

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 VEGA SES 6 Solar and Battery Storage Project and Ramon Substation expansion and to propose mitigation measures, where required, to reduce significant impacts.

Project Overview

VEGA 6

The solar energy facility site is located on approximately 320 acres of privately-owned vacant land on a single parcel (Assessor Parcel Number (APN) 034-160-002) in the unincorporated Imperial County, California. The site is located approximately 6 miles south of the southern-most edge of the Salton Sea; 10 miles west of the City of Brawley; and approximately 5 miles southwest of the community of Westmorland. The solar energy facility site is located directly south of Andre Road and 0.50 mile west of the Westside Main Canal.

The solar energy facility site is bound by undeveloped Open Space/Bureau of Land Management (BLM) land immediately to the west and south, and active agricultural land to the north and east. The Westside Main Canal travels southeast to northwest and is located northeast and east of the solar energy facility site.

The proposed VEGA 6 project involves the construction and operation of an 80 megawatt (MW) photovoltaic (PV) solar facility with an integrated 160 MW battery storage system (BESS) on approximately 320 acres of privately-owned land. The proposed VEGA 6 project would be comprised of solar PV arrays panels, an on-site substation, BESS, gen-tie line, inverters, transformers, underground electrical cables, and access roads. The proposed gen-tie line would be approximately 4-miles long and would connect to the Imperial Irrigation District's (IID) existing 161 kV "L" transmission line. The entire gen-tie route would be on federal lands managed by BLM within the California Desert Conservation Area planning area.

Ramon Substation Expansion

Energy generated by the VEGA 6 project will be transmitted to IID's existing 161 kV "L" Line, with ultimate delivery to IID's Ramon Substation in Riverside County. IID has identified that upgrades to the Ramon Substation will be required in order to accommodate several planned utility-scale projects, including the VEGA 6 project. Upgrades to the Ramon Substation would involve expansion of an approximately 4-acre area immediately adjacent to the existing substation. The proposed upgrades to the Ramon Substation are necessary infrastructure improvements to accommodate several planned utility-scale projects, including the VEGA 6 project, to connect to the IID grid. Because it is a necessary infrastructure improvement to allow the VEGA 6 project to connect to the IID grid, the Ramon Substation expansion is considered a connected project for the purposes of CEQA review.

The existing Ramon Substation is located on a single parcel (APN 651-230-015) in unincorporated Riverside County, generally northeast of Cathedral City, north of the Interstate-10 Freeway. The existing substation currently occupies approximately 6.7 acres of the 11.26-acre parcel. The proposed upgrades would involve expansion of an approximately 4-acre area immediately adjacent to the existing substation. Immediately west of the existing Ramon Substation and proposed expansion area is the existing Southern California Edison Mirage Substation. Access to the existing substation is provided by Ramon Road, which is immediately south of the existing substation.

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 VEGA 6 project (Appendix A of this EIR), Imperial County (County) determined that environmental effects to Forestry Resources, Energy, Mineral Resources, Population/Housing, Public Services, Utilities (Wastewater, Stormwater, and Solid Waste), and Wildfire would not be potentially significant. Therefore, these impacts are not addressed in this EIR; however, the rationale for eliminating these issues is discussed in Chapter 6.0, Effects Found Not Significant.

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
- Agriculture Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- GHG Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Noise and Vibration
- Public Services (Fire Protection and Police Protection)
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities/Service Systems (Water Supply)



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 VEGA 6 project. Table ES-2 summarizes existing environmental impacts that were determined to be potentially significant, mitigation measures, and level of significance after mitigation associated with the proposed Ramon Substation expansion.

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 known to the Lead Agency, including issues raised by other agencies and the public as well as issues to be resolved. 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 potential impacts related to impacts to IID facilities, traffic, special-status species, and air quality. Detailed analyses of these topics are included within each corresponding section contained within this document.

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Table ES-1. Summary of VEGA 6 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.	Potentially Significant	<p>AQ-1</p> <p>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. 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, tarps, or other suitable material, such as vegetative ground cover. • 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. 	Less than Significant

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		<ul style="list-style-type: none"> • 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 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>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. • Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use. • When commercially available, replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). <p>AQ-2 During construction activities, the construction contractor shall employ the following PM₁₀ reducing measures:</p> <ul style="list-style-type: none"> • All unpaved roads associated with construction shall be effectively stabilized of dust emissions using stabilizers/suppressant before the commencement of all construction phases. This will be conducted monthly at a rate of 0.1 gallon/ square yard of chemical dust suppressant. • All vehicles accessing the project site on unpaved roads shall be limited to a speed of 15 miles per hour. 	



Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>The Planning and Development Services Department and ICAPCD shall verify implementation of this measure.</p> <p>AQ-3 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 NO_x 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-4 Speed Limit. During construction and operation of the proposed project, the applicant shall limit the speed of all vehicles operating onsite on unpaved roads to 15 miles per hour or less.</p> <p>AQ-5 Dust Suppression. The project applicant shall employ a method of dust suppression (such as water or chemical stabilization) approved by ICAPCD. All unpaved roads associated with construction shall be effectively stabilized of dust emissions using stabilizers/suppressant before the commencement of all construction phases. This will be conducted monthly at a rate of 0.1 gallon/ square yard of chemical dust suppressant. 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-6 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-7 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. 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>	
<p>Impact 3.3-2: Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.</p>	<p>Potentially Significant</p>	<p>Implement Mitigation Measures AQ-1 through AQ-7</p>	<p>Less than Significant</p>
<p>Biological Resources</p>			
<p>Impact 3.4-1: Potential impacts on special-status species.</p>	<p>Potentially Significant</p>	<p>BIO-1 Preconstruction Nesting Bird Survey: If construction or other project activities are scheduled to occur during the bird breeding season (typically February 1 through August 31 for raptors and March 15 through August 31 for the majority of migratory bird species), a preconstruction nesting-bird survey shall be conducted by a qualified avian biologist to ensure that active bird nests, including those for the northern harrier, loggerhead shrike, black-tailed gnatcatcher, and burrowing owl, will not be disturbed or destroyed. The survey shall be completed no more than 3 days prior to initial ground disturbance. The nesting bird survey shall include the project area and adjacent areas where project activities have the potential to affect active nests, either directly or indirectly, due to construction activity or noise. If an active nest is identified, the biologist shall establish an appropriately sized disturbance limit buffer around the nest using flagging or staking. Construction activities shall not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist.</p> <p>BIO-2 Riparian Habitat or Sensitive Habitat Avoidance: To the greatest extent possible, plans shall avoid impacts to</p>	<p>Less than Significant</p>



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		<p>disturbed tamarisk thicket habitats to minimize potential impacts to special-status species.</p> <p>BIO-3 Minimization of Impacts to Sensitive Species on BLM Land: All vehicles shall stay on designated roads within BLM land to minimize impacts to habitat. Coordination with a qualified biologist shall occur prior to the staging of equipment and placement of temporary or permanent structures within BLM land. Additionally, a biologist shall demarcate temporary and permanent work spaces in the field prior to the commencement of construction-related activities. Construction plans shall incorporate measures to minimize and avoid impacts to habitats within this area. To control for introduction of invasive plant species, tires shall be cleaned prior to entering BLM lands.</p> <p>BIO-4 Biological Monitoring: A qualified biologist shall be present to monitor all ground-disturbing in vegetated areas and vegetation-clearing activities conducted for the project. During each monitoring day, the biological monitor shall perform clearance survey “sweeps” at the start of each workday that vegetation clearing takes place to minimize impacts on special-status species with potential to occur (including, but not limited to, special-status or nesting bird species, flat-tailed horned lizard, and American badger). The monitor will be responsible for ensuring that impacts to special-status species, nesting birds, and active nests will be avoided to the greatest extent possible. Biological monitoring shall take place until the project area has been completely cleared of any vegetation. If an active nest is identified, the biological monitor shall establish an appropriate disturbance-limit buffer around the nest using flagging or staking. Construction activities shall not occur within any disturbance limit buffer zones until the nest is deemed no longer active by the biologist. If special-status wildlife species are detected during biological monitoring activities, then consultation with the USFWS or CDFW shall be conducted, and a mitigation plan shall be developed to avoid and offset impacts to these species. Mitigation measures may consist of work restrictions or additional biological monitoring activities after ground-disturbing activities are complete.</p> <p>BIO-5 Preconstruction Surveys for Burrowing Owl: Preconstruction surveys for burrowing owl shall be conducted</p>	

