

---

***Initial Study / Mitigated Negative Declaration  
For:***

***MICHELLE SUBSTATION PROJECT***

**Prepared By:  
Ericsson-Grant, Inc.  
315 South Coast Highway, Suite U277  
Encinitas, CA 92024**

**Prepared For:**



**333 Barioni Boulevard  
Imperial, CA 92251**

**March 08, 2026**

---

---

**TABLE OF CONTENTS**

	<u>PAGE</u>
<u>SECTION 1</u>	
I. INTRODUCTION	4
<u>SECTION 2</u>	
II. ENVIRONMENTAL CHECKLIST	8
PROJECT SUMMARY	25
EVALUATION OF ENVIRONMENTAL IMPACTS	27
I. AESTHETICS .....	22
II. AGRICULTURE AND FORESTRY RESOURCES .....	23
III. AIR QUALITY .....	25
IV. BIOLOGICAL RESOURCES .....	27
V. CULTURAL RESOURCES.....	31
VI. ENERGY .....	35
VII. GEOLOGY AND SOILS .....	37
VIII. GREENHOUSE GAS EMISSIONS.....	40
IX. HAZARDS AND HAZARDOUS MATERIALS.....	41
X. HYDROLOGY AND WATER QUALITY .....	43
XI. LAND USE AND PLANNING .....	45
XII. MINERAL RESOURCES.....	46
XIII. NOISE .....	46
XIV. POPULATION AND HOUSING .....	47
XV. PUBLIC SERVICES.....	48
XVI. RECREATION .....	49
XVII. TRANSPORTATION .....	49
XVIII. TRIBAL CULTURAL RESOURCES.....	50
XIX. UTILITIES AND SERVICE SYSTEMS .....	51
XX. WILDFIRE .....	52
<u>SECTION 3</u>	
III. MANDATORY FINDINGS OF SIGNIFICANCE	64
IV. PERSONS AND ORGANIZATIONS CONSULTED	66
V. REFERENCES	67

---

APPENDICES

Appendix A: Biological Resource Assessment Imperial Irrigation District Michelle Substation Project  
Imperial, California.

---

## **SECTION 1**

### **I. INTRODUCTION**

#### **A. PURPOSE**

This document is a  policy-level,  project level Initial Study for evaluation of potential environmental impacts resulting from construction of the proposed Michelle Substation Project.

#### **CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS**

As defined by Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines, 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 (MND) 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 degrade the quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

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

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

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

The IID is designated 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 the project.

#### **B. INTENDED USES OF INITIAL STUDY**

This Initial Study is an informational document which is intended to inform the IID decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially

---

adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study prepared for the project will be circulated for a period of 35 days for public and agency review and comments. At the conclusion, if comments are received, the IID will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

### **C. CONTENTS OF INITIAL STUDY**

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

#### **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 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.

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

#### **SECTION 3**

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

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

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

#### **VI. FINDINGS**

---

## **SECTION 4**

### **VIII. RESPONSE TO COMMENTS (IF ANY)**

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

#### **D. 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 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 an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

#### **E. 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 IID’s jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

#### **F. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE**

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

##### **1. Tiered Documents**

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

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

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

---

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

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

“Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to affects 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]). This document must be available for inspection by the public at the office of the lead agency (CEQA Guidelines Section 15150[b]).
- 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, 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 material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

---

## **SECTION 2**

### **II. ENVIRONMENTAL CHECKLIST**

- 1. Project Title:** Michelle Substation
- 2. Lead Agency:** Imperial Irrigation District (IID)
- 3. Contact person and phone number:** Jeremy J Brooks, Environmental Compliance & Real Estate; (760) 339-9632
- 4. Address:** 333 E. Barioni Blvd., Imperial, CA
- 5. E-mail:** iidenvironmental@iid.com
- 6. Project location:** The proposed Michelle Substation Project (Project) is located on Assessor Parcel Number (APN) 044-220-093, which is an approximately 2.95-acre parcel on the west side of Dogwood Road immediately north of Central Drain, approximately 0.45 miles south of Aten Road and 3.0 miles north of Interstate I-8 Freeway in the City of Imperial, California (Figure 1). The parcel is included in the Victoria Ranch Specific Plan (VRSP) area and has been dedicated to the IID as an easement area for the purpose of infrastructure uses (City of Imperial, 2004).
- 7. Project sponsor's name and address:** Imperial Irrigation District (IID).
- 8. General Plan Designation:** The City of Imperial General Plan designates the Project site as an VR-S – School (Public Use) within the VRSP, as shown on Figure 2. The VRSP was adopted by the City of Imperial on June 2, 2004, and included the preparation and adoption of an MND. However, the MND prepared in 2003 assessed the area for the proposed Project to be developed as residential uses. In 2005, the VRSP was amended to modify the proposed land uses to include the Project site for public use but did not provide an environmental assessment of the modified uses. Given the inadequate assessment in 2003, this CEQA document is being prepared to provide a focused and specific analysis for the proposed electrical substation.  
  
The VRSP has been amended in 2005, 2008, and 2023 to currently allow for the development of a total of 1,118 single family units, 240 multi-family units, and 19± acres of commercial development. The VR-S designation primarily provides for the development of public school but also for the special use of infrastructure development. The VRSP designation of the Project site as VR-S included the potential use of the site for electrical utility services.
- 9. Zoning:** The Project site has a zoning designation of Specific Plan Overlay (SP).
- 10. Description of Project:** The Michelle Substation Project (Project) is located within the boundaries of Assessor Parcel Number (APN) 044-220-093 (Figure 3) and is bounded by an unpaved access road to the south, Dogwood Road on the east, and agricultural uses to the north and west. The proposed substation would include the installation of one 28-MVA substation transformer with four distribution feeders and associated equipment. The Project proposes to include the area and support equipment for an additional 28-MVA substation transformer accommodating four distribution feeders with the intent to install the second transformer as the need emerges. The entire 2.95-acre site is proposed to be cleared of agricultural uses and graded to accommodate the substation development.

---

Project Need: This new substation has been identified as a priority to accommodate load growth and increased flexibility and reliability to areas to the northeast of El Centro and South of Imperial. Additionally, it will address concerns over the surge in load demand from Electric Vehicle (EV) Chargers.

The Project includes the following components:

- Control room
- Communication Fiber Optic
- Relay Protection Panels
- Station service
- Automatic transfer switch
- DC batteries
- 92/13.2 kV Transformer
- 92 kV Breakers
- 12.47 kV Breaker Feeders
- Regulators
- Capacitor Banks

Construction of the new distribution substation will include installation of reinforced structural concrete slabs to support the transformers, 92k Steel Structures, 92KV Breakers, 12.47 Breaker Feeders assemblies, control building and other necessary components.

Substation: The installation of the new electrical substation includes one 28 MVA transformer and facilities that will interconnect with the existing 92-kV transmission system. The work associated to this new substation requires the design, procurement, and construction the one 28 MVA 92/13.2-kV power transformer with associated equipment and the preparations to accommodate a 92-kV transmission in and out line-extension. The associated equipment includes circuit breakers, disconnect switches, distribution buses with feeder breakers, capacitor banks, one control building with relays duplex panel and battery room, substation vaults, underground ducts conduit systems for the IID distribution feeder's getaways to the interconnection point, and a wall fence as per IID Standards. All new equipment will be bonded to a new grounding grid and conduit, and grounding shall be extended as required.

The substation site, including all conduit, grounding, switches, and steel structures will be secured with a 10-foot masonry wall surrounding the entire site. The substation will be built with one control building with underground conduits, copper ground grid, all necessary AC and DC panels, a supervisory control and data acquisition (SCADA) unit, an appropriate battery room with a lead acid battery bank with a battery monitoring system, and a battery charger. This proposed substation is planned to be served by the existing 92-kV transmission line that runs in proximity to the substation property line. The 92-kV transmission lines serving this substation will be designed to terminate in two steel "H" frame structures. All switches, insulators, and surge arrestors will be mounted in hot-deep galvanized steel supports.

Distribution: The distribution includes the installation of new distribution and transmission lines required for the high-voltage substation tie-ins and the outgoing connections for the four new distribution feeders. Lines will exit the substation underground and tie into the existing transmission poles that travel north and south along Dogwood Road.

---

Transmission: The power line component of the proposed Project for the substation would consist of transmission line “in and out” to an existing 92-kV transmission line and 12.47-kV distribution circuits under-build to the proposed Michelle Substation Project. The existing overhead power line is located adjacent to the Project site, running north and south along the eastern side of the property. New transmission lines may be required to be installed on the existing power poles that are located along Dogwood Road from Cruickshank Road north to W Aten Road. Replacement of the poles could be necessary but is not anticipated.

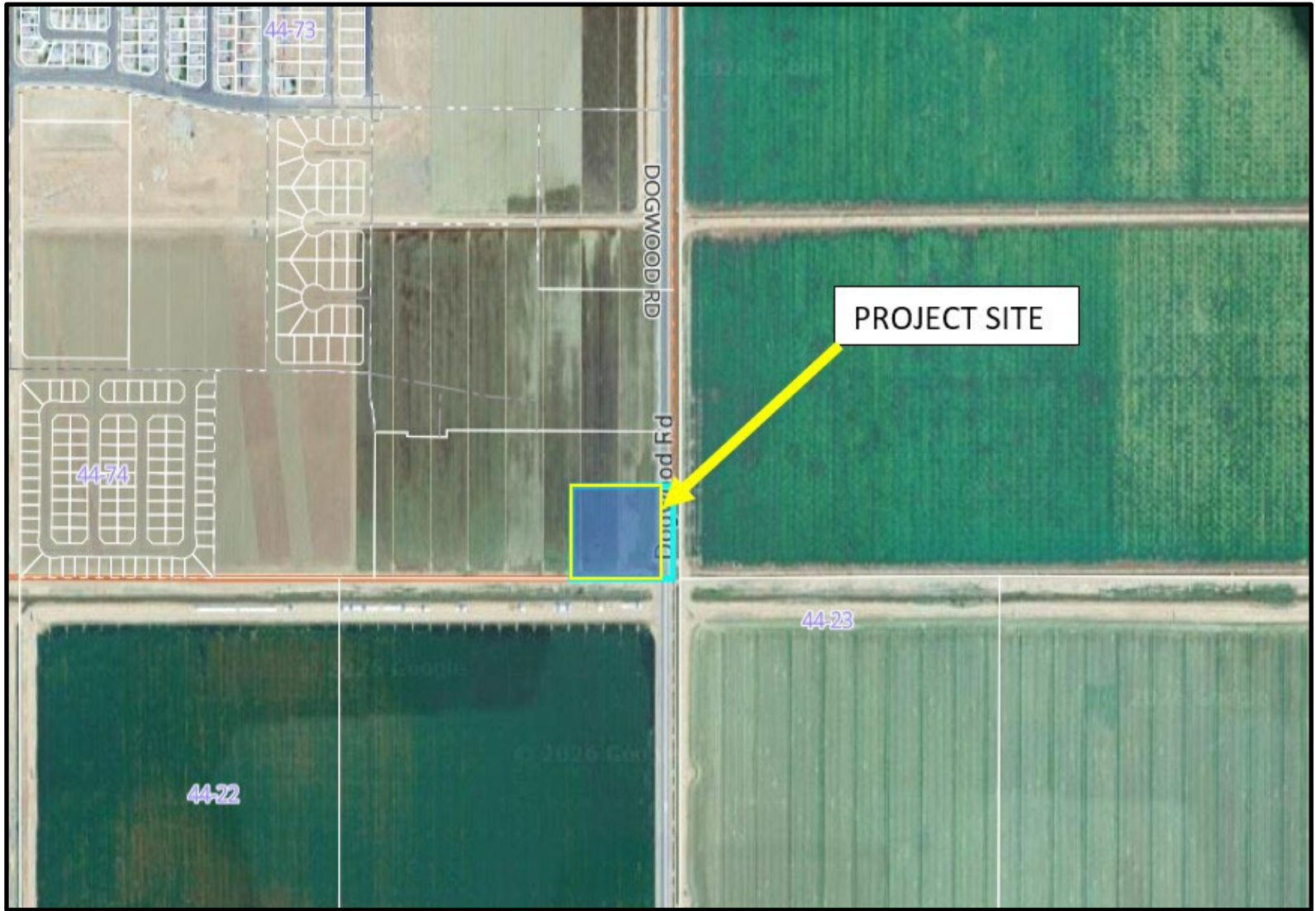
- 11. Surrounding land uses and setting:** The Project site will be located on a 2.95-acre parcel of undeveloped agricultural land that is surrounded on the western, northern, eastern, and southern sides by undeveloped agricultural land. Approximately 0.2 miles to the north-northwest and 0.25 miles to the west are residential uses from the VRSP. The next closest residential uses are a single-family home approximately 0.5 miles to the south and approximately 1.0 miles to the southwest.
- 12. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):** IID, encroachment permits County of Imperial.



