

# PROJECT REPORT

**TO: ENVIRONMENTAL EVALUATION  
COMMITTEE**

**AGENDA DATE: April 11, 2019**

**FROM: PLANNING & DEVELOPMENT SERVICES DEPT. AGENDA TIME 1:30 PM/No. 1**

**NON ACTION ITEM**                      **NON ACTION ITEM**  
PROJECT TYPE: Le Conte Battery Energy Storage SUPERVISOR DIST #2

LOCATION: 6319 Brockman Road APN: 052-190-041-000

Imperial County, CA. PARCEL SIZE: 278+/- acres

GENERAL PLAN (existing) Agriculture GENERAL PLAN (proposed) N/A

ZONE (existing) A-2 R General AG Rural ZONE (proposed) \_\_\_\_\_

GENERAL PLAN FINDINGS     CONSISTENT     INCONSISTENT     MAY BE/FINDINGS

PLANNING COMMISSION DECISION:                      HEARING DATE: \_\_\_\_\_

APPROVED     DENIED     OTHER

PLANNING DIRECTORS DECISION:                      HEARING DATE: \_\_\_\_\_

APPROVED     DENIED     OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 04/11/2019

INITIAL STUDY: 18-0016

NEGATIVE DECLARATION     MITIGATED NEG. DECLARATION     SEIR

## DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
AG / APCD	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
E.H.S.	<input checked="" type="checkbox"/>	NONE	<input type="checkbox"/>	ATTACHED
FIRE / OES	<input checked="" type="checkbox"/>	NONE	<input type="checkbox"/>	ATTACHED
OTHER				

IID, \_\_\_\_\_

## REQUESTED ACTION:xc

**SEE ATTACHED**

**Imperial County Planning & Development Services**

(Jim Minnick, Director)

801 MAIN ST., EL CENTRO, CA., 92243 760-482-4236

G:\MDB\052\190\041\eeclpROJREP

*Initial Study & Environmental Analysis  
For:*

**CUP Application 18-0018  
Initial Study IS 18-0016  
Le Conte Battery Energy Storage Project**  
*Le Conte Energy Storage, LLC*



*Prepared By:*

**COUNTY OF IMPERIAL**  
**Planning & Development Services Department**  
801 Main Street  
El Centro, CA 92243  
(442) 265-1736  
[www.icpds.com](http://www.icpds.com)

**April 11, 2019**

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## SECTION 1 INTRODUCTION

### A. PURPOSE

This document is a  policy-level,  project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Le Conte Battery Energy Storage Project (Refer to Exhibit "A" & "B").

### B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's "CEQA Regulations Guidelines for the Implementation of CEQA, as amended", an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.

According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study has determined that the proposed applications will not result in any potentially significant environmental impacts and therefore, a Negative Declaration is deemed as the appropriate document to provide necessary environmental evaluations and clearance as identified hereinafter.

This Initial Study and Negative Declaration are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the

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principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

### **C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION**

This Initial Study and Negative Declaration are informational documents which are intended to inform County of Imperial decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study and Negative Declaration, prepared for the project will be circulated for a period of 20 days (*30-days if submitted to the State Clearinghouse for a project of area-wide significance*) for public and agency review and comments. At the conclusion, if comments are received, the County Planning & Development Services Department will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

### **D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION**

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed applications.

#### **SECTION 1**

**I. INTRODUCTION** presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

#### **SECTION 2**

**II. ENVIRONMENTAL CHECKLIST FORM** contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a significant impact, potentially significant impact, or no impact.

**PROJECT SUMMARY, LOCATION AND ENVIRONMENTAL SETTINGS** describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

**ENVIRONMENTAL ANALYSIS** evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

#### **SECTION 3**

**III. MANDATORY FINDINGS** presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

**IV. PERSONS AND ORGANIZATIONS CONSULTED** identifies those persons consulted and involved in preparation of this Initial Study and Negative Declaration.

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V. REFERENCES lists bibliographical materials used in preparation of this document.

VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. **No Impact:** A "No Impact" response is adequately supported if the impact simply does not apply to the proposed applications.
2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.
3. **Less Than Significant With Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact".
4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study and Negative Declaration will be conducted under a  policy-level,  project level analysis. Regarding mitigation measures, it is not the intent of this document to "overlap" or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County's jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

1. Tiered Documents

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. Tiering is defined as follows:

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects;

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incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

"Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

Further, Section 15152(d) of the CEQA Guidelines states:

"Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

- (1) Were not examined as significant effects on the environment in the prior EIR; or
- (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

## **2. Incorporation By Reference**

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]). This document incorporates by reference appropriate information from the "Final Environmental Impact Report and Environmental Assessment for the "County of Imperial General Plan EIR" prepared by Brian F. Mooney Associates in 1993 and updates.

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR and updates are available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (760) 482-4236.
- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (760) 482-4236.
- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the

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relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.

- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.
- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.



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## II. *Environmental Checklist*

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1. **Project Title:** Le Conte Battery Energy Storage Project
2. **Lead Agency:** Imperial County Planning & Development Services Department
3. **Contact person and phone number:** David Black, Planner IV, (442) 265-1746
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** DavidBlack@co.imperial.ca.us
6. **Project location:** The proposed stand-alone Le Conte Battery Energy Storage System (BESS) Project (Project) will be located within the fence line of the existing Centinela Solar Energy (CSE) Project site on land wholly owned by CSE (APN 052-190-041). The Project BESS facility is proposed to be located adjacent to the east side of the existing SDG&E Drew Switchyard just south of SR 98, west of the existing solar panels, and east of Mandrapa Road, within the western portion of the overall existing CSE project site. Two alternative locations are also being proposed immediately west and east of the existing CSE Control Building. The existing overall CSE site is bounded by Fisher Road to the north, Mandrapa Road and Westside Main Canal on the west, Rockwood Road to the east, and the Woodbine Lateral Four sits just south of the CSE southern limits. California State Route (SR 98) bisects the overall CSE site from east to west and Brockman Road bisects the site from north to south. It is legally described as located within Township 17 South, Range 13 East, in sections 16 and 17 as shown on the Mount Signal 7.5' USGS Quadrangle.
7. **Project sponsor's name and address:** Le Conte Energy Storage, LLC. – 5000 Hopyard Road, Suite 480 Pleasanton, CA 94588 (Applicant)
8. **General Plan designation:** Agriculture
9. **Zoning:** A-3 (Heavy Agriculture), A-2 (General Agriculture), A-2R (General Agriculture Rural Zone)
10. **Description of project:** The proposed Project is a BESS capable of storing 125 MW of interconnection and transmission capacity on land entirely within the boundary of the existing CSE site. This proposed Project represents a complementary use to the existing CSE site. The existing CSE facility, was approved in December 2011 by the County of Imperial Board of Supervisors upon certification of a Final Environmental Impact Report (State Clearinghouse Number 2010111056) for the Centinela Solar Energy Project (2011 FEIR); approval of a CUP (CUP 10-0007) to construct and operate a 275 MW project on parcels zoned for agriculture (i.e., A-2, A-2-R and A-3); approval of a Variance (V11-0003) to allow the transmission towers to exceed the 120-foot height limit within the A-2-R and A-3 zones; and approval of other associated discretionary actions.

The proposed Project is a BESS that will allow for efficient storage of renewable energy generated in Imperial County so that it is available when needed most. The Project will use battery energy storage technology to absorb and discharge electrical energy onto the SDG&E power grid, which is controlled by the California Independent System Operator (CAISO). The Project's energy storage system will be similar in layout and appearance to a data center or "server farm" with rows of rack-mounted batteries housed inside one or more enclosures and consist of the following general components:

- **Batteries and Enclosures:** Banks of electrochemical batteries connected in series and parallel to provide the total energy storage capacity including associated electronics for monitoring and managing the batteries to ensure safety and the design life of the system.
- **Power Conversion Systems (PCS):** Each PCS will consist of bi-directional inverters with 480V AC output, and a medium voltage (MV) transformer which steps the voltage up to 34.5kV.
- **Substation:** AC energy from the MV transformers are aggregated at the Project substation and stepped up to 230-kV by high-voltage transformer(s) and then delivered to the Drew Switchyard.

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- *Ancillary Systems:* The plant ancillary systems control, protect and support the Project and its operation. They include fencing; security; lighting; fire protection; and heating, venting, and air conditioning (HVAC).

The proposed Project would not require any on-site regular employees. The BESS would be monitored 24 hours per day, 7 days per week, from the CSE on-site operations and maintenance control building. The BESS facility will be located entirely within the fence line of the existing CSE site. All components of the BESS will be housed internally within the 85,000 square foot BESS building(s), with the exception of the adjacent HVAC system and overhead gen-tie line.

Routine security rounds would be made by a security team monitoring the site and would be dispatched to the site in response to a fence breach or other alarm of the CSE site. The security monitoring includes the use of cameras, motion detectors and vehicular patrols of the site. Routine maintenance activities, including equipment testing, monitoring, and repair will occur as needed. Only authorized personnel will be permitted on-site and generally will be limited to the employees monitoring and maintaining the facility. The Project will not require the use of water.

Construction of the proposed Project will involve minimal grading to prepare the site for the BESS concrete foundations. Excavation will be used in activities such as trenching for underground wiring and cables, for placing electric poles, preparing equipment pads and for common services facilities. Dust generation would be controlled by watering and, as necessary, the use of other dust suppression methods and materials accepted by the ICAPCD or the California Air Resources Board (CARB). Construction activities would be completed within 12 months. The number of on-site construction workers would not exceed 50 employees at any one time per site.

Centinela Solar Energy, LLC, the owner of the Project site and the existing CSE facility, will lease the Project site to the Applicant. The Applicant will construct, own, and operate the Project. The Project will be dependent on rights owned by CSE, including but not limited to: use of a portion of the CSE Project site, rights of access, site improvements including drainage, grounding and site maintenance, physical security, as well as obtaining from CSE the right to use a portion of the facilities owned by CSE to connect to the SDG&E Drew Switchyard. The Project will interconnect to SDG&E Drew Switchyard via a shared gen-tie line currently delivering energy from the adjacent CSE project. Electrical energy to charge the Project's batteries will most often be generated by CSE. For a more detailed description and Applicant-prepared support documents please refer to the CUP application package on file with Imperial County Planning & Development Services Department. Two alternative locations (APN 052-190-010) are also being proposed immediately west and east of the existing CSE Control Building. The existing CSE site is bounded by Fisher Road to the north, Mandrapa Road and Westside Main Canal on the west, Rockwood Road to the east, and the Woodbine Lateral Four sits just south of the CSE southern limits. California State Route (SR 98) bisects the overall CSE site from east to west and Brockman Road bisects the site from north to south. It is legally described as located within Township 17 South, Range 13 East, in sections 16 and 17 as shown on the Mount Signal 7.5' USGS Quadrangle.

