



## Initial Study and NOP

Titan II Battery Energy Storage System and  
Imperial Irrigation District R-Line Upgrades  
Project

Initial Study #22-0005

CUP #22-0003

Tentative Tract Map #00995

*Imperial County, CA*

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# Introduction

## A. Purpose

This document is a  policy-level;  project-level Initial Study for evaluation of potential environmental impacts resulting with the proposed Titan II Battery Storage System and IID R-Line Upgrades Project.

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

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

- According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:
  - The proposal has the potential to substantially degrade quality of the environment.
  - The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
  - The proposal has possible environmental effects that are individually limited but cumulatively considerable.
  - The proposal could cause direct or indirect adverse effects on human beings.
- According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.
- According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study has determined that the proposed applications will result in potentially significant environmental impacts and, therefore, an Environmental Impact Report is deemed as the appropriate document to provide necessary environmental evaluations and clearance for the proposed project.

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

Pursuant to the County of Imperial's *CEQA Regulations, Guidelines for the Implementation of CEQA*, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County. The Imperial Irrigation

District (IID) would serve as a CEQA Responsible Agency pursuant to CEQA Guideline 15381 related to the R-Line upgrades component of the project. The Bureau of Land Management (BLM) would serve as the National Environmental Policy Act (NEPA) Lead Agency for R-Line upgrade right-of-way (ROW) approvals within BLM managed lands. BLM actions/approvals would be addressed under a separate NEPA document and process.

## C. Intended Uses of Initial Study and Notice of Preparation

This Initial Study and Notice of Preparation are informational documents intended to inform County of Imperial decision makers, the Imperial Irrigation District as a CEQA Responsible Agency pursuant to CEQA Guideline 15381, other responsible or interested agencies, and the general public of potential environmental effects of the proposed project. 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, IID as a Responsible Agency, and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

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

## D. Contents of Initial Study and Notice of Preparation

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

### Section 1

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

### Section 2

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

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

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

### Section 3

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

## E. Scope of Environmental Analysis

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

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

## F. Policy-Level or Project-Level Environmental Analysis

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

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

## G. Tiered Documents and Incorporation by Reference

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

### Tiered Documents

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

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

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

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

declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration.”

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

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

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

## Incorporation by Reference

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

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

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR is available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.
- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243, Ph. (442) 265-1736.
- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data, which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.
- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.
- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]).

# Environmental Checklist Form

1. **Project Title:** Titan II Battery Energy Storage System (BESS) and IID R-Line Upgrades Project
2. **Lead Agency Name and Address:** Imperial County Planning & Development Services Department, 801 Main Street, El Centro, CA 92243
3. **Contact Person and Phone Number:** Luis Bejarano, Planner II, 442-265-1746
4. **Project Location:** The Titan II BESS and IID R-Line Upgrades Project (project), includes two primary components, as follows:
  - **Titan II BESS.** The Titan II BESS site is located on the northern portion of one privately owned parcel (Assessor Parcel Number 018-170-067) in west-central Imperial County, California. It lies approximately 8 miles west of the junction of State Route (SR) 78 and SR 86, and approximately 5 miles east of the San Diego County line. The BESS site is located approximately 12 miles west of the southern tip of the Salton Sea and bordered on the east by the unpaved section of Pole Line Road south of SR 78.
  - **IID R-Line Upgrades.** The proposed transmission line upgrades would occur along an approximately 34-mile segment of the IID's existing 92 kilovolt (kV) R-Line located between the Dixieland Substation (southern extent) and Anza Substation (northern extent). The transmission line route traverses private land as well as federal land under the jurisdiction of the Bureau of Land Management (BLM).
5. **Project Sponsor's Name and Address:** Titan II, LLC.
6. **General Plan Designation:**
  - **Titan II BESS:** Agriculture.
  - **IID R-Line Upgrades:** Agriculture, Recreation, Government.
7. **Zoning:**
  - **Titan II BESS:** General Agricultural (A-2).
  - **IID R-Line Upgrades:**
    - General Agricultural (A-2).
    - General Agricultural, Renewable Energy Overlay Zone (A-2-RE).
    - General Agricultural/Rural Zone (A-2-R).
    - General Agricultural/Rural Zone, Renewable Energy Overlay Zone(A-2-R-RE).
    - Heavy Agriculture (A-3).
    - Heavy Agriculture, Renewable Energy Overlay Zone (A-3-RE).
    - Open Space/Preservation (S-2).
    - Government/Special (G/S).
8. **Description of Project:** See Project Summary below.
9. **Surrounding Land Uses and Setting:** Land uses surrounding the BESS site are limited to open desert within the Recreation/Open Space land use designation. The surrounding area, specifically to the east and northwest of the BESS site, has been developed with renewable energy facilities. The Titan I Solar

Facility is adjacent to the east of the BESS site, the Seville 1 and Seville 2 Solar Facilities and recently approved Seville 4 (January 2026; CUP #24-0013) and 5 Solar Facilities are located northwest of the BESS site. Land uses surrounding the project segment of the IID's existing 92 kV R-Line are limited to vacant, open desert within the Recreation/Open Space land use designation, and small pockets of agricultural land at the R-Line's southern terminus.

