



Initial Study and Notice of Preparation

Wildcat Energy Farm Project

Initial Study #23-0039

General Plan Amendment #23-0006

CUP #s: 23-0032 and 23-0033

Imperial County, CA

November 2024

Reviewed by:

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Introduction

A. Purpose

This document is a ☐ policy-level; ☒ project-level Initial Study for evaluation of potential environmental impacts resulting with the proposed Wildcat Energy Farm Project.

B. CEQA Requirements and the Imperial County's Rules and Regulations for Implementing CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's Rules and Regulations for Implementing CEQA, 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 the 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 Wildcat Energy Farm Project will result in potentially significant environmental impacts and therefore, an EIR is deemed as the appropriate document to provide necessary environmental evaluations and clearance for the proposed approvals under review in this Initial Study.

This Initial Study is prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); the State CEQA Guidelines & County of Imperial's CEQA Regulations, Guidelines for the Implementation of CEQA; 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's CEQA Regulations, Guidelines for the Implementation of 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 principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. Intended Uses of Initial Study and Notice of Preparation

This Initial Study and Notice of Preparation are informational documents which is 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 Notice of Preparation, prepared for the project will be circulated for a period of no less than 35 days for public and agency review and comments.

D. Contents of Initial Study and Notice of Preparation

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 Wildcat Energy Farm Project 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, necessary 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.

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 project.
2. Less Than Significant Impact: The proposed project 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 project 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 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 project and associated entitlement 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 in 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; 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/Mitigated Negative Declaration (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]).

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 is available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.
- 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. (442) 265-1736.
- 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 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]).

Environmental Checklist Form

1. **Project Title:** Wildcat Energy Farm Project
2. **Lead Agency Name and Address:** Imperial County Planning & Development Services Department, 801 Main Street, El Centro, CA 92243
3. **Contact Person and Phone Number:** Christina Willis, Willis Environmental Planning, 619-925-2836
4. **Project Location:** The Wildcat Energy Farm Project consists of a solar photovoltaic (PV) facility, a battery energy storage systems (BESS), an on-site transmission line to connect to the Imperial Irrigation District's (IID) existing "L" Line and upgrades to IID's transmission and distribution lines that traverse approximately 46 miles of private and public lands. The Wildcat Energy Farm solar facility and BESS site (herein referred to as Solar Plant Site) is located on approximately 5,900 acres of privately-owned, vacant land in Imperial County, California. The Solar Plant Site is located immediately south of the community of Salton City and is less than 1 mile west of the Salton Sea. State Route (SR) 86 transects the project site and would provide local and regional site access.
5. **Project Sponsor's Name and Address:** Wildcat Energy Farms, LLC, 1875 South Bascom Avenue, Suite 2400, Campbell, California 95008
6. **General Plan Designation:** Urban Area
7. **Zoning:** S-1 (Open Space/Recreation), S-2 (Open Space/Preservation), C-2 (Medium Commercial), and R-1/R-1-L-5 (Low Density Residential)
8. **Description of Project:** The project applicant, Wildcat Energy Farms, LLC, proposes to construct and operate an 800-megawatt (MW) PV solar facility with an integrated 800 MW (3,200 MW hour) BESS on approximately 5,900 acres of privately-owned land. The proposed project would comprise approximately 1,964,000 PV modules, associated collector and inverter facilities, a substation, and switchyard, an on-site water well, access roads and an on-site transmission line to connect to IID's existing "L" Line. In addition, the proposed project includes upgrades to the IID's existing "L" Line from 161 kilovolt (kV) to 230 kV and upgrades to IID's existing Wildcat Line from 12 to 34.5 kV to 230 kV within existing rights-of-way (ROW) to deliver the electrical energy produced to the planned IID Wixom Substation. These facilities are collectively referred to as the "proposed project" or "project." A detailed project description is provided in the Project Summary section below.
9. **Surrounding Land Uses and Setting: Briefly describe the project's surroundings:**

The Solar Plant Site is currently vacant, undeveloped, privately-owned land and is surrounded by open space to the east, west, and south. Areas managed by the Bureau of Land Management (BLM) are located to the northwest, south, and east.

Private land parcels adjacent to the southern portion of the Solar Plant Site consist of the Salton Sea Airport, a planned residential community with less than 10 homes, and undeveloped desert lands. Private land parcels to the east of the Solar Plant Site consist of undeveloped desert lands and the Salton City Wastewater Treatment ponds. Private lands to the north consist of Salton City, scattered residences, and commercial development.

The “L” Line and Wildcat Line upgrade routes are located within an existing utility easement and traverse a variety of private and public lands including undeveloped land, agricultural lands and lands owned by and under the jurisdiction of the Bureau of Land Management (BLM).

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

- California Regional Water Quality Control Board, Colorado River Basin Region
- Imperial County Air Pollution Control District
- Imperial County Public Works Department
- Imperial County Airport Land Use Commission
- Caltrans (Encroachment Permit)
- California Department of Fish and Wildlife
- U.S. Fish and Wildlife Service
- U.S. Army Corps of Engineers

The transmission line upgrades must also be approved by the Imperial Irrigation District and the Bureau of Land Management (BLM). BLM will be responsible for compliance with the National Environmental Policy Act.

11. 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, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes, California Native American tribes that are traditionally and culturally affiliated with the project area were sent an Assembly Bill (AB) 52/Senate Bill (SB) 18 consultation request letter on July 10, 2024.

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 checked="" 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 checked="" type="checkbox"/> Energy
<input checked="" type="checkbox"/> Geology/Soils	<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input checked="" type="checkbox"/> Hazards & Hazardous Materials
<input checked="" type="checkbox"/> Hydrology / Water Quality	<input checked="" 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 checked="" type="checkbox"/> Tribal Cultural Resources
<input checked="" type="checkbox"/> Utilities/Service Systems	<input type="checkbox"/> Wildfire	<input checked="" type="checkbox"/> Mandatory Findings of Significance

Environmental Evaluation Committee Determination

After Review of the Initial Study, the Environmental Evaluation Committee (EEC) 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.

EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ENVIRONMENTAL HEALTH	<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

Project Location

The Solar Plant Site is situated near the western edge of the Salton Sea and is located immediately south of the community of Salton City. State Route (SR) 86, traverses through the Solar Plant Site and provides local and regional access to the area (Figure 1).

Table 1 below depicts the Assessor's Parcel Numbers (APN), zoning designation, and acreage for each parcel for the project site. Figure 2 shows the existing zoning designations within the Solar Plant Site.

Table 1. Solar Plant Site Assessor's Parcel Numbers (APN), Zoning, and Acreage

Assessor's Parcel Number (APN)	Zoning Designation	Acreage
007-110-024	S-2	80.0
007-110-027	S-2	40.0
007-110-028	S-2	40.0
007-110-035	S-2	86.5
007-110-038	S-2	3.45
007-110-041	S-2	28.45
007-110-043	S-2	116.75
007-110-045	S-2	160.0
007-110-049	R-1-L-.5	336.16
007-110-051	S-1	23.4
017-010-004	S-2	13.2
017-010-016	R-1-L-.5	113.07
017-010-017	R-1-L-.5	1.5
017-010-031	R-1-L-.5	377.0
017-010-032	R-1-L-.5	159.0
017-010-041	R-1	39.47
017-010-042	R-1	40.68
017-010-046	R-1-L-.5	460.5
017-010-047	R-1-L-.5	3.38
017-010-048	R-1-L-.5	3.41
017-010-049	C-2/ R-1-L-.5	49.62
017-010-054	R-1-L-.5	112.15
017-010-055	R-1-L-.5	109.5
017-010-056	R-1-L-.5	170.06
017-010-058	R-1-L-.5	9.15
017-140-009	S-2	440.0
017-140-023	S-2	5.68

Assessor's Parcel Number (APN)	Zoning Designation	Acreage
017-150-001	S-2	640.0
017-150-002	S-2	320.0
017-150-012	S-2	640.0
017-150-013	S-2	637.01
017-340-005	S-2	641.42

Notes:

S-1=Open Space/Recreation; S-2=Open Space/Preservation; C-2=Medium Commercial; R-1 and R-1-L-.5=Low Density Residential

Renewable Energy Overlay Zone

In 2016, the County adopted the Imperial County Renewable Energy and Transmission Element, which includes an RE Zone (RE Overlay Map). This General Plan element was created as part of the California Energy Commission Renewable Energy Grant Program to amend and update the County's General Plan to facilitate future development of renewable energy projects.

The County Land Use Ordinance, Division 17, includes the RE Overlay Zone, which authorizes the development and operation of renewable energy projects with an approved conditional use permit (CUP). The RE Overlay Zone is concentrated in areas determined to be the most suitable for the development of renewable energy facilities while minimizing the impact on other established uses. CUP applications proposed for specific renewable energy projects not located in the RE Overlay Zone would not be allowed without an amendment to the RE Overlay Zone.

The entire Solar Plant Site is located outside of the RE Overlay Zone. Therefore, the applicant is requesting a General Plan amendment and Zone Change to include/classify the Solar Plant Site into the RE Overlay Zone. The applicant is also requesting a Zone Change for the parcels currently within the R-1 and R-1-L-.5 zones to be rezoned to S-1 (Open Space/Recreation) (Figure 3).

The underlying "Urban Area" General Plan designation would remain and areas designated as "Low Density Residential" would be changed to "Recreation/Open Space" (See Figure 4 and Figure 5). Additionally, the Solar Plant Site is located within the jurisdiction of the West Shores/Salton City Urban Area Plan (UAP). Therefore, a General Plan amendment is also required to allow for major facilities relating to the generation and transmission of electrical energy within the UAP's planning area.

Environmental Setting

The proposed Wildcat Energy Farm Solar Plant Site is currently vacant, undeveloped, privately owned land and is surrounded by open space to the east, west, and south. Areas managed by the BLM are located northwest, south, and east of the Solar Plant Site.

Private land parcels adjacent to the southern portion of the Solar Plant Site consist of the Salton Sea Airport, a planned residential community with less than 10 homes, and undeveloped desert lands. Private land parcels to the east consist of undeveloped desert lands and the Salton City Wastewater Treatment ponds. Private lands to the north of the Solar Plant Site consist of Salton City, scattered residences, and commercial development.

The proposed "L" Line upgrade route is generally undeveloped, desert lands and includes both private lands and public lands managed by the BLM. This route would traverse the West Side Main Canal and the New River. The proposed Wildcat Line upgrade route is also generally undeveloped,

consisting primarily of agricultural lands. The Wildcat Line traverses areas with development, including the community of Seeley, and would cross the New River and Interstate 8, W. Evan Hewes Highway and the San Diego and Arizona Railroad. Portions of this route are aligned north of the boundary of Naval Air Facility El Centro.

Project Components

The project applicant, Wildcat Energy Farms, LLC, proposes to construct and operate an 800- MW PV solar facility with an integrated 800 MW (3,200 MW hour) BESS on approximately 5,900 acres of privately-owned land. The proposed project would comprise approximately 1,964,000 PV modules, associated collector and inverter facilities, a substation, and switchyard, an on-site water well, access roads and an on-site transmission line to connect to IID's existing "L" Line. In addition, the proposed project includes upgrades to the IID's existing "L" Line from 161 kV to 230 kV and upgrades to IID's existing Wildcat Line from 12 to 34.5 kV to 230 kV within existing ROW to deliver the electrical energy produced to the planned IID Wixom Substation. These facilities are collectively referred to as the "proposed project" or "project." These project components are discussed in detail below and shown in Figure 6.

Solar Energy Facility

The proposed project involves the construction of an 800-MW alternating current (AC) PV solar energy facility.

PV solar cells convert sunlight directly into direct current electricity. The process of converting light (photons) to electricity (voltage) in a solid-state process is called the photovoltaic effect. A number of individual PV cells are electrically arranged and connected into solar PV modules, sometimes referred to as solar panels.

The solar field consists of 1,964,000 PV modules on 327,240 strings and associated collector and inverter facilities. The facility is expected to produce approximately 1,174,000 MW/year of energy for delivery to the IID.

