Table ES-1. Summary of Project Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		long-term drainage solutions to ensure the proper sequencing of drainage facilities and management of runoff generated from project impervious surfaces as necessary.	
Impact 3.8-8: Conflict with water quality control plan or sustainable groundwater management plan	Potentially Significant	Implement Mitigation Measures HYD-1 through HYD-2	Less than Significant

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Statement of Overriding Considerations

CEQA Guidelines Section 15093 requires the Lead Agency to balance, as applicable, the economic, legal, social, and technological, or other benefits of the project against its unavoidable environmental risks when determining whether to approve the project. No significant and unmitigated impacts have been identified for the proposed project; therefore, the County would not be required to adopt a Statement of Overriding Considerations pursuant to Section 15093 for this project.

Project Alternatives

Alternatives Considered but Rejected

Alternative Site

Section 15126.6(f)(2) of the CEQA Guidelines addresses alternative locations for a project. The key question and first step in the analysis is whether any of the significant effects of the proposed project would be avoided or substantially lessened by constructing the proposed project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Further, CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account when addressing the feasibility of alternative locations are whether the project proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

With respect to the proposed project, no significant, unmitigable impacts have been identified. With implementation of proposed mitigation, all potentially significant environmental impacts will be mitigated to a level of less than significant.

The Applicant investigated the opportunity to develop the project site in the general project area and determined that the currently proposed project site is the most suitable for development of the solar facility. An alternative site was considered and is depicted on Figure 7-1 (Chapter 7, Alternatives). This site is located southeast of the project site on privately-owned agricultural lands. The site, located on APN 025-600-027, comprises approximately 126 acres of land.

However, this site was rejected from detailed analysis for the following reasons:

- The alternative location site, as compared to the proposed project site, is located on agricultural land. According to the farmland maps prepared by the California Department of Conservation (2017), the alternative site is designated as Prime Farmland and Farmland of Statewide Importance. Therefore, compared to the proposed project, the alternative site would result in potentially significant impacts associated with conversion of Important Farmland to non-agricultural uses.
- Burrowing owls were not present on the project site during the biological surveys. As the proposed project is not within the IID Service District, no IID canals or drains (which are very attractive to burrowing owls) are present within the project site. Compared to the proposed project site, the alternative site is located entirely on agricultural fields and surrounded on all sides by agricultural fields. Agricultural fields provide habitat for burrowing owl. Irrigation canals and drains are commonly used as burrowing nesting sites in the Imperial Valley. It is anticipated that the potential for burrowing owl to occur on the alternative site during construction and operations is greater compared to the proposed project site.

- No significant, unmitigated impacts have been identified for the proposed project. Construction and operation of the proposed project at this alternative location would likely result in similar impacts associated with the proposed project, or additional impacts (conversion of Important Farmland to non-agricultural uses) that are currently not identified for the project at the currently proposed location.

As such, the County considers this alternative location infeasible and rejects further analysis of this alternative because of the factors listed above.

Original Site Plan Submittal

The project applicant originally proposed to construct and operate a 40 MW solar energy facility on approximately 300 acres within the western portion of the larger 640-acre project site parcel. The originally-proposed project was contemplated to be constructed in two phases (see Figure 7-2 in Chapter 7, Alternatives). Each phase would have produced 20 MW of energy and cover approximately 146 acres. A Power Purchase Agreement for 20 MW to San Diego Gas & Electric was secured by the project applicant for the first phase of the project. The second 20 MW phase would not be constructed until the time that an additional PPA is secured. The remaining portion of the property would remain undeveloped in order to protect sensitive environmental resources.

Although this alternative would result in an increased power production capacity and greater GHG emission offset compared to the proposed project, the County rejects the Original Site Plan Submittal from further analysis due to increased biological resources impacts, increased jurisdictional waters impacts, and potential disturbance to known and unknown cultural resources.

As shown on Figure 3.4-1 (Section 3.4, Biological Resources), arrow weed thicket, which is recognized by CDFW as a sensitive vegetation type, is known to occur in the southwest portion of the project site (Phase I development area as shown on 7-2). As shown on Figure 3.4-2 (Section 3.4, Biological Resources), the Phase I development area contains numerous braided ephemeral drainage channels, which could be considered federally and state jurisdictional. Based on this context, the Original Site Plan Submittal has the potential to impact a sensitive vegetation community and increased impacts on potentially jurisdictional waters compared to the proposed project. Further this alternative has the potential to disturb portions of a known cultural resource site.

Alternatives Evaluated

The environmental analysis for the proposed project evaluated the potential environmental impacts resulting from implementation of the proposed project, as well as alternatives to the project. The alternatives include: Alternative 1: No Project/No Development; Alternative 2: Development within Renewable Energy Overlay Zone – Agricultural Lands; Alternative 3: Development within Renewable Energy Overlay Zone – Desert Lands; and Alternative 4: Distributed Commercial and Industrial Rooftop Solar Only Alternative. A detailed discussion of the alternatives considered is included in Chapter 7. Table ES-2 summarizes the impacts resulting from the proposed project and the identified alternatives.

