Initial Study and NOP

Heber 1 Parasitic Solar Energy Project

Initial Study #: 25-0024

CUP #: 25-0010

Imperial County, CA

October 2025

Reviewed by:

County of Imperial

Planning & Development Services Department

801 Main Street

El Centro, CA 92243

Prepared by:

HDR Engineering, Inc.

591 Camino de la Reina, Suite 300

San Diego, CA 92108

This page is intentionally blank.

Contents

Introduction 1
A. Purpose 1
B. CEQA Requirements and the Imperial County's Rules and Regulations for Implementing CEQA 1
C. Intended Uses of Initial Study and Notice of Preparation 2
D. Contents of Initial Study and Notice of Preparation 2
E. Scope of Environmental Analysis 3
F. Policy-Level or Project-Level Environmental Analysis 3
G. Tiered Documents and Incorporation by Reference 3
Environmental Checklist Form 6
Environmental Factors Potentially Affected 8
Environmental Evaluation Committee Determination 8
Project Summary 10
Project Location 10
Project Summary 10
Environmental Setting 11
General Plan Consistency 11
Evaluation of Environmental Impacts 15
I. Aesthetics 17
II. Agriculture and Forestry Resources 19
III. Air Quality 21
IV. Biological Resources 22
V. Cultural Resources 24
VI. Energy 25
VII. Geology and Soils 26
VIII. Greenhouse Gas Emissions 28
IX. Hazards and Hazardous Materials 29
X. Hydrology and Water Quality 31
XI. Land Use and Planning 33
XII. Mineral Resources 34
XIII. Noise 35
XIV. Population and Housing 36
XV. Public Services 37
XVI. Recreation 38
XVII. Transportation 39
XVIII. Tribal Cultural Resources 40
XIX. Utilities and Service Systems 41
XX. Wildfire 43
XXI. Mandatory Findings of Significance 45
References 46
List of Preparers 47

This page is intentionally blank.

Introduction

A. Purpose

This document is a ☐ policy-level; ☒ project-level Initial Study for evaluation of potential environmental impacts resulting with the proposed Heber 1 Parasitic 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 applications will result in potentially significant environmental impacts and therefore, an Environmental Impact Report is deemed as the appropriate document to provide necessary environmental evaluations and clearance for the proposed project.

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

Pursuant to the County of Imperial's CEQA Regulations, Guidelines for the Implementation of CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning

Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. Intended Uses of Initial Study and Notice of Preparation

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

The Initial Study and Notice of Preparation, prepared for the project will be circulated for a period of no less than 35 days for public and agency review and comments.

D. Contents of Initial Study and Notice of Preparation

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

SECTION 1

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

SECTION 2

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

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

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

SECTION 3

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

E. Scope of Environmental Analysis

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

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

F. Policy-Level or Project-Level Environmental Analysis

This Initial Study will be conducted under a ☐ policy-level, ☒project-level analysis.

Regarding mitigation measures, it is not the intent of this document to “overlap” or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County’s jurisdiction, are also not considered mitigation measures, and therefore, will not be identified in this document.

G. Tiered Documents and Incorporation by Reference

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

1. Tiered Documents

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

“Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.”

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

“Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development

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

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

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

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

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

2. **Incorporation by Reference**

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

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

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR is available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.
- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243, Ph. (442) 265-1736.
- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.

- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the ‘County of Imperial General Plan EIR is SCH #93011023.

The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]).

Environmental Checklist Form

1. **Project Title:** Heber 1 Parasitic Solar Energy 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:** Alan Molina, Planner I, 442-265-1736
4. **Project location:** The proposed project would be located on one privately-owned parcel (Assessor Parcel Number [APN] 059-020-001) at 602 Dogwood Road in the southern portion of Imperial County, California. The project site is approximately 1.4 miles south of the community of Heber. The proposed solar energy facility would encompass approximately 106 acres in the southern portion of APN 059-020-001. The northern portion of APN 059-020-001 has been previously approved for development and operation of the Heber 2 Parasitic Solar and Dogwood Parasitic Solar Projects. The proposed solar energy facility would be developed southwest of the existing Heber 1 Geothermal Plant located on APN 054-250-036 at 895 Pitzer Road in Heber, California.

   Interstate 8 (I-8), located approximately 4.5 miles directly north, provides primary highway access to the project site. Dogwood Road stems off I-8 and provides immediate access to the project site. From the south, Willoughby Road runs west-east approximately 1,700 feet from the project site and connects to Dogwood Road, providing immediate site access.
5. **Project sponsor's name and address:** Heber Field Company, LLC, 947 Dogwood Road, Heber, CA 92249
6. **General Plan Designation:** Urban Area
7. **Zoning:** General Agriculture with a Geothermal Energy Zone Overlay in an Urban Area (A-2-G-U)
8. **Description of project:** The project applicant proposes to develop a 20 megawatt (MW) solar energy facility and interconnecting cable line (gen-tie line) that would provide parasitic load to the existing Heber 1 Geothermal Plant. The solar energy facility would provide behind-the-meter power used to offset the auxiliary load of the existing Heber 1 Geothermal Plant. The solar energy facility would not connect to or generate power that will enter the transmission grid; rather, the solar energy facility would be entirely behind-the-meter and would serve as an integrated part of the operation of the existing Heber 1 Geothermal Plant. There are three route options proposed, of which only one will be chosen, for the medium voltage cable that would connect the new 20 MW solar energy facility to the existing Heber 1 Geothermal Plant.

   Construction of the proposed project is anticipated to take approximately 16 to 19 months to complete. Facility construction would include demolition of an existing, but vacant, residence at the southwest corner of the project site and site preparation activities.

   Once constructed, the proposed project would generally be unstaffed but would require routine maintenance and unscheduled maintenance as needed. The solar energy facility would be monitored remotely with visitation on an as-needed basis, and security personnel will perform periodic site visits. Any required planned maintenance activities would generally consist of

equipment inspection and replacement and would be scheduled to avoid peak load periods. Any unplanned maintenance would be responded to as needed, depending on the event.

At the end of the permitted or useful life of the solar energy facility, the applicant will prepare a Site Reclamation and Restoration Plan that establishes the plan and protocol for dismantling, removing, abandoning, transporting, and disposing of the solar and transmission facilities, as well as the plan for performing site restoration activities after the facilities are removed. All facilities would be dismantled and the land involved would be restored to pre-project conditions.

9. **Surrounding land uses and setting: Briefly describe the project's surroundings:** Surrounding land uses in the project vicinity are primarily for industrial facilities, energy facilities, and agricultural cultivation. Agricultural operations are adjacent on all sides of the project site with geothermal pipelines and IID canals traversing the area. The northern portion of APN 059-020-001 has been previously approved for the development and operation of the Heber 2 Parasitic Solar and Dogwood Parasitic Solar Projects.