Battery Energy Storage System and On-Site Electrical Substation

An 800-MW (3,200 MW hour) BESS, substation, and switchyard are proposed within the north central portion of the project site just east of SR 86 generally south of Harvard Avenue and Goheen Avenue, in proximity to the existing IID "L" Line. The proposed BESS would consist of either lithium ion or flow batteries. The batteries will either be housed in storage containers or buildings fitted with HVAC and fire suppression systems as necessary, depending on the final selection of battery technology. The BESS would be located within a 500,000 square foot area (approximately 11.5 acres), the substation would be immediately east of the BESS within a 200,000 square foot area (approximately 4.6 acres), and the switchyard would be immediately adjacent to the existing "L" Line, within a 50,000 square foot area (approximately 1.15 acres).

Ancillary Facilities

The project will also include one water well, which would be drilled and operated on-site, subject to a separate CUP. The site is proposed to be fenced around the entire perimeter. The facility will generally be remotely operated, with occasional maintenance; however, no operations and maintenance building are proposed.

On-Site Transmission Connection and Off-Site Transmission Line Upgrades

The proposed project point of connection to the electrical grid would occur on-site within private lands at the location of the proposed project switchyard. The project would connect to the immediately adjacent existing IID “L” Line that traverses the Solar Plant Site within an existing right of way (ROW) associated with the “L” Line. Upgrades to both the existing “L” Line extending south from the Solar Plant Site, as well as the existing Wildcat Line which is located further to the south would be required. The proposed project transmission line upgrade routes are shown in Figure 7. Table 2 and Table 3 provide the list of APNs and landowners for each parcel that is traversed by the proposed “L” Line and Wildcat Line upgrades.

“L” Line Upgrade

The existing IID 161 kilovolt (kV) “L” Line traverses the project site east of SR 86, generally extending from the northern portion of the site to the southern portion of the site. This existing 161 kV “L” Line extends from the City of Imperial to Salton City. An upgrade to this 161 kV “L” Line to a 230 kV line using 100-foot steel poles within the existing ROW (referred to as the “L” Line route upgrade) would be required as part of implementation of the project. The “L” Line upgrades would extend approximately 36 miles from the project substation and switchyard area, to the south, and would connect with the Wildcat Line at APN 062-010-040.

Wildcat Line Upgrade

At the location where the existing “L” Line connects with the Wildcat Line (within APN 062-010-040), the newly upgraded 230 “L” Line would connect to an existing IID distribution line (referred to as the Wildcat Line). This existing line varies from 12 to 34.5 kV. This 12 to 34.5 kV line is proposed to be upgraded to a 230 kV line using 100-foot steel poles within the existing ROW and would utilize the existing poles as an “underbuilt” (referred to as the Wildcat Line route upgrade). The upgrades to the Wildcat Line would begin within APN 063-010-040 and extend south, terminating at the planned Wixom substation (APN 051-360-032).

Table 2. APNs and Landowners for “L” Line Upgrade

No.	Assessor's Parcel Number (APN)	Landowner
Township 11 South, Range 10 East, San Bernardino Meridian		
1	017-340-005	CA V, LLC
2	017-340-010	California State Lands Commission
3	017-340-025	Gurnee Michelle Pon Trustee ETAL
4	017-340-021	BLM
5	017-350-034	Gurnee Michelle Pon Trustee ETAL
6	017-350-013	BLM
7	017-350-031	Apex Energy Solutions, LLC
8	017-350-030	Apex Energy Solutions, LLC
9	017-440-036	Buenos Aires Leasing, LLC
10	017-440-005	California Cash for Homes, INC

No.	Assessor's Parcel Number (APN)	Landowner
11	017-440-004	Shenas Peter & Shenas Sally Ann ETAL
12	017-440-022	Buenos Aires Leasing, LLC
Township 11 South, Range 11 East, San Bernardino Meridian		
13	002-370-028	Three Flags Citrus, LLC
Township 12 South, Range 11 East, San Bernardino Meridian		
14	019-010-002	BLM
15	019-010-013	Pacific Southwest Ventures, LLC
16	019-010-010	BLM
17	019-060-035	Zarafili Issa & Debbas Diala JT
18	019-060-055	Moore Jeffery Conservator EST OF Brewer GL
19	019-060-037	Wachel Gerald
20	019-060-057	Perez Jose
21	019-060-038	Macaspac Maria A
22	019-060-043	Binnacle Light, LLC
23	019-060-044	Preece Steven J. & Marylynn TR 1/2 & Mealey Edwin
24	019-060-025	Sramek Bohumir B & Hevka H Trustees
25	019-060-003	Foley David William & Tribulato Ashley Rose
26	019-050-024	John Elmore Ranches LTD
27	019-050-017	Cooley Scott M Trustee
28	019-050-018	Cooley Scott M Trustee
29	019-100-003	BLM
30	019-110-012	Desert Valley Co
31	019-110-011	BLM
32	019-110-010	Cooley Scott M Trustee
Township 13 South, Range 11 East, San Bernardino Meridian		
33	034-010-005	BLM
34	034-010-006	Cooley Scott M Trustee
35	034-010-007	BLM
Township 13 South, Range 12 East, San Bernardino Meridian		
36	034-030-011	BLM
37	034-030-012	BLM
38	034-030-013	BLM
39	034-140-002	BLM
40	034-140-003	BLM
41	034-140-006	BLM
42	034-140-005	BLM
43	034-140-012	BLM

No.	Assessor's Parcel Number (APN)	Landowner
Township 14 South, Range 12 East, San Bernardino Meridian		
44	034-190-004	BLM
45	034-190-005	BLM
46	034-190-013	N/A
47	034-190-022	N/A
48	034-190-025	BLM
49	034-190-023	BLM
50	034-190-024	Wright Veronica Zwart & Zwart Frits W & Elyssabeth
51	034-210-023	Wright Veronica Zwart & Zwart Frits W & Elyssabeth
52	034-210-024	BLM
53	034-210-009	N/A
Township 14 South, Range 13 East, San Bernardino Meridian		
54	040-160-001	BLM
55	040-160-003	BLM
56	040-160-011	BLM
57	040-270-005	BLM
58	040-270-007	Labady Hugo & Liliana JT
59	040-270-016	BLM
60	040-300-001	BLM
Township 15 South, Range 13 East, San Bernardino Meridian		
61	062-010-037	Imperial Irrigation District
62	062-010-035	Swarthout Ward E & Laura M Trustees
63	063-010-040	Alphabet Farms, LLC
64	063-010-037	Meyer Imperial Investments II, LLC

Table 3. APNs and Landowners for Wildcat Line Upgrade

No.	Assessor's Parcel Number (APN)	Landowner
Township 15 South, Range 13 East, San Bernardino Meridian		
1	063-010-040	Alphabet Farms, LLC
2	062-010-021	Buckley Shirley J
3	062-010-024	Alphabet Farms, LLC
4	062-010-023	Alphabet Farms, LLC
5	063-010-039	Alphabet Farms, LLC
6	062-030-016	Alphabet Farms, LLC
7	062-030-017	Alphabet Farms, LLC
8	062-030-010	Alphabet Farms, LLC
9	062-020-027	Alphabet Farms, LLC

No.	Assessor's Parcel Number (APN)	Landowner
10	062-020-028	Alphabet Farms, LLC
11	062-020-027	Alphabet Farms, LLC
12	062-020-002	Alphabet Farms, LLC
13	062-020-003	Romero Augustin R & Romero Leeza
14	062-020-026	Alphabet Farms, LLC
15	062-020-021	Alphabet Farms, LLC
16	062-020-025	Alphabet Farms, LLC
17	062-020-024	Alphabet Farms, LLC
18	034-270-036	IID ID
19	034-270-039	Arnaiz Adawn Ali
20	034-320-006	Taylor Randy Darryl & Taylor Marian J
Township 15 South, Range 12 East, San Bernardino Meridian		
21	034-270-028	O'Connell Lila Jean
22	034-320-051	O'Connell Lila Jean
23	034-320-050	County of Imperial
24	034-270-043	IID ID & Real Estate & Environmental Compliance
25	034-270-014	Richter Robert L & Richter Carol Ann
26	034-320-033	IID ID & Real Estate & Environmental Compliance
27	034-320-003	Abatti Freddi M
28	034-270-033	Abatti Freddi M
29	034-270-034	County of Imperial
30	034-260-013	Richter Robert L & Richter Carol Ann
31	034-260-016	Holtz Family 2024 Trust
32	034-260-022	Richter Robert L & Richter Carol Ann
33	034-260-049	Westmoreland Douglas C & Westmoreland Elena L
34	034-310-017	Foster Becky Z & Foster David L
35	034-310-018	IID ID & Real Estate & Environmental Compliance
36	034-310-024	Kuhn John R
37	034-310-026	Kuhn Heidi L
38	034-310-027	Grizzle Kevin C & Grizzle Kim L
39	034-340-060	Kuhn John R
40	034-340-006	Gardonjim Farms, Inc.
41	034-340-061	JSJ Southwest Limited Liability Company
42	034-340-030	Westmoreland Douglas C & Westmoreland Elena L
43	034-340-071	Westmoreland Douglas C & Westmoreland Elena L

No.	Assessor's Parcel Number (APN)	Landowner
44	034-340-070	Kuhn John R
45	034-340-065	Ashurst Brock M & Ashurst Bethany A
46	034-340-027	MSPM Associates
47	034-340-029	MSPM Associates
Township 16 South, Range 12 East, San Bernardino Meridian		
48	034-380-049	MSPM Associates
49	034-380-007	MSPM Associates
50	034-380-008	Perelli-Minetti Tony
51	034-380-009	MSPM Associates
52	034-380-010	MSPM Associates
53	034-380-051	MSPM Associates
54	034-380-052	Kuhn Heidi L
55	051-120-005	Kuhn Heidi L
56	051-120-037	Strobel Richard J
57	051-120-007	Urbina Reyno & Urbina Roselina
58	051-120-076	County of Imperial
59	051-120-075	Kuhn Heidi L
60	051-120-067	Jimenez Family 2024 Trust
61	051-120-018	Hernandez Israel & Hernandez Maria D
62	051-120-064	Hernandez Israel & Hernandez Maria D
63	051-120-072	Hernandez Israel & Hernandez Maria D
64	051-120-073	Vega Felipe V & Vega Rachel
65	051-0120-074	Hernandez Israel & Hernandez Maria D
66	051-120-041	Gatlin Lareda D & Jackson Jay P
67	051-120-016	San Diego & Arizona RR
68	051-120-029	San Diego & Arizona RR
69	051-120-043	Vaca Pedro
70	051-120-060	Kuhn John R
71	051-440-001	Kuhn John R
72	051-120-059	Kuhn John R
73	051-440-014	Westmoreland Douglas C & Westmoreland Elena L
74	051-270-035	JR Preece Inc.
75	051-280-044	Brundy Thomas D & Brundy Karen D
76	051-270-036	JR Preece Inc.
77	051-270-041	Kuhn John R
78	051-280-054	Kuhn John R
79	051-310-002	IID ID
80	051-310-062	IID ID

No.	Assessor's Parcel Number (APN)	Landowner
81	051-310-055	Kuhn John R
82	051-310-026	JR Preece Inc.
83	051-310-050	JR Preece Inc.
84	051-310-023	Pearl Evans LLC
85	051-360-005	Nale Joe
86	051-360-004	AWCC Campo Verde LLC
87	051-360-032	AWCC Campo Verde LLC

Water Use

The water demand for the proposed project will consist of water needed during construction and water needed for maintenance once the project is operational.

Restoration of Solar Plant Site

Electricity generated by the proposed project could be sold under the terms of a Power Purchase Agreement (PPA) with a power purchaser (i.e., utility service provider). The projected life of the proposed project is 25 to 30 years. At the end of the PPA term, the owner of the project may choose to enter into a subsequent PPA, update technology and re-commission, or decommission and remove the generating facility and its components. Upon decommissioning, the Solar Plant Site could be converted to other uses in accordance with applicable land use regulations in effect at that time. A collection and recycling program would be executed to promote recycling of project components and minimize disposal in landfills. All permits related to decommissioning would be obtained, where required.

