

CHAPTER 4.0

ERRATA

4.1 INTRODUCTION

This Errata has been prepared in response to additional information that became available subsequent to publication of the Draft EIR for the Seville 4 Solar Project (proposed Project) which was circulated for a 50-day public review period in compliance with Public Resources Code 21091 from July 13 through August 31, 2018.

The minor modifications to the text of the Draft EIR detailed below reflect clarifications that do not constitute significant new information and do not change any of the impact conclusions of the Draft EIR. These minor modifications do not constitute changes to the Project or environmental setting nor would they result in any new significant environmental impacts. In addition, these minor revisions to the text, as described below, would not cause a substantial increase in the severity of any environmental impacts. Rather, these changes merely clarify portions of the text. Amended text is identified by page number. Clarifications to the draft EIR text are shown with underline and text removed from the draft EIR is shown with ~~striketrough~~.

4.2 CHANGES AND EDITS TO THE DRAFT EIR

The following changes and edits represent revisions to information included in the Draft EIR based upon: (1) additional or revised information required to prepare a response to a specific comment; (2) updated information required due to the passage of time; and/or (3) typographical errors. Given the minor changes associated with the document, the information added to the EIR does not meet the requirements for recirculation pursuant to Section 150885.5 of the State CEQA Guidelines.

A brief description of what the change or edit is provided as well as a reference to where the change or edit occurs in the document (page number, paragraph, sentence, table, etc). Changes to the portion of text are included in quotes ("").

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EXECUTIVE SUMMARY

Page ES-7, Table ES-1 Summary of Impacts, mitigation measure MM 4.1.4 has been revised to eliminate the mitigation measure reference.

**TABLE ES-1
SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
AIR QUALITY			
<p>Cumulative Visual Impacts Impact 4.1.4 Implementation of the proposed Project, in conjunction with large scale proposed, approved and reasonably foreseeable renewable energy projects in the Imperial Valley and the Ocotillo Wells Solar Project to the west in San Diego County, would alter the visual character of the region, resulting in a change to public views as well as increased daytime glare and nighttime lighting levels. Such impacts are typically addressed on a project-by-project basis. Therefore, cumulative impacts to visual resources are considered less than cumulatively considerable.</p>	LCC	<p>Implement mitigation measure MM 4.1.3a and MM 4.1.3b. <u>None required.</u></p>	LCC

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Page ES-15, Table ES-1 Summary of Impacts, mitigation measure MM 4.6.1 has been revised to change the word “with” to “within”:

**TABLE ES-1
SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
GEOLOGY AND SOILS			
Strong Seismic Ground Shaking			
<p>Impact 4.6.1 The primary seismic hazard at the Project area has the potential for strong ground shaking during earthquakes along the San Jacinto-Borrego fault. This is considered a potentially significant impact.</p>	PS	<p>MM 4.6.1 Structures <u>within</u> the Project area shall be designed and constructed in accordance with the 2016 California Building Code (CBC) and ASCE 7-10 Seismic Parameters.</p>	LTS

Page ES-17, Table ES-1 Summary of Impacts, mitigation measure MM 4.6.4c has been revised to change the “periodically” to “as needed”:

**TABLE ES-1
SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
GEOLOGY AND SOILS			
		<p>MM 4.6.4c Dressing (fine grading and compacting) of the slopes shall be implemented <u>periodically as needed</u> to fill small rivulets caused by direct rainfall onto the slopes. Surface soils coagulants shall also be considered for wind erosion control of the sandy ground surface.</p>	LTS

Page ES-17, Table ES-1 Summary of Impacts, Impact 4.13.4 has been corrected to match the Impact Statement on page 4.13-11 in Section 4.13, Public Services and Utilities.

**TABLE ES-1
SUMMARY OF IMPACTS**

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
<p>Cumulative Impacts to ICSO Services</p> <p>Impact 4.13.4 Development of the proposed Project, in combination other large-scale proposed, approved and reasonably foreseeable renewable energy projects in Imperial County would result in an increased cumulative demand for law enforcement. and strain current industry standard service levels. However, cumulative projects would not cause the ICSO the need to expand its facilities. Therefore, the proposed Project in combination with other cumulative projects would result in a impacts to law enforcement services are less than cumulatively considerable. impact to ICSO services.</p>	LCC	Implement mitigation measure MM 4.13.3.	LCC

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CHAPTER 1.0, INTRODUCTION

The text in Table 1.0-1 on pages 1.0-13 thru 1.0-15 of the Draft DEIR has been revised as follows in response to identify the correct District.