11. **Surrounding land uses and setting:** The Project will be located within the boundary of the existing CSE site. Land uses surrounding the overall CSE site include solar development, agricultural lands and the U.S. International Border with Mexico located approximately one mile to the south; the BLM California Desert Conservation Area Plan Utility Corridor N within the Yuha Basin, agricultural lands, and Westside Main Canal to the west; agricultural lands with a few rural residences, mobile homes and Mount Signal Slough are located approximately 500 feet to the east; and agricultural lands, the abandoned Mt. Signal Café, a few mobile homes and abandoned farm labor camp housing are located to the north along SR 98 and Brockman Road. SR 98 aligns east-west through the overall CSE site dividing the northern parcels from the southernmost parcels on the CSE facility.

12. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.):

- a. Planning Commission
- b. ICPDS
- c. Imperial County Public Works Department (ICPWD)
- d. Imperial County Board of Supervisors
- e. Imperial County Air Pollution Control District (ICAPCD)

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- f. California State Water Resources Control Board
  - g. California Department of Fish and Game (CDFG)
  - h. Air Pollution Control District

**13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so has consultation begun?** Pursuant to federal and state regulations, consultation will be initiated with culturally affiliated tribes. A qualified cultural resource specialist will be involved in construction oversight to engage appropriate culturally affiliated tribes in the unlikely event of new developments.

**Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21083.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.**

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality                   |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources      | <input type="checkbox"/> Energy                                   |
| <input checked="" type="checkbox"/> Geology /Soils       | <input type="checkbox"/> Greenhouse Gas Emissions           | <input checked="" type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology / Water Quality       | <input type="checkbox"/> Land Use / Planning                | <input type="checkbox"/> Mineral Resources                        |
| <input checked="" type="checkbox"/> Noise                | <input type="checkbox"/> Population / Housing               | <input type="checkbox"/> Public Services                          |
| <input type="checkbox"/> Recreation                      | <input checked="" type="checkbox"/> Transportation          | <input type="checkbox"/> Tribal Cultural Resources                |
| <input type="checkbox"/> Utilities / Service Systems     | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance       |

**ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION**

After Review of the Initial Study, the Environmental Evaluation Committee has:

Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

Found that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE DE MINIMIS IMPACT FINDING:  Yes  No

<u>EEC VOTES</u>	<u>YES</u>	<u>NO</u>	<u>ABSENT</u>
PUBLIC WORKS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ENVIRONMENTAL HEALTH SVCS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OFFICE EMERGENCY SERVICES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
APCD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
AG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SHERIFF DEPARTMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ICPDS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

\_\_\_\_\_  
Jim Minnick, Director of Planning/EEC Chairman

\_\_\_\_\_  
Date:

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## PROJECT SUMMARY

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**A. Project Location:** The proposed stand-alone Le Conte Battery Energy Storage System (BESS) Project (Project) will be located within the boundary of the existing Centinela Solar Energy (CSE) Project site on land wholly owned by CSE (APN 052-190-007). The BESS facility is proposed to be located adjacent to the east side of the existing SDG&E Drew Switchyard just south of SR 98, west of the existing solar panels, and east of Mandrapa Road, within the western portion of the overall existing CSE project site. Two alternative BESS locations within the existing CSE boundary are also being proposed immediately west and east of the existing CSE Control Building. The existing CSE site is bounded by Fisher Road to the north, Mandrapa Road and Westside Main Canal on the west, Rockwood Road to the east, and the Woodbine Lateral Four sits just south of the CSE southern limits. California State Route (SR 98) bisects the overall CSE site from east to west and Brockman Road bisects the site from north to south. It is legally described as located within Township 17 South, Range 13 East, in sections 16 and 17 as shown on the Mount Signal 7.5' USGS Quadrangle.

**B. Project Summary:** Le Conte Energy Storage, LLC. – 5000 Hopyard Road, Suite 480 Pleasanton, CA 94588 (Applicant) has submitted an application for: Conditional Use Permits (CUP) #18-0018, to develop the proposed Project. The Le Conte Battery Energy Storage Project is a proposed BESS with up to 125 MW of electrical interconnection and transmission situated on approximately three to five acres within the fence line of the existing CSE site. The BESS will consist of up to two BESS buildings totaling 85,000 square feet in size; batteries and enclosures; power conversion systems; substation: ancillary systems.

**C. Environmental Setting:** The Project will be located within the fence line of the existing CSE site. Land uses surrounding the overall CSE site include solar development, agricultural lands and the U.S. International Border with Mexico located approximately one mile to the south; the BLM California Desert Conservation Area Plan Utility Corridor N within the Yuha Basin, agricultural lands, and Westside Main Canal to the west; agricultural lands with a few rural residences, mobile homes and Mount Signal Slough are located approximately 500 feet to the east; and agricultural lands, the abandoned Mt. Signal Café, a few mobile homes and abandoned farm labor camp housing are located to the north along SR 98 and Brockman Road. SR 98 aligns east-west through the overall CSE site dividing the northern parcels from the southernmost parcels on the CSE facility

**D. Analysis:** Refer to analysis below.

**E. General Plan Consistency:** The Imperial County General Plan, Land Use Element, the Alhambra solar site has a land use designation of "Agriculture." The Imperial County Codified Ordinance, Title 9, Land Use Ordinance, presently has the CSE solar site zoned A-2 (General Agriculture) and A-3 (Heavy Agriculture). The Title 9, Land Use Ordinance, requires approval of a CUP to operate "Electrical Power Generating Plants," including BESS facilities, on lands zoned A-2 and A-3.

# Exhibit "A" Vicinity Map

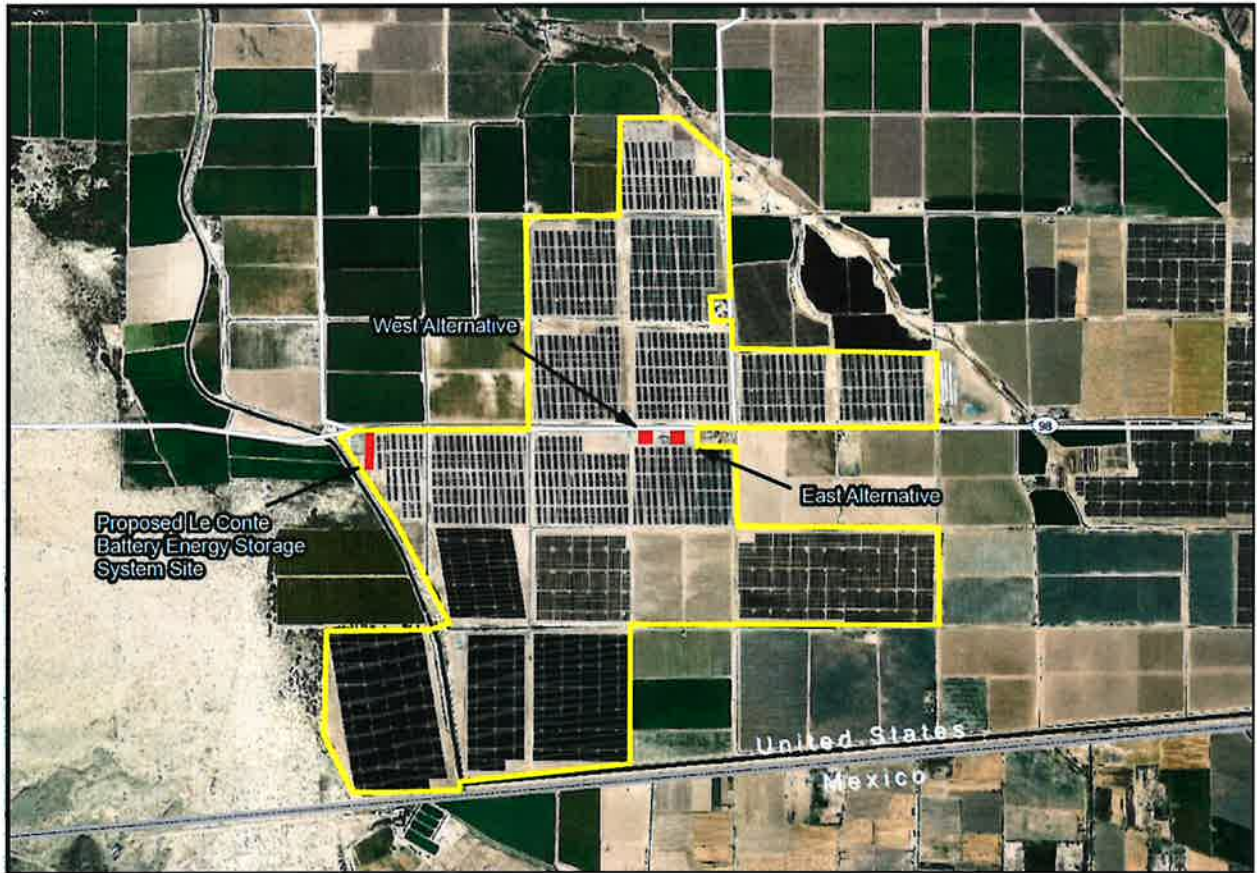
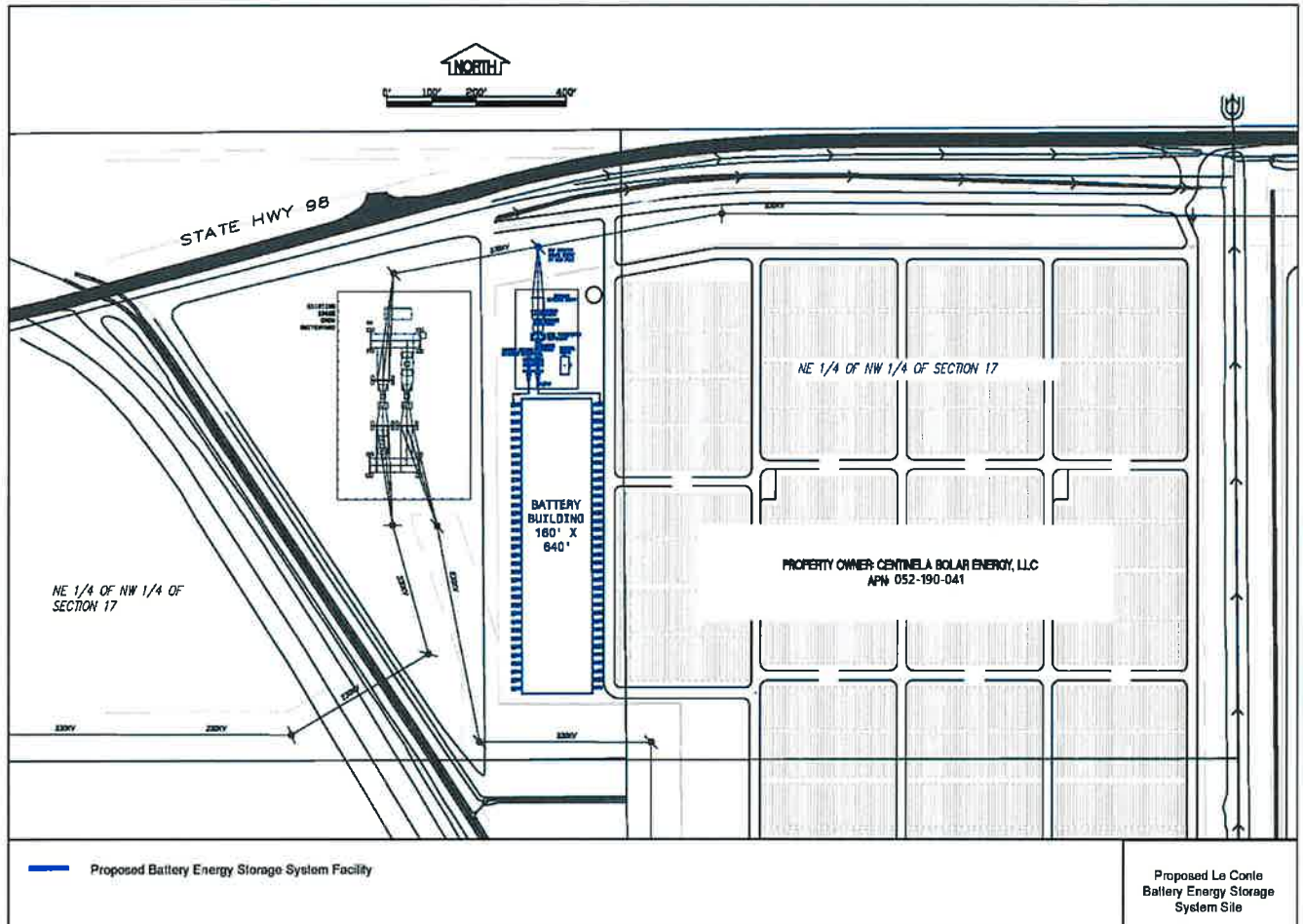


