PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE

AGENDA DATE: September 11, 2025

FROM: PLANNING & DEVELOPMENT SERVICES DEPT. **AGENDA TIME** 1:30 PM/No.2

CUP #25-0011/IS25-0025 Atlantica

PROJECT TYPE: Employee Temporary Parking SUPERVISOR DIST #1

LOCATION: 2640 East Highway 98, APN 059-250-022 & 023-

Holtville, CA PARCEL SIZE: Approx. 2.77 acres

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

ZONE (existing) A-2- (Medium Agriculture) ZONE (proposed) N/A

GENERAL PLAN FINDINGS ☒ CONSISTENT ☐ INCONSISTENT ☐ MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 09/11/2025

INITIAL STUDY: #25-0025

☐ NEGATIVE DECLARATION ☐ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	☒ NONE	☐ ATTACHED
AG	☒ NONE	☐ ATTACHED
APCD	☐ NONE	☒ ATTACHED
E.H.S.	☒ NONE	☐ ATTACHED
FIRE / OES	☐ NONE	☐ ATTACHED
OTHER		

REQUESTED ACTION:

(See Attached)

Draft

Initial Study

CUP# 25-0011, Temporary Construction Parking Area (North Site) for CEDAR 1/Imperial Sun Solar Project

Initial Study #25-0025

Conditional Use Permit #25-0011

Imperial County, CA

September 2025

[redacted]

Reviewed by:

County of Imperial

Planning & Development Services Department

801 Main Street

El Centro, CA 92243

Prepared 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 CUP # 25-0011, Temporary Construction Parking Area (North Site) for CEDAR 1/Imperial Sun Solar 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 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 CUP # 25-0011, Temporary Construction Parking Area (North Site) for CEDAR 1/Imperial Sun Solar Project will not result in potentially significant environmental impacts; therefore, a Negative Declaration 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.

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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

This Initial Study is an informational document 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 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

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 CUP # 25-0011, Temporary Construction Parking Area (North Site) for CEDAR 1/Imperial Sun Solar 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.

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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 into this document. Tiering is defined as follows:

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

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projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

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

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

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation by Reference

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

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.

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- 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]).

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Environmental Checklist Form

1. **Project Title:** CUP # 25-0011, Temporary Construction Parking Area (North Site) for CEDAR 1/Imperial Sun Solar 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:** David Black, Planner IV, (442) 265-1736
4. **Project Location:** The project site is located on two privately-owned parcels (Assessor Parcel Number [APN] 059-250-022 and -023) in the southernmost portion of Imperial County, California. The nearest cities include the City of Holtville, approximately 9 miles northwest, and the City of Calexico, approximately 11 miles west. The project site is located north of State Route 98 and east of Bonesteel Road. The CEDAR 1/Imperial Sun Solar Project site is located approximately 0.70 miles south of the project site.
5. **Project Sponsor's Name and Address:** Atlantica, 1553 W. Todd Dr. Suite 204, Tempe, AZ 85283
6. **General Plan Designation:** Agriculture
7. **Zoning:** General Agriculture (A-2)
8. **Description of Project:** The proposed project consists of a temporary construction parking area for construction workers that will be constructing the CEDAR 1/Imperial Sun Solar Project. The parking area would be used for temporary designated parking and access. The following describes the project components.

   The proposed parking area would encompass a total of 0.83 acres, and would include the following:

   - 1 - 8x40 Connex
   - 1 Dumpster
   - 52 - 10'x20' Parking Spaces (10'x20')
   - 2 - Silt Tracking Prevention Device (at north and south entrances)

   Access to the parking area would be provided via an existing private access road off of SR-98. The existing access road is located on APN 059-250-023, and directly connects to APN 059-250-022.
9. **Surrounding Land Uses and Setting: Briefly describe the project's surroundings:**

   The project site is located on two privately-owned parcels and is surrounded by active agricultural uses. The project site is zoned A-2. The parcels immediately surrounding the project site are zoned A-2 and Heavy Agriculture (A-3).
10. **(Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):**

    - Imperial County Air Pollution Control District
    - Imperial County Public Works Department

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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.?

In accordance with Assembly Bill (AB) 52, the County sent a Notifications of Consultation Opportunity pursuant to Public Resources Code Section 21080.3.1(d) to the Fort Yuma Quechan Indian Tribe and Agua Caliente Band of Cahuilla Indians on August 5, 2025. On August 5, 2025, the Fort Yuma Quechan Indian Tribe responded via e-mail that they do not wish to comment on the project. On August 13, 2025, the Agua Caliente Band of Cahuilla Indians responded via letter that the project area is not located within the Tribe's Traditional Use Area. Neither tribe requested tribal consultation.

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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.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ 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.

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EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	☐	☐	☒
ENVIRONMENTAL HEALTH	☒	☐	☐
OFFICE EMERGENCY SERVICES	☒	☐	☐
APCD	☒	☐	☐
AG	☒	☐	☐
SHERIFF DEPARTMENT	☐	☐	☒
ICPDS	☒	☐	☐

For [signature]

Jim Minnick, Director of Planning/EEC Chairman

9-16-2025

Date:

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Project Summary

Background

The project applicant, Atlantica, is seeking approval of a conditional use permit (CUP) for the development and use of a temporary construction parking area for construction workers that will be constructing the CEDAR 1/Imperial Sun Solar Project (previously known as VEGA SES 4 Solar Energy Project) that is located between the U.S./Mexico international border and the All-American Canal, on the California side.

The environmental impacts of the VEGA SES 4 Solar Energy Project were analyzed in an Environmental Impact Report (EIR) (State Clearinghouse #2021050018). The EIR analyzed the following components of the VEGA SES 4 Solar Energy Project:

- solar energy generation equipment and associated facilities including a substation and access roads (solar energy facility)
- battery energy storage system
- gen-tie line that would connect the proposed on-site substation to the point of interconnection at the existing Imperial Irrigation District's (IID) 92-kV "P" line
- heavy construction equipment/vehicle access route to the project via Gordon Wells Road or Gray Wells Road
- construction worker access

The Final EIR was certified by the Imperial County Board of Supervisors on October 24, 2023.

The location of the temporary construction parking area for construction workers was unknown at the time the Final EIR was certified. Therefore, the purpose of this Initial Study is to analyze the potential environmental impacts of the proposed temporary construction parking area for the CEDAR 1/Imperial Sun Solar Project (proposed project).