**Figure 1**  
**Regional Location Map**

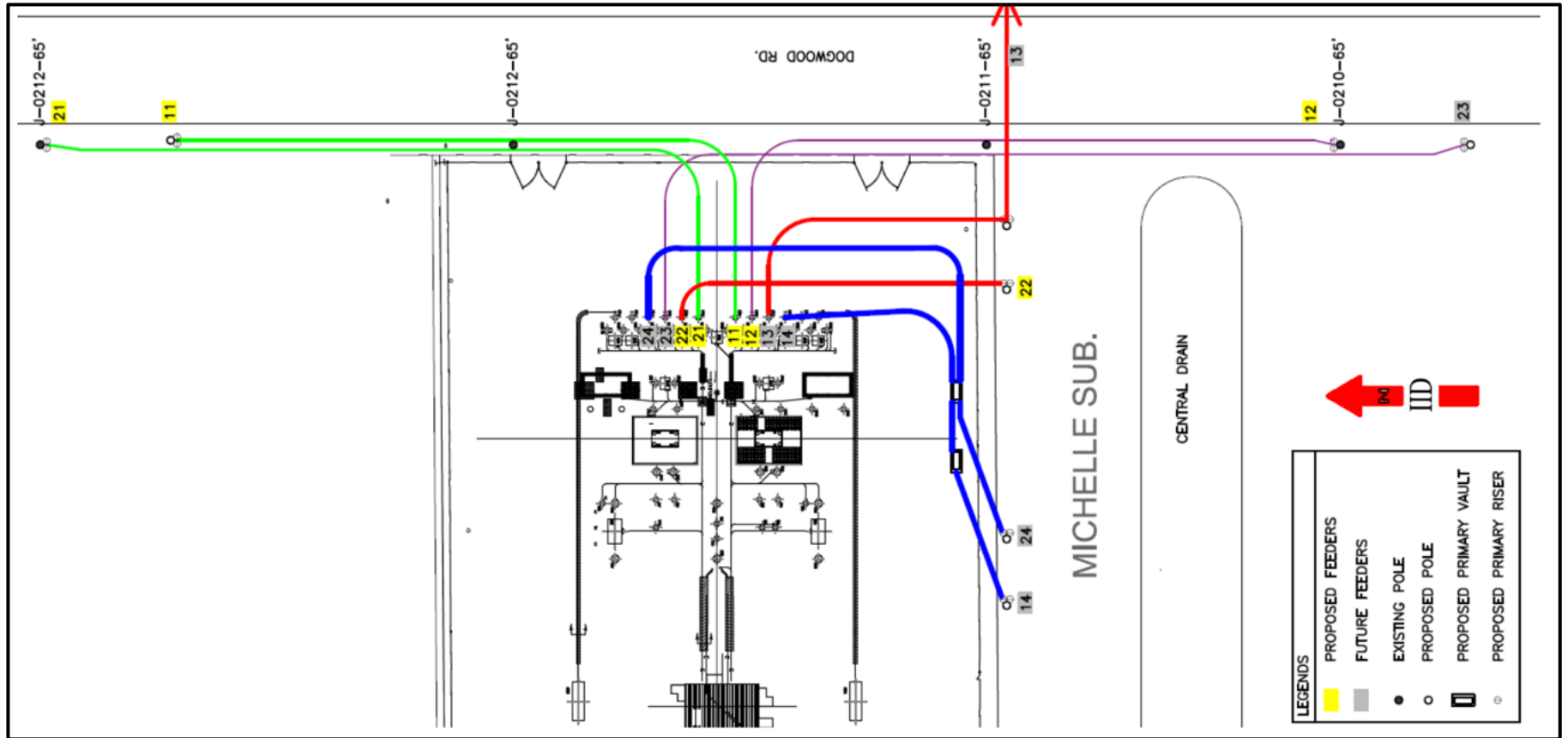


**Figure 2**  
**Victoria Ranch Specific Plan Land Use Map**



**Figure 3**  
**Project Development Area**





**Figure 5**  
Michelle Substation Getaway Layout Plan

13. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun? Yes.** Letters were sent to the following tribes and or agencies on February 04, 2026.

- Augustine Band of Cahuilla Mission Indians
- Ipay Nation of Santa Ysabel
- Inayu – Cosmit Band of Indians
- Jamul Indian Village A Kumeyaay Nation
- Kumeyaay Cultural Repatriation Committee
- Kwaaymi Laguna Band of Mission Indians
- La Jolla Band of Luiseño Indians
- La Posta Band of Mission Indians
- Los Coyotes Band of Cahuilla & Cupeño Indians
- Manzanita Band of Kumeyaay Nation
- Mesa Grande Band of Mission Indians
- Morongo Band of Mission Indians
- San Pasqual Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Yuhaaviatam of San Manuel Nation

The comment period ended 30 days after receipt of notification. No comments were received during the 30 day comment period.

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



**Photo 1:** View to the west from the southeastern corner of the site boundary.



**Photo 2:** View to the northwest from the western boundary of the project site.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

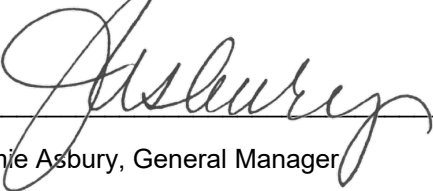
- |                                                          |                                                                    |                                                               |
|----------------------------------------------------------|--------------------------------------------------------------------|---------------------------------------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

**DETERMINATION**

After Review of the Initial Study, the IID has:

- Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- Found that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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

  
\_\_\_\_\_  
Jamie Asbury, General Manager

4-8-26  
\_\_\_\_\_  
Date

---

## PROJECT SUMMARY

- A. Project Location:** The proposed Michelle Substation Project (Project) is located on Assessor Parcel Number (APN) 044-220-093, which is an approximately 2.95-acre parcel on the west side of Dogwood Road immediately north of Central Drain, approximately 0.45 miles south of Aten Road and 3.0 miles north of Interstate I-8 Freeway in the City of Imperial, California (Figure 1). The parcel is included in the Victoria Ranch Specific Plan (VRSP) area and has been dedicated to the IID as an easement area for the purpose of infrastructure uses (City of Imperial, 2004).
- B. Project Summary:** The Michelle Substation Project (Project) is located within the boundaries of Assessor Parcel Number (APN) 044-220-093 (Figure 2) and is bounded by an unpaved access road to the south, Dogwood Road on the east, and agricultural uses to the north and west.

The proposed substation would include the installation of one 28-MVA substation transformer with four distribution feeders and associated equipment. The Project proposes to include the area and support equipment for an additional 28-MVA substation transformer accommodating four distribution feeders with the intent to install the second transformer as the need emerges. The entire 2.95-acre site is proposed to be cleared of agricultural uses and graded to accommodate the substation development.

**Project Need:** This new substation has been identified as a priority to accommodate load growth and increased flexibility and reliability to areas to the northeast of El Centro and South of Imperial. Additionally, it will address concerns over the surge in load demand from Electric Vehicle (EV) Chargers.

The Project includes the following components:

- Control room
- Communication Fiber Optic
- Relay Protection Panels
- Station service
- Automatic transfer switch
- DC batteries
- 92/13.2 kV Transformer
- 92 kV Breakers
- 12.47 kV Breaker Feeders
- Regulators
- Capacitor Banks

Construction of the new distribution substation will include installation of reinforced structural concrete slabs to support the transformers, 92-kV Steel Structures, 92-kV Breakers, 12.47-kV Breaker Feeders assemblies, control building and other necessary components.

**Substation:** The installation of the new electrical substation includes one 28 MVA transformer and facilities that will interconnect with the existing 92-kV transmission system. The work associated to this new substation requires the design, procurement, and construction the one 28 MVA 92/13.2-kV power transformer with associated equipment and the preparations to accommodate a 92-kV transmission in and out line extension. The associated equipment includes circuit breakers, disconnect switches, distribution buses with feeder breakers, capacitor banks, one control building with relays duplex panel and battery room, substation vaults, underground ducts conduit systems for the IID distribution feeder's getaways to the interconnection point, and a wall fence as per IID Standards. All new equipment will be bonded to a new grounding grid and conduit, and grounding shall be extended as required.

---

The substation site, including all conduit, grounding, switches, and steel structures will be fenced with a masonry wall. The substation will be built with one control building with underground conduits, copper ground grid, all necessary AC and DC panels, a supervisory control and data acquisition (SCADA) unit, an appropriate battery room with a lead acid battery bank with a battery monitoring system, and a battery charger. This proposed substation is planned to be served by the existing 92-kV transmission line that runs in proximity to the substation property line. The 92-kV transmission lines serving this substation will be designed to terminate in two steel "H" frame structures. All switches, insulators, and surge arrestors will be mounted in hot-deep galvanized steel supports.

**Distribution:** The distribution includes the installation of new distribution and transmission lines required for the high-voltage substation tie-ins and the outgoing connections for the four new distribution feeders. Lines will exit the substation underground and tie into the existing transmission poles that travel north and south along Dogwood Road.