Prior to issuance of the initial grading permit for the project, a Site Reclamation Plan in conformance with County of Imperial requirements would be prepared for review and approval by the Imperial County Planning and Development Services Department. This plan would be implemented at the end of power operations and would describe the proposed equipment dismantling, removal and site restoration program, in conformance with County requirements.

Project Approvals

The following are the primary discretionary approvals required for implementation of the project:

1. **General Plan Amendment (#23-0006).** An amendment to the County's General Plan, Renewable Energy and Transmission Element is required to implement the proposed project. CUP applications proposed for specific renewable energy projects not located in the Renewable Energy (RE) Overlay Zone would not be allowed without an amendment to the RE Overlay Zone. The entire Solar Plant Site is located outside of the RE Overlay Zone. Therefore, the applicant is requesting a General Plan amendment to include/classify the Solar Plant Site into the RE Overlay Zone. The underlying "Urban Area" General Plan designation would remain and areas designated as "Low Density Residential" would be changed to "Recreation/Open Space".

Additionally, the Solar Plant Site is located within the jurisdiction of the West Shores/Salton City UAP. Therefore, a General Plan amendment is also required to allow for major facilities relating to the generation and transmission of electrical energy within the UAP's planning area.

2. **Zone Change (#23-0008).** The applicant is requesting a Zone Change to include/classify all Solar Plant parcels into the RE Overlay Zone (i.e., Zone Change from S-1 to S-1-RE, S-2 to S-2-RE, C-2 to C-2-RE). Pursuant to Title 9, Division 5, Chapter 2, solar facilities are not listed under uses permitted with a CUP. Therefore, the applicant is also requesting a Zone Change for the areas zoned as R-1 and R-1-L-5 to be rezoned to S-1-RE.
3. **Approval of Conditional Use Permits (CUP 23-0032).** Implementation of the project would require the approval of a CUP by the County to allow for the construction and operation of the proposed solar energy facility with an integrated battery storage system. The Solar Plant Site parcels are currently zoned as S-1, S-2, C-2, and R-1/R-1-L-5. Pursuant to Title 9, Division 5, Chapter 18 and 19, the following uses are permitted in the S-1 and S-2 zone subject to approval of a CUP from Imperial County:

i) Major facilities relating to the generation and transmission of electrical energy provide[d] such facilities are not under State or Federal law, to [be] approved exclusively by an agency, or agencies of the State or Federal government, and provided such facilities shall be approved subsequent to coordination review of the Imperial Irrigation District for electrical matters. Such uses shall include but be limited to the following:

- *Electrical generation plants*
- *Facilities for the transmission of electrical energy (100-200 kV)*
- *Electrical substations in an electrical transmission system (500 kv/230 kv/161 kV)*

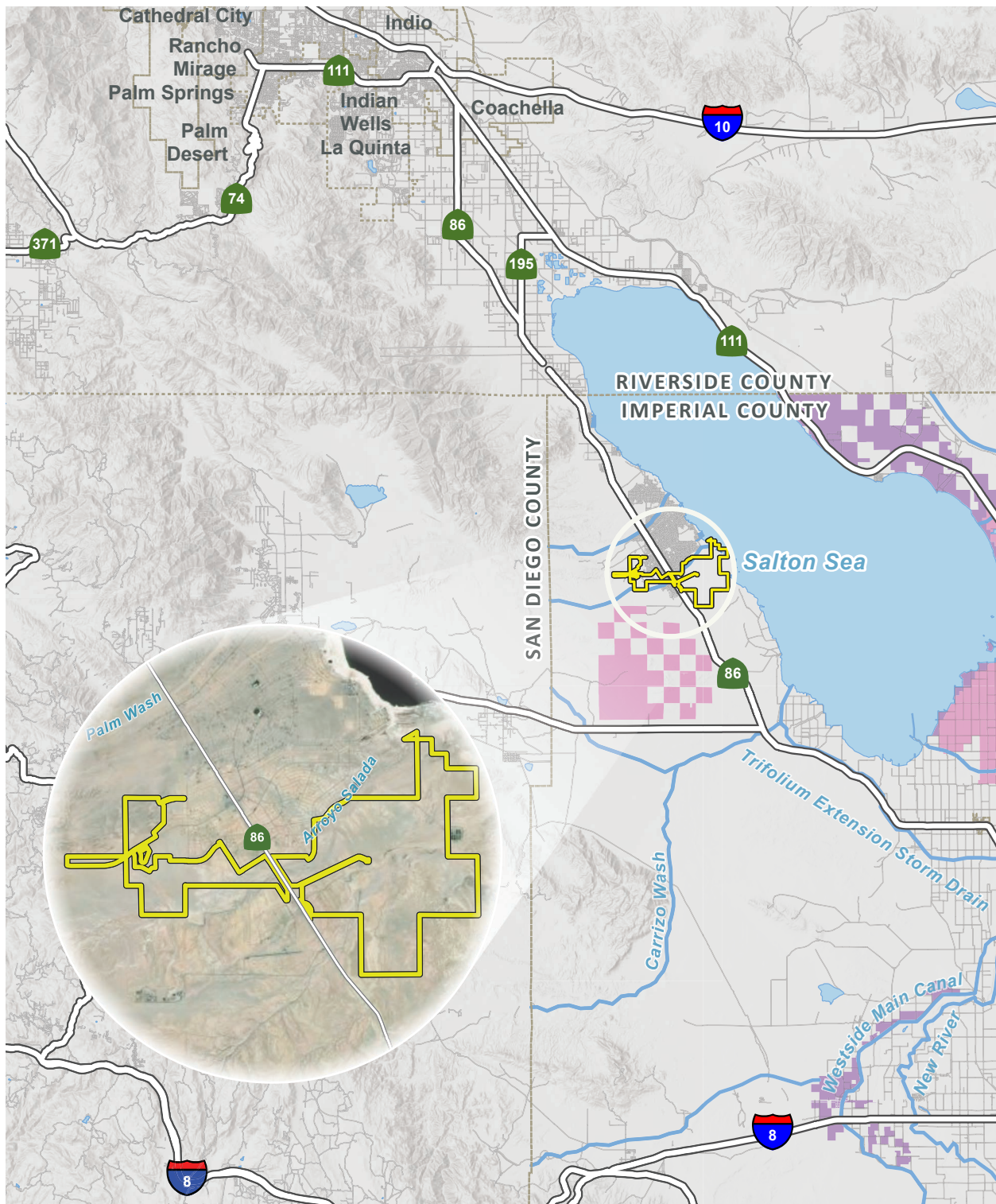
Pursuant to Title 9, Division 5, Chapter 13, the following use is permitted in the C-2 zone subject to approval of a CUP from Imperial County:




- *pp) Waste or energy facility*

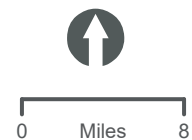
4. **Approval of CUP (CUP 23-0033) – Groundwater Well.** Pursuant to Title 9 Division 21: Water Well Regulations, §92102.00, the applicant will be required to obtain a CUP for the proposed on-site groundwater well. As required by §92102.00, no person shall (1) drill a new well, (2) activate a previously drilled but unused well, (unused shall mean a well or wells that have not been used for a 12 month) period by installing pumps, motors, pressure tanks, piping, or other equipment necessary or intended to make the well operational, (3) increase the pumping capacity of a well, or (4) change the use of a well, without first obtaining a CUP through the County Planning & Development Services Department.

The transmission line upgrades must also be approved by the Imperial Irrigation District and the BLM. BLM will be responsible for compliance with the National Environmental Policy Act.

Figure 1. Regional Location

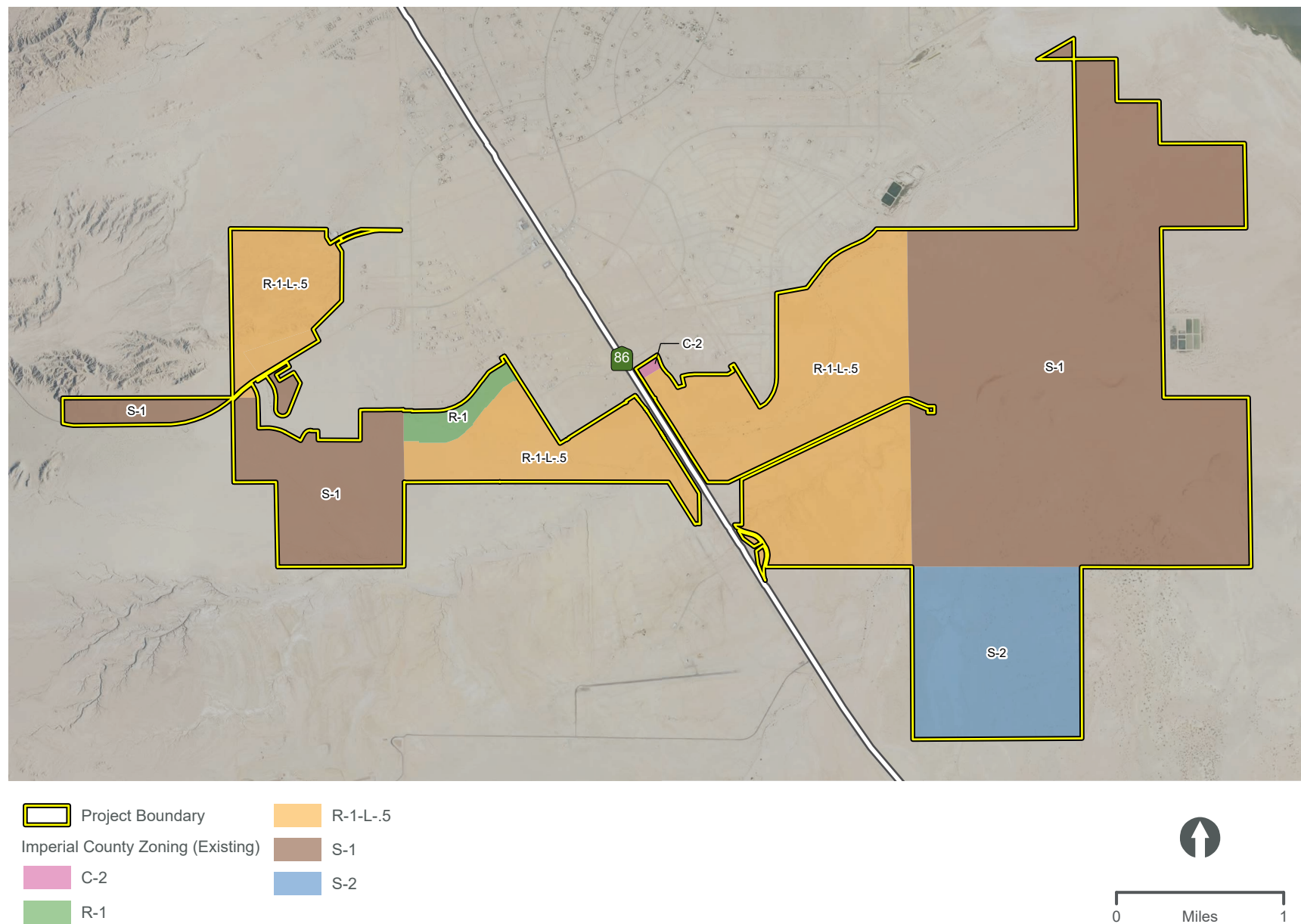


-  Project Area
- Renewable Energy Overlay Zones**
-  Geothermal
-  Renewable Energy/Geothermal