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		<p>within the areas assessed as having burrowing owl potential of the project area and adjacent areas prior to the start of ground-disturbing activities. Two surveys shall be conducted, with the first survey being conducted between 30 and 14 days before initial ground disturbance (grading, grubbing, and construction), and the second survey being conducted no more than 24 hours prior to initial ground disturbance. If burrowing owls or suitable burrowing owl burrows with sign (e.g., whitewash, pellets, feathers, prey remains) are identified in the project area during the survey and impacts to those features are unavoidable, consultation with the CDFW shall be conducted and the methods for avoidance or passive relocation should be followed.</p> <p><u>Should burrowing owl be detected on the project site as part of pre-construction surveys, the following burrowing owl avoidance buffers shall be adhered to, consistent with the Staff Report on Burrowing Owl Mitigation:</u></p> <table border="1" data-bbox="890 776 1629 1138"> <thead> <tr> <th data-bbox="890 776 1094 873" rowspan="2"><u>Location</u></th> <th data-bbox="1094 776 1249 873" rowspan="2"><u>Time of Year</u></th> <th colspan="3" data-bbox="1249 776 1629 824"><u>Level of Disturbance</u></th> </tr> <tr> <th data-bbox="1249 824 1377 873"><u>Low</u></th> <th data-bbox="1377 824 1499 873"><u>Med</u></th> <th data-bbox="1499 824 1629 873"><u>High</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="890 873 1094 963"><u>Nesting Sites</u></td> <td data-bbox="1094 873 1249 963"><u>April 1 – Aug 15</u></td> <td data-bbox="1249 873 1377 963"><u>200 meters</u></td> <td data-bbox="1377 873 1499 963"><u>500 meters</u></td> <td data-bbox="1499 873 1629 963"><u>500 meters</u></td> </tr> <tr> <td data-bbox="890 963 1094 1052"><u>Nesting Sites</u></td> <td data-bbox="1094 963 1249 1052"><u>Aug 16 – Oct 15</u></td> <td data-bbox="1249 963 1377 1052"><u>200 meters</u></td> <td data-bbox="1377 963 1499 1052"><u>200 meters</u></td> <td data-bbox="1499 963 1629 1052"><u>500 meters</u></td> </tr> <tr> <td data-bbox="890 1052 1094 1138"><u>Nesting Sites</u></td> <td data-bbox="1094 1052 1249 1138"><u>Oct 16 – Mar 31</u></td> <td data-bbox="1249 1052 1377 1138"><u>50 meters</u></td> <td data-bbox="1377 1052 1499 1138"><u>100 meters</u></td> <td data-bbox="1499 1052 1629 1138"><u>500 meters</u></td> </tr> </tbody> </table> <p>BIO-6 Minimization of Impacts to Palm Springs Pocket Mouse: Habitats on the VEGA 6 solar facility site and parts of the gen-tie line are suitable for the Palm Springs pocket mouse; presence could be assumed based on proximity of records and recommendations from small mammal experts that were consulted. If presence is assumed, consultation to develop suitable mitigation measures or in-kind mitigation to offset impacts with the CDFW may need to occur. If presence is not assumed, protocol surveys to determine presence or absence of Palm Springs pocket mouse are recommended. A</p>	<u>Location</u>	<u>Time of Year</u>	<u>Level of Disturbance</u>			<u>Low</u>	<u>Med</u>	<u>High</u>	<u>Nesting Sites</u>	<u>April 1 – Aug 15</u>	<u>200 meters</u>	<u>500 meters</u>	<u>500 meters</u>	<u>Nesting Sites</u>	<u>Aug 16 – Oct 15</u>	<u>200 meters</u>	<u>200 meters</u>	<u>500 meters</u>	<u>Nesting Sites</u>	<u>Oct 16 – Mar 31</u>	<u>50 meters</u>	<u>100 meters</u>	<u>500 meters</u>	
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		<p>preconstruction small mammal trapping survey shall be conducted for Palm Springs pocket mouse within suitable habitat in all areas of potential permanent and temporary disturbance lead by qualified biologists that are permitted to trap and handle small mammals under Memorandums of Understanding and Scientific Collection Permits with CDFW. Should Palm Springs pocket mouse individuals be identified during the preconstruction survey, consultation to develop suitable mitigation measures with the CDFW will occur. If the project area is found to be absent of Palm Springs pocket mouse, no further mitigation is required.</p> <p>BIO-7 Minimization of Impacts to Wetland/Riparian Habitat: New structures shall not be placed within 50 feet of wetland or riparian habitat boundaries. A construction buffer of 300 feet shall be established around the wetlands and riparian habitats during bird breeding season (February 1 to August 31). Prior to construction, fencing shall be installed approximately 10 feet from the wetland and riparian habitat boundaries within 50 feet of the VEGA 6 project area. Fencing shall be easily visible to construction personnel.</p> <p><u>BIO-GEN Biological Resource Protection Measures Prior to Construction:</u></p> <p>a. <u>Prior to the commencement of construction, a project biologist (a person with, at minimum, a bachelor's degree in biology, ecology, or environmental studies with familiarity with special status plant and wildlife species with the potential to be affected by the proposed Ramon Substation expansion) shall be responsible for overseeing compliance with protective measures for biological resources during vegetation clearing and work activities within and adjacent to areas of native habitat. The project biologist shall be familiar with the local habitats, plants, and wildlife, and shall maintain communications with the contractor to ensure that issues relating to biological resources are appropriately and lawfully managed. The project biologist may designate qualified biologists or biological monitors to help oversee project compliance or conduct preconstruction surveys for special status species. These biologists shall have familiarity with the species for which they would be</u></p>	