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

    - Department of Public Works – Ministerial permits (building, grading, encroachment)
    - Imperial County Air Pollution Control District – Fugitive dust control plan, Authority to construct
    - California Regional Water Quality Control Board – Notice of Intent for General Construction Permit

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 Campo Band of Mission Indians, Fort Yuma-Quechan Indian Tribe, and Agua Caliente Band of Cahuilla Indians on October 29, 2025. The AB 52 30-day review will end on November 28, 2025. The County is awaiting responses from these tribes.

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.

CALIFORNIA DEPARTMENT OF FISH AND GAME DE MINIMIS IMPACT FINDING:

☐Yes ☐No

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

Jim Minnick, Director of Planning/EEC Chairman Date:

Signature

Project Summary

Project Location

The proposed project would be located on one privately-owned parcel (APN 059-020-001) at 602 Dogwood Road in the southern portion of Imperial County, California (Figure 1). The project site is approximately 1.4 miles south of the community of Heber. The proposed solar energy facility would encompass approximately 106 acres in the southern portion of APN 059-020-001 (Figure 2). The northern portion of APN 059-020-001 has been previously approved for the Heber 2 Parasitic Solar and Dogwood Parasitic Solar Projects. The proposed solar energy facility would be developed southwest of the existing Heber 1 Geothermal Plant located on APN 054-250-036 at 895 Pitzer Road in Heber, California.

Interstate 8 (I-8), located approximately 4.5 miles directly north, provides primary highway access to the project site. Dogwood Road stems off I-8 and provides immediate access to the project site. From the south, Willoughby Road runs west-east approximately 1,700 feet from the project site and connects to Dogwood Road, providing immediate site access.

Project Summary

The project applicant proposes to develop a 20 megawatt (MW) solar energy facility and interconnecting cable line (gen-tie line) that would provide parasitic load to the existing Heber 1 Geothermal Plant (Figure 3). The solar energy facility would provide behind-the-meter power used to offset the auxiliary load of the existing Heber 1 Geothermal Plant. The solar energy facility would not connect to or generate power that will enter the transmission grid; rather, the solar energy facility would be entirely behind-the-meter and would serve as an integrated part of the operation of the existing Heber 1 Geothermal Plant. As shown in Figure 3, there are three route options proposed, of which only one will be chosen, for the medium voltage cable that would connect the new 20 MW solar energy facility to the existing Heber 1 Geothermal Plant.

Construction of the proposed project is anticipated to take approximately 16 to 19 months to complete. Facility construction would include demolition of an existing, but vacant, residence at the southwest corner of the project site and site preparation activities.

Once constructed, the proposed project would generally be unstaffed but would require routine maintenance and unscheduled maintenance as needed. The solar energy facility would be monitored remotely with visitation on an as-needed basis, and security personnel will perform periodic site visits. Any required planned maintenance activities would generally consist of equipment inspection and replacement and would be scheduled to avoid peak load periods. Any unplanned maintenance would be responded to as needed, depending on the event.

At the end of the permitted or useful life of the solar energy facility, the applicant will prepare a Site Reclamation and Restoration Plan that establishes the plan and protocol for dismantling, removing, abandoning, transporting, and disposing of the solar and transmission facilities, as well as the plan for performing site restoration activities after the facilities are removed. All facilities would be dismantled and the land involved would be restored to pre-project conditions.

Environmental Setting

Surrounding land uses in the project vicinity are primarily for industrial facilities, energy facilities, and agricultural cultivation. Agricultural operations are adjacent on all sides of the project site with geothermal pipelines and IID canals traversing the area. The northern portion of APN 059-020-001 has been previously approved for development and operation of the Heber 2 Parasitic Solar and Dogwood Parasitic Solar Projects.

General Plan Consistency

The proposed project is located within an unincorporated area of the County. The existing General Plan land use designation is “Urban Area.” The project site is currently zoned A-2-G-U (General Agriculture with a Geothermal Energy Zone Overlay in an Urban Area). The Geothermal Energy Zone allows for “Major Geothermal Projects” to be permitted through a CUP process.