Exhibit "B"  
Site Plan/Tract Map/etc.



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## EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a) the significance criteria or threshold, if any, used to evaluate each question; and
  - b) the mitigation measure identified, if any, to reduce the impact to less than significance



Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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**I. AESTHETICS**

Except as provided in Public Resources Code Section 21099, would the project:

- a) Have a substantial adverse effect on a scenic vista?    

**a)** The proposed project is located in a rural portion of Imperial County. The site is currently used for the existing CSE facility and does not contain any scenic features. Based on the rural nature of the area, the proposed Project will not obstruct views or degrade scenic vistas. Consequently, no further analysis of adverse impacts to scenic vistas is necessary.
- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?    

**b)** The Project will not contain nor is it adjacent to or visible from designated or eligible state or federal scenic highways. Consequently, no further analysis of visual impacts to scenic resources is necessary.
- c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?    

**c)** The proposed Project consists of an 85,000 square foot single-story BESS within the fence line of an overall existing CSE 170 MW utility-scale solar facility covering 1,600 acres. The existing CSE facility site is predominantly surrounded by utility-scale solar development and vacant agricultural land; no distinctive features exist on the site. Persons traveling in passenger vehicles on nearby roads or rural residences located within the vicinity of the Project site will not have views of the Project BESS facility. Thus, no visual impact will occur based on the site's existing solar development, rural location, lack of distinctive features; no further analysis of visual impacts to scenic resources is necessary.
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?    

**d)** The proposed Project will be located within the existing CSE site which is located in an area of Imperial County that is predominately used for agricultural production and solar development. Large portions of this area of the County are vacant desert lands. The primary source of light and glare in the area is from the existing solar development as well as motor vehicles traveling on surrounding roadways. Roadways generate glare during daytime hours from the sun's reflection off of cars and paved surfaces. Likewise, at night, vehicle headlights on surrounding roadways generate light and glare. Lighting is also located on the existing transmission lines to alert aircraft of potential hazards in their flight path. The BESS facility will not create a new source of substantial light or glare within the existing CSE site or surrounding area; no further analysis of light or glare impacts are necessary.

**II. AGRICULTURE AND FOREST RESOURCES**

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. --Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?    

**a)** The proposed Project will be co-located within the existing the fence line of an overall existing CSE 170 MW utility-scale solar facility, which covers 1,600 acres. No conversion of agricultural land uses will occur. Consequently, no further analysis of the conversion of agricultural lands to a non-agricultural use is necessary.
- b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?    

**b)** There are no Williamson Act contracted lands on-site or adjacent to the proposed Project site; therefore, there will be no impact and this issue will not be further evaluated in the SEIR.
- c) Conflict with existing zoning for, or cause rezoning of, forest

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land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? c)				
d) Result in the loss of forest land or conversion of forest land to non-forest use? d) The Project will not change the General Plan designation or zone for the property – it will remain designated and zoned for agricultural purposes; as such, there will be no impact and this issue will not be further evaluated in the SEIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? e) The proposed Project property consists of an existing utility-scale solar site. The location of the BESS facility within the fence line of the existing CSE solar development will not result in the conversion of agricultural lands to non-agricultural use or conversion of forest land to non-forest use. This issue does not warrant further analysis in the SEIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to the following determinations. Would the Project:

- |   |                          |                                     |                                     |                                     |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan?<br>a) The Project is located within the Salton Sea Air Basin (SSAB), under the jurisdiction of Imperial County Air Pollution Control District (ICAPCD or District). The Project area within the SSAB is designated as non-attainment for the federal and state ozone and particulate matter less than 10 microns (PM10) standards. The 8-hour Ozone Non-Attainment is considered moderate Non-Attainment while the 24-Hour PM10 is considered "Serious" Non-Attainment. Therefore, to comply with the ICAPCDs SIP and AAQP, the project must implement Best Available Control Measure (BACM) and Best Available Control Technology (BACT). Equipment usage and activities during construction of the proposed Project will result in emissions of PM10 and ozone precursors, including NOx and VOCs. The sources of emission will include heavy equipment used to excavate and grade the building pads and on-road motor vehicles for equipment and material deliveries and workers commuting to and from the site. Fine grading and activity on unpaved roads and lay-down areas will contribute to PM10 emissions, however it is not anticipated that these emissions will exceed ICAPCD thresholds. Further analysis of air quality impacts is warranted to determine whether the Project will conflict with or obstruct implementation of the applicable plans for attainment and, if so, to determine the reasonable and feasible mitigation measures that could be imposed. These issues will be evaluated in the SEIR. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| b) Result in a 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?<br>b) ICAPCD is a nonattainment area for the state and federal ozone PM10 standards. ICAPCD rules and regulations apply to all Project activities. The SEIR air quality analysis will include a quantitative discussion of emissions created by the Project. This will include activities such as truck trips to deliver panels and employee commute trips to the site. Cumulative contributions to this basin could be potentially significant unless mitigation is incorporated. Construction and operational emissions will be analyzed in the SEIR.   | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| c) Expose sensitive receptors to substantial pollutant concentrations?<br>c) The proposed BESS is located within the boundaries of the CSE facility without any sensitive receptors in close proximity of the proposed Project location. Construction equipment may create mildly objectionable odors associated with vehicle exhausts. However, this will occur on a temporary basis with no sensitive receptors being affected. This issue does not warrant further analysis in the SEIR.   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?<br>d) The proposed BESS is not anticipated to generate objectionable odors. Construction equipment may create mildly objectionable odors associated with vehicle exhausts; however, this will occur on a temporary basis with no sensitive receptors being affected. Therefore, no odor impact will occur, and this issue will not be discussed further in the SEIR.  | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

IV. **BIOLOGICAL RESOURCES**

Would the project:

- |  |                          |                                     |                                     |                                     |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?<br><b>a)</b> The BESS is proposed on vacant, undeveloped land that has been disturbed in association with the CSE Project. No foraging habitat for candidate, sensitive, or special status species is located on the proposed Project site. The proposed Project is unlikely to have an adverse impact on species within the vicinity of the CSE site. Because the propose BESS site has been previously scraped and leveled, impacts on special status plant species are expected to be less than significant in association with Project construction, operation or decommissioning. This issue will be discussed further in the SEIR.                                     | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?<br><b>b)</b> The BESS site has been disturbed in association with development of the existing CSE facility and does not contain riparian habitat or special status communities. Therefore, impact to riparian habitat or other sensitive natural community are not expected to occur in association with construction, operation or decommissioning of the BESS. The BESS site does not contain any features that are considered potentially jurisdictional waters; as such, this issue will not be evaluated in the SEIR.   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?<br><b>c)</b> The BESS site has been disturbed in association with development of the existing CSE facility and does not contain any waters that are considered potentially jurisdictional. Therefore, no impact is expected to federally protected wetlands will occur in association with construction, operation or decommissioning of the BESS. This issue will not be evaluated in the SEIR.  | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?<br><b>d)</b> The BESS is proposed within the boundaries of the existing CSE facility. This area is currently surrounded a chain link perimeter fence, allowing small mammals and reptiles to move freely through the site. Although medium- and large- sized mammals will not be able to move through the CSE facility, it should not inhibit their movement through the Yuha Basin. No change in wildlife movement will occur in association with construction, operation or decommissioning of the proposed Project. Therefore, this impact is expected to be less than significant.   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?<br><b>e)</b> Implementation of the BESS is not anticipated to conflict with any local policies or ordinances protecting biological resources during construction, operation or decommissioning. The Imperial County General Plan Open Space Conservation Policy requires detailed investigations to be conducted to determine the significance, location, extent, and condition of natural resources in the County. If any rare, sensitive, or unique plant or wildlife habitat will be impacted by a project, the County must notify the agency responsible for protecting plant and wildlife before approving the project. Consistent with this policy, appropriate studies have been prepared for the existing CSE facility that includes the site where the proposed BESS will be located. Therefore, this impact is expected to be less than significant. | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?<br><b>f)</b> Implementation of the BESS is not anticipated to provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan during construction, operation or decommissioning. The proposed BESS site is located within the boundary of the existing CSE facility; this location is vacant and has been previously cleared for development. Therefore, no impact is expected.  | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

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**V. CULTURAL RESOURCES**

Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?      
**a)** The Cultural Resources Inventory Report prepared for the CSE facility includes the proposed location of the BESS. In addition, a records search and field survey was conducted for the entire CSE facility site (that includes the proposed Project site) as part of the CSE facility 2011 FEIR. The area of potential affect of this previous field survey included a total of 43 cultural resources. One of those resources was determined eligible for listing in the National Register of Historic Places (NRHP), and four are recommended eligible. However, ground disturbance from grading, excavation, and trenching during construction, operation, maintenance, or decommission of the project, is not anticipated to cause a "substantial adverse change" in the "significance" of these sites. The area of the proposed Project site has been disturbed and leveled as part of the existing CSE facility. In addition, no historical resources as defined in §15064.5 are present at the proposed Project location and no impacts are anticipated to occur. This issue is anticipated to have less than significant impacts.
  