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p><u>conducting preconstruction surveys or monitoring construction activities.</u></p> <p>b. <u>The project biologist or designated qualified biologist shall review final plans, designate areas that need temporary fencing (e.g., environmentally sensitive area [ESA] fencing), and monitor construction activities within and adjacent to areas with native vegetation communities or special status plant and wildlife species. The qualified biologist shall monitor activities within designated areas during critical times such as vegetation removal, initial ground disturbing activities, and the installation of BMPs and fencing to protect jurisdictional resources, and shall ensure that all regulatory agency permit requirements, conservation measures, and general avoidance and minimization measures are properly implemented and followed. The qualified biologist shall check construction barriers or exclusion fencing and shall provide corrective measures to the contractor to ensure that the barriers or fencing are maintained throughout construction. The qualified biologist shall have the authority to stop work if a special status wildlife species is encountered within the Project area during construction. Construction activities shall cease until the Project Biologist or qualified biologist determine(s) that the animal will not be harmed or that it has left the construction area on its own. The appropriate regulatory agency(ies) shall be notified within 24 hours of sighting of a special status wildlife species.</u></p> <p>c. <u>Prior to the start of construction, all project personnel and contractors who will be on site during construction shall complete mandatory training conducted by the project biologist or a designated qualified biologist. Any new project personnel or contractors that come on board after the initiation of construction shall also be required to complete the mandatory Worker Environmental Awareness Program training before they commence with work. The training shall advise workers of potential impacts on jurisdictional resources. At a minimum, the training shall include the following topics: (1) occurrences of special status species and special status vegetation communities in the project area (including vegetation communities subject to USACE, CDFW, and RWQCB jurisdiction), (2) the purpose for resource protection; (3)</u></p>	



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		<p><u>protective measures to be implemented in the field, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced to avoid jurisdictional resource areas in the field (i.e., avoid areas delineated on maps or on the Project site by fencing); (5) environmentally responsible construction practices; and (6) the protocol to resolve conflicts that may arise at any time during the construction process.</u></p> <p><u>d. Prior to any ground disturbance the project boundary will be fenced as a means to protect the adjacent lands. The fencing/signage shall be clearly marked in the field by construction personnel under the guidance of the biologist or designated employee. The fencing/signage will remain in place for the duration of the project activities and no work or other project activities will occur outside of the fenced area to incidental impacts to nearby species. Upon completion of project activities, the fencing/signage will be removed.</u></p> <p><u>e. Construction activities shall be limited to daylight hours to the extent feasible. If nighttime activities are unavoidable, then workers shall direct all lights for nighttime lighting into the work area and shall minimize the lighting of natural habitat areas adjacent to the work area. The contractor shall use light glare shields to reduce the extent of illumination into special status vegetation communities. If the work area is located near surface waters, the lighting shall be shielded such that it does not shine directly into the water.</u></p> <p><u>f. Clearing shall be confined to the minimum area necessary to facilitate construction activities. Cleared vegetation and spoils shall be disposed of daily at a permanent off site spoils location or at a temporary on site location that will not create habitat for special status wildlife species. Spoils and dredged material shall be disposed of at an approved site or facility in accordance with all applicable federal, state, and local regulations.</u></p> <p><u>g. The Contractor shall avoid wildlife entrapment by completely covering or providing escape ramps for all excavated steep walled holes or trenches more than 1 foot deep at the end of each construction workday. The qualified biologist shall inspect open trenches and holes</u></p>	

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		<p><u>and shall remove or release any trapped wildlife found in the trenches or holes prior to filling by the construction contractor.</u></p> <p><u>h. Wildlife can be attracted to den like structures such as pipes and may enter stored pipes and become trapped or injured. All construction pipes, culverts, or similar features; construction equipment; or construction debris left overnight in areas that may be occupied by special status species that could occupy such structures shall be inspected by a qualified biologist prior to being used for construction. Such inspections shall occur at the beginning of each day's activities for those materials to be used or moved that day. If necessary, and under the direct supervision of the biologist, the structure may be moved up to one time to isolate it from construction activities, until the special status species has moved from the structure of its own volition, has been captured and relocated, or has otherwise been removed from the structure.</u></p> <p><u>a.i. The spread of dust from work sites to special-status vegetation communities or habitats for special-status species on adjacent lands shall be minimized by use of a water truck. Dirt access roads, haul roads, and spoils areas shall be watered at least twice each day when being used during construction dry periods.</u></p>	
<p>Impact 3.4-2: Impact on riparian habitat or other sensitive natural communities.</p>	<p>Potentially Significant</p>	<p>BIO-8 Aquatic Resources Permitting: If project-related impacts will occur to areas under the jurisdiction of the USACE, CDFW, or RWQCB, a regulatory permit with those agencies will be required prior to the impact occurring. Permitting includes preparation and submittal of a Preconstruction Notification under Section 404 of the federal CWA, an Application for Water Quality Certification under Section 401 of the federal CWA, and a Notification of Lake or Streambed Alteration under Section 1600 of the California Fish and Game Code. Other items such as finalized project plans, quantities of fill material, supporting technical studies, etc., are also submitted along with the applications. As a part of this process, the project must also identify and approve mitigation through the respective agencies. Mitigation can include onsite or offsite options or could include payment of an in-lieu fee to a conservation organization. Types of mitigation can include</p>	<p>Less than Significant</p>