Figure 1. Regional Location

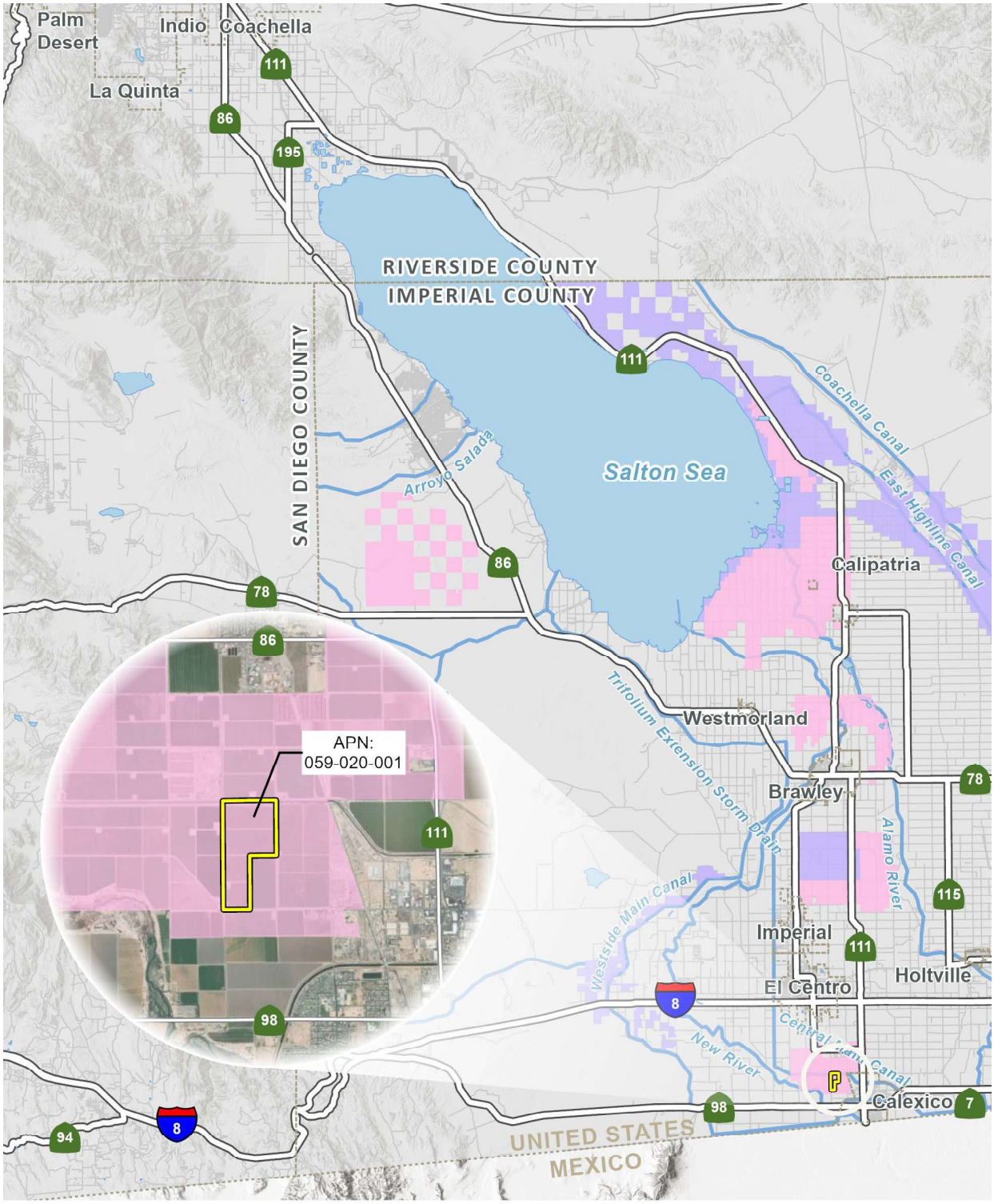


Figure 2. Project Site

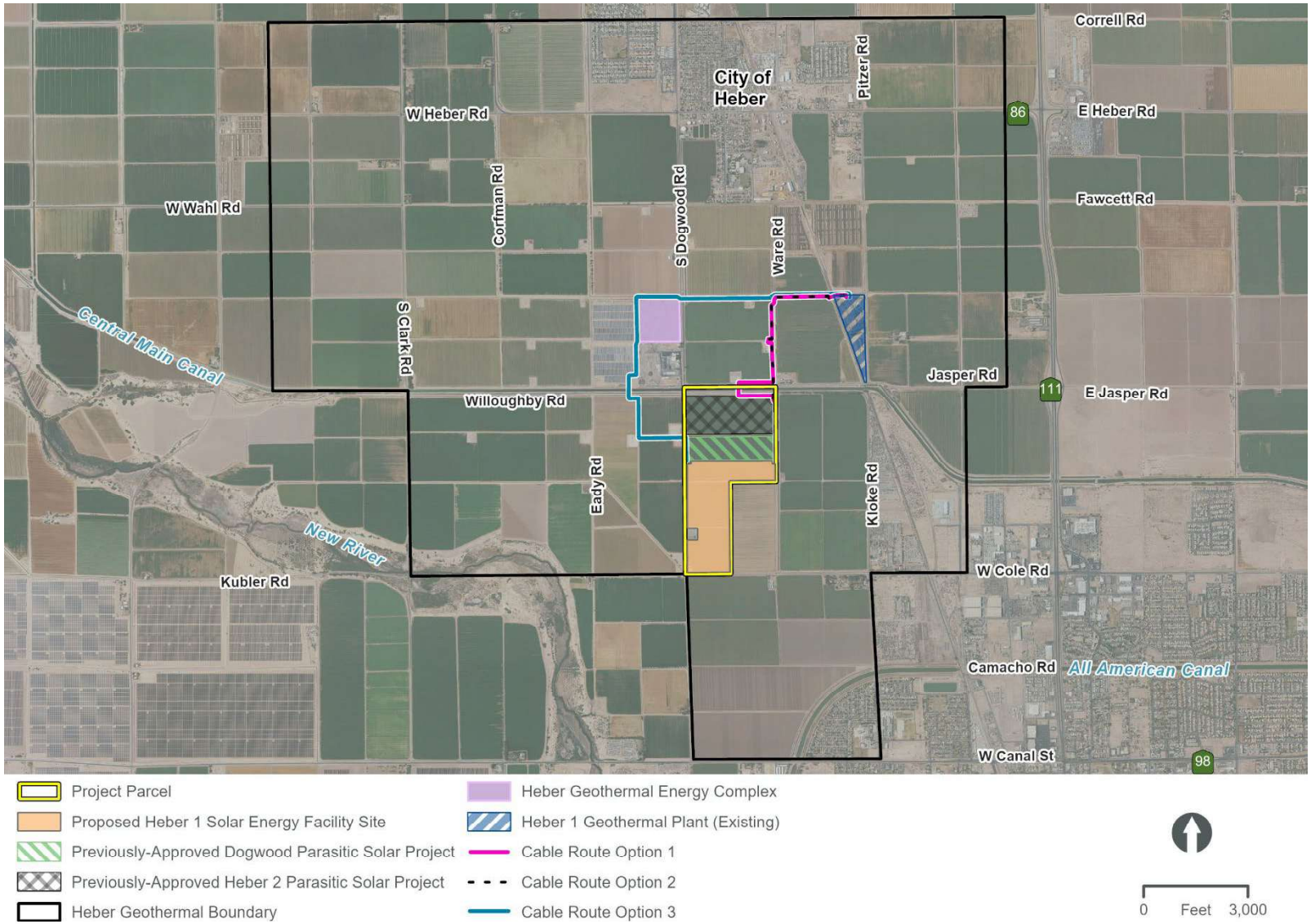
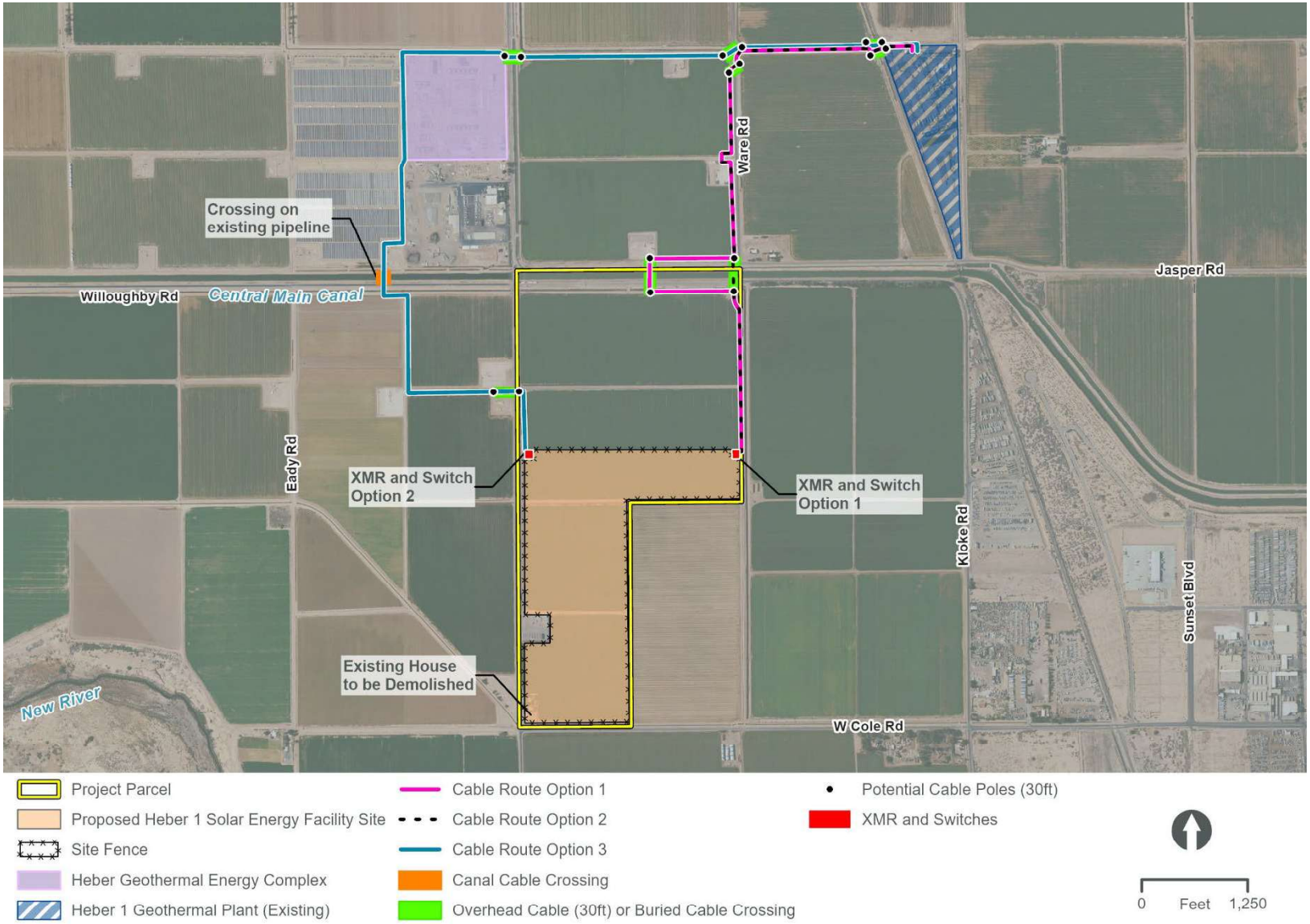