**Transmission:** The power line component of the proposed Project for the substation would consist of transmission line "in and out" to an existing 92-kV transmission line and 12.47-kV distribution circuit under-build to the proposed Michelle Substation Project. The existing overhead power line is located adjacent to the Project site, running along the eastern side of the property. The existing overhead power line is located adjacent to the Project site, running north and south along the eastern side of the property. New transmission lines may be required to be installed on the existing power poles that are located along Dogwood Road from Cruickshank Road north to W Aten Road. Replacement of the poles could be necessary but is not anticipated or a part of this project.

- C. Environmental Setting:** The proposed Project site is an undeveloped parcel of agricultural land and contains crop plants as described in the Biological Resources section and shown in Photos 1 through 2 and Figure 3. Additionally, an existing power is located along the eastern boundary of the Project site and are located throughout the region.
- D. Analysis:** The Project is the grading the site and construction of the proposed electrical substation, supporting transmission lines and associated components as detailed above. The analysis contained in this document examines any short-term construction impacts that may occur as a result of the Project as well as any long-term operational impacts associated with the operation of the substation.
- E. General Plan Consistency:** The proposed Michelle Substation Project has a School (Special Use) land use designation, as outlined in the City of Imperial General Plan and the Victoria Ranch Specific Plan (VRSP). The Project is considered consistent with the General Plan because it is a public utility use designed to serve the land designated for residential uses by the City of Imperial General Plan.
- F. Evaluation Of Environmental Impacts:**
- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the Project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on Project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a Project-specific screening analysis).

- 
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as Project-level, indirect as well as direct, and construction as well as operational impacts.
  - 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
  - 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
  - 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    - a) Earlier Analysis Used. Identify and state where they are available for review.
    - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.
  - 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
  - 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
  - 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a Project's environmental effects in whatever format is selected.
  - 9) The explanation of each issue should identify:
    - a) the significance criteria or threshold, if any, used to evaluate each question; and
    - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

**I. AESTHETICS**

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

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

**No Impact.** The proposed Project is a 2.95-acre parcel (APN 694-050-019) located along the western side of Dogwood Road immediately north of the Central Drain at the furthest southeastern corner of the City of Imperial boundary. The site is a dedicated parcel specifically for the use of utility service per the Victoria Ranch Specific Plan (VRSP) as shown in Figure 2. The Project site is currently undeveloped agricultural land that is surrounded on the western, northern, eastern, and southern sides by undeveloped agricultural land. Approximately 0.2 miles to the north-northwest and 0.25 miles to the west are single-family residential uses from the VRSP. The next closest residential uses are a single-family home approximately 0.5 miles to the south and approximately 1.0 miles to the southwest. As shown in Photos 1 through 2, the surrounding area is characterized by flat topography and mostly agricultural uses in most of the immediate area with residential development to the west and northwest.

Scenic vistas are typically expansive views from elevated areas that may or may not be designated scenic overlooks or areas providing a static vista view of a landscape. No scenic vistas have been identified within or near the Project area and therefore the Project would have no impact on a scenic vista. There are no Caltrans designated or eligible scenic highways in the area (Caltrans, 2026). Therefore, the Project would have no impact on scenic resources within a state scenic highway.

- b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

**No Impact.** As described in item “a)” above, the proposed Project would have a less than significant impact on a scenic vista or scenic highway and the Project site does not contain any scenic resources. Therefore, there would be no impact.

- c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

**No Impact.** The proposed Project site is at the edge of the City of Imperial limits and adjacent to existing and planned residential subdivision. Although the Project would develop an electrical substation in a mostly undeveloped agricultural area, the land use designation established in the VRSP planned for the use of the property to be developed with utility services. Therefore, the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality and would have no impact on the visual character of the area.

- d) Create a new source of substantial light or glare which would adversely affect day or

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

nighttime views in the area?

**No Impact.** The Project site currently includes overhead power lines but is otherwise undeveloped. The substation development would include all related equipment as described in the Project description, including transformers, transmission lines, circuit breakers, and a control building. As a public utility development, this equipment would not produce glare because of the galvanized coating and flat finish appearance on all equipment and apparatuses, and only minimal nighttime lighting would be needed and would only include security lights for nighttime illumination and safety. Lighting will be attached to equipment structures, buildings, and transmission lines for maintenance and personnel safety. All lighting would be directed downward and installed in conformance with County standards to avoid light spillage on to adjacent properties. Therefore, no impact is anticipated regarding creating a new source of substantial light or glare which would adversely affect day, or nighttime views.

## II. AGRICULTURE AND FORESTRY RESOURCES

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

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

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	-------------------------------------	--------------------------	--------------------------

**Potentially Significant Impact Unless Mitigation Incorporated.** According to the California Department of Conservation’s (DOC) California Important Farmland Finder, the Project site is entirely Farmland of Statewide Importance (California DOC, 2026). Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. The proposed Project would result in the development of the entire 2.95-acre site be converted from agricultural uses to utility service uses. Therefore, a potentially significant impact could result but with the implementation of mitigation measure AG-1, the impacts would be reduced to levels that are considered less than significant.

### Mitigation Measures

#### **AG-1 Payment of Agricultural and Other Benefit Fees.**

Prior to the issuance of a grading permit or building permit (whichever is issued first), one of the following options included below shall be implemented.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

*Option 1: Provide Agricultural Conservation Easements.* Provide Agricultural Conservation Easement(s). The permittee shall procure Agricultural Conservation Easements on a “2 on 1” basis on land of equal size, of equal quality farmland, outside the path of development. The conservation easement shall meet DOC regulations and shall be recorded prior to issuance of any grading or building permits; or

*Option 2: Agricultural In-Lieu Mitigation Fee.* The Permittee shall pay an “Agricultural In-Lieu Mitigation Fee” in the amount of 30 percent of the fair market value per acre for the total acres of the proposed site based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee will be placed in a trust account administered by the Imperial County Agricultural Commissioner’s office and will be used for such purposes as the acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County; or

*Option 3: Public Benefit Agreement.* The Permittee and County voluntarily enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that 1) is consistent with Board Resolution 2023-#17; and 2) must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation and enhancement of agricultural lands within Imperial County and to implement the goals and objectives of the Agricultural Benefit program (as amended by the Board of Supervisors on November 7, 2023: Resolution “Amending the Public Benefit Program for use with Solar Power Plants in Imperial County”, as specified in the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy; the Project and other recipients of the Project’s Agricultural Benefit Fee funds; or emphasis on creation of jobs in the agricultural sector of the local economy for the purpose of off-setting jobs displaced by this Project.

*Timing/Implementation:* Prior to the issuance of a grading permit or building permit.  
*Enforcement/Monitoring:* Imperial Irrigation District.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

**No Impact.** The proposed substation is located on land that is zoned for residential uses. Therefore, the proposed Project would not conflict with any existing Agricultural zoning or surrounding Williamson Act Contracts in non-renewal. The Project would have no impact on agricultural zoning 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))?

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

**No Impact.** Based on the City of Imperial General Plan Land Use Element, the Project site is not within an area of forest land or zoned for timberland production. No impact would occur.

- d) Result in the loss of forest land or conversion of forest land to non-forest use?

**No Impact.** There are no existing forest lands either on-site or within the City of Imperial area. The proposed Project would not result in the loss of forest land or conversion of forest land into non-forest use. Therefore, no impact is identified for this issue area.

- 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?

**No Impact.** As discussed in items “a” above, the proposed Project would result in the conversion of farmland to a non-agricultural use. However, the development of the proposed electrical substation would not involve other changes in the existing environment that could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

### III. AIR QUALITY

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

- a) Conflict with or obstruct implementation of the applicable air quality plan?

**Less than Significant Impact.** The Project site is located in Imperial County within the Salton Sea Air Basin (SSAB). The SSAB consists of all of Imperial County and a portion of Riverside County. Both the Imperial County Air Pollution Control District’s (ICAPCD) and South Coast Air Quality Management District (SCAQMD) have jurisdiction within the SSAB. The ICAPCD has full jurisdiction within all Imperial County and SCAQMD only has jurisdiction within Riverside County. The proposed Project includes the installation of an electrical substation and the associated connection and distribution equipment. Equipment used during construction would include boom trucks, bucket trucks, wire pulling trailers, rope pulling trailers, water truck, pickup truck, material handling trailers. The equipment would operate intermittently and continuously over a six- to ten-month construction period. Short-term air quality emissions would be generated during construction activities in association with operation of heavy equipment to install the facilities. Once operational, the Project would not generate additional emissions. The Project will comply with all applicable ICAPCD Rules and Regulations as well as with all applicable State and federal requirements for attainment of air quality objectives. Those requirements require emission reducing measures that are incorporated as Project features and include implementing a Construction Dust Control Plan, preparing a Construction Notification Form, obtaining approval of the Construction Equipment List, and implementation of a collection of rules from the Air District Rules and Regulations, emphasizing Regulation VIII, designed to maintain fugitive dust emissions to below 20% visible opacity. Therefore,

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

the Project's impact regarding conflicting with or obstructing implementation of an applicable air quality plan is considered less than significant.

- 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?

**Less than Significant Impact.** The Imperial County area is in nonattainment for Federal and State air quality standards for ozone, in attainment of Federal standards and nonattainment for State standards for PM10, and nonattainment (some areas) for Federal standards and attainment of State standards for PM2.5. The ICAPCD has prepared the 2018 Redesignation Request and Maintenance Plan for PM10, 2017 State Implementation Plan (SIP) for the 2008 8-Hour Ozone Standard, and 2013 SIP for the 2006 24-Hour PM2.5 Moderate Non-attainment Area Plan to achieve Federal and State standards for improved air quality in the Imperial County region. Inconsistency with any of the plans would be considered a cumulatively adverse air quality impact. As discussed in Section III. a), the Project will not 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. Therefore, the Project is consistent with the growth assumptions used in the Imperial County AQPs.

Results of the analysis provided in the *Air Quality Impact Assessment* prepared for the proposed Project (JK Consulting, 2023a) show that emissions generated from construction and operation of the Project will be less than the applicable ICAPCD emission thresholds for criteria pollutants. As a result, the Project will not 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.

Therefore, the proposed Project would not 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?

**Less than Significant Impact.** The Project site will be located on a 2.95-acre parcel of undeveloped agricultural land that is surrounded on the western, northern, eastern, and southern sides by undeveloped agricultural land. Approximately 0.2 miles to the north-northwest and 0.25 miles to the west are residential uses from the VRSP. The next closest residential uses are a single-family home approximately 0.5 miles to the south and approximately 1.0 miles to the southwest.