- b) Cause a substantial adverse change in the significance of archaeological resource pursuant to § 15064.5?      
**b)** Unrecorded subsurface archaeological resources could be damaged during construction of the Project. During Project operation and maintenance, no additional impacts to the archaeological resources are anticipated because the soil disturbance will have already occurred. As a result, impacts to archaeological resources are considered less than significant during Project operation. Decommissioning activities will consist of the removal of the battery cells, structures and wiring. During the decommissioning phase of the Project, earth-moving activities similar to those occurring during Project construction. However, the ground disturbance that will occur as a result of decommissioning will be in the same locations of disturbance that occurred during construction of the Project. As such, no further disturbance of potential archaeological resources is anticipated to occur.
  
- c) Disturb any human remains, including those interred outside of dedicated cemeteries?      
**c)** Subsurface human remains could be impacted during construction of the proposed Project. The proposed Project site has been historically disturbed by past agricultural practices and is currently vacant land within the CSE facility boundary. Although the potential for encountering subsurface human remains within the Project footprint is low, there remains a possibility that human remains could be present beneath the ground surface, and that such remains could be exposed during Project construction. Therefore, potential to encounter subsurface human remains is considered a potentially significant impact during construction.

**VI. ENERGY**

Would the project:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?      
**a)** The proposed Project includes energy storage capability improvements to an existing solar generation facility, with no change to operation that would create a new source of energy construction. During construction there will be a temporary consumption of energy resources for the movement of equipment and materials, but the duration is limited and the area of construction is minimal. Compliance with local, state, and federal regulations, which limit engine idling times and require recycling construction debris, will reduce short-term energy demand during the project's construction to the extent feasible and project construction will not result in a wasteful or inefficient use of energy. There are no unusual Project characteristics or construction processes that will require the use of equipment that will be more energy intensive than is used for comparable activities or use of equipment that will not conform to current emissions standards and related fuel efficiencies. Furthermore, individual Project elements are required to be consistent with Imperial County policies and emissions reductions strategies and will not consume energy resources in a wasteful or inefficient manner. Rather, the propose Project is planned to reliably and economically receive, store and transmit up to 125 MW of electric energy including a portion of the solar energy currently produced by the adjacent CSE facility. No impact is anticipated.
  
- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?      
**b)** State and local authorities regulate energy use and consumption through various means and programs. These regulations at the state level intended to reduce energy use and greenhouse gas (GHG) emissions. These include, among others, Assembly Bill (AB) 1493–Light-duty Vehicle Standards, California Code of Regulations Title 24, Part 6–Energy Efficiency Standards, California Code of Regulations Title 24, Part 11– California Green Building Standards. The ICAPCD has adopted Rule 904, Prevention of Significant Deterioration (PSD) Program, to regulate GHG emissions for new and modified major stationary sources. Affected sources will be subject to the Best Available Control Technology (BACT), which considers technical feasibility, cost and other energy, environmental and economic impacts. Rule 904 applies to projects that will result in 75,000 or more tons per year of Carbon Dioxide equivalents (CO2e). The proposed Project's construction methods and operations are consistent with these goals and measures. Accordingly,

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the proposed Project will not conflict with or obstruct plans for renewable energy or energy efficiency.

VII. **GEOLOGY AND SOILS**

Would the project:

- |    |  |                          |                                     |                                     |                                     |
|----|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) | Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
|    | a) People or structures could be exposed to potential substantial adverse effects. Please refer to the individual comments below. This issue will be further evaluated in the SEIR.  |                          |                                     |                                     |                                     |
|    | 1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
|    | 1) Imperial County is historically known as being a very active seismic area. The location of the proposed Project with respect to the San Andreas fault and Imperial fault could expose the Project to seismic impacts. The San Andreas fault southern extension is under the Salton Sea and north of the Project location, and the impact of a major quake to the area is unknown. The Project will not include full-time regular employees on-site; however, regular maintenance visits will be required where people will be exposed to potential seismic activity. This issue will be further analyzed in the SEIR.   |                          |                                     |                                     |                                     |
|    | 2) Strong Seismic ground shaking?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
|    | 2) Refer to Comment VII. a) above.   |                          |                                     |                                     |                                     |
|    | 3) Seismic-related ground failure, including liquefaction?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
|    | 3) As determined in the 2011 FEIR, based on the thickness of the overlying un-liquefiable soil in the CSE facility area, liquefaction induced ground rupture or sand boil formation (a sand boil is a conical pile of sand formed by the upward flow of groundwater caused by excess pore water pressures created during strong ground shaking) is not likely. Sand boils are not inherently damaging by themselves but are an indicator that liquefaction has happened below the surface. Liquefaction induced lateral spreading is not expected to occur on the CSE facility portion of the project site due to the planar topography, except adjacent to irrigation canals and drainage. As the proposed Project will be developed within the boundary of the existing CSE facility, this impact is anticipated to be less than significant.  |                          |                                     |                                     |                                     |
|    | 4) Landslides?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
|    | 4) The Project sites do not contain any steep slopes and is not considered to be at risk for landslides. As such, no further analysis is warranted.  |                          |                                     |                                     |                                     |
| b) | Result in substantial soil erosion or the loss of topsoil?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
|    | b) The Project proposes to fine grade up to five acres for the BESS facility building pad. As a result, development of the Project has the potential to expose soils to erosion during construction and operation. This issue will be further evaluated in the SEIR.   |                          |                                     |                                     |                                     |
| c) | Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?  | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
|    | c) The existing CSE site is within a topographically flat area. As indicated in the 2011 FEIR, soils on the existing CSE Facility site predominately consist of clays with imbedded silts and sandy silts. The native surface clays within the agricultural lands exhibit high to very high swell potential when tested according to the Uniform Building Code Standard 18-2 methods. The clay is expansive when wetted and can shrink with moisture loss (drying). Causes for soil saturation include landscape irrigation, broken utility lines, or capillary rise in moisture upon sealing the ground surface to evaporation. Moisture losses can occur with lack of landscape watering, lose proximity of structures to downslopes and root system moisture extraction from deep rooted shrubs and trees placed near the foundations. The solar field area could be subject to direct impacts resulting from potential swelling forces and reduction in soil strength resulting from saturation. However, mitigation measure to replace expansive soils or condition soils to minimize expansion were implemented during project construction of the existing CSE facility to reduce direct impacts associated with expansive soils. As the proposed BESS facility will be developed within the boundary of the existing CSE facility, this issue is considered to be less than significant. |                          |                                     |                                     |                                     |
| d) | Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial director indirect risks to life or property?  | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

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<p><b>d)</b> Expansive soils possess a shrink-swell characteristic that can result in structural damage over a long period of time. Expansive soils are largely comprised of silicate clays, which expand in volume when water is absorbed and shrink when dried. Highly expansive soils can cause damage to foundations and roads. As indicated in the 2011 FEIR, soils on the existing CSE Facility site predominately consist of clays with imbedded silts and sandy silts. The native surface clays within the agricultural lands exhibit high to very high swell potential when tested according to the Uniform Building Code Standard 18-2 methods. The clay is expansive when wetted and can shrink with moisture loss (drying). Causes for soil saturation include landscape irrigation, broken utility lines, or capillary rise in moisture upon sealing the ground surface to evaporation. Moisture losses can occur with lack of landscape watering, lose proximity of structures to downslopes and root system moisture extraction from deep rooted shrubs and trees placed near the foundations. The solar field area could be subject to direct impacts resulting from potential swelling forces and reduction in soil strength resulting from saturation. However, mitigation measure to replace expansive soils or condition soils to minimize expansion were implemented during project construction of the existing CSE facility to reduce direct impacts associated with expansive soils. As the proposed BESS facility will be developed within the boundary of the existing CSE facility, this issue is considered to be less than significant. Once construction is completed no employees will be based at the Project site. Primary security-related monitoring for the Project site will be done remotely, security personnel will conduct routine unscheduled security rounds, and will be dispatched to the site in response to a fence breach or other alarm. Site maintenance workers will access the Project site periodically to maintain the equipment and Project area. The public will not have access to the facility. Access to the Project area will be infrequent and limited to authorized personnel.</p>				
<p>e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?</p> <p><b>e)</b> Operation of the Project will not require staff at the Project site. Therefore, the Project does not propose the construction of any on-site septic systems or alternative wastewater disposal systems. The Project will have no impact. This issue will not be further evaluated in the SEIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p> <p><b>f)</b> Although the Imperial County historically has not been known for having significant paleontological resources, it is always a possibility that grading and other construction activities may uncover paleontological resources. This potential issue will be further evaluated in the SEIR.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**VIII. GREENHOUSE GAS EMISSION**

Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- a)** The Project will result in temporary greenhouse gas (GHG) emissions during construction activities and construction-related vehicle traffic. These GHG emissions will be more than off-set by the GHG emissions that will be avoided by storing energy from solar-based electrical power generation that effectively displaces other sources of power generation. This issue will be further evaluated in the SEIR.
- 
- b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?
- b)** California has passed several bills and the governor has signed at least three executive orders regarding GHGs. Assembly Bill 32 (the Global Warming Solutions Act) was passed by the California legislature on August 31, 2006. It requires the state's global warming emissions to be reduced to 1990 levels by 2020. In 2002, California established its Renewable Portfolio Standard (RPS) Program, with the goal of increasing the percentage of renewable energy in the state's electricity. In 2006, under Senate Bill 107, the RPS program codified the 20 percent goal. On November 17, 2008, the governor signed Executive Order S-14-08, requiring California utilities to reach the 33 percent renewable goal by 2020. The Project is intended to: (1) assist in reducing importation of power from fossil fuel power plants; and (2) contribute to a reduction in GHGs. GHGs have the potential to adversely affect the environment because such emissions contribute, on a cumulative basis, to global climate change. The proper context for addressing this issue in a CEQA document is as a discussion of cumulative impacts, because although the emissions of one single project will not cause global climate change, GHG emissions from multiple projects, past, present and future, throughout the world could result in a cumulative impact with respect to global climate change. In the global cumulative context, the location of GHG emissions is less relevant than similar emissions of criteria air pollutants or toxic air contaminants. Therefore, even though the net benefit of reducing emissions from fossil fuel power plants, the Project will aid in California's ambitious goal towards reductions in GHG to 1990 levels. The Project will not conflict with applicable plans or policies related to the reduction of GHG emissions.
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**IX. HAZARDS AND HAZARDOUS MATERIALS**

Would the project:

- |   |                          |                                     |                                     |                                     |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?<br><b>a)</b> The proposed Project will involve the transport, use, and disposal of hazardous materials in association with construction, operation and decommissioning. However, all materials will be transported, used and disposed of in accordance with all applicable local, state and federal requirements. Therefore, impacts associated with accidental release during hazardous materials transport, use and disposal are anticipated to be less than significant.   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?<br><b>b)</b> The proposed Project site was historically farmed but is now part of the existing CSE facility. The Phase I ESA prepared for the CSE Project did not identify the use of pesticides as a Recognized Environmental Condition. The Project, as proposed, includes safety features to reduce potential for leaks and fires. Potential impacts resulting from construction and operation of the Project may include the accidental release of certain materials such as CdTe, used biodegradable dielectric fluid, mineral oil, hydraulic oil, diesel fuel, grease, lubricants, solvents, adhesives and paints. The toxicity and potential release of these materials will depend on the quantity, the type of storage container, safety protocols used on-site. The used biodegradable dielectric fluid, CdTe, and mineral oil from the transformers will be collected and delivered to a recycling company at the time it is removed from the equipment thus eliminating any potential hazards. The Project will be subject to all local, state and federal laws pertaining to the use of hazardous materials on-site. Through the review process, the Project will be required to submit a complete list of all materials used on-site, how the materials will be transported, and in what form they will be used will be recorded to maintain safety and prevent possible environmental contamination or worker exposure. All on-site workers will be trained to properly identify and handle hazardous waste resulting from the Project. This issue will be further analyzed in the SEIR. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?<br><b>c)</b> There are no schools within one quarter-mile of the Project site. The Project is a BESS located within the existing CSE facility boundary that involves the storage of electricity. Project-related infrastructure will not emit hazardous materials or involve handling hazardous or acutely hazardous materials, substances, or waste within one quarter-mile of an existing or proposed school. The nature a BESS facility does not emit hazardous emissions. In the event there had been, the Project will not adversely affect the schools due to hazardous emissions. Therefore, no impact is anticipated.   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?<br><b>d)</b> An agency database record search for listings of records of hazardous substance related properties was conducted and did not reveal any listed sites within two miles of the Project site. Based on the information available from the agency database record search, the Project will not be located on or near a State of California listed hazardous materials site as identified in Government Code Section 65962.5, and a result, will not create a significant hazard to the public or the environment. This issue will not be further evaluated in the SEIR.  | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?<br><b>e)</b> The overall existing CSE facility, in which the proposed Project will be located, is approximately nine miles south of the Naval Air Facility, El Centro and approximately 7.5 miles west of the Calexico International Airport. The Project will not impact the airspace protection surfaces (Federal Aviation Administration (FAA) Part 77 surfaces) or safety zones associated with the Naval Air Facility or Calexico International Airport. Therefore, the Project will not result in any safety hazard for people residing or working in the Project area. This issue will not be further evaluated in the SEIR.   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
<b>f)</b> The Project will be required to have an Emergency Response Plan (ERP) acceptable to County Fire, as a standard condition of the approval of the CUP. The ERP will address potential emergencies including chemical releases, fires, and injuries. The ERP will describe emergency response equipment and equipment locations, evacuation routes, procedures for reporting to local emergency response agencies, responsibilities for emergency response, and other required actions to be taken in the event of an emergency. Employee response to an emergency will be limited to an immediate response to minimize the risk of escalation of the accident or injury. Employees will be trained to respond to fires, spills, earthquakes, and injuries. A first aid facility with adequate first-aid supplies and personnel qualified in first aid treatment will be onsite. This issue will not be further evaluated in the SEIR.				
<b>g)</b> Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? <b>g)</b> The Project site is not near wildlands or adjacent to urbanized areas; as such, there would be no impact. This issue will not be further evaluated in the SEIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**X. HYDROLOGY AND WATER QUALITY**

Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <b>a)</b> Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?<br><b>a)</b> The proposed Project will implement Best Management Practices (BMPs) in accordance with regulatory requirements to ensure compliance with water quality and waste discharge requirements. Prior to start of construction, a Storm Water Pollution Prevention Plan (SWPPP) for the site will be required to be prepared and submitted to the State Water Resources Control Board and the ICPWD. The SWPPP will need to utilize BMPs and improvements in developing the Project. The SWPPP's BMPs will be prepared in accordance with the National Pollution Discharge Elimination System regulations and as prescribed by Imperial County laws, ordinances, regulations, and standards as required by mitigation measure below. Earthmoving activities will be limited to the construction of the driveways and internal access roads, the electrical substation and any storm water protection or storage (detention) facilities. Final grading will include a dust suppression management plan such as earth-binding materials to disturbed areas. The SWPPP will include the identification of sediment and pollutants sources that could affect the quality of stormwater discharge, as well as BMPs to reduce or eliminate sediment and other pollutants in stormwater discharges. These BMPs will be implemented during construction of the Project as a condition of required permits, therefore, minimizing polluted discharge to the extent feasible. This issue is anticipated to be less than significant. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <b>b)</b> Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?<br><b>b)</b> The Project will not include the drilling of wells and will not use groundwater. The Project will not consume water during operation. No groundwater will be used; however, development of the Project site may affect the imperviousness of the site and groundwater recharge within the location it is developed. Water will continue to percolate through the ground as a majority of the surfaces on the existing CSE site will remain pervious. This issue is anticipated to be less than significant.   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <b>c)</b> Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:<br><b>c)</b> The existing CSE facility site is comprised of topography. Minimal fine grading will be necessary during construction of the BESS facility to support the building pads and foundations. Some excavation will be required to install underground wiring and cables, electric poles, equipment pads. The existing topography of the CSE facility will be maintained and the site will remain largely pervious. Impacts to existing drainage patterns are anticipated to be less than significant.   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <b>i)</b> result in a substantial erosion or siltation on- or off-site;<br><b>i)</b> The BMPs and stipulations developed for construction activities to reduce erosion will be applied to similar activities during the decommissioning phase of the BESS facility. As such, erosion control measures will be implemented to avoid and/or minimize potential erosion or siltation on- or off-site that could result during construction and decommissioning activities. The existing CSE facility, in which the proposed Project will be developed, includes design features such as permeable roads to minimize stormwater runoff; and retention/detention basins to minimize sedimentation and storm water runoff impacts. Based on implementation of the requirements summarized above, operation and maintenance of the Project will result in less than significant impacts under CEQA with regard to erosion or siltation on- or off-site.  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <b>ii)</b> substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |



	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
<p>ii) The Project site will involve at-grade construction and will are not anticipated to alter the existing drainage pattern of the site or create or contribute to runoff water. The existing CSE facility, in which the proposed Project will be developed, includes design features such as permeable roads to minimize stormwater runoff; and retention/detention basins to minimize storm water runoff impacts. This issue is anticipated to have less than significant impacts.</p>				
<p>iii) 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; or  <b>iii)</b> As noted in response X. c), the drainage patterns will not significantly change from the existing solar facility use. Existing permeable roads to minimize stormwater runoff; and retention/detention basins to minimize storm water runoff impacts will not contribute to additional sources of polluted runoff. This issue is considered to be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>iv) impede or redirect flood flows?  <b>iv)</b> As indicated in the 2011 FEIR, according to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, the majority of the existing CSE facility site is in Zone X, which is an area determined to be outside of the 0.2% annual chance of a flood. A portion of the project site is in Zone A, which is an area subject to a 1% annual chance of a flood. As the proposed BESS facility will be developed within the boundary of the CSE site, impact is identified for these issue areas are considered to be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?  <b>d)</b> The most likely location for a significant seiche to occur in the area is the Salton Sea; however, no significant seiches have occurred to date. No are anticipated relative to tsunamis or mudflows, as no topographical features or water bodies capable of producing such events occur within the vicinity of the Project site. This issue will not be further evaluated in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?  <b>e)</b> The Project does not propose to drill wells or utilize ground water. As previously described, the existing topography of the CSE facility will be maintained and the site will remain largely pervious. The Project is not anticipated to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**XI. LAND USE AND PLANNING**

Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Physically divide an established community?<br><b>a)</b> The proposed Project site will located within the boundary of the existing CSE facility. The area within the vicinity of the Project site is not heavily populated, and the Project will not divide an established community. This issue will not be further evaluated in the SEIR.  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?<br><b>b)</b> Electrical power generation facilities may be allowed in the A-3 and A-2 zones subject to approval of a CUP. Through the approval of a CUP for the Project, the Project will be deemed consistent with the General Plan and zoning designations for the properties. In addition, development of a BESS facility to assist in storing renewable energy will promote Imperial County's renewable energy directives and will be consistent with the County's goal, as stated in its April 20, 2010 proclamation, to rededicate "...its efforts to facilitating the development of the County as the Renewable Energy Capital..." This issue will be not be further evaluated in the SEIR. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XII. MINERAL RESOURCES**

Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) There are no known mapped mineral resources on the Project site. Accordingly, the Project will not result in the loss of availability of any potential mineral resources of value to the region and residents of the state. This issue will not be further evaluated in the SEIR.				
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Refer to Comment XII. a) above. This issue will not be further evaluated in the SEIR.				

**XIII. NOISE**

Would the project result in:

- |  |                          |                          |                                     |                                     |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| a) The Imperial County Noise Element of the General Plan states that the noise level shall not exceed 75 dBA Leq when averaged over an 8-hour period. The Project site is currently used for the existing CSE facility within a low residential density area, resulting in little potential of significant noise exposure to local residents. The construction and operation of the Project will not generate significant noise which exceeds local standards. In addition, fine grading associated with Project development is unlikely to generate groundborne vibration or noise levels through blasting or other construction-related activity, as the overall CSE Project area is characterized by relatively flat topography and has already been graded for the existing CSE facility. Construction activity associated with large earth moving equipment has the highest potential for creating noise since there could be temporary increase in noise levels on and adjacent to the site during construction. The proposed Project will be required to adhere to all applicable noise standards related to construction activities, as identified by Imperial County standards. During operation of the BESS facility, the maximum permitted continuous sound level shall be not more than 45 dBA Leq. The level may be exceeded by ten percent if the noise is intermittent and during daylight hours. This issue will be further evaluated in the EIR. However, based on the number of pieces of equipment and distance to the property line, as well as the low anticipated construction traffic volumes, noise levels are not anticipated to exceed County standards. Therefore, impacts associated with noise levels in excess of standards or a substantial temporary noise increase as a result of Project construction are anticipated to be less than significant. |                          |                          |                                     |                                     |
| b) Generation of excessive groundborne vibration or groundborne noise levels?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Construction of the proposed Project will result in some groundborne vibration caused by heavy equipment. However, vibration levels are not anticipated to exceed Federal Transit Administration thresholds and no residential structures are located in the vicinity of the Project to suffer damage or annoyance. Therefore, Project impacts associated with excessive groundborne vibration or groundborne noise are anticipated to be less than significant.  |                          |                          |                                     |                                     |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) The overall existing CSE facility, in which the proposed Project will be located, is approximately nine miles south of the Naval Air Facility, El Centro and approximately 7.5 miles west of the Calexico International Airport. The Project will not impact the airspace protection surfaces (Federal Aviation Administration (FAA) Part 77 surfaces) or safety zones. The Project site is located outside of the Naval Air Facility or Calexico International Airport 'Compatibility Map,' and the airport's noise contours. This issue will not be further evaluated in the SEIR   |                          |                          |                                     |                                     |