Project Location

As shown in Figure 1, the project site is located on two privately-owned parcels (Assessor Parcel Numbers [APN] 059-250-022 and -023) in the southernmost portion of Imperial County, California. The nearest cities include the City of Holtville, approximately 9 miles northwest, and the City of Calexico, approximately 11 miles west. As shown in Figure 2, the project site is located north of SR-98 and east of Bonesteel Road. The CEDAR 1/Imperial Sun Solar Project site is located approximately 0.70 miles south of the project site.

Project Components

The proposed project consists of a temporary construction parking area for construction workers that will be constructing the CEDAR 1/Imperial Sun Solar Project. The parking area would include designated parking and access. The following describes the project components.

As shown in Figure 3, the proposed parking area would encompass a total of 0.83 acres, and would include the following:

- 1 - 8x40 Connex

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- 1 Dumpster
- 52 - 10'x20' Parking Spaces (10'x20')
- 2 - Silt Tracking Prevention Device (at north and south entrances)

Access to the parking area would be provided via an existing private access road off of SR-98. The existing access road is located on APN 059-250-023, and directly connects to APN 059-250-022.

Construction Worker Access to CEDAR 1/Imperial Sun Solar Project Site

To access the CEDAR 1/Imperial Sun Solar Project site, construction workers would be picked up at a designated shuttle pick-up area from the parking area and dropped off at an existing driveway off SR-98. As shown in Figure 4, the construction workers would then walk across the All-American Canal at an existing crossing. No vehicles or construction vehicles are allowed to travel across this existing crossing. Designated shuttles would pick up workers at the south end of the crossing, and then travel west for approximately one mile along an existing dirt road to the CEDAR 1/Imperial Sun Solar Project site.

The environmental impacts associated with construction worker access to the CEDAR 1/Imperial Sun Solar Project site have been analyzed in the previously-certified VEGA SES 4 Solar Energy Project.

Environmental Setting

The project site is located on two privately-owned parcels and is surrounded by active agricultural uses. The project site is zoned A-2. The parcels immediately surrounding the project site are zoned A-2 and Heavy Agriculture (A-3).