The amount of construction emissions generated would be limited and for a short duration (i.e., three to four days a week for two to three weeks). Additionally, the Project would be required to comply with ICAPCD Policy 5 requirements for reduced emission construction equipment (i.e., Tier 3) as well as the implementation of an Enhanced Dust Control Plan. As discussed in section "b" above, all criteria pollutant emissions would be less than significant during Project construction and operations. Therefore, no sensitive receptors would be exposed to prolonged or substantial pollutant concentrations and, the proposed Project would result in less than significant impacts regarding exposing sensitive receptors to substantial pollutant concentrations.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

**Less than Significant Impact.** Potential odor impacts depend on multiple factors including the type of odor generated; the intensity of the source; the sensitivity of the receptor; the intensity of the source; and the direction and speed of the wind. Odors present a nuisance to the public and result in citizen complaints. During construction, exhaust from equipment (trucks, earthmoving equipment) may produce odors typically resulting from dust and heavy equipment exhaust. Odors produced during construction consist of unburned hydrocarbons from tailpipes of construction equipment. Equipment emission odors typically disperse rapidly and do not affect substantial numbers of people due to the localized area affected. Additionally, the closest sensitive receptors to the proposed substation are approximately 0.2 miles to the north-northwest. At this distance from the potential odor source, odors which could be adversely affecting a substantial number of people is considered less than significant.

IV. **BIOLOGICAL RESOURCES**

Would the Project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** The following discussion is based on the *Biological Resource Report, Michelle Substation Project, Imperial, California* prepared for the Project by Ericsson-Grant, Inc. (Appendix A). Ericsson-Grant, Inc. prepared a biological resource report to assess the potential for biological impacts related to the construction of the proposed electrical substation on the 2.95-acre development site.

**Literature Review**

A literature review was conducted to determine the existence or potential occurrence of special-status plant and animal species on the project footprint and in the project vicinity. Database records for the *El Centro, Brawley, Alamo, Holtville West, Calexico, Heber, Mount Signal, Seeley, and Brawley NW, California* USGS 7.5-minute series quadrangles were searched on January 26, 2026 using the CDFW Natural Diversity Data Base *Rarefind 5* online (CNDDDB, 2026) and the California Native Plant Society's *Online Inventory of Rare and Endangered Vascular Plants of California* (CNPS, 2026). A United States Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) (USFWS, 2023). Trust Resource Report was generated for the project footprint on January 28, 2026. Soils within the Project area were identified using the Natural Resources Conservation Service's (NRCS) Web Soil Survey (USDA, 2026).

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

**Site Survey**

EGL biologist, Brant Primrose, conducted a site visit on February 3<sup>rd</sup>, 2026, in order to identify general site conditions, vegetation communities, and suitability of habitat for various special- status species. The biological survey area (BSA), project footprint plus 500-foot buffer, was surveyed by foot within the Project site and binoculars were used to aid in the identification of species, potential nest locations, and foraging areas within the buffer area. A survey was conducted following the CDFW and the U.S. Fish and Wildlife’s (USFW) accepted survey protocols for and professional standards for raptors, Burrowing Owl, and Flat-Tailed Horn Lizard.

No special-status wildlife species were observed during the biological field surveys and no ground squirrel populations were observed, which serve as potential nesting sites for burrowing owls. Wildlife species observed within the project footprint consisted of those common to disturbed areas and adapted to human presence. All wildlife species observed are listed in the Biological Report (Appendix A).

**Vegetation Communities**

The two habitat types were identified within and adjacent to the Project site during the site survey: Agricultural and Stream Channel.

*Agricultural*

Agricultural lands are an anthropogenic habitat and are not described by CDFW (2023d) or by CNPS (CNPS 2023b). Within the Project site, agricultural lands consist of alfalfa (*Medicago sativa*), date palms (*Phoenix dactylifera*), Bermudagrass (*Cynodon dactylon*), and herbaceous vegetables, as well as several fallow fields. On-site farming practices include soil disking, plowing, herbicide application, and regular anthropogenic maintenance and disturbance associated with ongoing management actions. Compacted dirt roads and brow ditches are included within this land cover type.

*Stream Channel*

Although not recognized by the Manual of California Vegetation, Online Edition (CNPS 2023b), or the Natural Community List (CDFW 2023d), stream channel is described by Oberbauer et al. (2008) as areas that exhibit ephemeral or intermittent flow and are barren or sparsely vegetated as a result of the scouring effects of floods or other anthropogenic causes. These areas include irrigation ditches that are unvegetated or vegetated with ruderal species such as giant reed (*Arundo donax*), nettleleaf goosefoot (*Chenopodium murale*), and asthmaweed (*Erigeron bonariensis*). Stream channel is not located within the Project site but is adjacent to the southern boundary and within the BSA.

**Federally and/or State-Listed Plant Species**

Based on the results of the literature review and database searches, 16 special-status plant species were identified as occurring within the region. Due to the current conditions present on site, including the vegetation communities; soils; elevation ranges; previous known locations documented in the CNDDDB, by CNPS, and/or by USFWS; and current disturbance levels none are expected to occur within the Project site. Additionally, none were observed during the site survey

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

**Federally and/or State-Listed Wildlife Species**

Based upon the results of the literature review, twenty-four (24) special-status wildlife species are known to occur within the nine surrounding quadrangles of the project site. These species, their federal and State status, and habitat requirements are included in Appendix C.

One of these species, the Yuma Ridgway's rail (*Rallus obsoletus yumanensis*), is listed as endangered under the FESA, but was determined to not be expected to occur, nest, or roost within the Project site. Four species

One species, the Gila woodpecker (*Melanerpes uropygialis*), is listed as endangered under the CESA, but was determined to not be expected to occur, nest, or roost within the Project site. One species, the California black rail (*Laterallus jamaicensis coturniculus*), is listed as threatened under the CESA, but was determined to not be expected to occur, nest, or roost within the Project site. Two species included in the search results, the burrowing owl (*Athene cunicularia*), Crotch's bumble bee (*Bombus crotchii*) are listed as candidate endangered. The Crotch's bumble bee was determined to have a low potential to occur on the Project site as a transient during foraging but is not expected to nest.

*Burrowing Owl*

Burrowing owl is a candidate for endangered listing under the CESA and is a CDFW bird species of special concern. The species has a broad distribution and in southern California is known to occur in lowlands over a large region, including agricultural areas. They can occur in open desert areas, along irrigation dikes and levees, or wherever burrows are available away from intense human activity.

The Project site and surrounding area does not contain suitable natural habitat for the species as open grasslands are absent and the Project site is an active agricultural area, located adjacent to Dogwood Road, a major roadway, which may serve as deterrents. However, the site is comprised entirely of agricultural uses that has the potential to provide suitable burrowing habitat for the species.

*Nesting Birds*

The Project footprint consists entirely of agricultural lands and stream channels which are located immediately to the south of the Project site. These areas can provide potentially suitable habitat to support nesting birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. Although no raptors were observed during the site visit, the disturbed habitat within project footprint does provide foraging habitat for raptors, such as hawks and owls, among other resident and other avian species. Therefore, a potentially significant impact could result but with the implementation of mitigation measures BIO-1 and BIO-2, the impacts would be reduced to levels that are considered less than significant.

**Mitigation Measures**

**BIO-1 Preconstruction Resource Survey.**

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

Three days prior to any ground disturbing activities or vegetation removal related to the substation construction or transmission line installation, a qualified biologist shall conduct a preconstruction survey to identify any sensitive biological resource to flag for avoidance. Any sensitive species that may be present within the Project area shall be relocated outside of the impact areas. displaced by this Project.

*Timing/Implementation:* Prior to the issuance of a grading permit or building permit.  
*Enforcement/Monitoring:* Imperial Irrigation District.

**BIO-2 Preconstruction Nesting Bird Survey.**

If construction or other project activities are scheduled to occur during the bird breeding season (Typically February 1 through August 31 for raptors and March 15 through August 31 for the majority of migratory bird species), a pre-construction nesting-bird survey should be conducted by a qualified avian biologist to ensure that active bird nests, including those for the black-tailed gnatcatcher, burrowing owl, and loggerhead strike, will not be disturbed or destroyed. The survey should be completed no more than three days prior to the initial ground disturbance. The nesting-bird survey should include the Project Area and adjacent areas where project activities have the potential to affect active nests, either directly or indirectly due to construction activity or noise. If an active nest is identified, the biologist should establish an appropriately sized disturbance limit buffer around the nest using flagging or staking. Construction activities should not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist.

*Timing/Implementation:* Prior to the issuance of a grading permit or building permit.  
*Enforcement/Monitoring:* Imperial Irrigation District.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

**No Impact.** As discussed under item “a)” above, two habitat types were identified within and adjacent to the Project site during the site survey: Agricultural and Stream Channel.

The proposed Project would include the clearing of the entire 2.95-acre site and would only affect the agricultural vegetation community but not disturb the stream channels located to the south of the project footprint. There are no special-status vegetation communities within the Project footprint and no impacts related to sensitive vegetation communities would result from the clearing of the activities.

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

**No Impact.** The stream channel vegetation community has the potential to meet the requirements for jurisdictional waters, however none of the stream channel area are within the Project footprint or would be impacted by the development of the proposed Project. Therefore, the Project would have no impact on federally protected wetlands.

- d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

**No Impact.** Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. The Study Area does not provide any wildlife movement or corridor functions due to existing disturbances related to human presence, surrounding roadways, traffic and noise disturbances that preclude or dissuade wildlife from utilizing the BSA. Many of the species that are commonly found in urban environments, such as those within the BSA, do not have specific movement corridor requirements but instead use non-specific movement patterns across these urban areas. Based on the lack of migratory corridors in the BSA, no impact would occur.

- e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?

**No Impact.** See discussion under item “a)” above.

- 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?

**No Impact.** The Project site is located within the designated boundaries of the Desert Renewable Energy Conservation Plan and the Imperial Irrigation District 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. Therefore, no impact would occur.

**V. CULTURAL RESOURCES**

Would the Project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

**No Impact.** The property has undergone disturbance from past and on-going agricultural activities and grading in the past for decades. These agricultural activities have disturbed the surface and subsurface of the Project area, destroying any intact potential prehistoric or historic-era cultural resources. Additionally, the Project site does not contain any structures that could be considered an historic resource. Therefore, the proposed Project would have no impact on historical resources.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

**Potentially Significant Impact Unless Mitigation Incorporated.** The property has undergone disturbance from past and on-going agricultural activities and grading in the past decades. These agricultural activities have disturbed the surface and subsurface of the Project area, destroying any intact potential prehistoric or historic-era cultural resources. While the potential of finding a buried archaeological site during construction is considered low, the possibility exists for unknown resources to be encountered and, therefore, is potentially significant unless mitigation is incorporated.