Alternative 1: No Project/No Development Alternative

The CEQA Guidelines require analysis of the No Project Alternative (PRC Section 15126). According to Section 15126.6(e), “the specific alternative of ‘no project’ shall also be evaluated along with its impacts. The ‘no project’ analysis shall discuss the existing conditions at the time the Notice of Preparation is published, at the time environmental analysis is commenced, as well as what would be

reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

The No Project/No Development Alternative assumes that the project, as proposed, would not be implemented and the project site would not be developed.

The No Project/No Development Alternative would not meet a majority of the objectives of the project. Additionally, the No Project/No Development Alternative would not help California meet its statutory and regulatory goal of increasing renewable power generation, including GHG reduction goals of Assembly Bill (AB) 32 (California Global Warming Solutions Act of 2006).

Alternative 2: Development within Renewable Energy Overlay Zone – Agricultural Lands

The purpose of this alternative is to develop the proposed project within the existing boundary of County’s Renewable Energy (RE) Overlay Zone. 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 areas.

The Alternative 2 project site is located entirely within the RE Overlay Zone. Alternative 2 would involve the construction and operation of a 20 MW solar energy facility and associated infrastructure on approximately 100 acres within a 130-acre parcel (APN 034-260-036) located approximately 4 miles northeast of the Dixieland area in unincorporated Imperial County. The Alternative 2 project site is designated as Agriculture under the County’s General Plan and zoned A-3 (Heavy Agriculture).

Similar to the proposed project, Alternative 2 would require approval of a CUP to allow for the construction and operation of a solar project. Compared to the proposed project, the Alternative 2 project site is located within the RE Overlay Zone and would not require a General Plan Amendment or Zone Change to include/classify the project site into the RE Overlay Zone. The A-3 zone allows a maximum height limit of 120 feet for non-residential structures. No Variance would be required under this alternative because the proposed height of the transmission towers (70 feet) would not exceed 120 feet.

Alternative 2 would meet most of the basic objectives of the proposed project. However, this alternative would result in greater impacts for the following environmental issue areas as compared to the proposed project: aesthetics and visual resources, biological resources, cultural resources, and tribal cultural resources. Because the Alternative 2 site is located on agricultural lands, this alternative would result in the conversion of agricultural land to non-agricultural uses. Compared to the proposed project, this alternative would result in additional impacts (conversion of agricultural land to non-agricultural uses) that are currently not identified for the project at the currently proposed location. Further, the project applicant does not own, or otherwise control this property.

Alternative 3: Development within Renewable Energy Overlay Zone – Desert Lands

The purpose of this alternative is to develop the proposed project within the existing boundary of the County’s RE Overlay Zone. The Alternative 3 project site is located entirely within the RE Overlay Zone. Alternative 3 would involve the construction and operation of a 20 MW solar energy facility and associated infrastructure on approximately 100 acres within a 161-acre parcel (APN 021-190-003) located approximately 0.5 mile south of Slab City. The Alternative 3 project site is located on undeveloped desert land. Existing transmission lines traverse the southwest corner of the project site.

The Alternative 3 project site is located within the RE Overlay Zone and would not require a General Plan Amendment or Zone Change to include/classify the project site into the RE Overlay Zone. The

Alternative 3 project site is designated as Recreation under the County's General Plan and zoned General Agricultural with a renewable energy overlay (A-2-RE).

Similar to the proposed project, Alternative 3 will require approval of a CUP to allow for the construction and operation of a solar project. Compared to the proposed project, the Alternative 3 project site is located within the RE Overlay Zone and would not require a General Plan Amendment or Zone Change to include/classify the project site into the RE Overlay Zone. The A-2-RE zone allows a maximum height limit of 120 feet for non-residential structures. No Variance would be required under this alternative because the proposed height of the transmission towers (70 feet) would not exceed 120 feet.

Alternative 3 would meet most of the basic objectives of the proposed project. However, this alternative would result in greater impacts for the following environmental issue areas as compared to the proposed project: aesthetics and visual resources, cultural resources, tribal cultural resources, and hydrology/water quality. Further, the project applicant does not own, or otherwise control this property.

Alternative 4: Distributed Commercial and Industrial Rooftop Solar Only Alternative

This alternative would involve the development of a number of geographically distributed small to medium solar PV systems (100 kilowatts to 1 MW) within existing developed areas, typically on the rooftops of commercial and industrial facilities throughout Imperial County. Under this alternative, no new land would be developed or altered. Depending on the type of solar modules installed and the type of tracking equipment used, a similar or greater amount of acreage (i.e., greater than 100 acres of total rooftop area) may be required to attain the proposed project's capacity of 20 MW of solar PV generating capacity. This alternative would involve placement of PV structures, transmission lines, and development of additional supporting facilities, such as switching stations and substations at various locations throughout the County. This alternative assumes that rooftop development would occur primarily on commercial and industrial structures due to the greater availability of large, relatively flat roof areas necessary for efficient solar installations.