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Figure 1. Regional Location

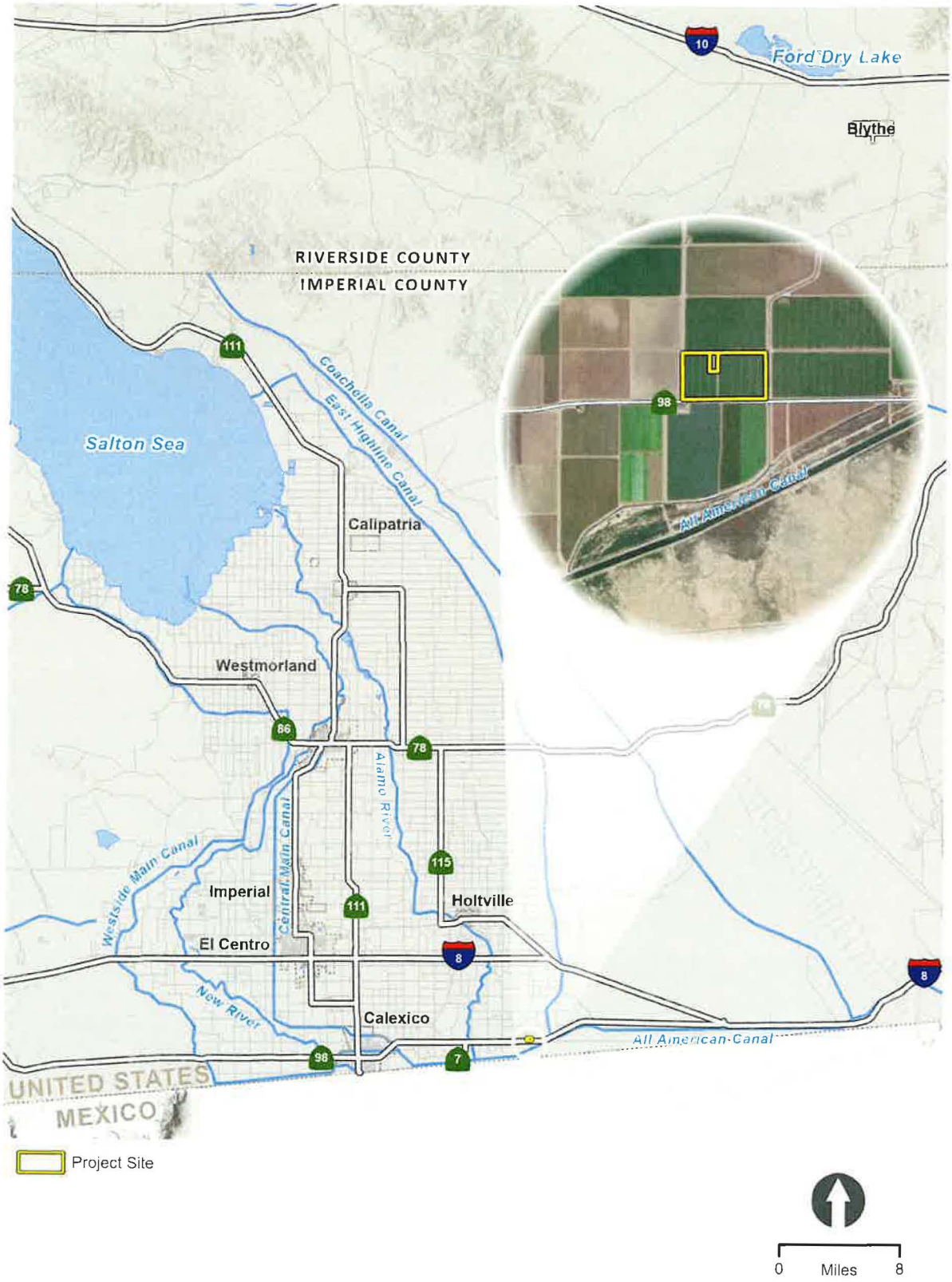

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Figure 2. Local Vicinity

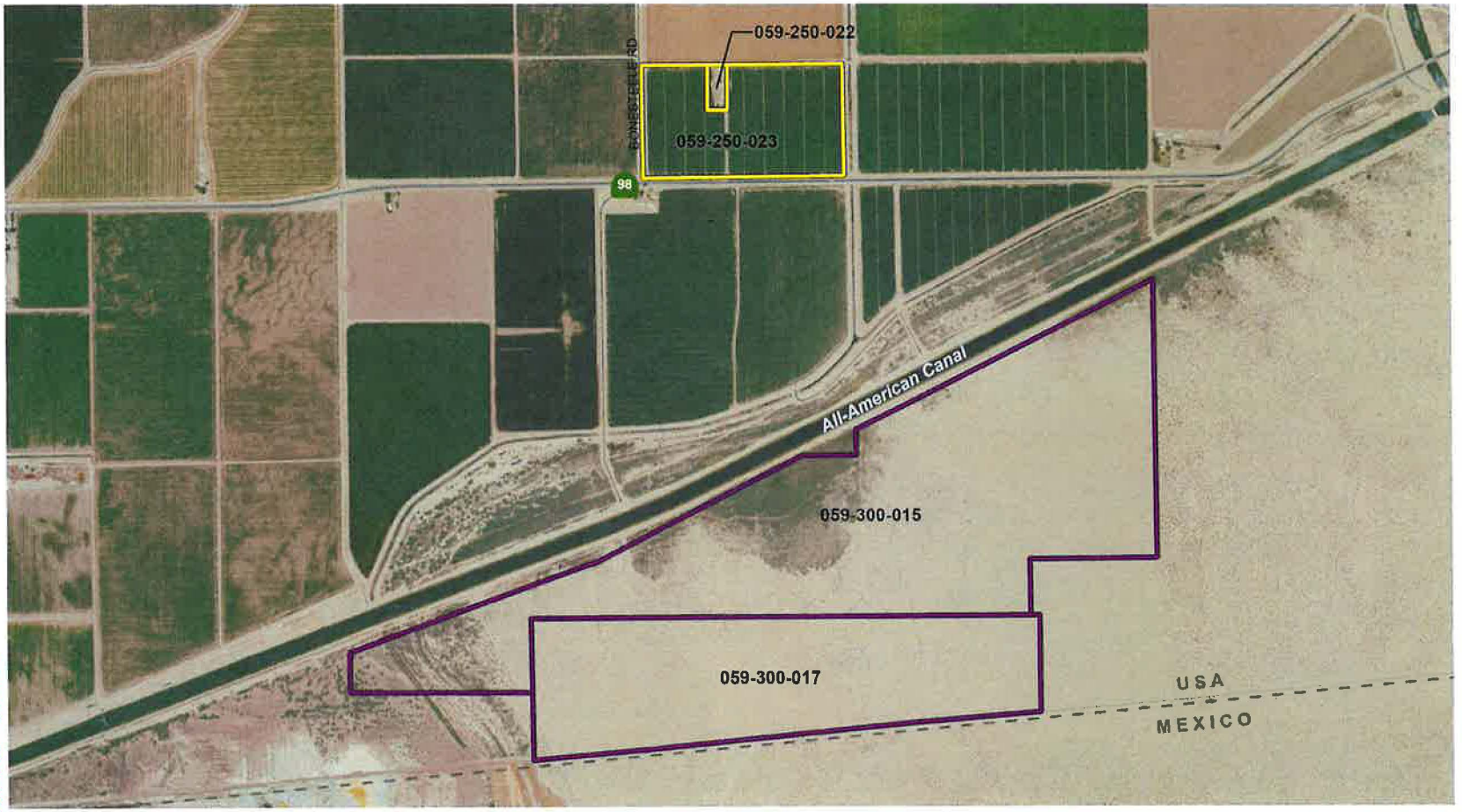

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Figure 3. Site Plan

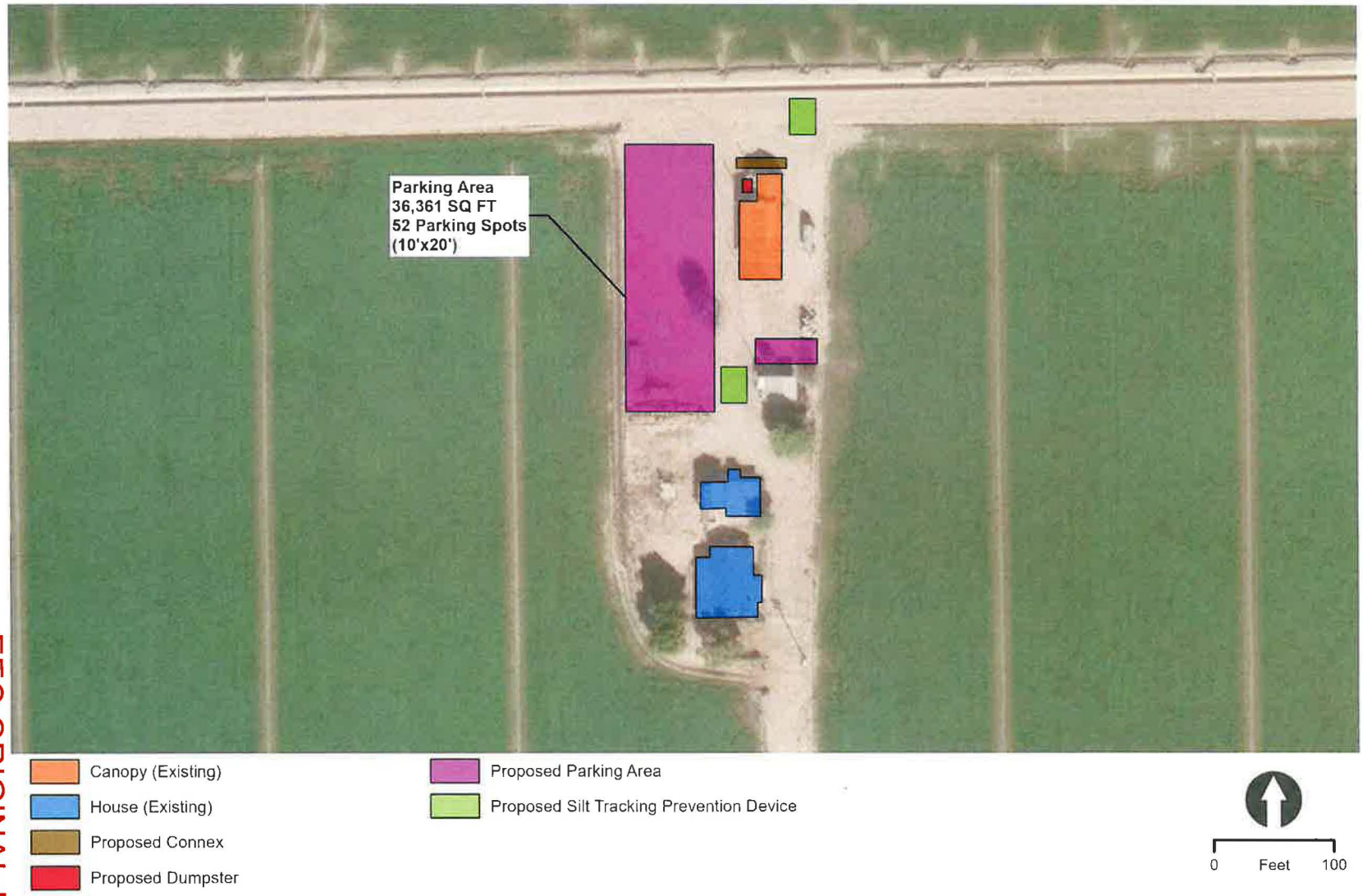

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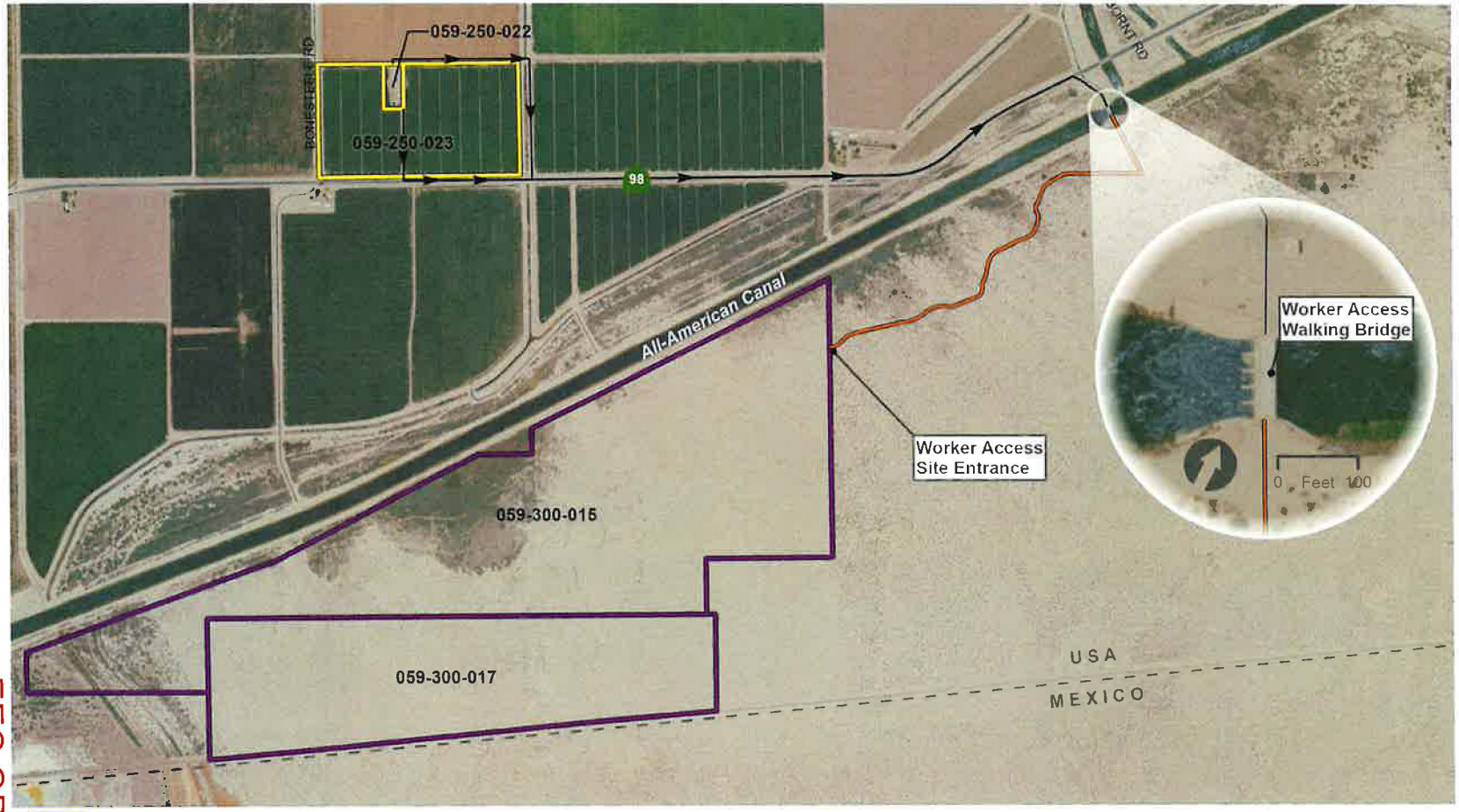
Figure 4. Construction Worker Access to CEDAR 1/Imperial Sun Solar Project Site



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Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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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.

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I. Aesthetics

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Impact Analysis

a) **No Impact.** The project site is not located within an area containing a scenic vista designated by the County's General Plan (County of Imperial 2016). Therefore, the proposed project would not have a substantial adverse effect on a scenic vista and no impact is identified.

b) **No Impact.** According to the Conservation and Open Space Element, no State scenic highways have been designated in Imperial County (County of Imperial 2016). The project site is not located within a state scenic highway corridor, nor are there any state scenic highways located in proximity to the project site. The nearest road segment considered eligible for a State scenic highway designation is Interstate 8, located over 40 miles northwest of the project site. The project site would not be visible from a state scenic highway. No impacts to scenic resources within any state scenic highways would occur.

c) **Less than Significant Impact.** The project site is located on two privately-owned parcels and viewers would be limited to property owners and employees servicing/maintaining IID facilities. The parking area would include designated parking and access. The presence of construction employee vehicles within the project site would temporarily alter views of the area from undeveloped land to a construction parking area. However, following the completion of construction of the CEDAR 1/Imperial Sun Solar Project, there would no longer be construction employee vehicles on the project site. Therefore, the proposed project would result in a less than significant impact to the existing visual character or quality of the site and its surroundings.

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d) **Less than Significant Impact.** The proposed project does not include the addition of substantial lighting or glare producing components. Temporary lighting would be used for illuminating the construction parking area while construction workers are on site. Following the completion of construction, any construction lighting would be removed from the site. Therefore, the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. This impact is considered less than significant.