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		restoration, creation, rehabilitation, enhancement, or other types of habitat improvement. Typically, the type of mitigation and acreage of mitigation is negotiated with the regulatory agencies during the permitting process.	
Impact 3.4-3: Impact on state or federally-protected wetlands.	Potentially Significant	Implement Mitigation Measures BIO-2, BIO-7, and BIO-8.	Less than Significant
Impact 3.4-6: Conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan.	Potentially Significant	Implement Mitigation Measure BIO-3.	Less than Significant
Cultural Resources			
Impact 3.5-1: Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.	Potentially Significant	<p>CUL-1 Prepare Phase I Cultural Resources Survey Report. Prior to issuance of a grading permit, the project applicant shall retain a qualified archaeologist defined as one meeting the Secretary of the Interior's Professional Qualification Standards (U.S. Department of the Interior 2008) to oversee a Phase I cultural resources survey for the VEGA 6 project, to determine if previously unidentified cultural resources exist within the project site and to relocate and evaluate the previously identified resources that have not yet been evaluated. <u>A Native American monitor shall accompany the qualified archaeologist during the pedestrian survey/fieldwork component of the Phase I Cultural Resources Survey Report.</u> The methods and results of the survey, as well as the records search, shall be summarized in a Phase I cultural resources survey report that follows the guidelines in Archaeological Resource Management Reports: Recommended Contents and Format, Department of Parks and Recreation, Office of Historic Preservation, State of California, 1990. The report shall address the requirements of CEQA and NEPA for NHPA/Section 106 compliance associated with any proposed BLM actions.</p> <p>CUL-2 A. Evaluate Significance of Find. If previously documented but unevaluated and/or newly documented archaeological resources are identified within the project site, they should be evaluated for inclusion in the CRHR and/or as unique</p>	Less than Significant

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		<p>archaeological resources. Should newly documented archaeological resources be found eligible for listing in the CRHR and/or constitute unique archaeological resources, avoidance and preservation in place is the preferred manner of mitigation. If avoidance is not feasible, a treatment plan should be developed by the qualified archaeologist in coordination with the project applicant and the lead agency that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resources.</p> <p><u>B. Cultural Resources Management Plan.</u> Project proponent will develop a cultural resources management plan (CRMP) to outline the process for compliance with applicable cultural resources laws, management of resources during operation, and consideration of the effect of decommissioning. The CRMP shall include the following: <u>identification of California Native American tribes, identification of long and short term management goals for cultural resources within the project area, evaluation of eligibility for the CRHR and NRHP for all resources within the project area, description of measures to avoid, minimize, and reduce significant impacts to cultural resources (including both historical and archaeological resources), unanticipated discovery procedures, monitoring needs, data recovery of significant cultural resources where avoidance is not possible, curation procedures for recovered artifacts, anticipated personnel requirements and qualifications. The draft CRMP shall be prepared by a registered professional archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards (U.S. Department of the Interior 2008) and reviewed and approved by the County of Imperial Planning and Development Services Department.</u></p> <p><u>C. Cultural Resources Training.</u> Project proponent will provide cultural resources training for all project personnel regarding the laws protecting cultural resources, appropriate conduct in the field, and other project-specific issues identified in the CRMP prepared for each site as required by Mitigation Measure CUL-2.B.</p>	



Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
<p>Impact 3.5-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.</p>	<p>Potentially Significant</p>	<p>CUL-3</p> <p>Evaluate Significance of Find (Unknown Archaeological Resources). In the event of the discovery of previously unidentified archaeological materials, the <u>archaeological monitor shall require that the contractor shall immediately cease all work activities within approximately 100 feet of the discovery. After cessation of excavation, the archaeological monitor 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.</u></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 shall 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 <u>in accordance with the procedures and recommendations established as part of the Cultural Resources Management Plan required by Mitigation Measure CUL-2B.</u></p>	<p>Less than Significant</p>
<p>Impact 3.5-3: Disturb human remains.</p>	<p>Potentially Significant</p>	<p>CUL-4</p> <p>Human Remains. If subsurface deposits believed to be human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist who meets the Secretary of the Interior’s Standards for prehistoric and historic archaeology and is familiar with the resources of the region, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:</p> <ul style="list-style-type: none"> • If the find includes human remains, or remains that are potentially human, the professional archaeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The 	<p>Less than Significant</p>