This alternative would require hundreds of installation locations across Imperial County, many of which would require approval of discretionary actions, such as design review, CUPs, or zone variances depending on local jurisdictional requirements. Similar to the proposed project, this alternative would be designed to operate year-round using PV panels to convert solar energy directly to electrical power. This alternative would involve the construction of transmission lines and development of additional supporting facilities, such as switching stations and substations at various locations throughout the County to distribute the energy.

Rooftop PV systems exist in small areas throughout California. Larger distributed solar PV installations are becoming more common. An example of a distributed PV system is 1 MW of distributed solar energy installed by Southern California Edison on a 458,000 square-foot industrial building in Chino, California.¹

Similar to utility-scale PV systems, the acreage of rooftops or other infrastructure required per MW of electricity produced is wide ranging, which is largely due to site-specific conditions (e.g., solar insolation levels, intervening landscape or topography, PV panel technology, etc.). Based on SCE's

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<http://newsroom.edison.com/releases/california-regulators-approve-southern-california-edison-proposal-to-create-nations-largest-solar-panel-installation-program>

use of 458,000-square feet for 1 MW of energy, approximately 9,160,000 square feet (approximately 210 acres) would be required to produce 20 MW.

As shown on Table ES-2, implementation of Alternative 4: Distributed Commercial and Industrial Rooftop Solar Only Alternative would result in reduced impacts for the following environmental issue areas as compared to the proposed project: hydrology/water quality. Overall, this alternative would result in greater impacts related to aesthetics, air quality, biological resources, cultural resources, tribal cultural resources, and utilities and service systems.

Environmentally Superior Alternative

The No Project/No Development Alternative would be considered the environmentally superior alternative, since it would eliminate all of the significant impacts identified for the project. However, CEQA Guidelines Section 15126.6(e)(2) states that “if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” As shown in Table ES-2, Alternative 2 and Alternative 3 would both result in less impacts on Land Use and Planning because they are located within the RE Overlay Zone and would not require a General Plan Amendment or Zone Change to include/classify the project site into the RE Overlay Zone. No Variance would be required under either of these alternatives because the proposed height of the transmission towers (70 feet) would not exceed the 120 feet height limit of non-residential structures in the A-2-RE Zone or A-3 Zone. However, compared to the proposed project, the Alternative 2 site is located on agricultural lands and would result in the conversion of agricultural land to non-agricultural uses. Compared to the proposed project, this alternative would result in additional impacts (conversion of agricultural land to non-agricultural uses) that are currently not identified for the project at the currently proposed location. Based on these considerations, Alternative 3 is considered the Environmentally Superior Alternative.

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Table ES-2. Comparison of Alternative Impacts to Proposed Project

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Development within Renewable Energy Overlay Zone – Agricultural Lands	Alternative 3: Development within Renewable Energy Overlay Zone – Desert Lands	Alternative 4: Distributed Commercial and Industrial Rooftop Solar Only Alternative
Aesthetics and Visual Resources	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Less Impact	<i>CEQA Significance:</i> Potentially Significant <i>Comparison to Proposed Project:</i> Greater Impact	<i>CEQA Significance:</i> Potentially Significant <i>Comparison to Proposed Project:</i> Greater Impact	<i>CEQA Significance:</i> Potentially Significant <i>Comparison to Proposed Project:</i> Greater Impact
Air Quality	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Less Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar	<i>CEQA Significance:</i> Potentially Significant <i>Comparison to Proposed Project:</i> Greater Impact
Biological Resources	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Less Impact (Avoid)	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Greater Impact	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Greater Impact	<i>CEQA Significance:</i> Potentially Significant <i>Comparison to Proposed Project:</i> Greater Impact
Cultural Resources	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Less Impact (Avoid)	<i>CEQA Significance:</i> Potentially Significant <i>Comparison to Proposed Project:</i> Greater Impact	<i>CEQA Significance:</i> Potentially Significant <i>Comparison to Proposed Project:</i> Greater Impact	<i>CEQA Significance:</i> Potentially Significant <i>Comparison to Proposed Project:</i> Greater Impact

Table ES-2. Comparison of Alternative Impacts to Proposed Project

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Development within Renewable Energy Overlay Zone – Agricultural Lands	Alternative 3: Development within Renewable Energy Overlay Zone – Desert Lands	Alternative 4: Distributed Commercial and Industrial Rooftop Solar Only Alternative
Geology and Soils	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Less Impact (Avoid)	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Similar Impact	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Similar Impact	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Similar Impact
GHG Emissions	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Less Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Hydrology/ Water Quality	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Less Impact (Avoid)	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Similar Impact	<i>CEQA Significance:</i> Potentially Significant <i>Comparison to Proposed Project:</i> Greater Impact	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact
Land Use/Planning	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Similar Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Less Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Less Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact



Table ES-2. Comparison of Alternative Impacts to Proposed Project

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Development within Renewable Energy Overlay Zone – Agricultural Lands	Alternative 3: Development within Renewable Energy Overlay Zone – Desert Lands	Alternative 4: Distributed Commercial and Industrial Rooftop Solar Only Alternative
Transportation/ Traffic	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Less Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Utilities/Service Systems	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Less Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Greater Impact

Notes:

CEQA=California Environmental Quality Act; GHG=greenhouse gas

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