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II. Agriculture and Forestry Resources

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Impact Analysis

a) **No Impact.** According to the California Department of Conservation's (DOC) California Important Farmland Finder, the project parcels are located on Prime Farmland and Farmland of Statewide Importance (DOC 2020). The proposed project involves the development and use of a temporary construction parking area for construction workers that will be constructing the CEDAR 1/Imperial Sun Solar Project. The portion of the project site that would be utilized for the temporary construction parking area would be sited on the property owner's farm equipment and operations yard that is no longer in use, and not being actively

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farmed. Furthermore, following the completion of construction of the CEDAR 1/Imperial Sun Solar Project, there would no longer be construction employee vehicles on the project site. Based on these considerations, the proposed project would not convert Important Farmland to non-agricultural use and no impact would occur.

b) **Less than Significant Impact.** The project site is currently zoned General Agriculture (A-2). Pursuant to Title 9, Division 5, Chapter 8, the following use is permitted within the A-2 zone subject to approval of a CUP from Imperial County:

- Temporary Construction/Office Yard

Therefore, with approval of the CUP, the proposed project would not conflict with existing zoning for agricultural use. This is considered a less than significant impact.

As of December 31, 2019, all Williamson Act contracts in Imperial County have been terminated. The project site is not located on Williamson Act contracted land. Therefore, the proposed project would not conflict with a Williamson Act contract and no impact is identified.

c) **No Impact.** The project site is 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 on-site 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 project site. 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) **Less than Significant Impact.** As discussed in Response II. a) above, the project would not permanently convert farmland to non-agriculture use. As discussed in Response II. d) above, there are no existing forest lands either on site or in the immediate vicinity of the project site. 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.

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III. Air Quality

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

Impact Analysis

a) **Less than Significant Impact.** The proposed project is located within the jurisdiction of the Imperial County Air Pollution Control District (ICAPCD). Because there would be no ground-disturbing activities such as excavation or grading that would occur on the project site, the project is not anticipated to generate substantial emissions that would exceed ICAPCD's significance thresholds. The proposed project's emissions would be limited to short-term exhaust and fugitive dust emissions from on-road vehicles (trips by construction workers). As shown in Figure 3, the project would install two silt tracking prevention devices to minimize sediments being tracked onto public roads and waterways. The locations of the proposed silt tracking prevention devices are conceptual at this time. Final locations would be determined as part of the Site Plan. Furthermore, the proposed project would be required to comply with ICAPCD's rules and regulations. Pursuant to ICAPCD, all construction sites, regardless of size, must comply with the requirements contained within Regulation VIII – Fugitive Dust Control Measures. Based on these considerations, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan and this is considered a less than significant impact.

b) **Less than Significant Impact.** Refer to Response III. a) above.

c) **Less than Significant Impact.** The nearest sensitive receptor is a residence located on the project site. The proposed project's emissions would be limited to short-term exhaust and fugitive dust emissions from on-road vehicles (trips by construction workers). As shown in Figure 3, the project would install two silt tracking prevention devices to minimize sediments being tracked onto public roads and waterways. The locations of the proposed silt tracking prevention devices are conceptual at this time. Final locations would be determined as part of the Site Plan. Furthermore, the proposed project would be required to comply with ICAPCD's rules and regulations. Pursuant to ICAPCD, all construction sites, regardless of size, must comply with the requirements contained within Regulation VIII – Fugitive Dust

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Control Measures. Due to the limited amount of criteria pollutants that would be generated, and compliance with ICAPCD's rules and regulations, the project would not expose sensitive receptors to substantial pollutant concentrations. This is considered a less than significant impact.

d) **Less than Significant Impact.** During construction, the proposed project presents the potential for generation of objectionable odors in the form of diesel exhaust from on-road vehicles (construction employee vehicles) in the immediate vicinity of the site. However, these emissions are short-term and temporary in nature and will rapidly dissipate and be diluted by the atmosphere downwind of the emission sources. Additionally, odors would be localized and generally confined to the project area. Therefore, odors generated during construction would not adversely affect a substantial number of people to odor emissions.

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IV. Biological Resources

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

a) **Less than Significant Impact.** The portion of the project site that would be utilized for the temporary construction parking area would be sited on the property owner's farm equipment and operations yard that is no longer in use. This area has been previously disturbed from past agricultural use and use as an operations yard. As shown in Figure 3, the area proposed for parking consists of mostly bare ground that is subjected to continued disturbance,

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preventing establishment of substantial vegetation cover, and surrounded by existing residential structures and a few trees. The proposed project would not involve ground-disturbing activities such as grading and excavation, vegetation removal, or tree removal. Based on the level of previous disturbance, and that no ground-disturbing activities would occur on the project site, the proposed project would not have a substantially adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species. This is considered a less than significant impact.

b) **No Impact.** The portion of the project site that would be utilized for the temporary construction parking area would be sited on the property owner's farm equipment and operations yard that is no longer in use. This area has been previously disturbed from past agricultural use and use as an operations yard. The area consists of mostly bare ground that is subjected to continued disturbance, preventing establishment of substantial vegetation cover. There are no sensitive habitats adjacent or in proximity to the site (the site is surrounded by agricultural lands). The project site does not support any riparian habitat or designated sensitive natural communities. Therefore, the proposed project would have no impact on riparian habitat or sensitive natural communities.

c) **No Impact.** According to the National Wetlands Inventory Wetlands Mapper, the project site does not contain wetlands (U.S Fish and Wildlife Service 2025). Therefore, implementation of the proposed project would not have a substantial adverse effect on federally protected wetlands or waters as defined by Section 404 of the Clean Water Act. No impact is identified for this issue area.

d) **No Impact.** The portion of the project site that would be utilized for the temporary construction parking area would be sited on the property owner's farm equipment and operations yard that is no longer in use. This area has been previously disturbed from past agricultural use and use as an operations yard. The project site lies adjacent to a large expanse of agricultural land, which isolates the project site from undisturbed desert habitats. While the project site functions as part of general habitat that provides for local movement of terrestrial wildlife, it does not serve as a corridor between native desert habitat. No impact would occur.

e) **No Impact.** As described in Responses IV. a) through d), the proposed project would not result in a substantial adverse effect on special-status species, sensitive vegetation communities, wetlands, or wildlife corridors. The proposed project would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur.

f) **No Impact.** The project site is not located in a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Implementation of the proposed project would result in no impact associated with the potential to conflict with local conservation plans.