Figure 3. Proposed Site Plan



Evaluation of Environmental Impacts

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

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significance.

I. Aesthetics

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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 that has been formally identified as a federal, state, or county scenic vista. No scenic vistas or areas with high visual quality would be disrupted. Thus, no impact is identified for this issue area and no further analysis is warranted.

b) **No Impact.** According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System (Caltrans 2018), the 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 eligible State scenic highway is the segment of the Sunset Cliffs Boulevard/State Route 98 west of Ocotillo. The project is located approximately 29 miles east of Ocotillo and therefore would not be visible from the project site. The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway. Therefore, no impact is identified for this issue area and no further analysis is warranted.

c) **Potentially Significant Impact.** Although the project site is not located near a scenic highway or designated scenic vista, the proposed project may result in a change to the look and rural character of the area. Therefore, a potentially significant impact is identified for this issue area. A visual assessment will be prepared for the project and this issue will be addressed in the EIR.

d) **Potentially Significant Impact.** The proposed project is located in a rural undeveloped area of Imperial County. There are no established residential neighborhoods immediately adjacent to the project site. Minimal lighting is required for project operation and is limited to safety and security functions. All lighting will be directed away from any public right-of-way; however, there is no heavily traveled public roadway in immediate proximity to the project site. The solar panels will be constructed of low reflective materials; therefore, it is not anticipated that they would result in creating glare. Although the proposed project is not expected to create a new source of substantial light or glare affecting day or nighttime views, a glint and

glare assessment will be prepared for the project and this issue will be addressed in the EIR. Therefore, a potentially significant impact is identified for this issue area.

II. Agriculture and Forestry Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **Potentially Significant Impact.** According to the California Department of Conservation's California Important Farmland Finder, portions of the project site are designated as Farmland of Statewide Importance and Prime Farmland (California Department of Conservation 2020). Therefore, implementation of the proposed project has potential to result in the conversion of Farmland of Statewide Importance and Prime Farmland to non-agricultural use. This is considered a potentially significant impact, and this issue will be further analyzed in the EIR.

b) **Potentially Significant Impact.** The project site is currently zoned A-2-G-U (General Agriculture with a Geothermal Energy Zone Overlay in an Urban Area). Pursuant to Title 9, Division 5, Chapter 8, the following uses are permitted in the A-2 zone subject to approval of a CUP from Imperial County:

- Electrical generation plants (less than 50 MW) excluding nuclear or coal fired and meeting requirements in Division 17.
- Facilities for the transmission of electrical energy (100—200 kv).
- Major Geothermal projects as per Division 17.
- Resource extraction and energy development as per Division 17.

Because the project is located on land designated for agricultural uses, this issue will be analyzed further in the EIR.

As of December 31, 2018, 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.** There are no existing forest lands, timberlands, or timberland zoned “Timberland Production” within or immediately adjacent to the project site that would conflict with existing zoning or cause rezoning. Therefore, no impact is identified for this issue area.

d) **No Impact.** There are no existing forest lands within or immediately adjacent to 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) **Potentially Significant Impact.** Refer to response II. a) above

III. Air Quality

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **Potentially Significant Impact.** The project site is located within the jurisdiction of Imperial County Air Pollution Control District (ICAPCD) in the Imperial County portion of the Salton Sea Air Basin. Construction of the proposed project would create temporary emissions of dust, fumes, equipment exhaust, and other air contaminants that may conflict with the ICAPCD's rules and regulations. These temporary construction emissions have the potential to result in a significant air quality impact.

b) **Potentially Significant Impact.** The criteria pollutants for which the project area is in state nonattainment under applicable air quality standards are ozone (O_3) and respirable particulate matter (PM_{10}). Air pollutants transported into the Salton Sea Air Basin from the adjacent South Coast Air Basin (Los Angeles County, San Bernardino County, Orange County, and Riverside County) and Mexicali (Mexico) substantially contribute to the non-attainment conditions in the Salton Sea Air Basin. A potentially significant impact is identified for this issue area. The CalEEMod air quality model will be utilized to estimate the project's air quality emissions and the results will be included in the EIR analysis.

c) **Potentially Significant Impact.** The project site is located in a rural agricultural area of Imperial County. The nearest sensitive land use to the project site is a single-family residence located approximately 300 feet northeast of the project site. Other nearby sensitive receptors include residences located approximately 0.57 miles north of the project site along E. Fawcett Road and Heber School located approximately 0.70 miles north of the project site. This issue is potentially significant and will be addressed in the EIR analysis.

d) **Less Than Significant Impact.** Land uses commonly considered to be potential sources of odorous emissions include wastewater treatment plants, sanitary landfills, food processing facilities, chemical manufacturing plants, rendering plants, paint/coating operations, and concentrated agricultural feeding operations and dairies. The construction and operation of the proposed solar facility is not anticipated to result in odor emissions, and impacts would be less than significant.

