6 Effects Found Not Significant

In accordance with Section 15128 of the CEQA Guidelines, an EIR must contain a statement briefly indicating the reasons that various potential significant effects of a project were determined not to be significant. Based on the Initial Study and Notice of Preparation prepared for the proposed project (Appendix A of this EIR), Imperial 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.

6.1 Agriculture and Forestry Resources

6.1.1 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.

6.2 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.

6.3 Population and Housing

Development of housing is not proposed as part of the proposed project. The unemployment rate in Imperial County as of December 2023 was 18.3 percent (State of California Employment Development Department 2024). The applicant expects to utilize construction workers from the local and regional area, a workforce similar to that involved in the development of other utility-scale solar facilities. Based on the unemployment rate in Imperial County (18.3 percent) (State of California Employment Development Department 2024), and the availability of the local workforce, construction of the proposed project would not have a growth-inducing effect.

Once construction is complete, the facilities will be staffed with 1-2 full-time employees. The project would require routine maintenance and unscheduled maintenance as needed. The solar facilities will be monitored remotely with visitation on as needed basis and security personnel will perform periodic site visits. The proposed project would not result in a substantial growth in the area, as the number of employees required to operate and maintain the facilities 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

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construction of replacement housing elsewhere. The proposed project would result in a less than significant impact to population and housing.

6.4 Public Services

6.4.1 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.

6.4.2 Parks and Other Public Facilities

Once the project is complete, the facilities will be staffed with 1-2 full-time employees. The project would require routine maintenance and unscheduled maintenance as needed. The solar facilities will be monitored remotely with visitation on as needed basis and security personnel will perform periodic site visits. 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.

6.5 Recreation

The project site is not used for formal recreational purposes. Also, the proposed project would not result in a substantial growth in the area, as the number of employees required to operate and maintain the facilities is minimal. 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, a less than significant impact is identified for recreation.

6.6 Utilities and Service Systems

Wastewater Facilities. Construction of the proposed facilities would not generate/discharge any wastewater. Portable toilets would be brought on-site per California Code of Regulations, Title 8, Section 1526, Subchapter 4, Construction Safety Orders Article 3, General §1526, Toilets at Construction Jobsites and disposed of at the appropriate wastewater facility, resulting in no impact to Regional Water Quality Control Board requirements. The HGEC employees have permanent bathrooms in the existing facilities, and no new wastewater would be generated from the operation of the proposed facilities. In addition, the OECs are air cooled and operate on a closed loop, do not consume any water and are therefore free of the environmental consequences that accompany water-based systems. Chemical additives are not required for the cooling tower operation and therefore there is no waste disposal. Impacts associated with wastewater facilities would be less than significant.

Storm Water Facilities. The proposed project will involve the construction of drainage control facilities within the project site, 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 off-site (i.e., outside of the project footprint) because the proposed facilities would not

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generate a significant increase in the amount of impervious surfaces that would increase runoff during storm events, and therefore, would not require the construction of off-site storm water management facilities. The proposed project would not require or result in the relocation or construction of new or expanded storm water facilities beyond those proposed as part of the project and evaluated in the EIR.

Water Facilities. All water necessary for the construction, operation, and decommissioning of the project would be obtained from the Applicant's existing contract with IID. Operational use of water resources for the project would be limited to domestic use within operations and maintenance buildings, solar panel washing, and fire protection services. Impacts associated with water facilities would be less than significant.

Power. The project would construct two parasitic solar photovoltaic facilities- one to provide auxiliary power to the proposed Dogwood Geothermal plant and one for the existing Heber 2 plant. The California Energy Commission (CEC) considers these two solar facilities behind-the-meter, which means that the energy generated by the solar arrays exclusively feeds the geothermal plants and does not directly enter the transmission grid. The energy generated by the solar facilities will be collected by an on-site substation and then transferred to the plants via a short transmission cable. The solar facilities will effectively reduce the margin between gross and net geothermal energy generation, allowing for the more efficient generation of geothermal energy and allow more geothermal energy to enter the grid. Before entering the grid, a new substation will be built near the Dogwood plant to step up the low voltage electrical energy generated at the Dogwood geothermal unit to the higher voltage required for commercial transmission. Pending Imperial Irrigation District (IID) review, no upgrades to off-site transmission facilities are necessary. If upgrades to off-site facilities are later deemed necessary through an IID transmission study, recommendations could include protection upgrades and metering replacements at existing IID substations and/or upgrades to telecommunications, distribution lines, and transmission lines. Such upgrades would use existing infrastructure, easements, right-of-way, and corridors to the extent practicable. The new Dogwood substation will connect directly to the existing point of interconnection with the IID controlled grid. Impacts associated with electric power facilities would be less than significant.

Natural Gas. No natural gas facilities are located near the project site and no natural gas hookup is required for the project. No impacts associated with natural gas facilities would occur.

Telecommunications. AT&T Corporation provides telephone service to Imperial County. Several companies provide wireless or cell phone services for the area as well. The project would not have an impact on any telecommunications.

Solid Waste Facilities. Solid waste generation would be minor for the construction and operation of the proposed project. Solid waste during construction will be disposed of in an approved solid waste disposal site in accordance with Imperial County Environmental Health Department requirements. Waste will be routinely collected and disposed of at an authorized landfill by a licensed disposal contractor. Trash would likely be hauled to the Calexico Solid Waste Site (13-AA-0004) located approximately 1.25 miles southwest of the project site in Calexico, CA. The Calexico Solid Waste Site has approximately 1,561,235 cubic yards of remaining capacity and is estimated to remain in operation through 2079 (CalRecycle 2019). The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

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

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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 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. A less than significant impact is identified for this issue.

6.7 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 2023). Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan; expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; exacerbate fire risk; or, expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact is identified for wildfire.

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