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V. Cultural Resources

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

Impact Analysis

a) **No Impact.** The portion of the project site that would be utilized for the temporary construction parking area would be sited on the property owner's farm equipment and operations yard that is no longer in use. This area has been previously disturbed from past agricultural use and use as an operations yard. The proposed project does not involve the demolition of any built structures on the project site. Therefore, the proposed project would have no impact on historical resources.

b) **No Impact.** The portion of the project site that would be utilized for the temporary construction parking area would be sited on the property owner's farm equipment and operations yard that is no longer in use. This area has been previously disturbed from past agricultural use and use as an operations yard. These uses have likely disturbed the surface and subsurface of the project area, destroying any intact potential archeological resources. Furthermore, the proposed project would not involve ground-disturbing activities such as grading and excavation, which could otherwise have a potential to encounter buried archaeological resources. Therefore, the proposed project would have no impact on archaeological resources.

c) **No Impact.** The proposed project would not involve ground-disturbing activities such as grading and excavation. Therefore, there is no potential to encounter human remains and no impact would occur.

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VI. Energy

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

Impact Analysis

a) **Less than Significant Impact.** The proposed project involves the development and use of a temporary construction parking area for construction workers that will be constructing the CEDAR 1/Imperial Sun Solar Project. The proposed project's energy consumption would be limited to fuel for employees' personal vehicles. . The proposed project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. This is considered a less than significant impact.

b) **Less than Significant Impact.** Refer to Response VI. a) above. The proposed project would not conflict with or obstruct a state or local plan for renewable energy of energy efficiency. This is considered a less than significant impact.

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VII. Geology and Soils

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

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Impact Analysis

ai) **No Impact.** According to the DOC's California Earthquake Hazards Zone Application (EQ Zapp), the project site is not located within or adjacent to any earthquake fault zone as delineated on the most recent Alquist-Priolo Earthquake Zoning Map (California DOC n.d.). Furthermore, the proposed project would not result in the construction of any structure intended for human occupancy. The proposed project would not exacerbate the potential for fault rupture to occur. Therefore, the proposed project would result in no impact associated with the rupture of a known earthquake fault.

aii) **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 project. However, as previously mentioned above, no active faults are underlaying or adjacent to the project site. Furthermore, the proposed project would not result in the construction of any structure intended for human occupancy. The proposed project would not exacerbate the potential for strong seismic ground shaking to occur. A less than significant impact is identified for this issue area.

aiii) **No Impact.** The project site is not located in an area susceptible to liquefaction hazards (California DOC n.d.). The proposed project would not result in the construction of any structure intended for human occupancy, and would not exacerbate the potential for liquefaction to occur. Therefore, no impact would occur.

aiv) **No Impact.** The project site is located in a relatively flat portion of Imperial County and is not identified as an area at risk of landslide (County of Imperial 2022). Therefore, no impact would occur.

b) **Less than Significant Impact.** The proposed project would not involve ground-disturbing activities such as grading and excavation. Therefore, the proposed project would not result in substantial soil erosion or the loss of topsoil. A less than significant impact is identified for this issue area.

c) **No Impact.** As described in Responses VII. a) above, the project site is not in a seismic or geologic hazard area subject to landslides or liquefaction. Lateral spreading involves the lateral movement of a liquefied soil layer (and overlying layers) toward a free face and caused by seismic shaking. Therefore, as the project area is not in a liquefaction hazard area, the risk of lateral spreading is also low.

Subsidence is the sinking of the Earth's surface in response to geologic or man-induced causes. Subsidence is primarily caused by groundwater extraction, aquifer-system compaction, drainage of organic soils, underground mining, hydro-compaction (i.e., shallow soil subsidence from adding water), natural compaction, sinkholes, and thawing permafrost. None of these causes of subsidence apply to the project site, and the project is not expected to result in on- or off-site subsidence. The proposed temporary construction parking area is surficial in nature and does not have the potential to become unstable resulting in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Project activities would not exacerbate geologic unit or soil stability conditions. Therefore, no impact would occur.

d) **No Impact.** The proposed temporary construction parking area is surficial in nature and does not have the potential to become unstable due to soil expansion, creating a substantial risk to life or property. Project activities would not exacerbate expansive soil conditions, and no impact would occur.

e) **No Impact.** The proposed project would not require the use of septic systems or alternative wastewater systems to accommodate wastewater needs. Therefore, no impact is identified for this issue area.

f) **No Impact.** The portion of the project site that would be utilized for the temporary construction parking area would be sited on the property owner's farm equipment and operations yard that is no longer in use. This area has been previously disturbed from past

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agricultural use and use as an operations yard. These uses have likely disturbed the surface and subsurface of the project area, destroying any intact potential archeological resources. Furthermore, the proposed project would not involve ground-disturbing activities such as grading and excavation, which could otherwise have a potential to encounter buried paleontological resources. Therefore, the proposed project would have no impact on paleontological resources.

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VIII. Greenhouse Gas Emissions

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

Impact Analysis

a) **Less than Significant Impact.** The proposed project would generate GHG emissions from on-road vehicles (trips by construction workers. Due to the short-term and temporary nature of the project (temporary construction parking area), GHG emissions would be minimal. Implementation of the proposed project would result in a less than significant impact associated with the generation of GHG emissions.

b) **Less than Significant Impact.** The proposed project would not conflict with any adopted plans, policies, or regulations adopted for the purpose of reducing GHG emissions. As discussed above in Response VIII. a), due to the short-term and temporary nature of the project (temporary construction parking area), GHG emissions would be minimal. Therefore, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs and a less than significant impact would occur.

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IX. Hazards and Hazardous Materials

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

Impact Analysis

a) **No Impact.** The proposed project involves the development and use of a temporary construction parking area for construction workers that will be constructing the CEDAR 1/Imperial Sun Solar Project. The project would not involve the routine transport, use, or disposal of hazardous materials. No impact is identified for this issue area.

b) **No Impact.** As described in Response IX. a) above, the project would not involve the routine transport, use, or disposal of hazardous materials. The project would not create a significant

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hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. Therefore, no impact is identified for this issue area.

c) **No Impact.** The project site is not located within 0.25 mile of any existing or proposed schools. Therefore, the proposed project would not pose a risk to nearby schools and no impact would occur.

d) **No Impact.** The project site is not identified as being located on a hazardous materials site pursuant to Government Code Section 65962.5. Implementation of the proposed project would result in no impact related to the project site being located on a listed hazardous materials site.

e) **No Impact.** The project site is not located within 2 miles of a public airport. The nearest airports to the project site are the Calexico International Airport located approximately 10 miles west of the project site and Holtville Airport located approximately 10 miles north of the project site. According to the Imperial County Airports Department, the Holtville Airport is currently closed. Therefore, implementation of the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area and no impact would occur.

f) **No Impact.** The proposed project does not include any alteration to the existing public road network and would not involve blocking or restricting any access routes. 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.** The project site is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan (County of Imperial 2022), the potential for a major fire in the unincorporated areas of the County is generally low. Based on a review of the California Department of Forestry and Fire Protection's fire hazard severity zone map, the project site is not located within a fire hazard severity zone (California Department of Forestry and Fire Protection 2024). The proposed project would not introduce features that directly or indirectly increase the risk of wildfire on the project site. No impact is identified for this issue area.