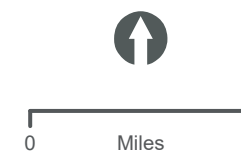
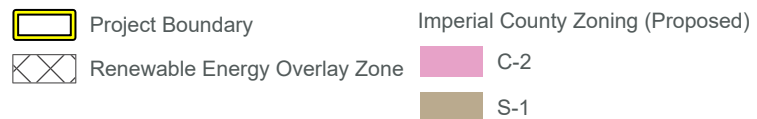
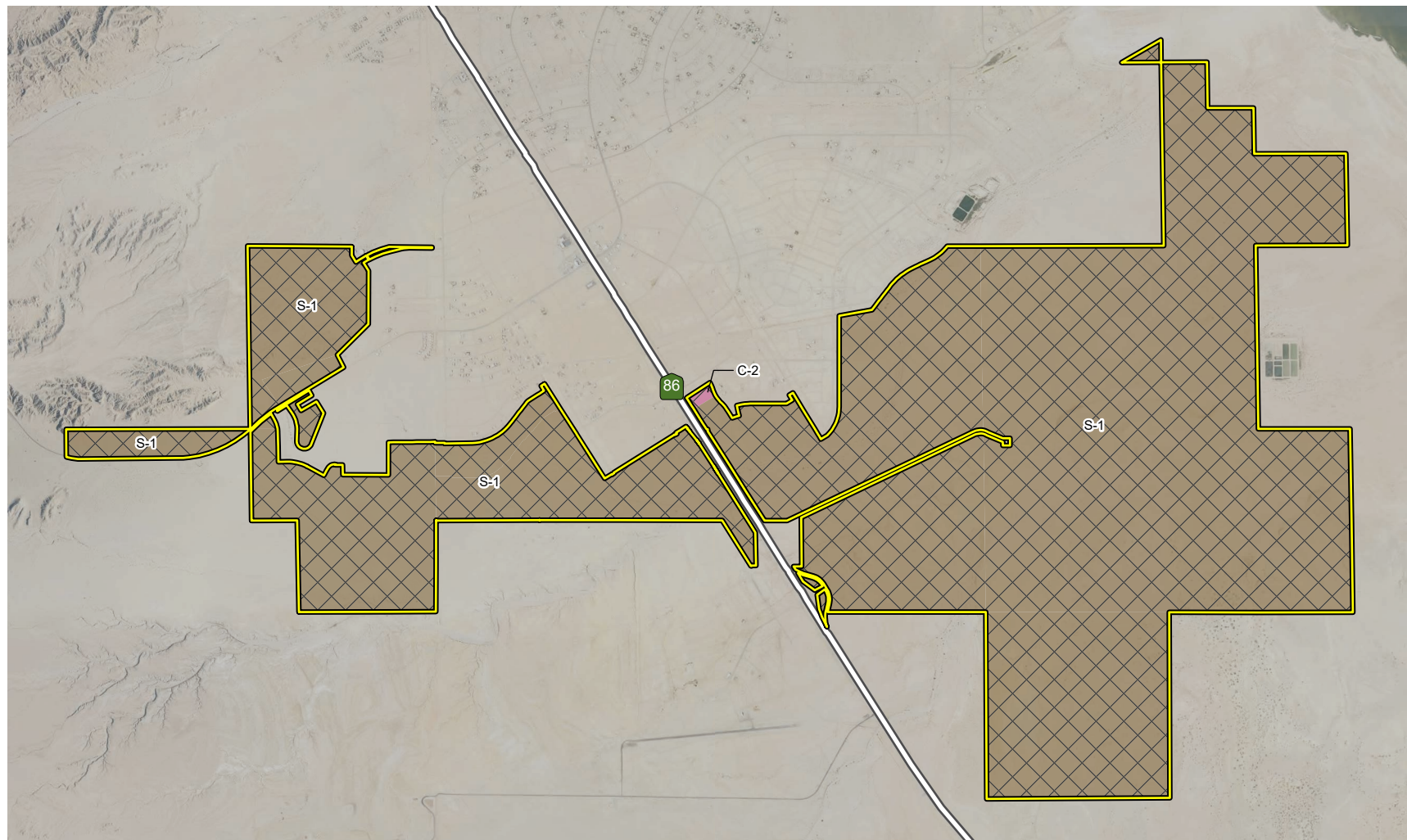




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Figure 2. Existing Solar Plant Site Zoning Designations

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Figure 3. Proposed Solar Plant Site Zoning Designations

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Figure 4. Existing Solar Plant Site General Plan Designations



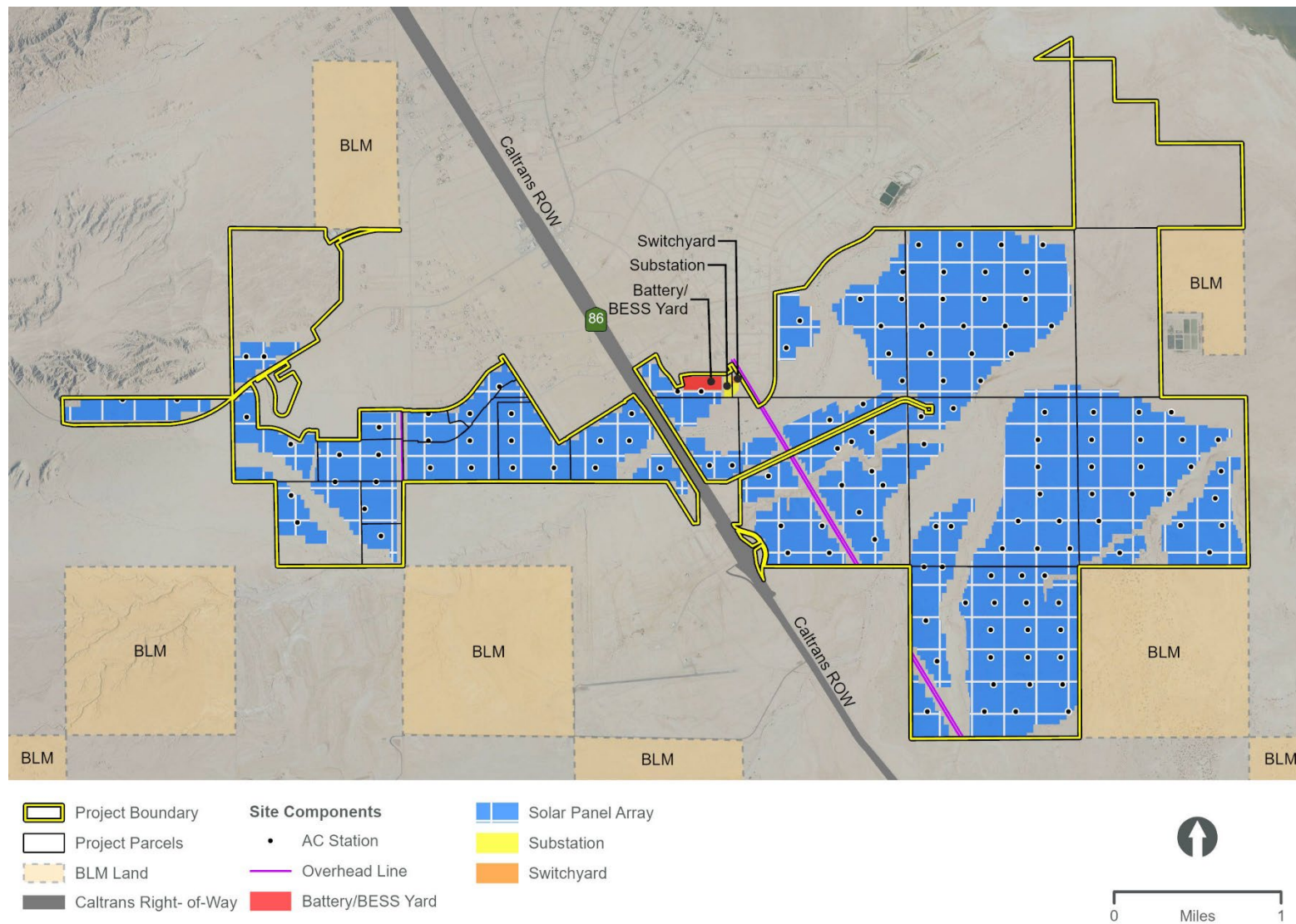
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Figure 5. Proposed Solar Plant Site General Plan Designations



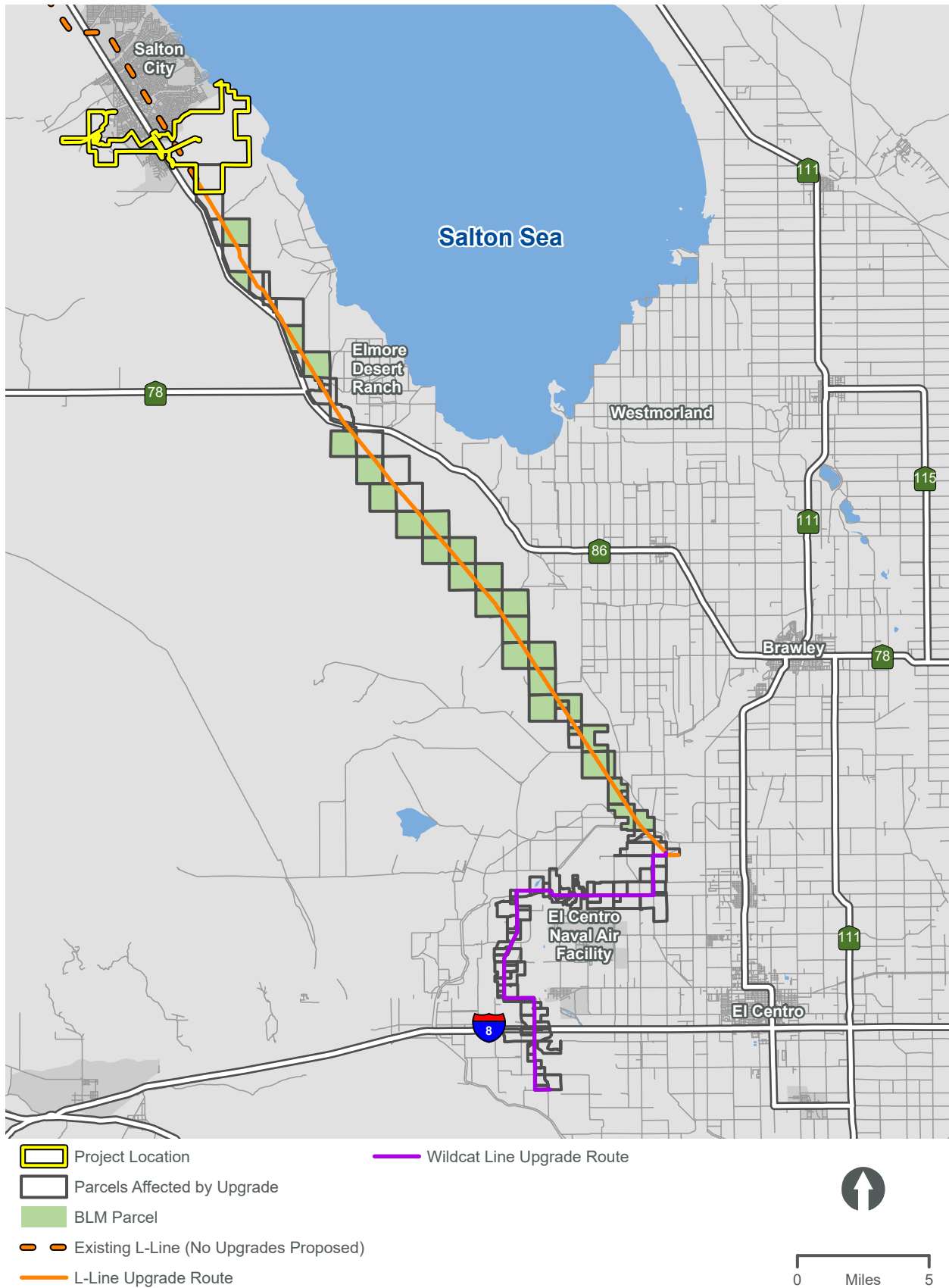
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Figure 6. Proposed Site Plan



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Figure 7. Proposed Transmission Line Upgrade Routes



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.