IV. Biological Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **Potentially Significant Impact.** The project site has the potential to support native habitats and/or sensitive species. According to the Conservation and Open Space Element of the General Plan (County of Imperial 2016), numerous special-status plants and special-status species occur in the County of Imperial. Of particular concern is the western burrowing owl, which was recently named by the California Department of Fish and Wildlife as a candidate for potential listing as a protected species under the California Endangered Species Act. Burrowing owls and burrows are commonly found along canals and drains. The Central Main Canal, Dogwood Canal, and smaller Imperial Irrigation District (IID) canals and drains traverse the project

site. Therefore, the project site has the potential to be used as burrowing owl foraging habitat, as burrowing owls and burrows are commonly found along canals and drains. Thus, a potentially significant impact is identified for this issue area. A biological resources technical report that will address the proposed project's potential impacts on biological resources will be prepared and this issue will be addressed in the EIR.

b) **Potentially Significant Impact.** Refer to response IV. a) above.

c) **Potentially Significant Impact.** Being situated in an agricultural area, the project site and surrounding areas are traversed by a network of drains, canals, and other irrigation infrastructure administered by the IID, some of which constitute potentially jurisdictional features. An aquatic resources delineation that will address the proposed project's potential impacts on state or federally protected wetlands will be prepared and included in the EIR analysis.

d) **Potentially Significant Impact.** Refer to response IV. a) above.

e) **Potentially Significant Impact.** Refer to response IV. a) above.

f) **No Impact.** The project site is located within the designated boundaries of the Desert Renewable Energy Natural Community Conservation Plan & Habitat Conservation Plan (NCCP/HCP). However, the project site is not located within or adjacent to an Area of Critical Environmental Concern. No impact is identified for this issue area.

V. Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **Potentially Significant Impact.** The project site has been disturbed by past farming uses. Thus, the presence of significant or undamaged cultural resources on the project site is unlikely. Although the proposed project is not expected to cause a substantial adverse change in the significance of a historical or archaeological resource, this issue will be analyzed further in the EIR. Therefore, a potentially significant impact is identified for this issue area. A cultural resources report that will address the proposed project's potential impacts on historic and prehistoric resources will be prepared and this issue will be addressed in the EIR.

b) **Potentially Significant Impact.** Refer to response V. a) above.

c) **Potentially Significant Impact.** Although unlikely, there is a potential for unknown human remains to be unearthed during earthwork activities. This issue is potentially significant and will be addressed in the EIR analysis.

VI. Energy

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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 use of energy associated with the proposed project includes both construction and operational activities. Construction activities consume energy through the use of heavy construction equipment and truck and worker traffic. The proposed project will use several energy- and fuel-efficient design features that would help minimize inefficient or wasteful use of energy and increase conservation during construction. The project grading plan and on-site construction equipment would also minimize impacts to the surrounding transportation network that would result from truck traffic associated with soil import/export and mobilization/demobilization. Additionally, implementation and operation of the solar facility would promote the use of renewable energy and contribute incrementally to the reduction in demand for fossil fuel use for electricity-generating purposes. Therefore, the proposed project would generate renewable energy resources and is considered a beneficial effect.

Based on these considerations, the proposed project would not result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. A less than significant impact has been identified for this issue area.

b) **Less than Significant Impact.** Construction equipment would comply with federal, state, and regional requirements where applicable. With respect to truck fleet operations the United States Environmental Protection Agency and the National Highway Traffic Safety Administration have adopted fuel efficiency standards for medium- and heavy-duty trucks. Construction equipment and trucks are required to comply with the California Air Resources Board's regulations regarding heavy duty truck idling limits of five minutes at a location and the phase in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption for more fuel-efficient engines. Because one of the main objectives of the project is to assist the state in meeting its obligations under California's Renewables Portfolio Standard Program, the project would be consistent with the applicable recommended actions of CARB's 2022 Climate Change Scoping Plan, as well as applicable federal, state, and local policies. The project would assist the State and regulated utility providers to generate a greater portion of energy from renewable sources consistent with the Renewables Portfolio Standard. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency during construction and operations. Short-term and long-term impacts would be less than significant.

VII. Geology and Soils

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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?	☒	☐	☐	☐

Impact Analysis

ai) **No Impact.** The project site is not located within or near an Alquist-Priolo Special Fault Study Zone. Therefore, no impact is identified for this issue area.

aii) **Potentially Significant Impact.** The project site is located in the seismically-active Imperial Valley in Southern California and considered likely to be subjected to moderate to strong ground motion from earthquakes in the region. The Imperial Fault Zone is the nearest active fault zone to the project site and is situated approximately 6.7 miles to the east. Due to the project's proximity to the Imperial Fault Zone, seismic hazards related to ground shaking could occur on the project site. Although the project is not designed for human occupancy, the project could pose a threat to emergency personnel. A potentially significant impact has been identified for this issue area. A geotechnical report that will address the proposed project's potential impacts on geology and soils will be prepared and this issue will be addressed in the EIR.

aiii) **Potentially Significant Impact.** Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as vibratory motion produced by earthquakes. With strong ground shaking, an increase in pore water pressure develops as the soil tends to reduce in volume. If the increase in pore water pressure is sufficient to reduce the vertical effective stress (suspending the soil particles in water), the soil strength decreases, and the soil behaves as a liquid (similar to quicksand). Liquefaction can produce excessive settlement, ground rupture, lateral spreading, or failure of shallow bearing foundations.

Four conditions are generally required for liquefaction to occur:

1) The soil must be saturated (relatively shallow groundwater).

2) The soil must be loosely packed (low to medium relative density).

3) The soil must be relatively cohesionless (not clayey).

4) Groundshaking of sufficient intensity must occur to function as a trigger mechanism.

All of these conditions may exist to some degree at the project site. Therefore, there is a potentially significant impact associated with liquefaction. A geotechnical report that will address the proposed project's potential impacts on geology and soils will be prepared and this issue will be addressed in the EIR.

aiv) **No Impact.** According to Figure 3: Landslide Susceptibility in the Seismic and Public Safety Element of the General Plan (County of Imperial 2022), the project site is not located in an area that is prone to landslide hazards. Furthermore, the site topography is flat, and no ancient landslides have been mapped in the area. Development of the project would not directly or indirectly cause potential substantive adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impact is identified for this issue area.

b) **Less than Significant Impact.** Soil erosion can result during construction as grading and construction can loosen surface soils and make soils susceptible to wind and water movement across the surface. Impacts are not considered significant because erosion would be controlled on-site in accordance with Imperial County standards, including preparation, review, and approval of a grading plan by the Imperial County engineer. Implementation of Imperial County standards would reduce the potential impacts to a less than significant level.

c) **Potentially Significant Impact.** Near surface soils within the project site will need to be identified to determine if these soils are unstable. Therefore, this issue is potentially significant and will be analyzed in the EIR.

d) **Potentially Significant Impact.** Near surface soils within the project site will need to be identified to determine if these soils are expansive. Therefore, this issue is potentially significant and will be analyzed in the EIR.

e) **No Impact.** The project does not include any septic tanks or wastewater disposal systems. Therefore, the project would have no impact on the project site soil and its capacity to adequately support the use of septic tanks or alternative wastewater disposal systems.

f) **Potentially Significant Impact.** Many paleontological fossil sites are recorded in Imperial County and have been discovered during construction activities. Paleontological resources are typically impacted when earthwork activities, such as excavation cut into geological deposits (formations) with buried fossils. It is not known if any paleontological resources are located on the project site. The proposed project's potential to impact paleontological resources will be addressed in the EIR.