**Mitigation Measures**

**CUL-1: Prepare and Implement a Cultural Resource Mitigation and Monitoring Plan.**

Prior to issuance of a grading permit, the Applicant shall retain a qualified archaeologist to prepare a Cultural Resource Mitigation and Monitoring Plan (CRMMP), which shall be submitted to and approved by the County of Imperial Planning and Development Services. The purpose of the CRMMP is to document the actions and procedures to be followed to ensure avoidance or minimization of impacts to cultural resources consistent with CEQA Guidelines Section 15126.4(b), and to lay out a detailed program of mitigation for direct and indirect impacts on cultural resources during Project implementation. The mitigation and monitoring plan shall identify procedures for monitoring and the implementation of a discovery plan in coordination with affected Tribal groups and include the following at a minimum:

- List of personnel involved in the monitoring activities;
- Inclusion of involvement of the Native American community, as appropriate;
- Description of the worker awareness program that shall be implemented;
- Description of how the monitoring should occur;
- Description of frequency of monitoring (e.g., full-time, part time, spot checking);
- Description of resources expected to be encountered (if any);
- Description of circumstances that would result in the halting of work at the Project site
- Description of procedures for halting work on the site and notification procedures including the notification of the Applicant, the ICPDSD, and tribal representatives within 24 hours of the inadvertent discovery of archaeological resources; and
- Description of monitoring reporting procedures.

The Project’s grading and construction plans and specifications shall state that full-time monitoring by a qualified archaeologist shall be conducted during the initial grubbing and ground disturbance for the Project. In the event that archaeological resources are inadvertently discovered during ground-disturbing activities, work

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or fossil recovery, may be warranted and would be discussed in consultation with the appropriate regulatory agency(ies).

*Timing/Implementation:* Prior to the initiation of any on-site grading.

*Enforcement/Monitoring:* Project contractor.

**CUL-2: Cultural Resources Construction Monitor.** The Applicant shall retain qualified archaeological monitors and a TCA (traditionally and culturally affiliated) Native American Monitor for all ground-disturbing activities associated with the Project. Native American tribes shall be given the opportunity to provide one or more certified cultural monitors for the Project during all excavation or earth-moving within the Project site in Holocene-aged deposits. The Construction Contractor shall give the Tribe’s Historic Preservation Officer (THPO) or other designated representative two weeks’ advanced notice of the monitoring opportunity and shall provide a copy of such notice to the County.

If a significant cultural resource site is found during ground-disturbing activities the resource will be protected in place, or data recovery will be initiated, consistent with the mitigation and monitoring plan required by **CUL-1**.

*Timing/Implementation:* Prior to the initiation of any on-site grading.

*Enforcement/Monitoring:* Project contractor.

**CUL-3: Disposition of Tribal Cultural Resources.** The landowner shall relinquish ownership to the TCA tribe all tribal cultural resources collected during the cultural resource mitigation monitoring conducted for the Project site for respectful and dignified treatment and disposition, including reburial, in accordance with the Tribe’s cultural and spiritual traditions. All cultural materials that are associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98.

*Timing/Implementation:* Prior to the initiation of any on-site grading.

*Enforcement/Monitoring:* Project contractor.

**CUL-4: Unanticipated Discoveries Historic Properties Treatment Plan/Data Recovery Plan.** Should an unanticipated discovery be made, avoidance is the preferred treatment (CEQA Guidelines, Section 15126.4(b)(3)(A)), but if the site cannot be avoided in place, then the site will be further evaluated. Immediately upon discovery of a find, a qualified archaeologist will evaluate the significance of the newly discovered site or unanticipated discovery along with attempted consultation with designated Native American representatives in order to provide proper management recommendations. If testing and evaluation of the site is recommended, the qualified archaeologist shall prepare a research design, schedule, and budget for review and approval by the County and the Applicant. During evaluation and testing, the appropriate Native American tribe shall be

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

notified in advance so that a tribal monitor can be present and assist with the work being conducted. At the completion of the monitoring program, the qualified archaeologist shall prepare a monitoring report that describes the Project, the personnel used, the dates of performance, and results. If cultural resources are recovered and cannot be preserved in place, they shall be cleaned, catalogued, analyzed, and reburied in a nearby area, after consultation or curated at the California Historical Resources Regional Information Center.

*Timing/Implementation:* Prior to the initiation of any on-site grading.

*Enforcement/Monitoring:* Project contractor.

**CUL-5: Prepare Final Monitoring Report and/or Evaluation Report.** Prior to the release of the grading bond and no later than 90 days after monitoring has been completed, a Monitoring Report and/or Evaluation Report shall be completed. This report shall describe the results, analysis and conclusions of the cultural resource mitigation monitoring efforts such as, but not limited to, the Research Design and Data Recovery Program. It will also include a list of Project personnel, a catalog of any cultural resources that were identified, any associated DPR 523 Forms and/or confidential maps, details of the location of the final disposition of cultural resources (if any), any issues or problems that occurred during monitoring, and any other pertinent information. The Monitoring Report shall be submitted by the Project archaeologist, along with the notes and comments from the TCA Native American Monitor(s) to the County for review and approval. Upon approval by the Lead Agency, a complete final report shall be submitted to the appropriate Information Center, and TCA Tribes, any relevant curation facility, and the landowner/applicant.

*Timing/Implementation:* Prior to the initiation of any on-site grading.

*Enforcement/Monitoring:* Project contractor.

- c) Disturb any human remains, including those interred outside of dedicated cemeteries?

**Potentially Significant Impact Unless Mitigation Incorporated.** As described in item b) above, due to the condition of the Project site, it is not likely that human remains would be found on the Project site based on lack of water resources and disturbance. However, depending on the depth of excavation, there is potential for previously unknown human remains to be present. This impact would be reduced to less than significant with the implementation of mitigation measure CUL-6 below.

**Mitigation Measures**

**CUL-6 Human Remains Discovery.** If subsurface deposits believed to be cultural or human origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a historic property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction.
- If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Imperial County Medical Examiner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California PRC, and AB 2641 will be implemented. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (Section 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the
- NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

*Timing/Implementation: As needed during grading and construction.*  
*Enforcement/Monitoring: Imperial Irrigation District.*

**VI. ENERGY**

Would the Project:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

**Less than Significant Impact.** The Project is proposed to address the future reliability of the utility and would not involve significant resource consumption of electricity or natural gas. This analysis focuses on the consumption or use of fuels associated with construction, operation, and maintenance of the Project. The Project would utilize energy mainly in the form of fuel consumed during construction. Operation and maintenance of the substation would require a negligible amount of on-site electricity for integration of the substation elements, such as security lighting. Fuels would also be utilized periodically to maintain equipment during operation.

The Project is intended to expand the electrical load capacity of the local electrical grid in order to accommodate planned, future growth in the area. Therefore, the Project would increase the reliability of energy services in the region. Due to the Project's increase in the reliability of energy services and increase in electrical load capacity, the Project would aid IID and local jurisdictions in meeting peak energy demand in its service area. While the Project would increase the electrical load capacity as it will supply and distribute electricity to consumers, it would not result in an increase in per capita energy consumption or result in the inefficient use of energy, such as a new residential or commercial development would. The Project would not alter the mix of power sources used by IID and would not directly or indirectly increase reliance on natural gas and oil or decrease reliance on renewable energy resources

Construction equipment, haul trucks, and worker vehicles would consume fuel during Project construction. Due to the small size of the Project and the small construction crew required for the Project, the consumption of fuel energy during construction would be temporary, localized, and would not represent a significant amount of fuel. Vehicles used for Project construction and operation would be required to comply with all federal and state efficiency standards. Additionally, there are no Project characteristics or features that would be inefficient or that would result in the use of equipment and vehicles in a manner that would be less energy efficient than similar Projects.

Operation of the Project would require a negligible amount of energy. Security and safety lighting would only be used when nighttime access for maintenance activities would be required. Some amount of gasoline would be consumed by worker vehicles conducting maintenance. However, the amount of fuel required for such routine maintenance would be minimal. Neither Project construction nor operation would have an adverse impact on energy consumption or conservation. Additionally, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

**No Impact.** The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency as it would include the construction of a new three transformer capacity electrical substation. The Project's construction would employ efficient vehicles that would follow CARB standards. The Project would not require a large fleet of equipment or staff for construction or operation. The Project would involve upgrading facilities for energy distribution and would not include generation or alter the existing source portfolio at the state or local level, which includes a variety of renewable energy sources. The end goal of the Project is to make the IID electrical system more dependable and less vulnerable to overload and potential blackouts and energy conveyed through the facility would comply with IID's Renewable Portfolio Standards and other applicable

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

obligations with respect to renewable energy and energy efficiency, thus, the Project would have no impact as it would not conflict with state or local plans for renewable energy or energy efficiency.

**VII. GEOLOGY AND SOILS**

Would the Project:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

- i.) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

**Less than Significant Impact.** According to Department of Conservation, Geologic Survey, 2024. EQ Zapp: California Earthquake Hazards Zone Application (California DOC, 2015), there are no designated Alquist-Priolo Earthquake fault zones that traverse the proposed Project area. The Imperial Fault is the closest fault and is approximately 2.20 miles to the east-northeast. Given the distance, the potential for rupture is not likely. Additionally, all IID equipment and transmission infrastructure must be designed in accordance with the most current edition of the Uniform Building Code (UBC) and the California Building Code (CBC) as applicable to withstand seismic hazards. Compliance with these codes is considered sufficient to prevent substantial adverse effects, including the risk of loss, injury, or death and is considered a less than significant impact.

- ii.) Strong Seismic ground shaking?
 

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

**Less than Significant Impact.** The primary seismic hazard at the Project site is the potential for strong ground shaking during earthquakes along the Imperial Fault. The Project site is approximately two miles from the Imperial fault and is located in areas identified with moderate and high ground shaking risks. The proposed Project does not include habitable structures that could be damaged in a seismic event and consists of replacing existing poles and upgrading existing substation equipment. Additionally, all IID equipment and transmission infrastructure must be designed in accordance with the most current edition of the UBC and the CBC as applicable to withstand seismic hazards. Compliance with these codes is considered sufficient to address seismic hazards. Thus, impacts resulting from strong seismic shaking are considered less than significant.

- iii.) Seismic-related ground failure, including liquefaction?
 

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

**Less than Significant Impact.** Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as those produced by earthquakes. According to the Imperial County General Plan, Safety Element (Imperial County, 2022a), the Project site is

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

not located in a liquefaction zone. Liquefaction is not anticipated at the Project site due to the cohesive nature of the site subsurface soils and, therefore, risk of injury at the Project site associated with seismic-related ground failure, including liquefaction is considered low. Thus, impacts to seismic-related ground failure, including liquefaction attributed to the Project are considered less than significant.

iv.) Landslides?

**No Impact.** According to the United States Geologic Survey (USGS), U.S. Landslide Inventory and Susceptibility Map (USGS, 2026) the Project site is located in an area with very low landslide potential as it can be characterized by flat terrain. Therefore, no impact would occur regarding landslides.

b) Result in substantial soil erosion or the loss of topsoil?