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X. Hydrology and Water Quality

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

Impact Analysis

a) **Less than Significant Impact.** Sedimentation and erosion can occur because of tracking from on-road vehicles (construction employee vehicles), or erosion and subsequent runoff of soil. As shown in Figure 3, the project would install two silt tracking prevention devices (at north and south entrances) to minimize sediments being tracked onto public roads and waterways. Based on these considerations, the proposed project would not violate any water

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quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. This is considered a less than significant impact.

b) **No Impact.** The proposed project would not involve the use of groundwater. Water to be used during project-related construction activities will be limited to the amount necessary to conduct dust control activities. During construction, construction water would be brought to the site for dust suppression. Therefore, the proposed project would not impede groundwater recharge and no impact would occur.

ci) **Less than Significant Impact.** As discussed in Response X. a) above, sedimentation and erosion can occur because of tracking from on-road vehicles (construction employee vehicles), or erosion and subsequent runoff of soil. As shown in Figure 3, the project would install two silt tracking prevention devices (at north and south entrances) to minimize sediments being tracked onto public roads and waterways. This is considered a less than significant impact.

cii) **Less than Significant Impact.** The proposed project would not involve the construction of impervious surfaces that would increase the rate of run-off. Project activities would be localized to the project site boundary and the surrounding pervious surface would remain similar to pre-project conditions. Water will continue to percolate through the ground, as the surfaces on the project site will remain pervious. In this context, the proposed project would not result in substantial increases in run-off. This is considered a less than significant impact.

ciii) **Less than Significant Impact.** Water will continue to percolate through the ground, as the surfaces on the project site will remain pervious. The proposed project would not 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. This is considered a less than significant impact.

civ) **No Impact.** According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (Map Number 06025C2125C), the project site is located within Zone X, which is an area determined to be outside of the 0.2 percent annual chance of a flood (FEMA 2024).

d) **No Impact.** The project site is within Zone X, which is an area determined to be outside of the 0.2 percent annual chance of a flood. The project site is not located near any large bodies of water. The Salton Sea is located approximately 38 miles northwest of the project site. Because of the distance, the Salton Sea does not pose a particularly significant danger of inundation from seiche or tsunami as related to the project site. Furthermore, the project site is over 100 miles inland from the Pacific Ocean. In addition, the project site is relatively flat. Therefore, there is no potential for the project site to be inundated by seiches or tsunamis. No impact would occur.

e) **No Impact.** The proposed project would not involve the use of groundwater. Water to be used during project-related construction activities will be limited to the amount necessary to conduct dust control activities. During construction, construction water would be brought to the site for dust suppression. The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur.

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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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

a) **No Impact.** The project site is located in a sparsely populated portion of Imperial County. There are no established residential communities located within or in the vicinity of the project site. The nearest established residential communities are located in the City of Holtville and City of Calexico, approximately 9 and 10 miles from the project site, respectively. Therefore, implementation of the proposed project would not divide an established community and no impact would occur.

b) **No Impact.** Implementation of the project would require the approval of CUP by the County to allow for the development and use of a temporary parking area for construction workers. The project parcels are currently zoned A-2. Pursuant to Title 9, Division 5, Chapter 8, the following use is permitted in the A-2 zone subject to approval of a CUP from Imperial County:

- Temporary Construction Office/Yard

Therefore, with approval of the CUP, the proposed project would not conflict with the County of Imperial Land Ordinance and no impact would occur.

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XII. Mineral Resources

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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 to the project site are construction sand and gravel (County of Imperial 2016). The project does not propose any extraction and thus loss of availability of these mineral resources. Additionally, the proposed project would not preclude future mineral resource exploration throughout the project 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 project site. No impact would occur.

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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?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

a) **Less than Significant Impact.** The proposed project involves the development and use of a temporary construction parking area for construction workers that will be constructing the CEDAR 1/Imperial Sun Solar Project. The portion of the project site that would be utilized for the temporary construction parking area would be sited on the property owner's farm equipment and operations yard that is no longer in use. As shown in Figure 3, there are existing residential structures on the project site. Noise levels would temporarily increase due to construction worker traffic . Because there would be no ground-disturbing activities such as excavation or grading that would occur on the project site, the project is not anticipated to generate a substantial increase in ambient noise levels. The project's noise impact would be less than significant.

b) **No Impact.** No ground-disturbing activities such as excavation or grading that would occur on the project site. The proposed project does not involve activities that would generate groundborne vibration such as blasting or use of pile drivers. Therefore, no impact would occur.

c) **No Impact.** The project site is not located within 2 miles of a public airport or a public use airport. The nearest airports to the project site are the Calexico International Airport located approximately 10 miles west of the project site and Holtville Airport located approximately 10 miles north of the project site. According to the Imperial County Airports Department, the Holtville Airport is currently closed. The Imperial County Airport Land Use Commission has established a set of land use compatibility criteria for lands surrounding the airports in Imperial County in the Imperial County Airport Land Use Compatibility Plan (ALUCP) (County of Imperial 1996). The project site is outside of the noise contours of the Calexico International Airport. Therefore, the project would not expose people residing or working in the project area to excessive noise levels and no impact would occur.

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XIV. Population and Housing

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Impact Analysis

a) **No Impact.** The proposed project involves the development and use of a temporary construction parking area for construction workers. Development of new housing or businesses is not proposed as part of the project. Furthermore, no development of new roads or infrastructure is proposed that would introduce new populations to the project site. After construction is complete, the temporary construction parking area would no longer be needed and the project site would be restored to pre-project conditions. No impact would occur.

b) **No Impact.** There are residential structures located on APN 059-250-022. The project would not displace existing people or housing on the project site, necessitating the construction of replacement housing elsewhere. Therefore, no impact would occur.