VIII. Greenhouse Gas Emissions

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **Potentially Significant Impact.** The production of greenhouse gas (GHG) emissions associated with the proposed project includes both construction and operational activities. In the long-term, the project is expected to provide a benefit with respect to reduction of GHG emissions. However, construction of the project would generate GHG emissions over a 16-19 month construction period. Exhaust emissions would result from construction equipment and machinery as well as from the vehicular traffic generated by construction activities. Thus, a potentially significant impact is identified for this issue area. The CalEEMod air quality model will be utilized to estimate the project's GHG emissions and the results will be included in the EIR analysis.

b) **Potentially Significant Impact.** Refer to response VIII. a) above.

IX. Hazards and Hazardous Materials

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **Potentially Significant Impact.** Construction of the proposed project would require the use of construction vehicles, associated grease, oil, and fuels. Vehicle fuels, oils, and grease have the potential to be released into the environment through natural events or human error. This is considered a potentially significant impact and will be addressed in the EIR analysis.

b) **Potentially Significant Impact.** Refer to response IX. a) above.

c) **No Impact.** The project is not located within one-quarter mile of an existing school. The closest school is Heber School, located approximately 0.70 miles to the north of the nearest project component (cable route).

Therefore, the project would have no impact on emitting or handling hazardous or acutely hazardous materials substances or waste within one-quarter mile of an existing or proposed school.

d) **No Impact.** Based on a review of the Cortese List conducted in September 2025, the project site is not listed as a hazardous materials site (Department of Toxic Substances Control 2025, State Water Resources Control Board 2025). Therefore, implementation of the project would result in no impact related to the project site being located on a listed hazardous materials site pursuant to Government Code Section 65962.5.

e) **No Impact.** The nearest airport to the project site is the Calexico International Airport, located approximately two miles southeast of the project site. According to Figure 3B of the Imperial County Airport Land Use Compatibility Plan (ALUCP), no portion of the project site is located within the Calexico International Airport's land use compatibility zones (ALUC 1996). 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. No impact is identified for this issue area.

f) **Less Than Significant Impact.** The Imperial County Office of Emergency Services (OES) has provided three plans addressing evacuation and evacuation responsibilities for County Fire, Police, and the OES among other topics related to emergency preparedness that do not identify specific evacuation routes. The project applicant would coordinate any construction activities and use of oversized loads or movement of construction/decommissioning equipment with the Imperial County Department of Public Works (ICDPW) and/or California Department of Transportation (Caltrans) and the El Centro Highway Patrol office. Further, the project will coordinate with the ICDPW for any requested dedication of rights-of-way needed for Dogwood Road for the consideration of existing and any future road needs. Lastly, the project shall file for an encroachment permit for any work or proposed work in the affected County or Caltrans road rights-of-way and for any and all new, altered or unauthorized existing driveway(s) to access the lot and for any proposed road crossings. Thus, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and would result in a less than significant impact.

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, the potential for a major fire in the unincorporated areas of the County is generally low (County of Imperial 2022). The project site is not located in areas considered wildlands, as the vast majority of the surrounding area is cultivated farmlands. According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the project area 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 2025). Therefore, there would be no impact associated with risk involving wildland fires.

X. Hydrology and Water Quality

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **Potentially Significant Impact.** The proposed project has the potential to create urban non-point source discharge (e.g., synthetic/organic chemicals). Potentially significant water quality impacts have been identified and will be addressed in the EIR.

b) **No Impact.** Any water needed for fugitive dust control, or other BMPs that require water will be obtained through the project applicant's existing IID contract. No groundwater wells will be drilled, nor will the project require the use of ground water. No impact on groundwater supply or recharge would occur.

ci) **Less than Significant Impact.** The proposed project would result in the creation of impervious surfaces. Soil erosion could result during construction and earthmoving as well as during site reclamation. However, the project applicant is required to comply with the National Pollution Discharge Elimination System (NPDES) Construction General Permit and the Industrial General Permit, as well as Imperial County Land Use Ordinance, Title 9, Chapter 10 – Grading Regulations. County standards and compliance with the NPDES require the creation of a Stormwater Pollution Prevention Plan (SWPPP), and the use of best management practices (BMPs) to reduce impacts to surface and ground water quality attributed to erosion or siltation to a level less than significant. The Applicant's compliance with Imperial County and State standards would ensure the project does not significantly alter the site's drainage resulting in erosion or siltation on-or off-site, and impacts would be less than significant.

cii) **Less than Significant Impact.** Refer to response X. ci) above.

ciii) **Less than Significant Impact.** Refer to response X. ci) above.

civ) **Less Than Significant Impact.** According to the Federal Management Agency (FEMA) Flood Insurance Rate Map (Panel 06025C2075C), the project site is within Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain (FEMA 2008). Therefore, the proposed project would not impede or redirect flood flows and this is considered a less than significant impact.

d) **No Impact.** According to the FEMA Flood Insurance Rate Map (Panel 06025C2075C), the project site is within Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain (FEMA 2008). In addition, there are no large bodies of water near the project site. The Salton Sea is the closest body of water near the project site and is 28 miles away, and the Pacific Ocean is over 90 miles away. Therefore, the project would not risk release of pollutants due to project inundation by flood, tsunami or seiche. No impact would occur.

e) **Less Than Significant Impact.** No groundwater wells will be drilled, nor will the project require the use of ground water. Any water needed for fugitive dust control, or other BMPs that require water will be obtained through the project applicant's existing IID contract. Furthermore, the project is required to comply with County, State, and Federal water quality standards. The proposed project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This is considered a less than significant impact.

XI. Land Use and Planning

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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, agriculturally zoned 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 approximately 0.60 miles north of the project site along E Fawcett Road; and the closest residence is approximately 300 feet northeast of the solar site. Therefore, implementation of the project would not divide an established community and no impact would occur.

b) **Less than Significant Impact.** The project site is currently designated by the General Plan as "Urban Area" and is zoned A-2-G-U (General Agriculture with a Geothermal Zone Overlay in an Urban Area).

Pursuant to Title 9, division 5, Chapter 8, the following uses are permitted in the A-2 zone subject to approval of a CUP from Imperial County.

- Electrical generation plants (less than 50 MW) excluding nuclear or coal fired and meeting requirements in Division 17.
- Facilities for the transmission of electrical energy (100—200 kv).
- Major Geothermal projects per Division 17.
- Resource extraction and energy development as per Division 17.

The County Land Use Ordinance, Division 17, includes the Renewable Energy Overlay Zone, which authorizes the development and operation of renewable energy projects, with an approved CUP. With an approved CUP the project would conform with the standards presented in the Implementation Ordinance of the Renewable Energy and Transmission Element update. Therefore, implementation of the project would not 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 and impacts would be less than significant.

XII. Mineral Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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.** The project site is not used for mineral resource production. According to Figure 8: Imperial County Existing Mineral Resources of the Conservation and Open Space Element of the General Plan (County of Imperial 2016), no known mineral resources occur within the project site nor does the project site contain mapped mineral resources. Therefore, the proposed project would not result in the loss of availability of any known mineral resources that would be of value to the region and the residents of California nor would the proposed project result in the loss of availability of a locally important mineral resource. Thus, no impact is identified for this issue area and no further analysis is required.

b) **No Impact.** Refer to response XII. a) above.