Agency/Individual	Issue Noted or Area of Controversy
<p>Garratt Aitchison, District Superintendent State of California, Department of Parks and Recreation - Colorado Desert District <u>Ocotillo Wells District</u></p>	<p>Concerned that the proposed Project may result in significant and unavoidable impacts to the Ocotillo Wells State Vehicular Recreation Area (OWSVRA) with regard to the following:</p> <ul style="list-style-type: none"> • Aesthetics <p>The project site is within the view shed of OWSVRA. Water tanks, fencing and security lighting may affect views.</p> <ul style="list-style-type: none"> • Air Quality <p>Methods and treatment of soils in and around the project site both during and after construction (water, binders, etc.) should be identified. Long-term restoration of the bladed area should be discussed.</p> <ul style="list-style-type: none"> • Biological <p>The potential cumulative impacts of further expansion of the Seville Solar Farm on sensitive species such as burrowing owl, kit fox, flat-tailed horned lizard, and fringe-toed lizard should be considered. Mitigation for these species should be identified in the immediate area and within or adjacent to the project.</p> <p>Fencing could provide predator perching opportunities which could impact flat-tailed horned lizards.</p> <p>Focused surveys should be completed to inform the EIR, as needed.</p> <p>Identify how much undisturbed desert habitat corridors and linkages would be affected.</p> <p>Concerned that loss of connectivity and foraging habitat will significantly impact the park.</p> <p>The EIR should discuss the potential for the solar panels to cause a "lake effect" in which birds may perceive the solar field as a water body.</p> <p>Project proponent should pre-plan for the early reintroduction of native vegetation to expedite in their growth, and increase the visual quality of operational structures.</p> <ul style="list-style-type: none"> • Geology and Soils <p>Provide specific information about the potential application of chemical stabilization agents to be discussed in the EIR.</p>

**TABLE 1.0-1
SUMMARY OF NOP COMMENTS**

Agency/Individual	Issue Noted or Area of Controversy
<p>Garratt Aitchison, District Superintendent State of California, Department of Parks and Recreation - Colorado Desert District <u>Ocotillo Wells District</u></p>	<ul style="list-style-type: none"> • Hydrology and Water Quality The EIR should address the water use by the project and cumulative effects in the area. • Recreation Recreational impacts range from potential interruption of wildlife and OHV travel corridors between OWSVRA and the BLM Areas of Critical Environmental Concern (ACEC's) and Superstition BLM OHV area, to potential night sky impacts to our Interpretive Program's stargazing events. Potential aesthetic impacts from glare as well as public safety impacts need to be analyzed in the EIR. Request that the Project proponents work with State Parks staff during the development of the EIR to appropriately mitigate any impacts to recreation, visitor services, and associated public safety at OWSVRA. • Transportation/Traffic Inquires if identified truck trips to export or import material to the jobsite, as well as other associated construction traffic, will create the need for traffic control signs/devices for the park visitors as they ingress and egress on State Highway 78. Inquires if the Project restrict or eliminate, either temporarily or permanently, access between OWSVRA and the Superstition OHV area. Inquires how the construction schedule for numerous projects will affect traffic along the 78 corridor over time. Inquires how often will there be periodic maintenance events and the volume of traffic associated with those events. • Tribal Cultural Resources Due to the Project's proximity to the Ancient Lake Cahuilla shoreline, there is a high potential for impacts to cultural resources and possibly human remains. The project should be designed to avoid these impacts. • Noise Address why the noise impacts are potentially significant and why they would continue past the short-term construction periods in the EIR.

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**TABLE 1.0-1
SUMMARY OF NOP COMMENTS**

Agency/Individual	Issue Noted or Area of Controversy
Garratt Aitchison, District Superintendent State of California, Department of Parks and Recreation - Colorado Desert District <u>Ocotillo Wells District</u>	Address proximity effects from this project on the camping, visual, interpretive and public safety operations at the OWSVRA. <ul style="list-style-type: none"> • Utilities and Service Systems If the Project includes the construction of new stormwater drainage facilities, the potential change in the Ocotillo-Clark Groundwater Basin should be addressed in the EIR. <p>Requests that the Lead Agency and Project proponent work with State Parks, where appropriate, to address the above questions and concerns prior to release of the EIR.</p> <p><i>The above issues are addressed as appropriate throughout the document including Sections 4.1 Aesthetics, 4.3 Transportation and Circulation, 4.4 Air Quality, 4.5 Climate Change, 4.7 Cultural Resources, 4.8 Noise, 4.11 Hydrology and Water Quality, and Section 4.12 Biological Resources.</i></p>

Page 1.0-9 of the Draft EIR, the second sentence of the paragraph under the heading 1.8.1 Notice of Preparation has been revised to match the number of letters listed in Table 1.0-1 Summary of NOP Comment Letters:

“~~Seven~~ Eight letters were received in response to the NOP from various agencies and individuals.”