I. Aesthetics

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized 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 points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **No Impact.** According to the Conservation and Open Space Element of the Imperial County General Plan, the Solar Plant Site and proposed off-site transmission line upgrades are not located within an area that has been formally identified as a federal, state, or county scenic vista (County of Imperial 2016). No scenic vistas or areas with high visual quality would be disrupted. Thus, no impact is identified for this issue area and no further analysis is warranted.
- b) **No Impact.** According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System (Caltrans 2018), the Solar Plant Site and proposed off-site transmission line upgrades are not located within a state scenic highway corridor, nor are there any state scenic highways located in proximity to the Solar Plant Site. The SR 86, I-8, and Evan Hewes Highway are not designated as state scenic highways. The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway. Therefore, no impact is identified for this issue area and no further analysis is warranted.
- c) **Potentially Significant Impact.** The Solar Plant Site is located immediately south of the community of Salton City and is therefore, located within an urbanized area and has a General Plan designation of "Urban Area." However, although the Solar Plant Site is not located near a scenic highway or designated scenic vista, the proposed project may result

in a change to the look and rural character located to the south, east, and west of the Solar Plant Site boundaries with the installation of solar panel arrays.

The proposed off-site transmission line upgrades could potentially alter the existing views with installation of new, and taller, steel poles and structures within the existing ROW. All transmission line upgrades would be installed within the existing transmission line ROW and not within Caltrans' ROWs. Therefore, a potentially significant impact is identified for this issue area. A visualization study will be prepared for the project and this issue will be addressed in the EIR.

- d) **Potentially Significant Impact.** Minimal lighting is required for project operation and is limited to safety and security functions. All lighting will be directed away from any public ROW; however, there are scattered residences located north of the Solar Plant Site and SR 86 traverses the Solar Plant Site.

Any lighting required for safety and security within the Solar Plant Site would be hooded and oriented downward to avoid spilling over to adjacent parcels consistent with Title 9, Division 17, Chapter 2: Specific Standards for all Renewable Energy Projects, of the County's Zoning Ordinance. Additionally, the solar panels would be constructed of low reflective materials; therefore, it is not anticipated that they would result in creating glare. Although the proposed project is not expected to create a new source of substantial light or glare affecting day or nighttime views, a glare study will be prepared for the proposed project and this issue will be addressed in the EIR. The glare study will also address impacts related to drivers on nearby roadways on the State Highway system. Therefore, a potentially significant impact is identified for this issue area.

In addition, the Salton Sea Airport is located approximately 0.7 miles southwest of the Solar Plant Site. Although the solar panels would be constructed of low reflective materials, the potential for glare to impact aircraft will need to be analyzed further in the EIR.

II. Agriculture and Forestry Resources

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>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.</i></p> <p>Would the project:</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest 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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **No Impact.** According to the California Department of Conservation's (DOC) California Important Farmland Finder, the Solar Plant Site is not located on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California DOC 2020). The Solar Plant Site has not been mapped. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use and no impact would occur. The proposed "L" Line and Wildcat Line upgrades would be located within existing utility ROW already used for electricity

transmission, and therefore would not convert existing agricultural land to a non-agricultural use.

- b) **No Impact.** The Solar Plant Site is currently zoned S-1 (Open Space/Recreation), S-2 (Open Space/Preservation), C-2 (Medium Commercial), and R-1 (Low Density Residential) and is not zoned for agricultural use. The proposed “L” Line and Wildcat Line upgrades would be within existing utility ROW already used for electricity transmission, and therefore would not conflict with existing agricultural zoning. Therefore, the proposed project would not conflict with existing zoning for agricultural use and no impact is identified.

As of December 31, 2018, all Williamson Act contracts in Imperial County have been terminated. The Solar Plant Site is not located on Williamson Act contracted land (California DOC 2022). Therefore, the proposed project would not conflict with a Williamson Act contract and no impact is identified. The proposed “L” Line and Wildcat Line upgrades would be within existing utility ROW already used for electricity transmission, and therefore would not conflict with existing zoning or Williamson Act lands.

- c) **No Impact.** The Solar Plant Site and off-site transmission line upgrade area are not located on forest land as defined in PRC Section 1220 (g). There are no existing forest lands, timberlands, or timberland zoned Timberland Production either onsite or in the immediate vicinity; therefore, the project would not conflict with existing zoning of forest land or cause rezoning of any forest land. Additionally, the site is not zoned as forest, timberland or for Timberland Production. Therefore, no impact is identified for this issue area.
- d) **No Impact.** There are no existing forest lands either on site or in the immediate vicinity of the Solar Plant Site or off-site transmission line upgrade areas. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area.
- e) **No Impact.** As discussed in Response II. a) above, the Solar Plant Site is not located on land designated as Important Farmland and would not convert farmland to non-agriculture use. The proposed “L” Line and Wildcat Line upgrades would be within existing utility ROW already used for electricity transmission. As discussed in Response II. d) above, there are no existing forest lands either on or in the immediate vicinity of the Solar Plant Site or transmission line upgrade area. Therefore, the proposed project would not result in the conversion of forest land to non-forest use. Thus, no impact is identified for this issue area.

III. Air Quality

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i>				
<i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** The Solar Plant Site is located within the jurisdiction of Imperial County Air Pollution Control District (ICAPCD) in the Imperial County portion of the Salton Sea Air Basin. Construction of the proposed project would create temporary emissions of dust, fumes, equipment exhaust, and other air contaminants that may conflict with the ICAPCD's rules and regulations. No stationary source emissions would be generated by the proposed project; however, temporary construction emissions have the potential to result in a significant air quality impact. The off-site transmission line upgrades would also result in temporary construction emissions. An air quality and greenhouse gas study will be prepared to analyze the proposed project's consistency with air quality plans, and will be included in the EIR analysis.
- b) **Potentially Significant Impact.** Currently, the Salton Sea Air Basin is either in attainment or unclassified for all federal and state air pollutant standards, with the exception of the federal ozone (O₃), particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) standards, and state standards for O₃ and PM₁₀. Air pollutants transported into the Salton Sea Air Basin from the adjacent South Coast Air Basin (Los Angeles County, San Bernardino County, Orange County, and Riverside County) and Mexicali (Mexico) substantially contribute to the non-attainment conditions in the Salton Sea Air Basin. A potentially significant impact is identified for this issue area. An air quality and greenhouse gas study will be prepared to analyze the proposed project's potential air quality impacts and will be included in the EIR analysis.
- c) **Potentially Significant Impact.** Several single-family residences are located along the northern-central border of the Solar Plant Site and are scattered on the east and the west sides of SR 86. The nearest single-family residences are located along Saundra Avenue and are as close as approximately 50 feet from the Solar Plant Site boundary. While there may be sensitive receptors in proximity to the off-site transmission line upgrade routes, there

would be minimal grading (if necessary) and a limited use of construction vehicles at any one time, with relatively short durations. This issue will be addressed in the air quality and greenhouse gas study and EIR analysis.

- d) **No Impact.** Land uses commonly considered to be potential sources of odorous emissions include wastewater treatment plants, sanitary landfills, food processing facilities, chemical manufacturing plants, rendering plants, paint/coating operations, and concentrated agricultural feeding operations and dairies. The operation of a solar facility and battery storage system are not odor producers. Therefore, no impact is identified for this issue.

IV. Biological Resources

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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 Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input 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, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** According to the Conservation and Open Space Element of the General Plan (County of Imperial 2016), numerous special-status species occur in the County, and of particular concern is the western burrowing owl which may have the potential to occur within the Solar Plant Site. Burrowing owls, a candidate species under the California Endangered Species Act, are commonly found along canals and drains. Although there are

no IID canals located within the Solar Plant Site, access roads, canals, and other drainages could be located in the project vicinity. There is also the potential for other sensitive animal species to occur on-site including Snowy Plover, Yuma Ridgeway Rail, Southwestern Willow Flycatcher, and flat-tailed horned lizard, as well as sensitive plant species. Additionally, the transmission line upgrades that would be required as part of project implementation may traverse biologically sensitive lands. The proposed off-site transmission line upgrade areas are also likely to traverse areas with the presence of sensitive biological resources. Thus, a potentially significant impact is identified for this issue area. A biological resources report that will address the proposed project's potential impacts on biological resources will be prepared and included in the EIR analysis.

- b) **Potentially Significant Impact.** Refer to response IV. a) above.
- c) **Potentially Significant Impact.** According to the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory, the Solar Plant Site is situated between riverine features that connect to the Salton Sea (USFWS 2024). The Solar Plant Site is located approximately 0.7 mile west of the Salton Sea. There does not appear to be ponds within the Solar Plant Site; however, the Solar Plant Site has drainage channels that could potentially be considered jurisdictional waters by California Department of Fish and Wildlife (CDFW) and United States Army Corps of Engineers (USACE). The proposed off-site transmission line upgrades areas may also traverse jurisdictional waters (e.g., the New River). Therefore, a potentially significant impact is identified for this issue area. A jurisdictional waters/wetlands delineation report will be prepared and included in the EIR analysis.
- d) **Less than Significant Impact.** The Solar Plant Site provides wildlife movement opportunities because the majority of the site is vacant and undeveloped desert land which could support some terrestrial wildlife movement. However, the Solar Plant Site is not located within a recognized terrestrial species corridor or major habitat linkage. Additionally, the Solar Plant Site would not be considered a wildlife movement corridor that would need to be preserved to allow wildlife to move between important natural habitat areas due to the absence of conserved natural lands in the vicinity and the Solar Plant Site's proximity to areas containing existing disturbances (i.e., paved highway and roads). The Solar Plant Site is also mostly surrounded by open unimpeded desert land, functioning as two habitat blocks located east and west of SR-86 rather than a corridor. The Solar Plant Site is exposed and contains no major features that would be considered critical movement corridors for wildlife. Although the dirt roads and desert washes located within the project boundaries are likely utilized by wildlife moving through the area, these features would not be considered necessary linkages between conserved natural habitat areas or critical for wildlife movement because of the nearby open space surrounding the project. The proposed off-site transmission line upgrades would be on elevated structures that would not act as a barrier to wildlife movement. Construction of the project is not anticipated to impede or significantly affect any existing terrestrial wildlife corridor, and this is considered a less than significant impact. Nonetheless, this issue will be addressed in the biological resources report being prepared for the project.
- e) **Potentially Significant Impact.** Refer to response IV. a) above.
- f) **No Impact.** The Solar Plant Site and proposed off-site transmission line upgrades route are not located in a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact is identified for this issue area.

V. Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** Currently, the Solar Plant Site is vacant, undeveloped privately owned land that is surrounded by open space to the east, west, and south. According to the Conservation and Open Space Element of the General Plan (County of Imperial 2016), the Solar Plant Site is located in an area of heightened prehistoric and historic sensitivity due to its proximity to the Salton Sea. Initial cultural resources records search results indicate that there are previously recorded cultural resources located within the Solar Plant Site. The proposed off-site transmission line upgrades may also traverse areas with cultural resources. A cultural resources report that will address the proposed project's potential impacts on historic and prehistoric resources will be prepared and this issue will be addressed in the EIR.
- b) **Potentially Significant Impact.** Refer to response V. a) above.
- c) **Potentially Significant Impact.** There is a potential for unknown human remains to be unearthed during earthwork activities based on initial cultural resources records search results. This issue is potentially significant and will be addressed in the EIR.

VI. Energy

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** The project includes the construction of an 800-MW AC solar field, consisting of 1,964,000 tracker modules in 327,240 strings and associated collector and inverter facilities, and an 800-MW (3,200 MW hour) BESS, on approximately 5,900 acres of vacant land. In addition, upgrades to both the existing IID “L” Line, as well as the existing Wildcat Line to the south would be required as part of project implementation. The existing 161 kV “L” Line would be upgraded to a 230 kV line and the Wildcat Line would be upgraded from a 12 to 34.5 kV line to a 230 kV line as well.

The use of energy associated with the proposed project includes both construction and operational activities. Construction activities consume energy through the use of heavy construction equipment and truck and worker traffic. However, construction of the proposed project would involve the use of energy- and fuel-efficient construction equipment that would help minimize inefficient or wasteful use of energy and increase conservation during construction.

Although the project would directly support the Renewable Portfolio Standards (RPS) goal for increasing the percentage of electricity procured from renewable sources, the energy used during construction and operations will be evaluated in further detail as part of the greenhouse gas (GHG) emissions assessment which includes an energy analysis. Therefore, this issue will be addressed as potentially significant in the EIR.