**Less than Significant Impact.** The proposed Project includes excavation, grading, trenching, backfilling, and other construction work required for the construction of a new three transformer capacity electrical substation and supporting distribution lines. This work could result in substantial soil erosion or loss of topsoil via wind and by surface water runoff during storms. The runoff could cause erosion and increase sedimentation and transport of pollutants offsite, potentially affecting water quality. To minimize soil erosion, IID would comply with current state and local stormwater regulations and because the site is over one acre would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) for the Project and would include implementation of stormwater Best Management Practices (BMPs), and other erosion and sediment control measures. Implementation of these regulatory requirements would reduce the impact to less than significant with mitigation

c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse?

**Less than Significant Impact.** Construction activities would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. There are no landslide-related hazards identified in the Project area, as the surrounding landscape is relatively flat. The Project would not include groundwater withdrawal or pumping; therefore, it would not cause subsidence in the Project area. Additionally, the Project area is not within an area known to pose any risks related to liquefaction or lateral spreading, as any seismic-related ground shaking would have little effect in the Project area. Additionally, the Project must comply with the UBC and CBC to ensure the structures are designed in accordance with geologic and seismic conditions. Concrete and steel structures must follow standard IEEE-693: recommended Practice for Seismic Design of Substations. Compliance with mandatory design and building requirements will reduce potential impacts associated with construction on an unstable geologic unit to less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

risks to life or property?

**Less than Significant Impact.** The proposed Project is located on Imperial-Glenbar silty clay loams, wet, 0 to 2 percent slopes (USDA, 2019). The clay content of this soil results in a high shrink-swell potential which can cause damage to roads unless special designs are used. The Project does not include any habitable structures and the foundations for the equipment that will be installed will be designed and engineered taking into consideration the soils present. Therefore, direct, and indirect risk to life and property are considered less than significant.

- 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?

**No Impact.** The proposed Project does not propose new septic tanks or an alternative wastewater disposal system. The facility would continue to operate using the existing septic system. No impact would occur.

- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

**Potentially Significant Impact Unless Mitigation Incorporated.** Many paleontological fossil sites are recorded in Imperial County and have been discovered during construction activities. Paleontological resources are typically impacted when earthwork activities, such as mass excavation cut into geological deposits (formations) with buried fossils. One area in which paleontological resources appear to be concentrated in this region is the shoreline of ancient Lake Cahuilla, which would have encompassed the present-day Salton Sea. The lake covered much of the Imperial Valley and created an extensive lacustrine environment. Lake Cahuilla experienced several fill recession episodes before it finally dried up about 300 years ago. In 1905, the Colorado River overflowed into the Salton Basin creating the present-day Salton Sea.

According to the Geologic Map of California – San Diego-El Centro Sheet, the Project site is underlain by Quaternary Lake deposits (QI) (Jennings, C.W. 1962). The Project site is located in the Imperial Valley which is directly underlain by geologic units comprised of quaternary lake deposits of the ancient Lake Cahuilla. Lakebed deposits of ancient Lake Cahuilla have yielded fossil remains from numerous localities in Imperial Valley. These include extensive shell beds, fish, seeds, pollen, diatoms, foraminifera, sponges, and wood. Lake Cahuilla deposits have also yielded vertebrate fossils, including teeth and bones of birds, horses, bighorn sheep, and reptiles. Therefore, the paleontological sensitivity of these lakebed deposits within the Project site are considered to be high.

Impacts on any surface or near surface level paleontological resources may occur because of grading and disturbance of the area. Even relatively shallow excavations in the Lake Cahuilla beds exposed in the Project site may encounter significant vertebrate fossil remains. Therefore, this potential impact is considered a significant impact. Mitigation Measure GEO-1 one would ensure that the potential impacts on paleontological resources do not rise to the level of significance pursuant to CEQA. Implementation of Mitigation Measure GEO-1 would reduce the impact on paleontological resources to a level less than significant

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

**Mitigation Measures**

**GEO-1: Paleontological Resource Discovery.** In the event that unanticipated paleontological resources or unique geologic resources are encountered during ground disturbing activities, work must cease within 50 feet of the discovery, and a paleontologist shall be hired to assess the scientific significance of the find. The consulting paleontologist shall have knowledge of local paleontology, and the minimum levels of experience and expertise as defined by the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. If any paleontological resources or unique geologic features are encountered within the Project site, the consulting paleontologist shall prepare a Paleontological Treatment and Monitoring Plan to include the methods that will be used to protect paleontological resources that may exist within the Project site, as well as procedures for monitoring, fossil preparation and identification, curation of specimens into an accredited repository, and preparation of a report at the conclusion of the monitoring program.

*Timing/Implementation:* During construction involving drilling or excavations to depths of 3 feet or more.

*Enforcement/Monitoring:* Paleontological Monitor and Imperial Irrigation District.

**VIII. GREENHOUSE GAS EMISSIONS**

Would the Project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

**Less than Significant Impact.** The proposed Project includes the construction of a new electrical substation and supporting transmission line upgrades/installation. Greenhouse gases (GHG) are generated by heavy equipment used during construction. Equipment used during construction would include boom trucks, bucket trucks, wire pulling trailers, rope pulling trailers, water truck, pickup truck, material handling trailers. The equipment would operate intermittently and continuously over a six- to ten-month construction period. Based on the limited duration of the Project as well as mandatory compliance with SCAQMD rules (i.e., Rule 900, Procedures for issuing permits to operate for sources subject to title V of the federal clean air act amendments of 1990), the Project is not anticipated to generate substantial GHGs. Therefore, generation of greenhouse gas emissions would be considered a less than significant impact.

- b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

**Less than Significant Impact.** SB 375 requires Metropolitan Planning Organizations (MPO) to adopt a Supplemental Control Strategy (SCS) or Alternative Planning Strategy (APS) that will prescribe land use allocation in that MPO's regional transportation plan. The California Air

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

Resources Control Board (CARB), in consultation with MPOs, has provided each affected region with reduction targets for greenhouse gas (GHGs) emitted by passenger cars and light trucks in the region for the years 2020 and 2035. For the Southern California Association of Government's (SCAG) region, CARB set targets at eight (8) percent per capita decrease in 2020 and a nineteen (19) percent per capita decrease in 2035 from a base year of 2005.

Executive Order B-30-15 establishes a California GHG reduction target of 40 percent below 1990 levels by 2030 to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050. Executive Order B-30-15 requires MPO's to implement measures that will achieve reductions of GHG emissions to meet the 2030 and 2050 GHG emissions reductions targets.

The applicable General Plan for the Project is the Imperial County General Plan. The Imperial County Planning and Development Services' Central Imperial County Traffic Impact Fee Study identifies a trip generation rate of two vehicles per acre per day for agricultural uses. The Project site would generate approximately 80 daily construction trips considering the existing land use. Upon completion of the construction phase of the Project, site operations will be limited to maintenance activities which will yield an average of less than one trip per day. Mobile source emissions resulting from the Project would be less than what is accounted for in ICAPCD AQP's and the adopted SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.

As described in section "a", the projected GHG emissions generated by the Project will not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, mitigation is not warranted since there is a less than significant impact from Project operational emissions. Therefore, impacts regarding an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of GHGs are considered less than significant.

**IX. HAZARDS AND HAZARDOUS MATERIALS**

Would the Project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

**Less than Significant Impact.** The Project would not use or store any appreciable quantities of hazardous chemicals during construction. Diesel fuel, oil and hydraulic fluid would be present in association with heavy equipment used and staged on-site. However, the limited quantities of materials and the duration of construction would result in a less than significant impact regarding the creation of a hazard to the public through the routine transport, use, or disposal of hazardous materials.

- b) Create a significant hazard to the public or the environment through foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

**Less than Significant Impact.** Construction activities associated with the Project would involve routine storage, transport, and handling of hazardous materials. Vehicles and equipment containing

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

petroleum products would be used on the site. Mineral oil, used to insulate transformers, would be transported to the site in the sealed transformer equipment. Any hazardous waste generated during construction (e.g., diesel fuel, oil, solvents) would be disposed of or recycled off-site in accordance with all applicable laws pertaining to the handling and disposal of hazardous waste. Potential for release of hazardous materials from construction activities into the environment is low in relation to the type of construction to be performed and potential for release of materials (e.g., accidental spill of diesel, oil, or hydraulic fluid). Given the protocols required for the transport, handling and storage of these materials, potential for upset and accidental release of hazardous materials is considered less than significant.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

**No Impact.** As shown in Figure 2, there is a future elementary school proposed approximately 0.28 miles from the western boundary of the Project site. Hazardous materials to be used during the construction and operation of the proposed Project would consist of low toxicity materials including gasoline, diesel fuel, oil, and lubricants associated with construction equipment and vehicles. These low toxicity materials would be used throughout the proposed Project area. The low toxicity of the materials associated with the proposed Project and proper handling, storage, and disposal of all hazardous materials in accordance with the project specific SWPPP, Spill Prevention, Control, and Countermeasure (SPCC), and applicable regulations would reduce impacts to the future school to a less-than-significant level.

- 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?

**No Impact.** Database searches were conducted for potential hazardous sites located on, or within one-quarter mile of the Project site using the California Department of Toxic Substances Control's (DTSC) EnviroStor Database and State Water Resources Control Board's (SWRCB) Geotracker database (SWRCB, 2026). These databases are an online search and Geographic Information System (GIS) tool for identifying sites that have known contamination or sites for which there may be reasons to further investigate. No reported cases were found on the Project site and no active sites were located within one-quarter mile of the Project site (California DTSC, 2026; SWRCB, 2026). Therefore, implementation of the proposed 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) 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?

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

**No Impact.** The Imperial County Airport is located approximately 2.10 miles to the west-northwest of the Project site. The proposed Project includes the construction of a new electrical substation on an undeveloped and vacant property and installation of supporting distribution lines. Therefore, the proposed Project would not result in safety hazard or excessive noise for people residing or working in the Project area and no impact would occur.

- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

**No Impact.** The proposed Project is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project would temporarily disrupt traffic along Dogwood Road as construction vehicles are entering and exiting the Project site. However, this disruption would be minor and temporary, and Dogwood Road would remain unobstructed. Thus, the proposed Project would not impair the implementation of, or physically interfere with, any adopted emergency response plan or emergency evacuation plans. No impact would occur.

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

**Less than Significant Impact.** Fire protection and emergency medical services in the area are provided by the Imperial Fire Department. According to a map prepared by the California Department of Forestry and Fire Protection (CalFire, 2026), the proposed Project is in a Local Responsibility Area (LRA). The proposed Project site is not identified as a Fire Hazard Severity Zone. The areas surrounding the Project site include rural and agricultural areas but no wildland areas. Therefore, the potential to expose people or structures to significant risk of loss, injury or death involving wildland fires is considered less than significant.