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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?	☐	☐	☒	☐
ii. Police Protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

Impact Analysis

ai) **Less Than Significant Impact.** Fire protection and emergency medical services in the project area are provided by the Imperial County Fire Department. The proposed project does not include the development of new occupiable buildings or other buildings that would increase demand on the Imperial County Fire Department, nor would it require a need for increased fire protection services or new fire protection infrastructure. Therefore, a less than significant impact would occur.

aii) **Less Than Significant Impact.** Police protection services in the project area is provided by the Imperial County Sheriff's Department. The proposed project would not require police services beyond routine patrols and response. The proposed project would not induce growth in the project area that would result in the permanent, and increased need of police protection services. Therefore, a less than significant impact would occur.

aiii) **No Impact.** The proposed project does not include the development of any residential land uses that would result in an increase in population or student generation. Construction activities are not expected to require a substantial number of workers. The proposed project would not result in an increase in student population within the Imperial County's School District since it is anticipated that construction workers would commute during construction operations. The proposed project would not result in an increase in student population within the Imperial County's School District. Therefore, the proposed project would have no impact on Imperial County schools.

aiv) **No Impact.** Construction activities are not expected to require a substantial number of workers. Furthermore, no full-time employees are required to operate the project. Substantial permanent increases in population that would adversely affect local parks is not anticipated. Therefore, the proposed project would have no impact on parks.

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av) **No Impact.** Construction activities are not expected to require a substantial number of workers. Substantial permanent increases in population that would adversely affect libraries and other public facilities (such as post offices) is not anticipated. Therefore, the proposed project would have no impact on other public facilities such as post offices and libraries.

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XVI. Recreation

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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. 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. No impact would occur.

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XVII. Transportation

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

Impact Analysis

a) **No Impact.** Implementation of the proposed project would not require any public road widening to accommodate vehicular trips associated with the proposed project. There is no regular bus service to the general area and project-related activities would not impact mass transit. The proposed project would not interfere with bicycle facilities because the proposed project is located in a rural portion of the County with no existing or potential future designated bike routes in the area. Therefore, the proposed project would not result in any significant impacts to any roadway segments or transportation related facilities/infrastructure within the project area ; and would not conflict with a program plan, ordinance, or policy as it relates to traffic and transportation. No impact would occur.

b) **Less than Significant Impact.** The proposed project consists of a temporary construction parking area for construction workers that will be constructing the CEDAR 1/Imperial Sun Solar Project. Given the nature of the project, traffic volumes generated by the project would be minor, limited to construction employee trips and delivery trucks. Therefore, the proposed project would result in a less than significant VMT impact.

c) **No Impact.** The proposed project does not include any alteration to the existing public road network. The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The project applicant will be required to comply with recommendations for safety within the Caltrans ROW. Therefore, no impact would occur.

d) **No Impact.** The proposed project does not include any alteration to the existing public road network and would not involve blocking or restricting any access routes. Therefore, the proposed project would not result in inadequate emergency access and no impact would occur.

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XVIII. Tribal Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
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)?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

a-b) **No Impact.** Assembly Bill (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. Assembly Bill 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, the County sent a Notifications of Consultation Opportunity pursuant to Public Resources Code Section 21080.3.1(d) to the Fort Yuma Quechan Indian Tribe and Agua Caliente Band of Cahuilla Indians on August 5, 2025. On August 5, 2025, the Fort Yuma Quechan Indian Tribe responded via e-mail that they do not wish to comment on the project. On August 13, 2025, the Agua Caliente Band of Cahuilla Indians responded via letter that the project area is not located within the Tribe's Traditional Use Area. No requests for consultation have been received. The project is not anticipated to cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a 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 PRC Section 5024.1, and, per the criteria set forth in Section 5024.1, considering the significance of the resource to a California Native American tribe. Therefore, no impact would occur.

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XIX. Utilities and Service Systems

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Impact Analysis

a) **No Impact.** The proposed project consists of a temporary construction parking area for construction workers that will be constructing the CEDAR 1/Imperial Sun Solar Project. The project would not include new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Therefore, the project would not require or result in the relocation or construction of new or expanded utilities or service systems and would not impact water supplies or wastewater treatment providers.

b) **Less than Significant Impact.** The project's water use would be limited to dust control during the construction phase. Due to the nature and short-term duration of the project and minimal water demand needed, there would be sufficient water supplies available to serve the project. Therefore, this impact is considered less than significant.

c) **No Impact.** The proposed project would not generate wastewater that would need to be treated by a wastewater treatment facility. Onsite wastewater needs will be accommodated

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by the use of portable toilets that would be removed from the project site once construction is complete. No impact would occur.

d) **Less than Significant Impact**. Solid waste generation would be minor for the proposed project. There are several solid waste facilities within Imperial County and solid waste will be disposed of using a locally-licensed waste hauling service, most likely Allied Waste. Trash would likely be hauled to the Calexico Solid Waste Site (13-AA-0004) located in Calexico. The Calexico Solid Waste Site has approximately 1,561,235 cubic yards of remaining capacity and is estimated to remain in operation through 2179. (CalRecycle 2024). Therefore, there is ample landfill capacity in the County to receive the minor amount of solid waste generated by construction and operation of the proposed project. 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 well is expected to be minimal. This impact is considered less than significant.

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XX. Wildfire

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

a) – d) **No Impact.** According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2024). Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan; expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; exacerbate fire risk; or, expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact is identified for wildfire.

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XXI. Mandatory Findings of Significance

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☒	☐
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)?	☐	☐	☒	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Impact Analysis

a) **Less than Significant Impact.** Based on the analysis contained in this Initial Study, the proposed project would not result in significant impacts to biological resources or cultural resources. Therefore, a finding of less than significant is identified for this issue area.

b) **Less than Significant Impact.** Based on the analysis contained in this Initial Study, the proposed project would not result in significant impacts to any resource area. The proposed project would incrementally contribute to cumulative impacts for projects occurring within the vicinity of the project. However, the incremental accumulation of effects would not be cumulatively considerable. Therefore, a finding of less than significant is identified for this issue area.

c) **Less than Significant Impact.** Based on the analysis contained in this Initial Study, the proposed project would not cause substantial adverse effects on human beings, either directly or indirectly. Any effects related to construction of the project would be temporary and short-term and would not result in any long-term or permanent effects on human beings. This is considered a less than significant impact.

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List of Preparers

This Initial Study was prepared for the Imperial County Planning and Development Services Department by HDR. The following professionals participated in its preparation:

Imperial County Planning and Development Services Department

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Findings

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

☒ The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☐ The Initial Study identifies potentially significant effects but:

(1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.

(2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.

(3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A MITIGATED NEGATIVE DECLARATION will be prepared.

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

NOTICE

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

9-16-2025 — for

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

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

Applicant Signature — Date: 9/16/2025

JOSE ALBERTO SANCHEZ, PROJECT MANAGER

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