- b) **Less than Significant Impact.** Implementation and operation of the project would promote the use of renewable energy and contribute incrementally to the reduction in demand for fossil fuel use for electricity-generating purposes and help California meet its RPS. Additionally, the project would be consistent with the County’s General Plan Conservation and Open Space Element, Objective 9.2 which encourages renewable energy developments. The proposed project would directly support state and local plans for renewable energy development and would be considered a less than significant impact.

VII. Geology and Soils

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- ai) **No Impact.** According to the California Earthquake Hazards Zone Application (California DOC 2019), the Solar Plant Site is not located within a State of California, Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Earthquake Fault Zone is located approximately 7.3 miles west of the Solar Plant Site. The proposed project would not result in the construction of any structure intended for human occupancy and all structures and on-site facilities would be designed in accordance with the most recent California Building Code (CBC). Therefore, the proposed project result in no impact associated with the rupture of a known earthquake fault.
- a ii) **Less than Significant Impact.** Southern California is a seismically active region, therefore it is highly likely that regional earthquakes would occur that could affect the proposed Wildcat Energy Farm project and proposed off-site transmission line upgrades. However, as previously mentioned above, no active faults are underlying or adjacent to the Solar Plant Site. All structures and onsite facilities would be designed in accordance with the most recent CBC for the peak site ground acceleration. However, the Solar Plant Site could be affected by the occurrence of seismic activity to some degree but no more than the surrounding properties. A potentially significant impact has been identified for this issue area. A geotechnical report that will address the proposed project's potential impacts on geology and soils will be prepared and this issue will be addressed in the EIR.
- a iii) **Less than Significant Impact.** Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as vibratory motion produced by earthquakes. With strong ground shaking, an increase in pore water pressure develops as the soil tends to reduce in volume. If the increase in pore water pressure is sufficient to reduce the vertical effective stress (suspending the soil particles in water), the soil strength decreases, and the soil behaves as a liquid (similar to quicksand). Liquefaction can produce excessive settlement, ground rupture, lateral spreading, or failure of shallow bearing foundations.

Four conditions are generally required for liquefaction to occur, including: 1) saturated soil, 2) loosely packed soil, 3) relatively cohesionless soil, and 4) groundshaking of sufficient intensity must occur to trigger the mechanism.

All four conditions listed above may exist to some degree at the Solar Plant Site and along the proposed off-site transmission line upgrades. Therefore, there is a potentially significant impact associated with liquefaction. A geotechnical report that will be prepared and will address the proposed project's potential impacts on geology and soils. This issue will be addressed in the EIR.
- a iv) **No Impact.** According to Figure 2: Landslide Activity in the Seismic and Public Safety Element of the General Plan (County of Imperial 1997), the Solar Plant Site and proposed off-site transmission line upgrades are not located in an area that is prone to landslide hazards. Furthermore, with the exception of incised drainages that traverse the Solar Plant Site, the Solar Plant Site and surrounding area is relatively flat and no steep slopes have been identified on the site. Therefore, no impact is identified for this issue area.
- b) **Potentially Significant Impact.** According to Figure 3: Erosion Activity in the Soil the Seismic and Public Safety Element of the General Plan (County of Imperial 1997), the Solar Plant Site and proposed off-site transmission line upgrades are within a generally flat area with low levels of natural erosion. However, soil erosion can result during construction as grading and construction can loosen surface soils and make soils susceptible to wind and water movement across the surface. Erosion would be controlled on-site in accordance with Imperial County standards including preparation, review, and approval of a grading plan by the Imperial County Engineer. However, due to the large area subject to construction and soil disturbing activities, this impact is considered potentially significant and will be addressed in further detail in the EIR.

- c) **Potentially Significant Impact.** Near surface soils within the Solar Plant Site and proposed off-site transmission line upgrades will need to be identified to determine if the soils are unstable. Therefore, this issue is potentially significant and will be analyzed in the EIR.
- d) **Potentially Significant Impact.** Near surface soils within the Solar Plant Site and proposed off-site transmission line upgrades will need to be identified to determine if they consist of soils having expansion potential. Therefore, this issue is potentially significant and will be analyzed in the EIR.
- e) **No Impact.** The Solar Plant Site and proposed off-site transmission line upgrades would not require the installation of septic tanks or alternative wastewater disposal systems. During construction, it is assumed that construction workers would utilize port-o-potties that would be removed from once construction is completed. The proposed solar facility and battery storage system would be remotely operated, controlled and monitored and with no requirement for daily on-site employees. Therefore, no impact is identified for this issue area.
- f) **Potentially Significant Impact.** Many paleontological fossil sites are recorded in Imperial County and have been discovered during construction activities. Paleontological resources are typically impacted when earthwork activities, such as mass excavation cut into geological deposits (formations) with buried fossils. It is not known if any paleontological resources are located on the Solar Plant Site or proposed off-site transmission line upgrades. The proposed project's potential to impact paleontological resources will be addressed in the EIR.

VIII. Greenhouse Gas Emissions

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** In the long-term, the proposed project is expected to provide a benefit with respect to reduction of greenhouse gas emissions. However, the proposed project has the potential to generate greenhouse gas emissions during construction, in addition to construction worker trips to and from the Solar Plant Site and the proposed transmission line upgrade routes. Thus, a potentially significant impact is identified for this issue area. An air quality and greenhouse gas emissions assessment will be prepared for the proposed project, and this issue will be addressed in the EIR.
- b) **Potentially Significant Impact.** Refer to response VIII. a) above.

IX. Hazards and Hazardous Materials

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input 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?	<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?	<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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** Construction of the proposed project (including proposed off-site transmission line upgrades) will involve the limited use of hazardous materials, such as fuels and greases to fuel and service construction vehicles and equipment. Project construction activities that would disturb soils would include the use of construction vehicles and equipment and their associated grease, oil, and fuels. Vehicle fuels, oils, and grease have the potential to be released into the environment through natural events or human error.

No extremely hazardous substances are anticipated to be produced, used, stored, transported, or disposed of as a result of project construction. Operation of the proposed project will be conducted remotely. Therefore, no habitable structures (e.g. housing or operation and maintenance [O&M] building) are proposed on the Solar Plant Site. Regular and routine maintenance of the proposed project may result in the potential to handle hazardous materials. However, the hazardous materials handled on-site would be limited to small amounts of everyday use cleaners and common chemicals used for maintenance. The applicant will be required to comply with State laws and County Ordinance restrictions, which regulate and control hazardous materials handled on-site. Such hazardous wastes would be transported off-site for disposal according to applicable State and County restrictions and laws governing the disposal of hazardous waste during construction and operation of the project. A less than significant impact would occur for hazardous materials related to the PV solar panels and associated facilities.

However, the proposed project includes an 800-MW (3,200 MW hour) BESS which would consist of lithium ion or flow batteries. The batteries will either be housed in storage containers or buildings fitted with HVAC and fire suppression systems as necessary, depending on the final selection of battery technology. The U.S. Department of Transportation (DOT) regulates transport of lithium-ion batteries under the DOT's Hazardous Materials Regulations (HMR) (49 CFR Parts 171-180). The HMR apply to any material DOT determines is capable of posing an unreasonable risk to health, safety, and property when transported in commerce. Lithium-ion batteries must conform to all applicable HMR requirements when offered for transportation or transported by air, highway, rail, or water. Additionally, carbon (as graphite) is flammable and could pose a fire hazard. Fire protection is achieved through project design features, such as monitoring, diagnostics and a fire suppression system. The project would be required to comply with state laws and county ordinance restrictions, which regulate and control hazardous materials handled on site. The project will also be required to comply with Imperial County Fire Department Fire Prevention Bureau CUP Conditions of Approval for solar project and BESS systems. The potential hazard associated with the proposed BESS system will be addressed in the EIR.

- b) **Potentially Significant Impact.** Refer to response IX. a) above.
- c) **No Impact.** The Solar Plant Site is not located within 0.25 mile of any existing or proposed schools. The nearest school is West Shores High School located approximately 2 miles to the northeast of the Solar Plant Site at 2381 Shore Hawk Avenue. Additionally, there are no schools within 0.25 miles of the "L" Line or Wildcat Line upgrade routes. Therefore, the proposed project would not pose a risk to nearby schools and no impact would occur.
- d) **Potentially Significant Impact.** Based on a review of the Cortese List conducted in July 2024, the Solar Plant Site is not listed as a hazardous materials site (DTSC 2024). Table 4 shows the hazardous materials sites located within 1,000 feet of the proposed transmission line upgrades (DTSC 2024).

Therefore, implementation of the proposed project has a potentially significant impact related to being located on a listed hazardous materials site pursuant to Government Code Section 65962.5.

Table 4. Hazardous Materials Sites within 1,000 feet of the Proposed Transmission Line Upgrades

Hazardous Materials Site	Address	Type	Status	Proposed Transmission Line Upgrades
El Centro Rocket Target No. 2 (#93)	E1/2, NW1/2, S13, T14S & R12E	Cleanup Site – State Response	Active	L-Line
Imperial County Class III Waste Management Facility	Worthington, Imperial, CA	Land Disposal Site	Open – Closing with monitoring	Wildcat Line

Source: Compiled by HDR 2024

- e) **Potentially Significant Impact.** The Solar Plant Site is located within two miles of a public airport. The nearest airport is the Salton Sea Airport located approximately 0.7 miles southwest of the Solar Plant Site. As identified in the Imperial County Airport Land Use Compatibility Maps, the proposed Solar Plant Site is located within the noise contours of the Salton Sea Airport (ICPDS 2023). Additionally, the proposed off-site transmission line upgrades would traverse areas that are in proximity to airports (e.g., Naval Air Station El Centro). Therefore, potentially significant impacts may occur and will be addressed in the EIR.
- f) **No Impact.** The proposed project, including off-site transmission line upgrades, does not involve blocking or restricting any access routes. The proposed access road at the Solar Plant Site would be designed in accordance with fire department standards. Therefore, the proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan. No impact is identified for this issue area.
- g) **No Impact.** Based on a review of the California Department of Forestry and Fire Protection's fire hazard severity zone map, the Solar Plant Site and proposed off-site transmission line upgrades are not located within a fire hazard severity zone (California Department of Forestry and Fire Protection 2023). The proposed project would not introduce features that directly or indirectly increase the risk of wildfire on the Solar Plant Site. No impact is identified for this issue area.

X. Hydrology and Water Quality

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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:				
i. result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** The proposed project would require construction activities that would disturb soils such as the use of construction vehicles and equipment and their associated grease, oil, and fuels. Vehicle fuels, oils, and grease have the potential to be released into the environment through natural events or human error and therefore, could significantly affect water quality.

As runoff flows over developed surfaces, water can entrain a variety of potential pollutants including, but not limited to, oil and grease, pesticides, trace metals, and nutrients. These pollutants can become suspended in runoff and carried to receiving waters. If they are not intercepted or are left uncontrolled, the polluted runoff would otherwise freely sheet flow from the Solar Plant Site to the IID Imperial Valley Drains and could result in the accumulation of these pollutants in the receiving waters. Potentially significant water quality impacts have been identified and will be addressed in the EIR.