CHAPTER 2.0, PROJECT DESCRIPTION

Page 2.0-3 of the Draft EIR, the second bullet has been revised to correct the section number by adding a period between 91701 and 01.

- “One Zone Change (ZC 17-0001) to add the “RE” Renewable Energy Overlay Zone to the existing “A-2” General Agriculture zone. Pursuant to Section 91701.01 (“RE” RENEWABLE ENERGY OVERLAY ZONE) of Title 9 of the Imperial County Code (Land Use Ordinance), land classified in some other (non-overlay) zone may also be classified in the “RE” Renewable Energy Overlay Zone by the County Board of Supervisors if a future renewable energy project would be located adjacent to the existing “RE” Overlay Zone and the project was not located in a sensitive area and it would not result in any significant environmental impacts.”

Page 2.0-16 of the Draft EIR has been revised to add the following text to the first paragraph at the top of the page:

“Eight-foot high security fencing would be installed around the perimeter of the Project area at the commencement of construction and site access would be limited to authorized site workers. In addition, a motion detection system and closed-circuit camera system may also be installed. The site would be remotely monitored 24 hours per day 7 days per week. In addition, routine unscheduled rounds may be made by the security team monitoring the site.”

Page 2.0-22 of the Draft EIR has been revised to add the following text to the first sentence of the second paragraph under “H. Decommissioning and Reclamation Plans”:

“The sequence for decommissioning would include dismantling and demolition of above-ground structures; concrete removal; removal and dismantling of underground utilities; excavation and removal of soil and final site contour.”

CHAPTER 3.0, INTRODUCTION TO THE ANALYSIS AND ASSUMPTIONS USED

No revisions.

CHAPTER 4.0, ENVIRONMENTAL ANALYSIS

No revisions.

SECTION 4.1, AESTHETICS

No revisions.

SECTION 4.2, LAND USE

Page 4.2-2 of the Draft EIR has been revised as follows to provide clarification regarding access to the OWSVRA off of SR 78.

“The OWSVRA can be accessed from multiple locations along SR 78, including Road 183 (Tarantula Wash) and Road 191 near the Project site. The Ocotillo Wells District Office is approximately 20 miles west of SR 86 ~~(BLM n.d.)~~.”

SECTION 4.3, TRANSPORTATION AND CIRCULATION

No revisions.

SECTION 4.4, AIR QUALITY

Page 4.4-17 of the Draft EIR, Impact 4.4.1 has been revised to remove “of” as follows:

“Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard

Impact 4.4.1 Implementation of the proposed Project would increase air pollutant emissions during Project construction and operation. The mitigated and unmitigated daily emissions (both winter and summer) of PM₁₀ were calculated to exceed ICAPCD thresholds during construction weeks 3-20 ~~of~~ for both the Fixed-Frame Configuration and HSAT Configuration. No criteria pollutant thresholds were calculated to be exceeded during Project operations. Therefore, the Project’s potential to conflict with or obstruct an air quality plan or violate an air quality standard is considered a **potentially significant impact** during Project construction.”

Page 4.4-40 of the Draft EIR, Impact 4.4.4 and the subsequent construction impact discussion has been revised as follows:

“Violate air Quality Standard/Cause Air Quality Violation

Impact 4.4.4 The proposed Project would generate criteria pollutant emissions during construction. However, the short-term construction emissions exceedances of ICAPCD thresholds would be mitigated with implementation of mitigation measures, including those in the ICAPCD’s Policy 5. Operational emissions would not exceed ICAPCD thresholds but would still incorporate Applicant-proposed

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measures, including the requirement for the adoption of an Operational Dust Control Plan (ODCP) detailing how dust emissions will be controlled and maintained during the operational phase of the project, to reduce dust. Therefore, the proposed Project would result in a **less than cumulatively considerable impact** with regard to violating an air quality standard.”

Construction

The projects listed in Table 3.0-1 are large scale renewable energy projects. As such, the majority of air emissions from these projects would be generated during construction with drastically reduced emissions occurring during operations and maintenance.