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>archaeologist shall notify the Imperial County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented.</p> <ul style="list-style-type: none"> If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC may mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 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 reinterment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the Imperial County Planning and Development Services Department, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction. 	
Geology/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 	Less than Significant



Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> • 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 • 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 Measures GEO-1 and HYD-1.	Less than Significant
Impact 3.6-6: Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project.	Potentially Significant	Implement Mitigation Measure GEO-1.	Less than Significant
Impact 3.6-7: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating	Potentially Significant	Implement Mitigation Measure GEO-1.	Less than Significant

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
substantial direct or indirect risks to life or property.			
Impact 3.5-9: Impact on paleontological resources.	Potentially Significant	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, curation of specimens into an accredited repository, and preparation of a report at the conclusion of the monitoring program.	Less than Significant
Hydrology/Water Quality			
Impact 3.9-1: Violation of water quality standards.	Potentially Significant	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.	Less than Significant



Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>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 quality objectives: dissolved oxygen, floating material, oil and grease, potential of hydrogen (pH), and turbidity • 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>	

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<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 long-term drainage solutions to ensure the proper sequencing of drainage facilities and management of runoff generated from project impervious surfaces as necessary.</p>	
<p>Impact 3.9-3: Result in erosion or siltation on- or off-site.</p>	<p>Potentially Significant</p>	<p>Implement Mitigation Measure HYD-1.</p>	<p>Less than Significant</p>
<p>Impact 3.9-4: Increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.</p>	<p>Potentially Significant</p>	<p>Implement Mitigation Measure HYD-2.</p>	<p>Less than Significant</p>
<p>Impact 3.9-5: Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.</p>	<p>Potentially Significant</p>	<p>Implement Mitigation Measure HYD-1.</p>	<p>Less than Significant</p>
<p>Impact 3.9-8: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.</p>	<p>Potentially Significant</p>	<p>Implement Mitigation Measures HYD-1 and HYD-2.</p>	<p>Less than Significant</p>



Table ES-2. Summary of Proposed Ramon Substation Expansion Impacts and Proposed Mitigation Measures

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
Biological Resources			
Impact 3.4-1: Potential impacts on special-status species.	Potentially Significant	<p>RS-BIO-1 Coachella Valley Multiple Species Habitat Conservation Plan Fee Payment: As a signatory to the Coachella Valley Multiple Species Habitat Conservation Plan, the IID shall require a local development mitigation fee prior to the issuance of building permits for the proposed use on the project site at the rates applicable at the time of payment of the fee as set forth in the most recent fee schedule. The Project applicant shall be required to provide documentation to the IID confirming the payment of the local development mitigation fee.</p> <p>The Coachella Valley milk-vetch and Coachella Valley fringe-toed lizard are federally listed species and CVMSHCP covered species with potential to occur within the project footprint. Direct impacts to these species' as a result of the covered Project activity would be in compliance with the CVMSHCP as long as the IID, a permittee of the CVMSHCP, submits a payment of the mitigation fee, complies with the requirements of CVMSHCP Section 4.2, Conservation Areas; Section 4.4, Avoidance, Minimization, and Mitigation Measures; and Section 4.5 Land Use Adjacency Guidelines, and is in full compliance with CEQA, CESA, and FESA requirements.</p> <p>RS-BIO-2 Biological Resource Protection Measures Prior to Construction:</p> <p>a. Prior to the commencement of construction, a project biologist (a person with, at minimum, a bachelor's degree in biology, ecology, or environmental studies with familiarity with special status plant and wildlife species with the potential to be affected by the proposed Ramon Substation expansion) shall be responsible for overseeing compliance with protective measures for biological resources during vegetation clearing and work activities within and adjacent to areas of native habitat. The project biologist shall be familiar with the local habitats, plants, and wildlife, and shall maintain communications with the contractor to ensure that issues relating to biological resources are appropriately and lawfully managed. The project biologist may designate</p>	Less than Significant