XIII. Noise

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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 Imperial County Title 9 Land Use Ordinance, Division 7, Chapter 2, Section 90702.00 - Sound level limits, establishes one-hour average sound level limits for the County's land use zones. Agricultural/industrial operations are required to comply with the noise levels prescribed under the general industrial zones. Therefore, the proposed project will be required to maintain noise levels below 75 decibels (dB) (averaged over one hour) during any time of day.

The proposed project will also be expected to comply with the Noise Element of the General Plan which states that construction noise, from a single piece of equipment or a combination of equipment, shall not exceed 75 dB, when averaged over an eight-hour period, and measured at the nearest sensitive receptor. Construction equipment operation is also limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m on Saturday. Nevertheless, the proposed project will result in the increase in ambient noise levels during construction. A noise report that will address the proposed project's potential noise impacts will be prepared and this issue will be addressed in the EIR.

b) **Less than Significant Impact.** Groundborne vibration and noise could originate from earth movement during the construction phase of the proposed project. However, significant vibration is typically associated with activities such as blasting or the use of pile drivers, neither of which would be required during project construction. Construction activities most likely to cause vibration include heavy construction equipment and site grading operations. Although all heavy, mobile construction equipment has the potential to cause at least some perceptible vibration when operating close to buildings, the vibration is usually short term and is not of sufficient magnitude to cause building damage. Heavy equipment such as dozers, loaders, and drill rig equipment would not be operated close enough to any residences or structures to cause vibration impact. Operation of the project would not result in vibrations perceptible to nearby receptors. As such, impacts would be less than significant.

c) **No Impact.** The nearest airport to the project site is the Calexico International Airport, located approximately two miles southeast of the project site. According to Figure 4G of the Imperial County ALUCP, the project site is located outside of the noise contours of the Calexico International Airport (ALUC 1996). Therefore, the proposed project would not expose people to excessive airport noise levels, and no impact would occur.

XIV. Population and Housing

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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.** Project construction would require approximately 15 workers onsite during the construction period. After construction is complete, the solar facility would generally be unstaffed but would require routine maintenance and unscheduled maintenance as needed. It is assumed that the workforce would be from southern California and would likely not require long-term housing accommodations. The project is sited within the Geothermal Overlay Zone and the project does not involve the construction of any new housing or commercial areas that would attract new residents to the area, nor does it require the extension of roads or creation of other infrastructure. The project would not appear to induce population growth; therefore, the project would have no impact.

b) **Less than Significant Impact.** An existing single-family home is located in the southwest corner of the project site. This home would be demolished as part of the project. However, the home is vacant and owned by the applicant. Therefore, while the house would be removed, the project would not displace any residents. This is considered a less than significant impact.

XV. Public Services

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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.** The project is located in an unincorporated area of Imperial County outside of Heber and Calexico, California. The project would not likely impact or displace the location of existing fire protection facilities. The project applicant will have a certified fire engineer review the proposed facility and existing fire response infrastructure to determine if the existing fire response facilities are adequate or if additional facilities (i.e., hydrants, access points) are necessary. The project will have a thorough Emergency Response Plan (ERP) created with consultation from the Imperial County Fire Department. The project ERP will address all emergencies likely to occur at the site and requires an Emergency Coordinator who can work with County Fire Protection. Therefore, impacts would be less than significant.

aii) **Less Than Significant Impact.** The project would not likely impact or displace the location of existing police protection facilities. The project would also include public safety mechanisms such as fences and gates to protect the facility and reduce unauthorized visitations. In addition, there will be a security service that monitors the property. Furthermore, the project applicant would be required to pay their share of local infrastructure improvement costs. Therefore, impacts would be less than significant.

aiii) **Less Than Significant Impact.** The proposed project does not include the development of residential land uses that would result in an increase in population or student generation. Also, the number of construction and operational workers coming to the region is low and is not expected to increase demand for schools or require the construction of new schools. Therefore, impacts would be less than significant.

aiv) **Less Than Significant Impact.** The number of construction and operational workers coming to the region is low and is not expected to increase demand on existing or future parks. Therefore, impacts would be less than significant.

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

XVI. Recreation

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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 project would not directly or indirectly increase the number of residents keeping the county compliant with the Quimby Act which requires 5 acres of parkland for every 1,000 residents. Project construction would likely require approximately 15 workers. After construction is complete, the solar facility would generally be unstaffed but would require routine maintenance and unscheduled maintenance as needed. These workers and employees are anticipated to come from existing populations that live in or commute from the surrounding local community. As there is no increase of residences or residents, it is reasonably foreseeable that the project would not lead to an increase of use or deterioration of existing neighborhood, regional, or other recreational facilities. Therefore, the project would have no impact on the use or deterioration of existing recreational resources.

b) **No Impact.** The project does not include nor require the construction of a recreational facility as the project does not alter the current ratio of parkland acres to residents. Therefore, the project will have no impact on the construction or expansion of recreational facilities which might have an adverse effect on the environment.

XVII. Transportation

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **Potentially Significant Impact.** Construction of the proposed project would result in a small increase of traffic to the area, which may result in a potentially significant impact. Therefore, a traffic impact study that will address the proposed project's potential impacts on traffic will be prepared, and this issue will be addressed in the EIR.

b) **Potentially Significant Impact.** Section 15064.3(b) of the CEQA Guidelines provides guidance on determining the significance of transportation impacts and focuses on the use of vehicle miles traveled (VMT), which is defined as the amount and distance of automobile travel associated with a project. Given the nature of the project, after construction, there would be a nominal amount of vehicle trips generated by the project. Once the proposed project is implemented, the proposed project would require intermittent maintenance requiring a negligible amount of traffic trips on an annual basis. However minimal, the proposed project would increase the number of vehicular trips related to construction and the need for intermittent maintenance on an annual basis. Therefore, this issue is potentially significant and will be addressed in the traffic impact study and EIR analysis.

c) **No Impact.** The project would not result in any changes to any roads, intersections, streets, highways, nor would it provide any incompatible uses to the street and highway system. All vehicles that would be used for travel to and from the project site would be licensed and comply with all appropriate transportation laws and regulations including obtaining and adhering to provisions of any required permits for oversized loads. As such, no impact related to transportation design hazards would occur.

d) **No Impact.** The proposed facility would be constructed within the property boundaries of the project site and would not affect emergency vehicle access to the facility or any roadway. Emergency vehicle access is identified and designated at the project site, and these areas would not be changed as result of the proposed project. Therefore, no impacts to emergency access to the site or surrounding area would occur under the project.

XVIII. Tribal Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **Potentially Significant Impact.** Assembly Bill 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, Imperial County, as the CEQA lead agency, sent an AB 52 consultation request letter to the Campo Band of Mission Indians, Fort Yuma-Quechan Indian Tribe, and Agua Caliente Band of Cahuilla Indians on October 29, 2025. This issue will be further analyzed in the EIR.