**X. HYDROLOGY AND WATER QUALITY**

Would the Project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

**Less than Significant Impact.** The proposed Project includes the construction of a new electric substation and supporting transmission line upgrades/installation. Construction activities are not anticipated to violate waste discharge requirements or degrade water quality. Because more than one acre of soil would be disturbed as part of Project construction, a SWPPP will be required. The SWPPP will identify construction and post-construction BMPs to ensure that no material is discharged or transported off-site during a rain event. The SWPPP would include measures such as silt fencing, fiber rolls, street sweeping, etc. to avoid impacts on water quality. Implementation of the SWPPP and compliance with BMPs will ensure that the Project will not violate any water quality standards. A less than significant impact would occur.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
<p>b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?</p> <p><b>No Impact.</b> The proposed Project includes the construction of an electric substation and supporting transmission line upgrades/installation. The Project itself would have minimal water demand during construction and would be limited to dust control. During operations, the Project would not require a water supply. Therefore, no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces in a manner which would:</p> <p>i) Result in a substantial erosion or siltation on- or off-site.</p> <p><b>Less Than Significant Impact.</b> The proposed Project includes the construction of a new electric substation and supporting transmission line upgrades/installation. There are no streams or rivers that intersect the site or the area proposed to be disturbed by the Project. The Project site does not include any water bodies and the Project would not substantially alter the existing drainage pattern on the site or area in a way that would alter the course of a stream or river. The potential for erosion would be limited to exposed soils during construction. Soil may be stockpiled during construction but would be temporary and Best Management Practices would be employed including watering of exposed soil and installation of fiber rolls or silt fencing to prevent soil transport. Because of the small size of the substation site and because IID would design the drainage to avoid any increase in the peak-flow rate, the potential increase in stormwater discharge would be negligible and any impact that would alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces is considered less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;</p> <p><b>Less than Significant Impact.</b> The proposed Project is not anticipated to substantially increase the amount of impervious surfaces as the proposed activity would consist of the construction of a new three-transformer capacity electric substation as the only source of new impervious surfaces. Because more than one acre of soil would be disturbed as part of Project construction, a SWPPP will be required. The SWPPP will identify construction and post-construction BMPs to ensure that surface runoff is controlled in a manner that prevents flooding on- or offsite. As a result, the Project would have a less than significant impact regarding increasing the rate or amount of surface runoff in a manager which would result in flooding on- or off-site.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>iii) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

polluted runoff?

**No Impact.** The proposed Project would not generate substantial amounts of runoff as described in item ii), above. Therefore, no impact would occur.

iv) Impede or redirect flows?

**No Impact.** The proposed Project would be required to prepare a SWPPP which will identify construction and post-construction BMPs to ensure that surface runoff is controlled in a manner that will not impede or redirect flows as described in item ii), above. Therefore, no impact would occur.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

**No Impact.** The proposed Project site is approximately 22 miles northwest of the northern tip of the Salton Sea which is the nearest large water body. Due to the distance, the Salton Sea does not pose a significant danger of inundation from tsunami or seiche related to the Project site. Thus, no impact is identified for these issues.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

**No Impact.** During construction and operations, the proposed Project would not result in the use of groundwater or inhibit the recharge of groundwater as the Project would not result in a substantial increase of impervious surfaces. Therefore, the proposed Project would have no impact on implementation of a water quality control plan or sustainable groundwater management plan.

**XI. LAND USE AND PLANNING**

Would the Project:

a) Physically divide an established community?

**No Impact.** The proposed Project includes the construction of a new electrical substation on an undeveloped agricultural property and installation of supporting distribution lines located in the furthest southeastern portion of the City of Imperial. As shown in Figure 2, the VRSP and the City of Imperial have designated the Project site to be zoned for as a special use, specifically for utility services. The residential development envisioned in the VRSP has only been 75% built out and the Project site is surrounded by agricultural uses. As a development that is intended to serve a future residential development, the proposed Project would not physically divide an established community and no impact would occur.

b) Conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

**No Impact.** The proposed Project site is zoned for the VRSP area and is designated as “School (Special Use)” and the VRSP specially identifies the Project site as intended for future utility services as future demand grows. Therefore, the proposed construction of a new electrical substation is

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

following the VRSP and City of Imperial designations. No impact would occur.

**XII. MINERAL RESOURCES**

Would the Project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

**No Impact.** The Project site has been used for agricultural operations for years. According to Figure 8 of the Conservation and Open Space Element of the County of Imperial General Plan (County of Imperial 2016), no known mineral resources occur within the Project area. Thus, no impact is identified with regard to mineral resources

- 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?

**No Impact.** Refer to item a), above.

**XIII. NOISE**

Would the Project result in:

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

**Less than Significant Impact.** Construction of the proposed Project would result in short-term, temporary noise with most of the noise occurring during the site preparation and preliminary stages of construction. Construction activities would create temporary localized increases in noise levels from operation of on-site equipment as well as from delivery trucks hauling materials. The major construction activities for the proposed Project would consist of excavation, compaction, and equipment installation.

Short-term construction noise generated by equipment would occur with varying intensities and durations. Proposed equipment includes Boom Trucks, Bucket Trucks, Wire Pulling Trailers, Rope Pulling Trailers, Water Truck, Pickup Truck, Material Handling Trailers. Noise levels from construction operations decrease at a rate of approximately 6 dBA per doubling of distance from the source. Noise sensitive uses include residences, schools, churches, hospitals, nursing homes, parks, and recreation areas. The nearest sensitive receptors to the substation construction activities are homes located approximately 1,500 feet away to the north and west of the Project site associated with the VRSP residential community.

Once operational, the proposed Project equipment would operate 24 hours per day, 7 days per week. Noise levels are not anticipated to increase to a level that would be perceptible to the

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

residents at the VRSP area, located approximately 1,5000 feet to the north-northwest. Therefore, impacts resulting from generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project are anticipated to be less than significant.

- b) Generation of excessive groundborne vibration or groundborne noise levels?

**Less than Significant Impact.** Construction of the proposed Project could generate groundborne vibration during the construction of the electrical substation, the required trenching for undergrounding of wires, and the replacement of electrical poles. Typical examples of equipment used are wheel excavator, backhoes, drill rigs, concrete trucks, forklifts, and hand tools. The majority of groundborne vibrations would be felt in close proximity to the construction activities. The nearest sensitive receptors to the construction activities are homes located approximately 1,500 feet to the north-northwest in the VRSP area. Although the construction could generate some ground borne vibration it would not be considered excessive and is temporary in nature. Therefore, this impact is considered less than significant.

- c) For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

**No Impact.** The Imperial County Airport is located approximately 2.10 miles to the west-northwest of the Project site. The proposed Project includes the construction of a new electrical substation on an undeveloped and vacant property and installation of supporting distribution lines. Therefore, the proposed Project would not result in exposure of people residing or working in the Project area to excessive noise levels . No impact would occur.

**XIV. POPULATION AND HOUSING**

Would the Project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?

**No Impact.** The proposed Project is the construction of a new electrical substation and installation of supporting distribution lines. The Project is proposed to expand existing infrastructure in order to increase the electrical load capacity. This increase would be necessary to accommodate planned future growth as anticipated by VRSP, the City of Imperial, and the County of Imperial. The Project does not propose the development of new housing, nor does it propose construction or extension of new roads. Therefore, the Project is designed to increase capacity in response to regional growth projections. As a result, the Project would not indirectly induce unplanned population growth through the extension of infrastructure and no impact would occur.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

**No Impact.** The proposed Project would be construction on undeveloped agricultural land. As a result, the proposed Project would not displace substantial numbers of existing housing or people requiring construction of replacement housing elsewhere. No impact would occur regarding the need for replacement housing.

**XV. PUBLIC SERVICES**

- a) 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, maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

- 1) Fire protection?

**Less than Significant Impact.** The City of Imperial contracts with the Imperial County Fire Department (ICFD) to provide all fire protection, emergency medical services (EMS), and fire prevention for the city and its residents. The proposed Project includes the construction of a new electrical substation and supporting distribution lines and would not increase population and is not anticipated to result in a substantial increase in demand for fire protection as none of the Project components are flammable. Therefore, impacts to fire protection are considered less than significant.

- 2) Police Protection?

**No Impact.** The City of Imperial Police Department would serve the Project site for public safety needs. The proposed Project includes the construction of a new electrical substation and installation of supporting distribution lines that has been envisioned as a part of the VRSP area and would not increase population over what has been planned. Therefore, an increase in calls for police protection is not anticipated to increase substantially because of the proposed Project. No impact is identified.

- 3) Schools?

**No Impact.** The proposed Project is not anticipated to impact schools because it neither includes a residential component nor would it generate the need for new housing to accommodate the workforce population. Therefore, no impact is identified for this issue area.

- 4) Parks?

**No Impact.** The proposed Project is not anticipated to impact parks because it either includes a residential component nor would it generate the need for new housing to accommodate workforce population. Therefore, no impact is identified for this issue area.

- 5) Other Public Facilities?

**No Impact.** The Project would enable IID to provide a more reliable service for its existing and planned future electrical system. The Project does not include any component that would increase

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

demand for other public facilities such as a new school, park, or other public facility. No impact would occur.

**XVI. RECREATION**

- a) Would the Project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

**No Impact.** The proposed Project includes the construction of a new three transformer capacity electrical substation and installation of supporting distribution lines. The Project would not create demand for neighborhood or regional parks in the City of Imperial. Thus, no impact is identified for these issues.

- b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?

**No Impact.** The proposed Project includes the construction of a new electrical substation and installation of supporting distribution lines. The Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact is identified.

**XVII. TRANSPORTATION**

Would the Project:

- a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

**No Impact.** Project construction would require hauling of equipment and materials as well as worker commute trips to and from the Project area along local arterial roadways. These trips would add to existing traffic volumes on the local roadways. Based on these minor temporary increases to traffic volumes (construction would last approximately six- to ten-month, with peak construction traffic only occurring for one-third of this period), temporary construction related trips are not considered to significantly affect roadway operations over existing conditions on any utilized roadways. There are no designated bikeways or pedestrian facilities in the Project vicinity, and the Project site is not served by public transportation. Furthermore, construction of the Project would not interfere with any planned bicycle, pedestrian, or public transit facilities.

Once completed, the Project is estimated to only require two vehicle trips a month for operational maintenance. Given the temporary increase in traffic and minimal long-term operational traffic, the proposed Project would have no adverse impact on a program, plan or ordinance addressing the

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

circulation system.

- b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

**Less than Significant Impact.** CEQA Guidelines Section 15064.3, subdivision (b), focuses on Vehicle Miles Traveled (VMT) as the criteria for determining the significance of transportation impacts. The proposed Project includes the construction of a new electrical substation and installation of supporting distribution lines. Construction would generate temporary construction-related traffic. This Project would be categorized under Section 15064.3, subdivision (b), qualitative analysis. Subdivision (b)(3) acknowledges that lead agencies may not be able to quantitatively estimate VMT for every Project type. In these cases, Subdivision (b)(3) encourages lead agencies to evaluate factors such as the availability of transit, proximity to other destinations, and other factors that may affect the amount of driving required by the Project. Construction of the proposed Project would result in a temporary increase in local traffic in association with construction-related workforce traffic and material deliveries.