**XIV. POPULATION AND HOUSING**

Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a) According to the Applicant, the Project will not require any regular on-site employees. This Project will not generate substantial population growth. This issue will not be further evaluated in the EIR.       |                          |                          |                          |                                     |

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? b) There is no displacement of existing housing and housing will not be required off-site. The Project will not involve demolition or displacement of existing residences, nor will it require construction of replacement housing in other localities. The Project will not displace substantial numbers of people or require replacement housing elsewhere. This issue will not be further evaluated in the EIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**XV. PUBLIC SERVICES**

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: a) 1) Fire Protection? a1) The Project will be operated remotely and will not include any regular on-site employees or habitable structures. The Project site and access are pre-existing, as the proposed Project site is located within the boundary of the existing CSE facility. Fire extinguishers will be available around the site during construction and operation. Water that is used for construction will also be available for fire fighting during construction if required. The existing CSE site contains all-weather fire road and emergency access rows between the panel rows with vehicle turn-around areas to allow access within the facility and to the DC to AC electrical inverter modules. This will allow fire trucks access to the entire site accommodating the 300-foot long fire hoses. Fire risk that the traditional lithium-ion cells have will most likely be caused by over-charging or through short circuit due to age. The Project will incorporate monitoring and a fire suppression system that includes FM-200 gas agent with smoke detectors, control panel, alarm, piping and nozzles. The fire protection system will be designed by a certified fire protection engineer and installed by a fire protection system contractor licensed in California. The Project will have a purpose-built battery enclosure with a fire protection system designed in accordance with all of the current building and fire codes in effect in the County at the time of building permit submission. The fire protection plan is anticipated to include a combination of prevention, suppression, and isolation methods and materials. The Project will comply with all applicable codes; this impact is anticipated to be less than significant.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Police Protection? a2) Police protection services in the Project area are provided by the Imperial County Sheriff's Department. The proposed BESS facility will be located within the fence line of the existing CSE site. All components of the BESS will be housed internally within the 85,000 square foot BESS building(s), with the exception of the adjacent HVAC system and overhead gen-tie line. An existing perimeter fence 8-feet in height and constructed of 2-inch chain link diamond mesh topped with three-strand barbed wire with line posts a maximum of 10 feet apart currently surrounds the entire perimeter of the CSE facility site. Barbed wire is required for security and for safety (restricted access to high voltage equipment). The CSE facility substation has a separate interior fence with barbed wire. Each fenced parcel on the CSE site has two entrances secured by locking gates. The main business entrance at the common services area (south of SR 98 off Brockman Roads) has an access-controlled security gate and a hard-surfaced road leading to the common services area buildings. Emergency services have 24-hour access to enter through gates at each access point. The existing CSE security system provides for remote observation, recording, and alarming of site conditions. No impacts to impacts with regard to substantial adverse physical impacts associated with the provision of new or physically altered police facilities are anticipated.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3) Schools? a3) There is estimated to be up to 50 workers per day during the construction of the Project on the site. It is expected that most of these workers will commute to the Project site from surrounding communities. Therefore, substantial temporary increases in population that will adversely affect local school populations are not expected. There will be no impact. This issue will not be further evaluated in the SEIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4) Parks? a4) The Project would not generate a significant demand for schools, parks or other public facilities associated with the temporary construction workforce and no operational staffing requirements of the BESS. This issue will not be further evaluated in the SEIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5) Other Public Facilities? a5) As stated above, the Project will not generate a significant demand for schools, parks or other public facilities associated with the temporary construction workforce and no staffing requirements of the Project during operation. This issue will not be further evaluated in the SEIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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**XVI. RECREATION**

- a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- a) The Project is an industrial use with no adverse affects to existing or future proposed parks, nor require the construction or expansion of any recreational facilities. The temporary increase of population during construction that might be caused by an influx of workers will be minimal. As a result, there will be no detectable increase in the use of parks. This issue will not be further evaluated in the SEIR.
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?
- b) Refer to Comment XVI. a) above. This issue will not be further evaluated in the SEIR.

**XVII. TRANSPORTATION**

Would the project:

- a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- a) The Project will have no staff on-site on a daily basis and will be a remotely monitored facility. Routine unscheduled security rounds and maintenance trips will be made, though they will be few. Therefore, operational traffic will not be substantial, and will not conflict with Imperial County standards. There will be temporary traffic generation during the short-term construction phase of the Project. A maximum of 50 employees will be on-site during peak construction, and it is anticipated that a portion of these employees will carpool (two workers per vehicle). It is assumed that workers will commute during the AM and PM peak hours. It is assumed that any off-site trips for meals will be taken in the hours outside of AM or PM peak commute times. This impact is anticipated to be less than significant.
- b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?
- b) Implementation of the proposed Project would add construction traffic to existing traffic volumes on the study area intersection and roadways. It is anticipated that affected intersections and roadway segments will remain unchanged with the addition of construction trip generation. Therefore, impacts to are anticipated to less than significant. However, this issue will be further evaluated in the SEIR.
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- c) No changes in the existing circulation network or access will occur as a result of implementation of the Project. Based on the Project's location in a rural portion of Imperial County with low traffic volumes, it is not considered to increase hazards due to a geometric design or an incompatible use with surrounding agricultural land. Therefore, no impact is anticipated in association with hazards due to a design feature or incompatible uses.
- d) Result in inadequate emergency access?
- d) Access to the CSE project site is via US Interstate 8 (I-8), SR 98 and local roads. From I-8, the proposed Project can be accessed via Drew Road or Brockman Road. All entrances to the CSE facility site parcels use local roads with the exception of one parcel south of SR 98 and west of the Mount Signal Drain that access the site off of SR 98. All weather, 24-foot wide, gravel roads are located inside the perimeter of each fenced existing CSE solar field area. Interior gravel roads 20-foot wide spaced no more than 500-feet apart align in either a north to south or east to west direction through the solar fields. This access also serves the CSE substation. The Imperial County Fire Department will require that all fire apparatus access roads are properly designed to accommodate emergency access. Therefore, impacts associated with emergency access are anticipated to be less than significant.

**XVIII. TRIBAL CULTURAL RESOURCES**

- a) Would the project cause a substantial adverse change in the

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is:

**a.**

- 1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or
- |                          |                          |                                     |                          |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

1) The proposed Project site is vacant and located within the boundary of the existing and operational CSE facility. Fine grading will be necessary to prepare the property for accommodating any BESS building development. The Cultural Resources Inventory Report prepared for the CSE facility includes the proposed location of the BESS. In addition, a records search and field survey was previously conducted for the entire CSE facility site (that includes the proposed Project site) as part of the CSE facility 2011 FEIR. The area of potential affect of this previous field survey included a total of 43 cultural resources. One of those resources was determined eligible for listing in the National Register of Historic Places (NRHP), and four are recommended eligible. However, ground disturbance from grading, excavation, and trenching during construction, operation, maintenance, or decommission of the project, is not anticipated to cause a "substantial adverse change" in the "significance" of these sites. The area of the proposed Project site has been disturbed and leveled as part of the existing CSE facility. This issue is anticipated to have less than significant impacts.

- 2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.
- |                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

2) Pursuant to federal and state regulations, consultation will be initiated with culturally affiliated tribes. A qualified cultural resource specialist will be involved in construction oversight to engage appropriate culturally affiliated tribes in the unlikely event of new developments. Excavation activities are within the profile of previous CSE project disturbance, so the placement of a BESS facility is anticipated to have no impact to tribal cultural resources.

**XIX. UTILITIES AND SERVICE SYSTEMS**

Would the project:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- |                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

a) During construction of the Project, surface disturbance has the potential to create fugitive particulate dust. As such, the Project will use water supplied by CSE for dust control during construction. Adherence to applicable Imperial County Air Pollution Control District (ICAPCD) Rules and implementation of CSE's dust control plan will minimize dust emissions. It is anticipated that one water truck with a capacity will be used to apply water as necessary to disturbed areas during earthmoving activities. Construction water will be supplied by CSE through its existing water supply connection and will trucked to the site via internal CSE roads. Potable water provided to workers during construction will be in the form of bottled water. Development of the proposed Project will not require new electrical power, natural gas, or telecommunications to be constructed. This issue is anticipated to result in no impact.

- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
- |                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

b) It is anticipated that one water truck will be used to apply water to disturbed areas during short-term construction phase earthmoving activities. Water may be withdrawn from the existing tank within the CSE project site which is connected to the IID. Potable water provided to workers during construction will be in the form of bottled water. No water is required during operation of the BESS facility. No impact is anticipated for this issue. This issue will not be further evaluated in the SEIR.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>c)</b> No wastewater collection or treatment will be necessary as part of the Project, as there will be no generation of wastewater on-site. This issue will not be further evaluated in the SEIR.				
d) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>d)</b> The Project will generate solid waste during the construction phase and will need to dispose of it within a permitted landfill. The operations and maintenance of the facility is not expected to generate significant solid waste. Materials brought to the proposed Project site will be used to construct BESS facilities and few residual materials are expected. Non-hazardous construction refuse and solid waste will be disposed of at a local landfill, while any hazardous waste generated during Project construction will be disposed of at an approved location. The Project will not generate a significant amount of waste that will exceed the capacity of local landfills. This issue will not be further evaluated in the SEIR.				
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>e)</b> The Project will generate solid waste during construction and operation, thus requiring the consideration of waste reduction and recycling measures. However, the Project will be required to comply with all federal, state and local solid waste regulations. Therefore, impacts will be less than significant. This issue will not be further evaluated in the SEIR.				