XIX. Utilities and Service Systems

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **Less Than Significant Impact.** Operational use of water resources for the project would be limited to domestic use for solar panel washing and fire protection services. Impacts associated with water facilities would be less than significant. Construction of the proposed facility would not generate/discharge any wastewater. Impacts associated with water facilities would be less than significant.

The energy generated by the solar facility will be collected and then transferred to the existing Heber 1 Geothermal Plant via a transmission cable. The solar facility will effectively reduce the margin between gross and net geothermal energy generation, allowing for the more efficient generation of geothermal energy and allow more geothermal energy to enter the grid. Impacts associated with electric power facilities would be less than significant.

No natural gas facilities are located near the project and no natural gas hookup is required for the project. No impacts associated with natural gas facilities would occur. The project will not have an impact on any telecommunications.

The project would not 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, impacts would be less than significant.

b) **Potentially Significant Impact.** The project will obtain water for construction and decommissioning activities, including grading, and dust control through the project applicant's existing contract with IID. Once the project is operational, water will be required for solar panel washing and fire protection services. Although water for solar panel washing and fire protection services during project operation is not anticipated to result in a significant increase in water demand/use, IID would provide the water required for operations and maintenance and potable water will be trucked onto the site. Thus, a potentially significant impact is identified for the availability of sufficient water supplies to serve the proposed project for the reasonably foreseeable future. The proposed project's potential impacts on water supplies will be analyzed in the EIR.

c) **No Impact.** The proposed project would generate a minimal volume of wastewater during construction. During construction, portable chemical sanitary facilities will be used by all construction personnel. These facilities will be serviced by a local contractor. In addition, all construction liquids would be disposed of in compliance with all appropriate local, state and federal disposal regulations. Therefore, no impacts to the wastewater treatment utility's service capacity would occur.

d) **Less than Significant Impact.** Solid waste generation would be minor for the construction and operation of the proposed project. Solid waste during construction will be disposed of in an approved solid waste disposal site in accordance with Imperial County Environmental Health Department requirements. Waste will be routinely collected and disposed of at an authorized landfill by a licensed disposal contractor. Trash would likely be hauled to the Calexico Solid Waste Site (13-AA-0004) located approximately 1.25 miles southwest of the project site in Calexico, CA. The Calexico Solid Waste Site has approximately 1,921,178 cubic yards of remaining capacity and is estimated to remain in operation through 2200 (CalRecycle 2024). The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

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

e) **Less than Significant Impact.** Refer to response XIX. d) above.

XX. Wildfire

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **No Impact.** According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the project area 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 2025). Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact is identified for this issue area.

b) **No Impact.** The project area 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 2025). The Seismic and Public Safety Element of the County General Plan also states that the potential for a major fire in the unincorporated areas of the County are generally low (County of Imperial 2022). The project site is located on flat land, which does not pose a fire risk due to slope conditions. The County's Multi-Jurisdictional Hazard Mitigation Plan (2021) recognizes and manages events of high winds and other extreme weather in Imperial County. The project would not exacerbate wildfire risks associated with slope or prevailing winds; no impact would occur.

c) **No Impact.** The project area 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 2025). All interconnection lines would be primarily situated along existing utility lines. All infrastructure would comply with existing regulations and would not exacerbate fire risk; no impacts would occur.

d) **No Impact.** Figure 3: Landslide Susceptibility in the Seismic and Public Safety Element of the General Plan (County of Imperial 2022), the project is not located in the area that is prone to landslide hazards. Furthermore, the site topography is flat, and no ancient landslides have been mapped in the area. The project would not alter the existing drainage pattern surrounding the project site and it would comply with regulations that reduce the potential for excess runoff waters from the project site. The project would not

expose people or structures to significant risks as a result of runoff, post-fire instability, or drainage changes; therefore no impact would occur.

XXI. Mandatory Findings of Significance

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless 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) **Potentially Significant Impact.** The proposed project has the potential to result in significant environmental effects on biological resources and cultural resources, which could directly or indirectly cause adverse effects on the environment. These issues will be further evaluated in the EIR.

b) **Potentially Significant Impact.** Implementation of the proposed project has the potential to result in impacts related to: aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, transportation, tribal cultural resources, and utilities/service systems. The proposed project has the potential to result in cumulative impacts with regards to the identified issue areas. Cumulative impacts will be discussed and further analyzed in the EIR.

c) **Potentially Significant Impact.** Implementation of the proposed project has the potential to result in impacts related to: air quality, geology/soils, and hazards and hazardous materials. These potential environmental effects could cause substantial adverse effects on human beings. These issues will be further evaluated in the EIR.

References

California Department of Conservation (DOC). 2020. California Important Farmland Finder. Available on-line at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed September 26, 2025.

California Department of Forestry and Fire Protection. 2025. Fire Hazard Severity Zone Viewer. Available on-line at: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008. Accessed September 26, 2025.

California Department of Resources Recycling and Recovery (CalRecycle). 2024 Facility/Site Summary Details: Calexico Solid Waste Site (13-AA-0004). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4179?siteID=591. Accessed September 26, 2025.

California Department of Transportation (Caltrans). 2018. California Scenic Highway Mapping System. Available on-line at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. September 26, 2025.

County of Imperial. 2022. County of Imperial General Plan. Seismic and Public Safety Element. https://www.icpds.com/assets/GPA21-0004-Seismic-and-Public-Safety-Element-11-22-2022.pdf.

——— 2016. County of Imperial General Plan. Conservation and Open Space Element. Available on-line at: https://www.icpds.com/planning/land-use-documents/general-plan/conservation-and-open-space-element.

——— 2021. Imperial County Multi-Jurisdictional Hazard Mitigation Plan. January 2021. Available on-line at: https://firedept.imperialcounty.org/wp-content/uploads/2021/01/Imperial-County-MHMP-2021-Plan-Update-2021_01_11.pdf.

Department of Toxic Substances Control. 2025. EnviroStor. Available on-line at: https://www.envirostor.dtsc.ca.gov/public/. Accessed September 26, 2025.

Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Map (Panel 06025C2075C).

Imperial County Airport Land Use Commission (ALUC). 1996. Imperial County Airport Land Use Compatibility Plan. Available on-line at https://www.icpds.com/assets/hearings/airport-land-use-commission/aluc-compatibility-plan-1996-part-1.pdf.

State Water Resources Control Board. 2025. GeoTracker. Available on-line at: https://geotracker.waterboards.ca.gov/. Accessed on September 26, 2025.

List of Preparers

This Initial Study was prepared for the Imperial County Planning and Development Services Department by HDR at 591 Camino de la Reina, Suite 300, San Diego, CA 92108. The following professionals participated in its preparation:

Imperial County Planning and Development Services Department

Jim Minnick, Director,

Michael Abraham, AICP, Assistant Director

Diana Robinson, Planning Division Manager

Alan Molina, Planner II

HDR

Tim Gnibus, Principal

Sharyn Hidalgo, Project Manager

Madison Gallagher, Environmental Planner

Ian Plascencia, Environmental Planner

Trent Lundberg, Geographic Information Systems Analyst

Katherine Turner, Document Production Administrator

This page is intentionally blank.