- b) **Potentially Significant Impact.** The water demand for the proposed project will consist of water needed during construction for dust control and soil conditioning during installation of the photovoltaic panels, battery storage units, and related infrastructure. During the operational phase of the solar facility, water will be needed for routine maintenance activities, which primarily consists of washing the photovoltaic panels to maintain generation efficiency. The proposed water source for the project is groundwater, which would be obtained from the proposed on-site groundwater well. Potentially significant groundwater supply impacts have been identified and will be addressed in the EIR.
- ci) **Less than Significant Impact.** It is anticipated that the proposed drainage patterns would be similar to the existing site conditions. Larger, incised drainage features on the Solar Plant Site are proposed to be avoided. The project applicant would be required to implement on-site erosion control measures in accordance with Imperial County standards which require preparation, review, and approval of a grading plan by the Imperial County Engineer. Therefore, the proposed project would not result in substantial erosion or siltation on- or off-site. A less than significant impact is identified for this issue area.
- cii) **Potentially Significant Impact.** The installation of the proposed solar panel arrays would result in an increase of impervious surfaces at the Solar Plant Site and therefore, increase the amount of surface water runoff in the project area. Although water will continue to percolate through the ground, the increase of impervious surfaces could result in in flooding on- or off-site or exceed the capacity of existing or planned stormwater drainage systems and provide substantial additional sources of polluted runoff. A potentially significant impact related to increasing the rate or amount of surface runoff in the area has been identified and this issue will be addressed in the EIR.
- ciii) **Potentially Significant Impact.** As stated in response X. cii) above, the proposed project would result in an increase of impervious surfaces at the Solar Plant Site. Therefore, the proposed project could create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provided substantial additional sources of polluted runoff. A potentially significant impact has been identified and this issue will be addressed in the EIR.
- civ) **Potentially Significant Impact.** According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (Map Numbers 06025C0339C and 06025C0343C), the Solar Plant Site is located within Zone AE and Zone X (FEMA 2021). Flood Zone AE indicates that the proposed project would be located within a Special Flood Hazard Area determined to be a high-risk area that is close to floodplains and bodies of water (Salton Sea). Flood Zone X is an area determined to be outside of the 0.2 percent annual chance of a flood. The proposed project would involve the placement of structures within a 100-year flood hazard area. This would constitute a potential need for Clean Water Act permits (Section 404 and Section 401) issued by the U.S. Environmental Protection Agency or U.S. Army Corps of Engineers and/or a Section 1602 permit from the California Department of Fish and Wildlife. The proposed off-site transmission line upgrades would occur within areas where structures already exist. The proposed transmission line upgrades involve replacement of existing poles at existing pole locations. However, construction of upgrades may involve the need for new construction access in locations associated with 100-year flood. Therefore, potentially significant impacts related to flooding have been identified and this issue will be addressed in the EIR.

- d) **Less than Significant Impact.** The Solar Plant Site is located within Zone AE and Zone X (FEMA 2021). According to the Seismic and Public Safety Element of the General Plan, the most likely location for a significant seiche to occur is the Salton Sea, which is located less than 1 mile east of the Solar Plant Site. While there have been a number of seismic events since the formation of the Salton Sea, no significant seiches have occurred to date. A seiche could occur, however, in the Salton Sea under the appropriate seismic conditions. The Salton Sea is proximal to the San Andreas and San Jacinto faults and would be subject to significant seismic ground shaking that could generate a seiche (County of Imperial 1997). The likelihood of seismic activity producing waves large enough to affect the Solar Plant Site is small. Although the Solar Plant Site is located in an area with potential for a seiche, the risk of release of pollutants attributable to inundation is considered low based on no documented history of seiche-induced flooding of the Solar Plant Site. No substantial damage is expected from seiches on the Solar Plant Site, and implementation of the project would not increase the inherent risk of seiches on the Solar Plant Site. Therefore, this would be a less than significant impact.
- e) **Potentially Significant Impact.** The proposed project would include the installation of an on-site groundwater well on the Solar Plant Site. In addition, as described in response X. a) above, the proposed project has the potential to create urban non-point source discharge that could affect runoff and be carried into receiving waters. As such, potentially significant impacts related to conflicting with a water quality control plan and a sustainable groundwater management plan have been identified and this issue will be addressed in the EIR.

XI. Land Use and Planning

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Less than Significant Impact.** The Solar Plant Site is located in a sparsely populated portion of Imperial County and south of the community of Salton City. Several single-family residences are along the northern-central border of the Solar Plant Site and are scattered on the east and the west sides of SR 86. The nearest single-family residences are located along Saundra Avenue and are as near as approximately 50 feet from the Solar Plant Site boundary. Although in close proximity to residences, implementation of the proposed solar facility, including the proposed off-site transmission line upgrades, would not divide an established community and a less than significant impact would occur.
- b) **Potentially Significant Impact.** Implementation of the project requires an amendment to the County's General Plan Renewable Energy and Transmission Element, Zone Change, and approval of two CUPs, as described below:

- **General Plan Amendment:** The applicant is requesting a General Plan Amendment to include/classify all parcels at the Solar Plant site into the RE Overlay Zone. The underlying "Urban Area" General Plan designation would remain and areas designated as "Low Density Residential" would be changed to "Recreation/Open Space".

Additionally, the applicant is requesting an amendment to the West Shores/Salton City UAP to allow for the use of a solar facility and battery storage system within the UAP's planning area.

- **Zone Change:** The Solar Plant Site is currently zoned Low Density Residential (R-1 and R-1-L-5), Medium Commercial (C-2), Open Space/Recreation (S-1), and Open Space/Preservation (S-2). The applicant is requesting a Zone Change to include/classify all parcels at the Solar Plant Site into the Renewable Energy/Geothermal (REG) Overlay Zone (i.e., Zone Change from S-1 to S-1-RE, S-2 to S-2-RE, C-2 to C-2-RE). Pursuant to Title 9, Division 5, Chapter 2, solar facilities are not listed under uses permitted with a CUP in the R-1 or R-1-L-5 Zones. Therefore, the applicant is also requesting a Zone Change for the areas zoned as R-1 and R-1-L-5 to be rezoned to S-1-RE.
- **Conditional Use Permits:** The Solar Plant Site parcels are currently zoned as S-1, S-2, C-2, R-1/R-1-L-5. Pursuant to Title 9, Division 5, Chapter 18 and 19, the following uses are permitted in the S-1 and S-2 zones subject to approval of a CUP from Imperial County:

i) Major facilities relating to the generation and transmission of electrical energy provide[d] such facilities are not under State or Federal law, to [be] approved

exclusively by an agency, or agencies of the State or Federal government, and provided such facilities shall be approved subsequent to coordination review of the Imperial Irrigation District for electrical matters. Such uses shall include but be limited to the following:

- *Electrical generation plants*
- *Facilities for the transmission of electrical energy (100-200 kV)*
- *Electrical substations in an electrical transmission system (500 kv/230 kv/161 kV)*

Pursuant to Title 9, Division 5, Chapter 13, the following use is permitted in the C-2 zone subject to approval of a CUP from Imperial County:

- *pp) Waste or energy facility*

The County Land Use Ordinance, Division 17, includes the Renewable Energy (RE) Overlay Zone, which authorizes the development and operation of renewable energy projects, with an approved CUP. CUP applications proposed for specific renewable energy project not located in the RE Overlay Zone would not be allowed without an amendment to the RE Overlay Zone. The entire Solar Plant Site is located outside of the RE Overlay Zone.

Pursuant to Title 9 Division 21: Water Well Regulations, §92102.00, the applicant will be required to obtain a CUP for the proposed on-site groundwater well. As required by §92102.00, no person shall (1) drill a new well, (2) activate a previously drilled but unused well, (unused shall mean a well or wells that have not been used for a 12 month) period by installing pumps, motors, pressure tanks, piping, or other equipment necessary or intended to make the well operational, (3) increase the pumping capacity of a well, or (4) change the use of a well, without first obtaining a CUP through the County Planning & Development Services Department.

As previously mentioned, the proposed project would involve amendments to the West Shores/Salton City UAP. The Land Use and Planning analysis in the EIR will include an analysis of the project's consistency with the West Shores/Salton City UAP. The Solar Plant Site's context in relation to the County's Airport Land Use Plan will also be addressed especially in consideration of the proximity of the Salton Sea Airport to the Solar Plant Site. Additionally, the transmission line upgrade for the "L" Line would require BLM approvals to upgrade the 161 kV "L" Line to a 230 kV line using 100-foot steel poles within the existing ROW (within BLM-managed lands). The "L" Line traverses the Desert Renewable Energy Conservation Plan (DRECP) area, therefore the proposed "L" Line upgrades will be evaluated to ensure consistency with the BLM's DRECP Land Use Plan Amendment in the EIR.

In summary, the proposed General Plan Amendment and Zone Change may result in a conflict with an applicable land use plan, policy or regulation. A potentially significant impact has been identified for this issue, and this issue will be addressed in the EIR.

XII. Mineral Resources

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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"/>
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"/>

Impact Analysis

- a) **No Impact.** Construction of the proposed project would not result in any impacts to known mineral resources or mineral resource recovery sites. The nearest active mines for mineral resources are open pit sand and gravel located approximately 7.5 miles to the north of the Solar Plant Site (California DOC 2022). Additionally, the proposed project would not preclude future mineral resource exploration throughout the Solar Plant Site. No impact would occur.
- b) **No Impact.** As noted in Response XII. a), implementation of the proposed project would not result in any impacts to known mineral resources or mineral resource recovery sites. Additionally, the proposed project would not preclude future mineral resource exploration throughout the Solar Plant Site. No impact would occur.

XIII. Noise

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** The Imperial County Title 9 Land Use Ordinance, Division 7, Chapter 2, Section 90702.00 - Sound level limits, establishes one-hour average sound level limits for the County's land use zones. Table 5 shows the applicable sound level limits for the applicable land use zones for the proposed project.

The proposed project is required to comply with the noise levels prescribed in Table 5.

Table 5. Sound Level Limits for the Project

Land Use Zone	Time of Day	One-Hour Average Sound Level (Decibels)
All R-1	10 p.m. to 7 a.m.	45
All Commercial (C-2)	7 a.m. to 10 p.m.	60
General Industrial	Anytime	75

Source: County of Imperial, Title 9, Division 7, Chapter 2, Section 90702.00.

In addition to adhering to the County's sound level limits, the project proposed will also be expected to comply with the Noise Element of the General Plan which states that construction noise, from a single piece of equipment or a combination of equipment, shall not exceed 75 dB, when averaged over an eight-hour period, and measured at the nearest sensitive receptor. Construction equipment operation is also limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. on Saturday. Nevertheless, the proposed project will result in the increase in ambient noise levels during construction, which in some locations, would be in relative proximity to existing residential uses. A noise report

that will address the proposed project's potential noise impacts will be prepared and this issue will be addressed in the EIR.

- b) **Potentially Significant Impact.** The County of Imperial does not regulate vibrations associated with construction. However, significant vibration is typically associated with activities such as blasting or the use of pile drivers, neither of which would be required during project construction. Construction activities most likely to cause vibration include heavy construction equipment and site grading operations. Although all heavy, mobile construction equipment has the potential to cause at least some perceptible vibration when operating close to buildings, the vibration is usually short term and is not of sufficient magnitude to cause building damage. Heavy equipment such as dozers, loaders, and drill rig equipment have the potential to be operated in proximity to residences or structures so as to cause vibration impact. Operation of the project would not result in vibrations perceptible to nearby receptors. Potential noise impacts will be addressed in the EIR.
- c) **Less than Significant Impact.** The Solar Plant Site is not located within 2 miles of a public airport. However, the nearest airport is the Salton Sea Airport located approximately 0.7 miles southwest of the Solar Plant Site. The Salton Sea Airport is a private airport, but open for public use and has an adopted Airport Land Use Plan. As such, the proposed project is located within the airport compatibility zone of the Salton Sea Airport (ICDPS 2023). Portions of the Wildcat Line upgrade route are also located within the airport compatibility zone of the Naval Air Facility El Centro (ICPDS 2023). The proposed project does not include any habitable structures or new residents. Therefore, implementation of the proposed project would not expose people residing or working in the project area to excessive noise levels from the Salton Sea Airport operations and a less than significant impact would occur.

XIV. Population and Housing

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **Less than Significant Impact.** Development of housing is not proposed as part of the proposed project. No full-time employees are required to operate the proposed project since the project facility will be monitored remotely. However, it is anticipated that maintenance of the facility will require minimal site presence to perform periodic visual inspections and minor repairs. On intermittent occasions, the presence of additional workers may be required for repairs or replacement of equipment and panel cleaning; however, due to the nature of the facility, such actions will likely occur infrequently and would likely come from the existing local workforce. Therefore, the proposed project would not result in a substantial growth in the area, as the number of employees required to operate and maintain the facility is minimal. A less than significant impact is identified for this issue area.
- b) **No Impact.** No residential units are on the Solar Plant Site or along the proposed transmission upgrade routes that would require relocation. Therefore, the proposed project would not displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. No impact would occur.