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>qualified biologists or biological monitors to help oversee project compliance or conduct preconstruction surveys for special status species. These biologists shall have familiarity with the species for which they would be conducting preconstruction surveys or monitoring construction activities.</p> <p>b. The project biologist or designated qualified biologist shall review final plans, designate areas that need temporary fencing (e.g., environmentally sensitive area [ESA] fencing), and monitor construction activities within and adjacent to areas with native vegetation communities or special status plant and wildlife species. The qualified biologist shall monitor activities within designated areas during critical times such as vegetation removal, initial ground disturbing activities, and the installation of BMPs and fencing to protect jurisdictional resources, and shall ensure that all regulatory agency permit requirements, conservation measures, and general avoidance and minimization measures are properly implemented and followed. The qualified biologist shall check construction barriers or exclusion fencing and shall provide corrective measures to the contractor to ensure that the barriers or fencing are maintained throughout construction. The qualified biologist shall have the authority to stop work if a special status wildlife species is encountered within the Project area during construction. Construction activities shall cease until the Project Biologist or qualified biologist determine(s) that the animal will not be harmed or that it has left the construction area on its own. The appropriate regulatory agency(ies) shall be notified within 24 hours of sighting of a special status wildlife species.</p> <p>c. Prior to the start of construction, all project personnel and contractors who will be on site during construction shall complete mandatory training conducted by the project biologist or a designated qualified biologist. Any new project personnel or contractors that come on board after the initiation of construction shall also be required to complete the mandatory Worker Environmental Awareness Program training before they commence with work. The training shall advise workers of potential impacts on jurisdictional resources. At a minimum, the</p>	



Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>training shall include the following topics: (1) occurrences of special status species and special status vegetation communities in the project area (including vegetation communities subject to USACE, CDFW, and RWQCB jurisdiction), (2) the purpose for resource protection; (3) protective measures to be implemented in the field, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced to avoid jurisdictional resource areas in the field (i.e., avoid areas delineated on maps or on the Project site by fencing); (5) environmentally responsible construction practices; and (6) the protocol to resolve conflicts that may arise at any time during the construction process.</p> <p>d. Prior to any ground disturbance the project boundary will be fenced as a means to protect the adjacent lands. The fencing/signage shall be clearly marked in the field by construction personnel under the guidance of the biologist or designated employee. The fencing/signage will remain in place for the duration of the project activities and no work or other project activities will occur outside of the fenced area to incidental impacts to nearby species. Upon completion of project activities, the fencing/signage will be removed.</p> <p>e. Construction activities shall be limited to daylight hours to the extent feasible. If nighttime activities are unavoidable, then workers shall direct all lights for nighttime lighting into the work area and shall minimize the lighting of natural habitat areas adjacent to the work area. The contractor shall use light glare shields to reduce the extent of illumination into special status vegetation communities. If the work area is located near surface waters, the lighting shall be shielded such that it does not shine directly into the water.</p> <p>f. Clearing shall be confined to the minimum area necessary to facilitate construction activities. Cleared vegetation and spoils shall be disposed of daily at a permanent off site spoils location or at a temporary on site location that will not create habitat for special status wildlife species. Spoils and dredged material shall be disposed of at an approved site or facility in accordance with all applicable federal, state, and local regulations.</p>	

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>g. The Contractor shall avoid wildlife entrapment by completely covering or providing escape ramps for all excavated steep walled holes or trenches more than 1 foot deep at the end of each construction workday. The qualified biologist shall inspect open trenches and holes and shall remove or release any trapped wildlife found in the trenches or holes prior to filling by the construction contractor.</p> <p>h. Wildlife can be attracted to den like structures such as pipes and may enter stored pipes and become trapped or injured. All construction pipes, culverts, or similar features; construction equipment; or construction debris left overnight in areas that may be occupied by special status species that could occupy such structures shall be inspected by a qualified biologist prior to being used for construction. Such inspections shall occur at the beginning of each day's activities for those materials to be used or moved that day. If necessary, and under the direct supervision of the biologist, the structure may be moved up to one time to isolate it from construction activities, until the special status species has moved from the structure of its own volition, has been captured and relocated, or has otherwise been removed from the structure.</p> <p>i. The spread of dust from work sites to special-status vegetation communities or habitats for special-status species on adjacent lands shall be minimized by use of a water truck. Dirt access roads, haul roads, and spoils areas shall be watered at least twice each day when being used during construction dry periods.</p> <p>RS-BIO-3 Minimize and Avoid Impacts on Special-Status Species:</p>	



Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>a. The project biologist shall conduct focused pre-construction surveys for federal- and State-listed and other special-status plants. All special-status plant species (including listed threatened or endangered species, and all CRPR 1A, 1B, 2, 3, and 4 ranked species) impacted by project activities shall be documented in pre-construction survey reports. Surveys shall be conducted during the appropriate season in all suitable habitat located within the project footprint. The field surveys and reporting must conform to current CDFW botanical field survey protocol (CDFG 2009) or more recent updates, if available.</p> <p>b. The project biologist shall conduct focused pre-construction surveys for any special-status wildlife species, including Coachella Valley fringe-toed lizard, flat-tailed horned lizard, burrowing owl, loggerhead shrike, vermilion flycatcher, Palm Springs pocket mouse, American badger, and Coachella Valley round-tailed ground squirrel <u>and Crotch's Bumble Bee in accordance with "The California Department of Fish and Wildlife Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (June 6, 2023)."</u> Surveys shall be conducted at least 14 days prior to the start of construction within suitable habitat located within the project footprint. At the discretion of the project Biologist, work will be halted if the species are highly disturbed.</p>	
Impact 3.4-6: Conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan.	Potentially Significant	Implement Mitigation Measures RS-BIO-3.	Less than Significant
Cultural Resources			
Impact 3.5-2: Cause a substantial adverse change in	Potentially Significant	RS-CUL-1 Evaluate Significance of Find (Unknown Archaeological Resources). In the event of the discovery of previously	Less than Significant

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
<p>the significance of an archaeological resource pursuant to §15064.5.</p>		<p>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 County of Riverside Planning Department. 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.</p>	
<p>Impact 3.5-3: Disturb human remains.</p>	<p>Potentially Significant</p>	<p>RS-CUL-2 Human Remains. If subsurface deposits believed to be human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist who meets the Secretary of the Interior’s Standards for prehistoric and historic archaeology and is familiar with the resources of the region, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:</p> <ul style="list-style-type: none"> • If the find includes human remains, or remains that are potentially human, the professional archaeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Riverside County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. • If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate 	<p>Less than Significant</p>



Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p>a Native American Most Likely Descendant (MLD) for the project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC may mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 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 reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the County of Riverside Planning Department, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.</p>	
Hydrology/Water Quality			
<p>Impact 3.9-1: Violation of water quality standards.</p>	<p>Potentially Significant</p>	<p>RS-HYD-1 Prepare SWPPP and Implement BMPs Prior to Construction. IID 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 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) 	<p>Less than Significant</p>

Environmental Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> • 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 quality objectives: dissolved oxygen, floating material, oil and grease, potential of hydrogen (pH), and turbidity • 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>	
Impact 3.9-3: Result in erosion or siltation on- or off-site.	Potentially Significant	Implement Mitigation Measures RS-HYD-1.	Less than Significant

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).

The proponent does not have control of an alternate site; if control were viable, the proponent would have to re-initiate the application process as a new project. Similar to the proposed project site, an alternate site would require environmental review once the proponent has prepared sufficient project description information. At present, the proponent does not have control of an alternate site. This alternative would be the most complex, costly, and time-consuming alternative to implement. It is unknown if the environmental impacts associated with this Alternative would be less than the proposed project because it would be speculative to evaluate an unsecured alternate site. This is primarily due to the fact that the proponent does not have control of an alternate site. Therefore, an alternative site was eliminated from further consideration in this EIR.

Alternatives Evaluated

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)(1), “the specific alternative of ‘no project’ shall also be evaluated along with its impact.” Also, pursuant to Section 15126.6(e)(2); “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 further developed with a solar energy project. The No Project/No Development Alternative would fail to meet any of the project objectives. 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: Reduced Project Site

The purpose of this alternative is to reduce the size of the solar facility site to minimize impacts on riparian habitat and jurisdictional resources. There is riparian habitat associated with the detention basins within the solar facility site. Additional riparian habitat is associated with the agricultural drains and roadside ditches. Ephemeral drainages are located throughout the northern portion of the solar facility site.

This alternative would avoid development on portions of the solar facility site where riparian habitat and jurisdictional resources occur. The solar facility site would be reduced by approximately 109 acres from a total of 320 acres to 211 acres. Under this alternative, the gen-tie line alignment would be extended approximately 0.54 miles to the south.

Implementation of the Reduced Project Site Alternative would generally result in reduced impacts to air quality, biological resources, cultural resources, hydrology/water quality, and utilities/service systems. Alternative 2 would meet most of the basic objectives of the proposed project and should remain under consideration. However, this alternative would make it more difficult to achieve the overall objective of providing a total of 80 MW of renewable solar energy, as there would be less area available for the placement of PV structures.

Environmentally Superior Alternative

Table ES-3 provides a qualitative comparison of the impacts for each alternative compared to the proposed project. 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-3, Alternative 2 would be the environmental superior alternative because it would reduce impacts for the following environmental issue areas as compared to the proposed project: air quality, biological resources, cultural resources, hydrology/water quality, and utilities/service systems.



Table ES-3. Comparison of Alternative Impacts to Proposed Project

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
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> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Air Quality	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Less Impact	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less 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> Less 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> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact
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

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
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
Hazards and Hazardous Materials	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
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> Less Impact
Land Use/Planning	No Impact	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Similar Impact	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> Similar Impact
Noise and Vibration	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
Public Services	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



Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
Transportation	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
Tribal Cultural Resources	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
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> Less Impact

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