The construction phase of the proposed Project may contribute to a net increase in criteria pollutants PM10. As noted above, the Imperial Valley is classified as non-attainment for federal and state PM10 standards. Thus, the Project’s contribution to existing criteria pollutants could be cumulatively considerable without mitigation. However, as described under Impact 4.4.1 above, implementation of mitigation measures MM 4.4.1a, MM 4.4.1b and MM 4.4.1c, and ICAPCD’s Policy 5, would reduce construction-phase PM10 and NOx emissions to less than significant levels, resulting in a **less than cumulatively considerable contribution** to existing criteria pollutants. In addition, all other cumulative projects are required to comply with Regulation VIII and would also be assumed to implement mitigation measures to reduce their individual construction air quality emissions. In this way, each individual cumulative project would reduce construction emissions on a project-by-project basis resulting in less than cumulatively considerable contributions to existing criteria pollutants. Because the proposed Project would mitigate air quality emissions associated with construction, and other cumulative projects would also mitigate construction emissions on a project-by-project basis, emissions resulting in a violation of an air quality standard would be reduced to **less than cumulatively considerable.**”

Page 4.4-41 of the Draft EIR has been revised to include language regarding application of Best Available Control Measures (BACM) and the requirement of an Operational Dust Control Plan (ODCP) has been added to the operational discussion in response to the comment.

“Operation

Emissions resulting from operations of the Project for all criteria pollutants would be limited and very low in number (limit operational maintenance, periodic panel washing). Such levels of emissions should not cause localized exceedances or contribute cumulatively to existing exceedances of the State or federal ozone and PM10 standards. Further, the Project would implement Applicant-proposed mitigation measures to periodically apply chemical stabilization agents (soil binders) to exposed soil surfaces during operations. Finally, to assure the continued application of Best Available Control Measures (BACM), the ICAPCD requires the submittal and compliance with an Operational Dust Control Plan (ODCP) detailing how dust emissions will be controlled and maintained during the operational phase of the project. Therefore, the proposed Project would result in a **less than cumulatively considerable contribution** to air quality standard violations during operations. Moreover, operation of the proposed Project, in combination with other cumulative projects identified in Table 3.0-1, would result in **less than cumulatively considerable** impacts to air quality standards and air quality violations.”

SECTION 4.5, CLIMATE CHANGE AND GREENHOUSE GASES

No revisions.

SECTION 4.6, GEOLOGY AND SOILS

No revisions.

SECTION 4.7, CULTURAL RESOURCES, TRIBAL CULTURAL RESOURCES AND PALEONTOLOGICAL RESOURCES

Page 4.7-18 of the Draft EIR has been revised to clarify the roads parallel to Road 191:

“P-13-001266 / IMP-1266 (Including subsumed P-13-008587 / IMP-8010)

Only a small portion of P-13-001266/IMP-1266 intersects the survey area, including the previously subsumed resource P-13-008587/IMP-8010. Approximately 60 buffware body sherds were identified within the portion of the site that lies with the survey area. A small percentage of the buffware body sherds show evidence of burning. P-13-001266/IMP-1266 also includes one grayware body sherd; five wonderstone interior flakes; 10+ volcanic interior flakes; six quartzite interior flakes; three obsidian interior flakes; one petrified wood interior flake; one jasper primary flake; and five fire-affected rocks (FAR). The site has been impacted by vehicular traffic along Road 191 (an ~~OWSVRA~~ road, refer to Figure 4.2-1 in Section 4.2, Land Use), which cuts through the western boundary of the site. Two roads parallel Road 191: one is maintained by the Imperial Irrigation District and the other is maintained by State Parks.”

SECTION 4.8, NOISE

No revisions.

SECTION 4.9, AGRICULTURAL RESOURCES

No revisions.

SECTION 4.10, HAZARDS AND HAZARDOUS MATERIALS

No revisions.

SECTION 4.11, HYDROLOGY AND WATER QUALITY

No revisions.

SECTION 4.12, BIOLOGICAL RESOURCES

Due to a printing error, pages 4.12-15 thru 4.12-48 of Section 4.12 Biological Resources, were inadvertently omitted from the Draft EIR. These pages included the discussion of Impacts and Mitigation Measures. The information provided in pages 4.12-15 thru 4.12-48 of Section 4.12 Biological Resources while informative, did not deprive the public of meaningful opportunity to comment on the impacts and mitigation measures as these were included in the Executive Summary Table of the Draft EIR.

Page 4.12-12 of the Draft EIR, the last sentence of the paragraph under “Survey Area Characteristics” has been revised to correct the references to the site photographs:

“Representative site photographs are presented below in ~~Figures~~ Photos 4.12-1 through 4.12-5 ~~6.~~”

SECTION 4.13, PUBLIC SERVICES AND UTILITIES

No revisions.

CHAPTER 5.0, CUMULATIVE IMPACTS SUMMARY

No revisions.

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CHAPTER 6.0, ALTERNATIVES

No revisions.

CHAPTER 7.0, OTHER CEQA REQUIRED CONSIDERATIONS

No revisions.

CHAPTER 8.0, LIST OF PREPARERS

Page 8.0-1, the following correction has been made.

“COUNTY OF IMPERIAL

Jim Minnick, ~~Interim~~ Director of Planning and Development Services”

CHAPTER 9.0, REFERENCES

No revisions.