**XX. WILDFIRE**

Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Substantially impair an adopted emergency response plan or, emergency evacuation plan?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <b>a)</b> The proposed Project will be developed on vacant land within the existing CSE facility boundary. The Project will be required to have an Emergency Response Plan (ERP) acceptable to County Fire, as a standard condition of the approval of the CUP. The ERP will address potential emergencies including chemical releases, fires, and injuries. The ERP will describe emergency response equipment and equipment locations, evacuation routes, procedures for reporting to local emergency response agencies, responsibilities for emergency response, and other required actions to be taken in the event of an emergency. Employee response to an emergency will be limited to an immediate response to minimize the risk of escalation of the accident or injury. Employees will be trained to respond to fires, spills, earthquakes, and injuries. A first aid facility with adequate first-aid supplies and personnel qualified in first aid treatment will be onsite. This issue will not be further evaluated in the SEIR. |                          |                          |                          |                                     |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <b>b)</b> The proposed project is located within an existing utility-scale solar site and is not located in or near state responsibility areas or lands classified as very high fire severity zone. The Project is not within an area of risk due to slope, prevailing winds, and other factors, will not exacerbate wildfire risks, and not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and will have no impact to these risks.  |                          |                          |                          |                                     |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <b>c)</b> The proposed Project is located within an existing solar development and is not located in or near state responsibility areas or lands classified as very high fire severity zone. There is no exacerbation of fire risk associated with construction of the Project and will have no impact.  |                          |                          |                          |                                     |

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
d) 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? d) The proposed Project is located within the existing CSE facility site and is not located in or near state responsibility areas or lands classified as very high fire severity zone. The project will have no impact to the risk to people or structures due to runoff, post-fire slope instability, or drainage changes.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino, (1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.*

Revised 2009- CEQA  
 Revised 2011- ICPDS  
 Revised 2016 – ICPDS  
 Revised 2017 - ICPDS

**SECTION 3**  
**III. MANDATORY FINDINGS OF SIGNIFICANCE**

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

- |  |                          |                                     |                                     |                          |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| <p>a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, eliminate tribal cultural resources or eliminate important examples of the major periods of California history or prehistory?</p> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)</p>  | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?</p>  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |



#### IV. PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

##### A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Paul Foulger, Planning Division Manager
- David Black, Project Planner
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office

##### B. OTHER AGENCIES/ORGANIZATIONS

- Planning Commission
- ICPDS
- Imperial County Public Works Department (ICPWD)
- Imperial County Board of Supervisors
- Imperial County Air Pollution Control District (ICAPCD)
- California State Water Resources Control Board
- California Department of Fish and Game (CDFG)
- Air Pollution Control District

*(Written or oral comments received on the checklist prior to circulation)*

## V. REFERENCES

1. "County of Imperial General Plan EIR", prepared by Brian F. Mooney & Associates in 1993; and as Amended by County in 1996, 1998, 2001, 2003, 2006 & 2008, 2015, 2016.
2. "Final Environmental Impact Report/Environmental Assessment for the Centinela Solar Energy Project", prepared by ericsson-grant inc. in 2011
3. Agency Database Records Search Report by Burns & McDonnell.

**VI. NEGATIVE DECLARATION – County of Imperial**

---

*The following Negative Declaration is being circulated for public review in accordance with the California Environmental Quality Act Section 21091 and 21092 of the Public Resources Code.*

---

**Project Name:**

**Project Applicant:**

**Project Location:**

**Description of Project:**

**VII. FINDINGS**

**This is to advise that the County of Imperial, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environmental and is proposing this Negative Declaration based upon the following findings:**

- The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a **NEGATIVE DECLARATION** will be prepared.
  
- The Initial Study identifies potentially significant effects but:
  - (1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.
  - (2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.
  - (3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A **NEGATIVE DECLARATION** will be prepared.

**If adopted, the Negative Declaration means that an Environmental Impact Report will not be required. Reasons to support this finding are included in the attached Initial Study. The project file and all related documents are available for review at the County of Imperial, Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 (442) 265-1736.**

**NOTICE**

---

**The public is invited to comment on the proposed Negative Declaration during the review period.**

---

Date of Determination                      Jim Minnick, Director of Planning & Development Services

---

*The Applicant hereby acknowledges and accepts the results of the Environmental Evaluation Committee (EEC) and hereby agrees to implement all Mitigation Measures, if applicable, as outlined in the MMRP.*

\_\_\_\_\_  
Applicant Signature

\_\_\_\_\_  
Date

## **SECTION 4**

### **VIII. RESPONSE TO COMMENTS**

(ATTACH DOCUMENTS, IF ANY, HERE)

**IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)**

(ATTACH DOCUMENTS, IF ANY, HERE)

S:\CEQA RULES\CEQA Rules 2016\2016 Update of Rules and Regs\Initial Study - Environmental Checklist Template 2017.docx

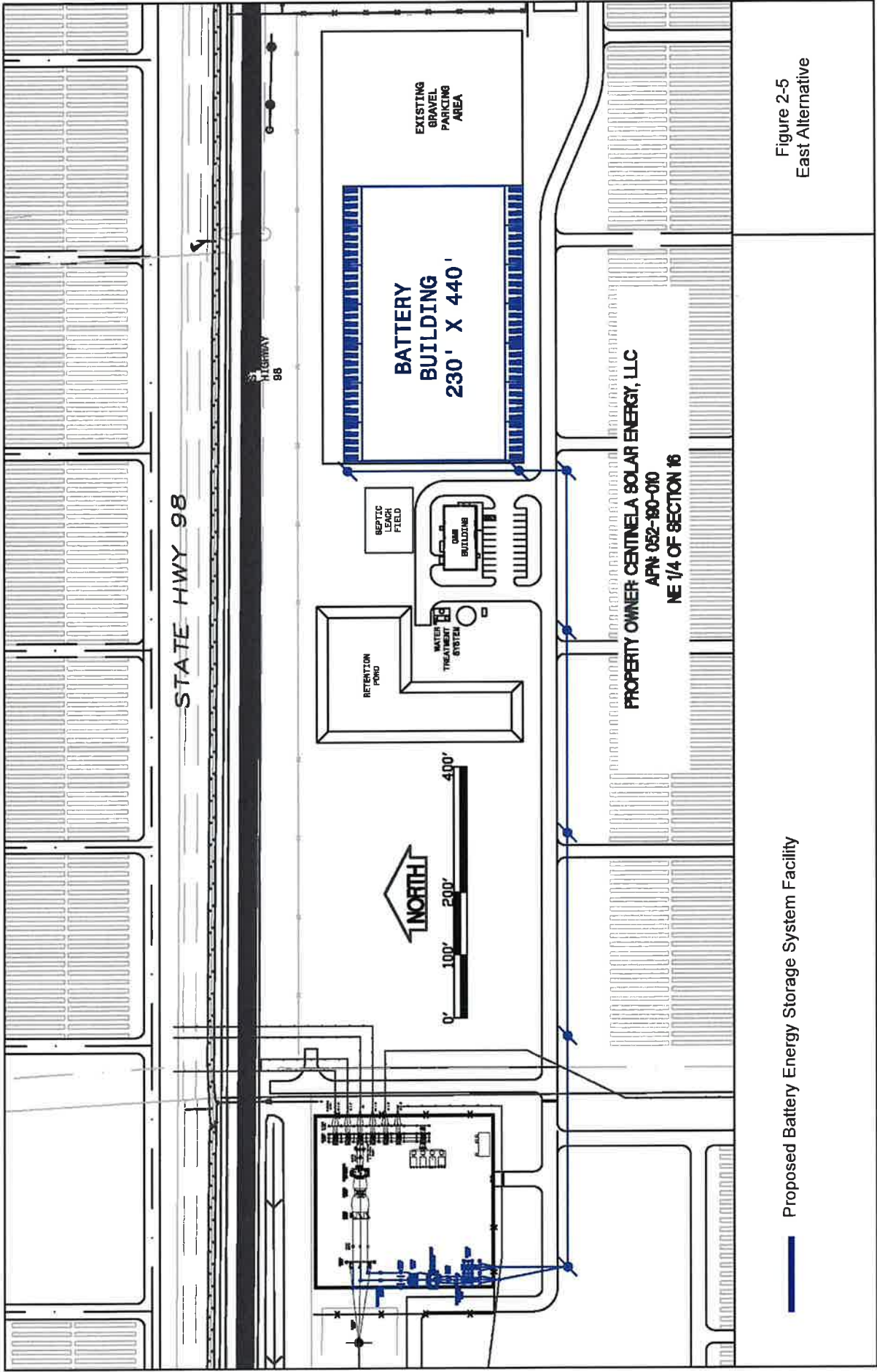


Figure 2-5  
East Alternative

Proposed Battery Energy Storage System Facility

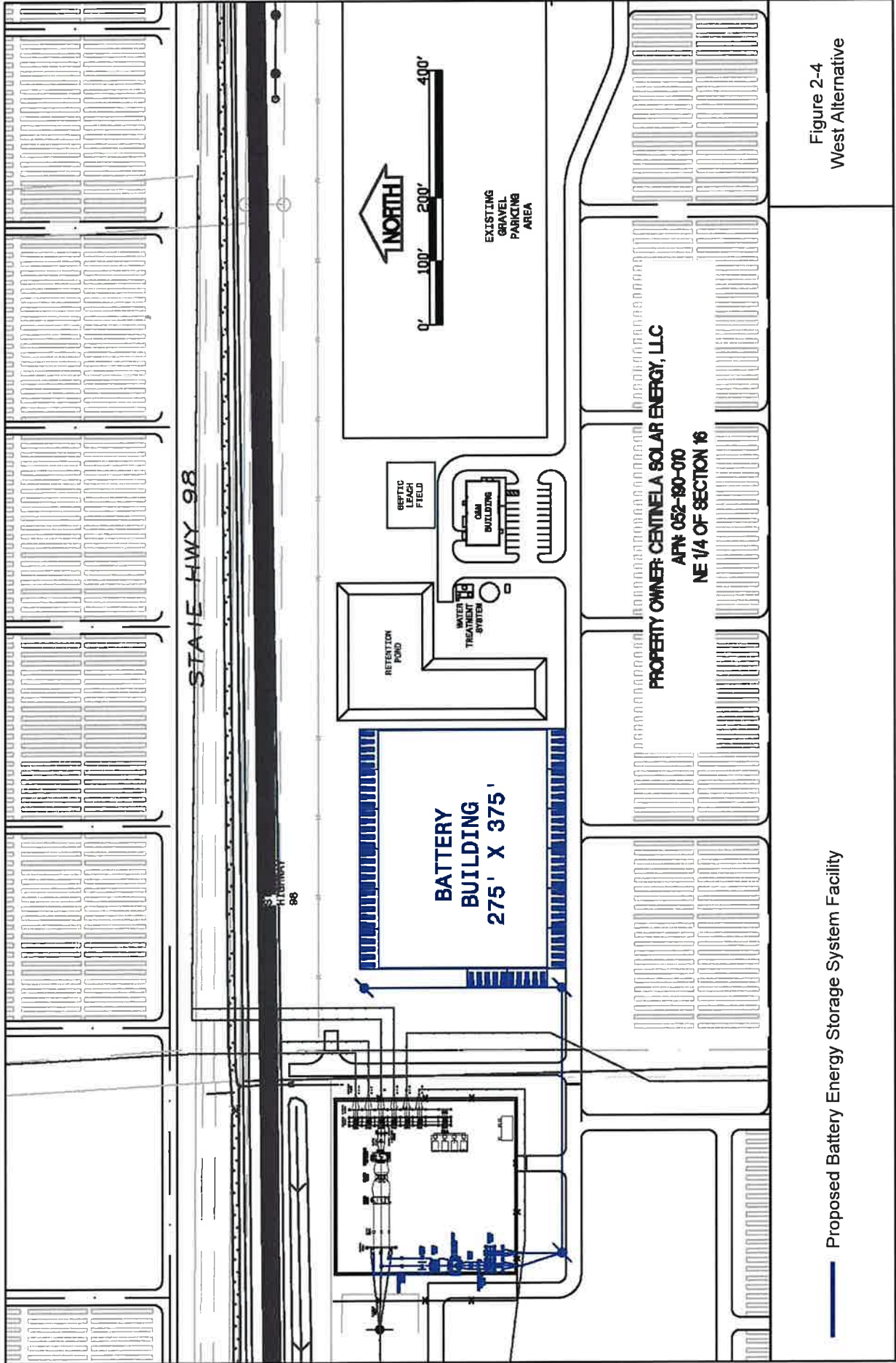


Figure 2-4  
West Alternative

Proposed Battery Energy Storage System Facility



AIR POLLUTION CONTROL DISTRICT



**RECEIVED**

**AUG 10 2018**

**IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES**

August 10, 2018

Jim Minnick  
Planning & Development Services Director  
801 Main Street  
El Centro, CA 92243

**SUBJECT: Conditional Use Permit #18-0018 – LeConte Energy Storage, LLC**

Dear Mr. Minnick,

The Air District has reviewed Conditional Use Permit #18-0018 for LeConte Energy Storage LLC, in which the applicant is proposing a battery storage system with up to 125 MW of electricity interconnection and transmission capacity on land entirely within the boundary of the Centinela Solar Energy facility. The project consists of constructing one or two warehouse-style buildings, totaling approximately 85,000 square feet, as well as constructing a substation and a 230-kilovolt overhead tie line that will tap into the existing Centinela Solar Energy (CSE) gen-tie line.