XV. Public Services

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
i. Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- ai) **Less than Significant Impact.** The Solar Plant site is located adjacent to the community of Salton City. The project would not likely impact or displace the location of existing fire protection facilities. The project applicant will have a certified fire engineer review the proposed facilities and existing fire response infrastructure to determine if the existing fire response facilities are adequate or if additional facilities (i.e., hydrants, access points) are necessary. The project will also be reviewed by the Imperial County Fire Department and will be required to adhere to applicable fire protection ordinances, and special conditions identified by the Fire Department as part of the CUP review process. The proposed off-site transmission line upgrades would be located within existing utility corridors. Therefore, impacts would be less than significant.
- aii) **Less Than Significant Impact.** The project would not likely impact or displace the location of existing police protection facilities. The project would also include public safety mechanisms such as fences and gates to protect the facilities and reduce unauthorized visitations. In addition, the project will include remote security monitoring and intrusion alerts for the entire property. Furthermore, the project applicant would be required to pay their share of local infrastructure improvement costs. The proposed off-site transmission line upgrades would be located within existing utility corridors. Therefore, impacts would be less than significant.
- aiii) **Less Than Significant Impact.** The proposed project does not include the development of residential land uses that would result in an increase in population or student generation. Also, the number of construction and operational workers coming to the region is low, and would be temporary, and is therefore not expected to increase demand for schools or require the construction of new schools. Therefore, impacts would be less than significant.
- aiv) **Less Than Significant Impact.** The number of construction and operational workers coming to the region is expected to be low, and would be temporary, and is therefore not

expected to increase demand on existing or future parks. Therefore, impacts would be less than significant.

- av) **Less Than Significant Impact.** The number of construction and operational workers coming to the region is low, and would be temporary, and is therefore not expected to increase demand for any public services (such as post offices). Therefore, impacts would be less than significant.

XVI. Recreation

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **No Impact.** The proposed project would not increase the use of existing neighborhood parks and regional parks or other recreational facilities. The proposed project would not induce new populations that would result in the substantial physical deterioration of recreational facilities. The proposed off-site transmission line upgrades would be located within existing utility corridors. No impact would occur.
- b) **No Impact.** The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities. The proposed project would not induce new populations that would require new recreational facilities. The proposed off-site transmission line upgrades would be located within existing utility corridors. No impact would occur.

XVII. Transportation

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** Construction of the proposed project would result in a small increase of traffic to the area, which may result in a potentially significant impact. Therefore, a traffic impact study that will address the proposed project's potential impacts on traffic during construction and operation will be prepared, and this issue will be addressed in the EIR.
- b) **Potentially Significant Impact.** Section 15064.3(b) of the CEQA Guidelines provides guidance on determining the significance of transportation impacts and focuses on the use of vehicle miles traveled (VMT), which is defined as the amount and distance of automobile travel associated with a project. Given the nature of the project, after construction, there would be a nominal amount of vehicle trips generated by the project. Once the proposed project is implemented, the proposed project would require intermittent maintenance requiring a negligible amount of traffic trips on an annual basis. However minimal, the proposed project would increase the number of vehicular trips related to construction and the need for intermittent maintenance on an annual basis. Therefore, this issue is potentially significant and will be addressed in the traffic impact study and EIR analysis.
- c) **Less than Significant Impact.** The project would not result in any changes to any roads, intersections, streets, highways, including new access points from SR-86, nor would it provide any incompatible uses to the street and highway system. All vehicles that would be used for travel to and from the Solar Plant Site and the transmission line upgrade routes would be licensed and comply with all appropriate transportation laws and regulations including obtaining and adhering to provisions of any required permits for oversized loads. To accommodate emergency access, PV panels would be spaced to maintain proper clearance. Proposed project facilities would be designed, constructed, and operated in accordance with applicable fire protection, California Public Utilities Commission (CPUC) safety standards, and other environmental, health, and safety requirements. As such, impacts related to transportation design hazards are considered less than significant.
- d) **Less than Significant Impact.** As previously stated, the PV panels would be spaced to maintain proper clearance. Proposed project facilities would be designed in accordance with applicable fire protection, CPUC safety standards, and other environmental, health, and safety

requirements. All proposed facilities would be constructed within the property boundaries of the Solar Plant Site and would not affect emergency vehicle access to the facility or any roadway. Emergency vehicle access is identified and designated at the Solar Plant Site, and these areas would not be changed as result of the project. Therefore, impacts to emergency access are considered less than significant.

XVIII. Tribal Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project cause a substantial adverse change in the 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:</i>				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a-b) **Potentially Significant Impact.** AB 52 was passed in 2014 and took effect July 1, 2015. It established a new category of environmental resources that must be considered under CEQA called tribal cultural resources (Public Resources Code 21074) and established a process for consulting with Native American tribes and groups regarding those resources. AB 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.

In accordance with AB 52, Imperial County, as the CEQA lead agency, sent AB 52/SB 18 consultation request letters to California Native American tribes that are traditionally and culturally affiliated with the project area on July 10, 2024. This issue will be further analyzed in the EIR.

XIX. Utilities and Service Systems

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater 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"/>
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"/>
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"/>

Impact Analysis

- a) **Potentially Significant Impact.** The Solar Plant site does not currently contain any public utilities or services such as water, wastewater treatment, stormwater drainage, natural gas, or telecommunications facilities; however, the IID's "L" Line electric powerline is aligned through the eastern portion of the Solar Plant Site.

The proposed project would construct a new groundwater well in addition to stormwater basins, but not require the construction of any wastewater treatment, or energy facilities to accommodate the demand of the project. During project construction, water will be needed for dust control and soil conditioning during installation of the PV panels, battery storage units, and related infrastructure. During the operational phase, water will be needed for routine maintenance activities, which will primarily consist of washing the PV panels to maintain generation efficiency. The project's water supply will be provided by a new on-site groundwater supply well to be drilled and installed as part of the project.

As previously mentioned, the proposed project would increase the amount of impervious surfaces on-site with the installation of the solar panel arrays and could therefore, increase surface water runoff during storm events and potentially exceed the capacity of existing or planned stormwater drainage systems. As such, the proposed project could potentially result in the need for expanded stormwater facilities in the Solar Plant Site. A potentially significant impact related to expanding stormwater drainage has been identified and will be addressed in the EIR.

The proposed solar facility, BESS, and proposed off-site transmission line upgrades for both the “L” Line and Wildcat Line would not generate a significant increase in the amount of impervious surfaces that would increase runoff during storm events and exceed the capacity of existing or planned stormwater drainage systems. Although water from solar panel washing would continue to percolate through the ground, as a majority of the surfaces within the Solar Plant Site would remain pervious, the project may include two retention/detention basins on-site. Given that the Solar Plant Site is bisected by SR-86, one retention/detention basin would be constructed on the eastern portion of the Solar Plant Site and the other on the western portion of the site. As such, the proposed project could potentially result in the need for constructing new stormwater drainage systems and a potentially significant impact has been identified. This issue will be addressed further in the EIR.

The wastewater generated during construction would be contained within portable toilet facilities and disposed of at an approved site. The minimal volume of wastewater generated during construction would not require the relocation expansion, or construction of wastewater treatment facilities.

Further, no habitable structures (e.g. housing or O&M buildings) are proposed on the Solar Plant Site. Therefore, the proposed project would not require or result in the relocation or construction of new natural gas facilities.

- b) **Potentially Significant Impact.** During project construction, water will be needed for dust control and soil conditioning during installation of the PV panels, battery storage units, and related infrastructure. During the operational phase, water will be needed for routine maintenance activities, which will primarily consist of washing the PV panels to maintain generation efficiency. The maintenance activities are anticipated to be conducted up to twice a year over a one-to-two-week period each event, so the maintenance water demand is intermittent and not spread throughout the year.

The project would result in an increase in water demand/use, as water from the proposed on-site groundwater well would be required for construction and operations and maintenance. Thus, a potentially significant impact is identified for the availability of sufficient groundwater supplies to serve the proposed project for the reasonably foreseeable future. The proposed project’s potential impacts on water supplies will be analyzed in the EIR.

- c) **No Impact.** The proposed project would not generate wastewater that would need to be treated by a wastewater treatment facility. On-site wastewater needs will be accommodated by the use of portable toilets that would be removed from the Solar Plant Site once construction is complete. No impact would occur.
- d) **Less than Significant Impact.** Solid waste generation would be minor for the construction and operation of the proposed project. Trash would likely be hauled to the Salton City Solid Waste Site (13-AA-0011) located approximately 1.2 miles south of the Solar Plant Site at 935 West Highway 86. The Salton City Solid Waste Site has approximately 62,974,488 cubic yards of remaining capacity and is estimated to remain in operation through 2038 (CalRecycle 2023). Therefore, there is ample landfill capacity in Imperial County to receive the minor amount of solid waste generated by construction and operation of the proposed project.

All treated wooden poles removed along the proposed transmission line upgrade routes would be properly handled, transported, and disposed of at the Salton City Solid Waste Site, consistent with federal, state, and local statutes and regulations. Additionally, because the

proposed project would generate solid waste during construction and operation, the project will be required to comply with state and local requirements for waste reduction and recycling; including the 1989 California Integrated Waste Management Act and the 1991 California Solid Waste Reuse and Recycling Access Act of 1991. Also, conditions of the conditional use permits will contain provisions for recycling and diversion of Imperial County construction waste policies. Therefore, a less than significant impact is identified for this issue area.

- e) **Less than Significant Impact.** The proposed project would comply with all applicable statutes and regulations related to solid waste. As discussed in Response XIX. d) above, solid waste generated by the proposed solar photovoltaic facility and BESS is expected to be minimal. This impact is considered less than significant.

XX. Wildfire

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>				
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) 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"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **No Impact.** According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the Solar Plant Site and proposed off-site transmission line upgrades are not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2022). Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact is identified for this issue area.
- b) **No Impact.** The Solar Plant Site and proposed off-site transmission line upgrades are not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2022). Therefore, the proposed project would not exacerbate wildfire risks. No impact is identified for this issue area.
- c) **Less than Significant Impact.** Fire protection and emergency medical services in the area are provided by the Imperial County Fire Department. The Solar Plant Site and proposed off-site transmission line upgrades are not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2022). Further, the proposed project is located in an area of Imperial County which has a generally low potential for a major fire (County of Imperial 2016).

The project involves the installation of solar PV panels, an on-site substation and switchyard, BESS, inverters, transformers, and an aboveground gen-tie line. To accommodate emergency access, PV panels would be spaced to maintain proper clearance. Proposed project facilities would be designed, constructed, and operated in accordance with applicable fire protection, CPUC safety standards, and other environmental, health, and safety requirements. Primary access roads would be constructed to meet the County Fire Department's standards. Further, water for emergency fire suppression is proposed to be provided by the proposed on-site groundwater well. Therefore, operation and maintenance would not affect the ability of fire personnel to respond to fires or exacerbate fire risk and would continue to be adequately supported by the existing fire protection services. A less than significant impact is identified for this issue area.

- d) **No Impact.** The Solar Plant Site and proposed off-site transmission line upgrades are not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2022). Additionally, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact is identified for this issue area and no further analysis is warranted.

XXI. Mandatory Findings of Significance

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Does the project have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** The proposed project has the potential to result in significant environmental effects on biological resources and cultural resources, which could directly or indirectly cause adverse effects on the environment. These issues will be further evaluated in the EIR.
- b) **Potentially Significant Impact.** Implementation of the proposed project has the potential to result in impacts related to: aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use/planning, noise, transportation, tribal cultural resources, and utilities/service systems. The proposed project has the potential to result in cumulative impacts with regards to the identified issue areas. Cumulative impacts will be discussed and further analyzed in the EIR.
- c) **Potentially Significant Impact.** Implementation of the proposed project has the potential to result in impacts related to: air quality, hazards, geology/soils, GHG emissions, and noise. These potential environmental effects could cause substantial adverse effects on human beings. These issues will be further evaluated in the EIR.

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