Operation of the substation does not require it be permanently staffed and would be operated by IID remotely. IID maintenance employees would visit approximately twice per month to conduct routine checks and maintenance (no new employees would be needed to operate the facility). Therefore, the proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts to VMT are considered less than significant.

- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

**No Impact.** The proposed Project is the construction of a new electrical substation and installation of supporting distribution lines. No changes to the traffic patterns or land uses would result from the proposed Project. No impact would occur.

- d) Result in inadequate emergency access?

**No Impact.** The proposed Project would result in temporary increases in temporary construction traffic along surface streets to access the Project site but would be at levels that do not block traffic flow to surrounding properties. Any traffic would be minimal and temporary. Therefore, the Project would not present any emergency access issues to surrounding residential and agricultural uses. No impact would occur regarding emergency access

**XVIII. TRIBAL CULTURAL RESOURCES**

- a) 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

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

that is:

**Potentially Significant Impact Unless Mitigation Incorporated.** The proposed Project includes the construction of a new electrical substation and installation of supporting distribution lines and is located on property that is vacant and undeveloped but has undergone disturbance from past and on-going agricultural activities and grading in the past decades. These agricultural activities have disturbed the surface and subsurface of the Project area, destroying any intact potential prehistoric or historic-era cultural resources. While the potential of finding a buried cultural site during construction is considered low, the possibility exists for unknown resources to be encountered and, therefore, is potentially significant unless mitigation is incorporated. This impact would be reduced to less than significant with the implementation of mitigation measure CUL-1 through CUL-5.

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

**No Impact.** The proposed Project does not contain any structures that could be eligible for registration in the California Register of Historical Resources or local registry. No impact would occur.

- ii.) 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 is subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.
- |                          |                                     |                          |                          |
|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|-------------------------------------|--------------------------|--------------------------|

**Potentially Significant Impact Unless Mitigation Incorporated.** Refer to item “a,” above.

**XIX. UTILITIES AND SERVICE SYSTEMS**

Would the Project:

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

**Less than Significant Impact.** The proposed Project includes the construction of a new electrical substation and installation of supporting distribution lines. The environmental effects of these

activities are analyzed in this document. No other new or expanded water or storm water drainage, electric power, natural gas, or telecommunications facilities would be required. The proposed Project would serve the needs for future development that has been planned by the City of Imperial and County of Imperial General Plans and improve the reliability of IID's existing electrical system. All impacts can be reduced to less than significant levels with mitigation incorporated.

- b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

**No Impact.** The proposed Project would require a minimal amount of water during construction to control dust and would not be at a level that would impact the available water supplies. Once operational, the Project will not require any new water usage. Therefore, no impacts to water supply will result.

- 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?

**No Impact.** The proposed Project would not produce or increase the amount of wastewater requiring treatment. Portable toilets would be used for workers during construction. No impact would occur regarding wastewater treatment.

- d) Generate solid waste more than state or local standards, or more than the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

**No Impact.** The proposed Project would generate construction waste. This would be temporary and would be hauled and disposed of at a local landfill licensed to accept construction waste. Once construction is complete, the Project is anticipated to produce minimal waste by the employees operating the facility. Therefore, no impact to solid waste would occur.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

**No Impact.** Refer to item d) above.

**XX. WILDFIRE**

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?

**No Impact.** The proposed Project is the construction of a new electrical substation and installation of supporting distribution lines. The Project site is not located along any public street that would impede traffic during the construction of the proposed electrical substation. Additionally, electrical service would be maintained during the extent of the Project construction and integration. Thus, the proposed Project would not impair the implementation of, or physically interfere with, any adopted emergency response plan or emergency evacuation plans. No impact is identified for this issue area.

- 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?

**No Impact.** The potential for uncontrolled wildfire is unlikely given the topography and agricultural vegetation. The Project does not include habitable structures. Therefore, no impact would occur regarding exposing Project occupants to pollutant concentrations from 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?

**Less Than Significant Impact.** The proposed Project includes the construction of a new electrical substation and installation of supporting distribution lines. The Project structures are not intended for and would not be used for occupation. Therefore, the Project would not expose Project occupants to increased risks associated with wildfire.

The Project is located in an undeveloped parcel containing sparse desert vegetation with the nearest residence occurring approximately 1,500 feet to the north-northwest. Transmission line upgrade and installation work would occur along existing roadways and easements. The Project footprint is not located in an area of elevated wildfire risk and fuels normally associated with wildfire such as dry brush, chaparral, and forests are not present near the site. As a part of the Riverside Fire Code, the Project would be required to install early detection warning systems and maintain defensible space around the substation. Additionally, the proposed substation would be constructed in accordance with applicable standards, which are designed to reduce wildland fire risk. Therefore, Project construction and operation would result in a less than significant impact.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes?

**No Impact.** The proposed Project is located on flat agricultural land in the City of Imperial and is

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

not located downstream or near any river, stream or body of water associated with any risk of flooding or landslides. No impact would occur that would result in exposing people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes.

*Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino, (1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.  
Revised 2009- CEQA, Revised 2011- ICPDS, Revised 2016 – ICPDS, Revised 2017 - ICPDS*

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

### SECTION 3

#### III. MANDATORY FINDINGS OF SIGNIFICANCE

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

- a) Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?
- 

**Less Than Significant Impact.** The proposed Project includes the construction of a new electrical substation and installation of supporting distribution lines. The area impacted by the construction is undeveloped and contains agricultural vegetation that has undergone past clearing and disturbances as well as areas that are adjacent to roadways and transmission line easements. As identified by the biological assessment, the site has the potential to provide nesting and foraging opportunities for bird species covered by the MBTA. Implementation of mitigation measures BIO-1 and BIO-2 would ensure there is a less than significant impact with regard to degrading the quality of the environment, substantially reducing the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, 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.)
- 

**No Impact.** Due to the short-term and temporary nature of construction and minimal change in emissions during operation, no significant individual or cumulative impacts to air quality or greenhouse gas emissions are anticipated. The proposed Project would serve the needs for future growth in the area that has been planned for by the City of Imperial General Plan and VRSP. No other individual Projects would result in a cumulative impact regarding any other resource areas discussed in this document. In conclusion, the proposed Project would have no individually or cumulatively considerable impacts.

- c) Does the Project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?
-

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

**No Impact.** As described in items a and b, the construction impacts are short term and would not result in any long-term increases in air emissions which could be harmful to human beings. Once completed, the Project would not increase air emissions or any other hazard to human beings. No other significant impacts have been identified in this analysis which could result in adverse impacts to human beings. Therefore, no impact is identified regarding the Project having a substantial adverse effect on human beings directly or indirectly.

---

## **IV. PERSONS AND ORGANIZATIONS CONSULTED**

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

### **A. IMPERIAL IRRIGATION DISTRICT**

Jeremy J Brooks, Project Manager (Consultant)

Efrain V. Sanchez, Project Manager IID-PMO

### **B. AGENCIES/ORGANIZATIONS**

California Department of Fish and Wildlife

United States Department of Fish and Wildlife

### **C. ENGINEER AND TECHNICAL STUDIES**

Ericsson-Grant, Inc. – Biological Study

---

## V. REFERENCES

- CalFire, 2026. Fire Hazard Severity Zone map. Available online at: <https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9>. Accessed January 08, 2026. Referenced in text as (CalFire, 2026).
- California Department of Conservation. 2015. Fault Activity Map of California. Available online at: <https://maps.conservation.ca.gov/cgs/fam/>. Accessed January 08, 2026. Referenced in text as (California DOC, 2015).
- California Department of Conservation. 2022. Geologic Map of California, 2010. Available online at: <https://maps.conservation.ca.gov/cgs/gmc/app/>. Accessed January 08, 2026. Referenced in text as (California DOC, 2022).
- California Department of Conservation. 2024. EQ Zapp: California Earthquake Hazards Zone Application. November 21, 2024. <https://www.conservation.ca.gov/cgs/sh/eqzapp>. Accessed January 08, 2026. Referenced in text as (California DOC, 2024).
- California Department of Conservation. 2026. California Important Farmland Finder. <https://maps.conservation.ca.gov/dlrp/ciff/>. Accessed January 08, 2026. Referenced in text as (California DOC, 2026).
- California Department of Toxic Substances Control. 2026. EnviroStor Database. Available online at: [https://www.envirostor.dtsc.ca.gov/public/map/?global\\_id=60001495](https://www.envirostor.dtsc.ca.gov/public/map/?global_id=60001495). Accessed January 08, 2026. Referenced in text as (California DTSC, 2026).
- California Native Plant Society (CNPS). Rare Plant Program. 2026. Rare Plant Inventory (online edition, v9.5.1). Website <https://www.rareplants.cnps.org> [accessed 5 February 2026]
- California Natural Diversity Database (CNDDDB). 2026. RareFind 5 [Internet]. Records of occurrence for U.S.G.S. 7.5- minute Quadrangle maps: *El Centro, Brawley, Alamo, Holtville West, Calexico, Heber, Mount Signal, Seeley, and Brawley NW, California, California*. CDFW [February 5, 2026]. State of California Resources Agency. Sacramento, California.
- Caltrans. 2026. California State Scenic Highways. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed January 08, 2026. Referenced in text as (Caltrans, 2026).
- City of Imperial. 2004. Victoria Ranch Specific Plan. July 2004. Referenced in text as (City of Imperial, 2004).
- County of Imperial. 2016. Imperial County General Plan. Conservation and Open Space Element. March 8, 2016. <https://www.icpds.com/assets/planning/conservation-open-space-element-2016.pdf> Accessed January 08, 2026. Referenced in text as (Imperial County, 2016).
- Imperial County. 2022. Imperial County Safety Element. November 11, 2022. <https://www.icpds.com/assets/GPA21-0004-Seismic-and-Public-Safety-Element-11-22-2022.pdf>. Accessed January 08, 2026. Referenced in text as (Imperial County, 2022).
- Natural Resources Conservation Service's (NRCS) Web Soil Survey (USDA). 2026. Accessed January 2026. <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>.
- State Water Resources Control Board. 2026. Geotracker database. Available online at: <https://geotracker.waterboards.ca.gov/>. Accessed on January 8, 2026. Referenced in text as (SWRCB, 2026).
- United States Department of Agriculture. 2019. Web Soil Survey. <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed January 08, 2026. Referenced in text as (USDA, 2024).

---

United States Geological Survey. 2025 Landslide Susceptibility Map. November 03, 2025. <https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d> . Accessed January 08, 2026. Referenced in text as (USGS, 2025).

United States Fish and Wildlife Service (USFWS). 2023. Information for Planning and Consultation. Carlsbad Fish and Wildlife office. Accessed February 05, 2023. <https://ecos.fws.gov/ipac/>.

---

APPENDIX A  
BIOLOGICAL RESOURCE ASSESSMENT  
IMPERIAL IRRIGATION DISTRICT  
MICHELLE SUBSTATION PROJECT  
IMPERIAL, CALIFORNIA