The project will be located at 319 Brockman Road in Calexico (APNs 052-190-010-000 & 052-190-041-000) on approximately three to five acres of private land wholly owned by CSE and would be similar in layout and appearance to a data center or “server farm” with rows of rack-mounted batteries housed inside one or more enclosures. The energy storage system will consist of banks of electrochemical batteries connected in series and parallel as well as power conversion systems of bi-directional inverters with 480V AC output and a medium voltage transformer to step the voltage up to 34.5kV. The energy storage system will also have a substation which will step up AC energy from the medium voltage transformers to 230 kV by high voltage transformers which will then be delivered to the Drew Switchyard, and plant ancillary systems which will control, protect and support the project and its operations including fencing, security, lighting, fire protection, HVAC, etc.

Construction is anticipated to last between 12 and 24 months in total. Once finished and in operation, the project will be managed by CSE personnel. Routine maintenance activities, including equipment testing, monitoring, and repair would occur as needed.

After review, the Air District would like to remind the applicant that all construction and earthmoving activities are required to comply with Regulation VIII Fugitive Dust Rules. Additionally, while these types of projects appear to be clean operationally, they can cumulatively contribute to an air quality violation. For this reason, the proposed solar farm may be required to submit an Operational Dust Control Plan.

In addition to the above-mentioned comments, the applicant should also contact our Engineering Division in order to verify if any equipment used, such as any emergency power generators, will require an Air District Permit. For additional information, Air District Rules and Regulations can be found on our website at [www.co.imperial.ca.us/AirPollution](http://www.co.imperial.ca.us/AirPollution) under the "Planning" tab. Should the applicant have any further questions, please contact our office at (442) 265-1800.

Sincerely,

A handwritten signature in blue ink, appearing to read 'AS', written over a horizontal line.

Axel Salas, EIT  
APC Environmental Coordinator



# IID

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August 13, 2018

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AUG 13 2018  
IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES

Mr. David Black  
Planner IV  
Planning & Development Services Department  
County of Imperial  
801 Main Street  
El Centro, CA 92243

**SUBJECT: Le Conte Energy Storage, LLC Battery Storage Project, CUP No. 18-0018**

Dear Mr. Black:

On July 25, 2018, the Imperial irrigation District received from the Imperial County Planning & Development Services Department, Conditional Use Permit application no. 18-0018. The applicant, Le Conte Energy Storage, LLC; proposes to develop a battery storage system with up to 125 MW of electrical interconnection and transmission capacity on land within the boundary of the Centinela Solar Energy facility located at 319 Brockman Road in Calexico, CA.

The IID has reviewed the document and has the following comments; however, it is important to note that the district is unable to provide a more comprehensive response at this time as the information provided does not include sufficient detail regarding project design and specifications, and reserves the right to provide a supplemental response at a later date:

1. To enable IID to provide energy related comments, the district requires an electrical one-line diagram showing the battery storage project's relation to Centinela Solar Energy facility and its connection to Drew Switchyard as well as the final approved project drawings.
2. IID's canal or drain banks may not be used to access the project sites. Any abandonment of easements or facilities shall be approved by IID based on systems (Irrigation, Drainage, Power, etc.) needs.
3. Per State of California Water Resources Control Board Division of Drinking Water, the battery storage project will need to have a contract with an approved provider to deliver the drinking water to the work site.
4. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such

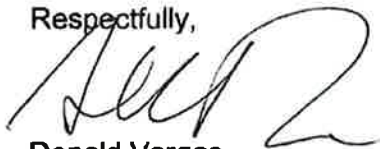
David Black  
August 13, 2018  
Page 2

as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; requires an encroachment permit, or encroachment agreement (depending on the circumstances). The permit application and its instructions are available at <http://www.iid.com/home/showdocument?id=271>. Additional information regarding encroachment permits or agreements can be provided by the IID Real Estate Section, which can be contacted at (760) 339-9239.

5. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at [dvargas@iid.com](mailto:dvargas@iid.com). Thank you for the opportunity to comment on this matter.

Respectfully,



Donald Vargas  
Compliance Administrator II

Kevin Kelley – General Manager  
Mike Pacheco – Manager, Water Dept.  
Enrique B. Martinez – Manager, Energy Dept.  
Jamie Asbury – Deputy Manager, Energy Dept., Operations  
Enrique De Leon – Asst. Mgr., Energy Dept., Distr., Planning, Eng. & Customer Service  
Vance Taylor – Asst. General Counsel  
Robert Laurie – Asst. General Counsel  
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance  
Harold Walk Jr. – Supervisor, Real Estate  
Randy Gray – ROW Agent, Real Estate  
Jessica Lovecchio – Environmental Project Mgr. Sr., Water Dept.



COUNTY OF IMPERIAL

DEPARTMENT OF PUBLIC WORKS

155 S. 11th Street  
El Centro, CA  
92243

Tel: (442) 265-1818  
Fax: (442) 265-1858

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Public Works works for the Public



August 28, 2018

Mr. Jim Minnick, Director  
Planning & Development Services Department  
801 Main Street  
El Centro, CA 92243

RECEIVED

AUG 29 2018

IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES

Attention: David Black, Planner IV

**SUBJECT: CUP 18-0018; LeConte Energy Storage, LLC**  
Located on 319 Brockman Road, Calexico, CA.  
APN 052-190-010 & 041.

Dear Mr. Minnick:

This letter is in response to your submittal received by this department on July 25, 2018 for the above mentioned project. The applicant proposes a battery storage system with up to 125 MW of electrical interconnection and transmission capacity on land entirely within the boundary of the Centinela Solar Energy facility.

Department staff has reviewed the package information and the following comments shall be Conditions of Approval:

1. No road right of way conditions required. (As directed by Imperial County Board of Supervisors per Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan).
2. The applicant shall furnish a Drainage and Grading Plan/Study to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site properties. The Study/Plan shall be submitted to the Department of Public Works for review and approval. The applicant shall implement the approved plan. Employment of the appropriate Best Management Practices (BMP's) shall be included. (Per Imperial County Code of Ordinances, Chapter 12.10.020 B).
3. An encroachment permit shall be secured from the Department of Public Works for any and all new, altered or unauthorized existing driveway(s) to access the properties through surrounding County roads. As a minimum a Commercial type Driveway shall be constructed. (Per Imperial County Code of Ordinances, Chapter 12.10.020 B).
4. The applicant for Encroachment Permits in County Roads and Right of Way is responsible for researching, protecting, and preserving survey monuments per the Professional Land Surveyor's Act (8771 (b)). This shall include a copy of the referenced survey map and tie card(s) (if applicable) for all monuments that may be impacted.

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5. The applicant for grading plans and/or improvement plans is responsible for researching, protecting, and preserving survey monuments per the Professional Land Surveyor's Act (8771 (b)). This shall include a copy of the referenced survey map and tie card(s) (if applicable) for all monuments that may be impacted by the project whether it be on-site or off-site.
6. Any activity and/or work within Imperial County right-of-way shall be completed under a permit issued by this Department (encroachment permit). Any activity and/or work may include, but not be limited to, installation construction entrances, installation of temporary traffic control devices, road dust mitigation activities, installation of overhead or underground electrical crossings, etc.
7. CALTRANS should be contacted for any impacts to State Route 98.

**INFORMATIVE:**

The following items are for informational purposes only. The applicant is responsible to determine if the enclosed items affect the subject project.

- A solid waste management plan may be required from the County Environmental Health Services (EHS) Department to ensure waste generated from the event is disposed properly. Similarly, food vendor activities may also need to be verified and/ or permitted by EHS
- The Sheriff's Department and County Fire Departments may need to be notified of the proposed event and additional measures may need to be taken by the applicant pending their review.
- All on-site traffic area shall be hard surfaced to provide all weather access for fire protection vehicles. The surfacing shall meet the Department of Public Works and Fire/OES Standards as well as those of the Air Pollution Control District (APCD) (Per Imperial County Code of ordinances, Chapter 12.10.020 A).
- All permanent structures, including above ground piping abutting public roads shall be located outside the ultimate right of way. Additionally, locations of instruments and appurtenances cannot pose a traffic study hazard.
- Access to the site will require the installation of commercial driveway. The installation of the driveway shall be completed per the Engineering Design Guidelines Manual for the Preparation and checking of Street Improvement, Drainage, and Grading Plans within Imperial County.
- The project may require a National Pollutant Discharge Elimination System (NPDES) permit and Notice of Intent (NOI) from the Regional Water Quality Control Board (RWQCB) prior county approval of onsite grading plan (40 CFR 122.28).

- At time of development, if required, by **Section 8762(b) of the Professional Land Surveyors Act**, a record of shall be filed with County Recorder of Imperial County.
- A Transportation Permit may be required from road agency(s) having jurisdiction over the haul route(s) for any hauls of heavy equipment and large vehicles which impose greater then legal loads on riding surfaces, including bridges. **(Per Imperial County Code of Ordinances, Chapter 12.10.020 B).**
- As this project proceeds through the planning and the approval process, additional comments and/or requirements may apply as more information is received.

Should you have any questions, please do not hesitate to contact this office. Thank you for the opportunity to review and comment on this project.

Respectfully,

John A. Gay, PE  
Director of Public Works

By:



Manuel Ortiz  
Assistant County Engineer

OB/dm