**10. Other Public Agencies whose Approval is Required (e.g., permits, financing approval, or participation agreement):**

- Department of Public Works – Ministerial permits (building, grading, encroachment).
- Imperial County Air Pollution Control District – Fugitive dust control plan, authority to construct.
- California Regional Water Quality Control Board – Notice of Intent for General Construction Permit.
- Imperial Irrigation District – Pursuant to CEQA §21069 and CEQA Guideline 15381, the IID has the responsibility of carrying out and/or otherwise approving the proposed R-Line upgrades component of the project.
- Bureau of Land Management (NEPA Lead Agency):
  - Permanent transmission ROW: The transmission line route traverses private land as well as federal land under the jurisdiction of BLM. The majority of the proposed R-Line upgrades would be located within the existing transmission line alignment and ROW. However, in a few locations the existing ROW is constrained and would require expansion to accommodate the proposed improvements. Accordingly, the project applicant is seeking an ROW grant from BLM to authorize expansion of the existing ROW on BLM-managed lands.
  - Temporary ROW: ROW request for temporary construction access.

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

In accordance with Assembly Bill (AB) 52, the County sent a Notifications of Consultation Opportunity pursuant to Public Resources Code Section 21080.3.1(d) to California Native American tribes traditionally and culturally affiliated with the project area on June 2, 2026. The AB 52 30-day review will end on July 2, 2026. The County is awaiting responses from tribes.



## Environmental Factors Potentially Affected

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

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

## Environmental Evaluation Committee Determination

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

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

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

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Signature

Jim Minnick, Director of Planning/EEC Chairman

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Date:

# Project Summary

## Project Background

### Originally Approved Project – Seville 4 Solar Project (2019; CUP #17-0006)

On January 15, 2019, the Imperial County Board of Supervisors certified the Final EIR (State Clearinghouse (SCH) No. 2017061062) and approved one CUP (CUP #17-0006) for the Seville 4 Solar Project. CUP #17-0006 authorized the construction, operation, and reclamation of a 20-megawatt (MW) solar generation facility, a substation, internal transmission lines, security fence, and internal access roads on Lot 8 of Tract Map No. 00988 (now Assessor Parcel Number 018-170-067) (Figure 1). The previously approved CUP also authorized construction of a 34.50-kilovolt (kV) gen-tie line to connect the facility to the regional electrical grid.

### Currently Proposed Project

Since approval of CUP #17-0006, which authorized development of a 20 MW solar facility, the Seville 4 Solar Project (2019) has been renamed Titan II. The project applicant, Titan II, LLC, is now requesting to modify the previously approved CUP to add a 40 MW BESS and gen-tie line to interconnect with the R-Line on APN 018-170-067 (CUP #22-0003).

The proposed project would also include replacing and upgrading equipment along an approximately 34-mile segment of the existing IID 92 kV R-Line, between the Dixieland Substation and Anza Substation. The R-Line upgrades are planned in order to address long-term integrity of the system as well as capacity and maintenance issues associated with the existing R-Line, which among others, is susceptible to further deterioration and damage from high wind events and/or storms. Generally, the R-Line upgrades would involve replacing existing wooden transmission poles that are approximately 50 to 80 feet in height with steel monopoles. The new steel pole structures would be of similar height, ranging from approximately 50 to 80 feet. The majority of the proposed transmission line upgrades would be located within the existing transmission line alignment and ROW; however, in a few areas, the existing ROW is limited/narrow and will need to be expanded to accommodate the improvements.

The proposed project consists of the following components: 1) Modification to CUP #17-0006 to add the BESS and gen-tie line to interconnect with the R-Line, and 2) Upgrades to the IID's R-Line.

## Project Location

### Titan II BESS

The Titan II BESS site is located on the northern portion of one privately owned parcel (APN 018-170-067) in west-central Imperial County, California. It lies approximately 8 miles west of the junction of State Route (SR) 78 and SR 86, and approximately 5 miles east of the San Diego County line (Figure 2). The BESS site is located approximately 12 miles west of the southern tip of the Salton Sea and bordered on the east by the unpaved section of Pole Line Road south of SR 78.

As shown in Figure 3, the surrounding area, specifically to the east and northwest of the project site, has been developed with renewable energy facilities. The Titan I Solar Facility is adjacent to the east of the project site, the Seville 1 and Seville 2 Solar Facilities and recently approved Seville 4 (January 2026; CUP # 24-0013) and 5 Solar Facilities are located northwest of the project site. IID's existing 92 kV R-Line runs north to south within the Titan II Project parcel along its eastern boundary.

## IID R-Line Upgrades

The proposed transmission line upgrades would occur along an approximately 34-mile segment of the IID's existing 92 kV R-Line located between the Dixieland Substation (southern extent) and Anza Substation (northern extent) (Figure 4). The transmission line route traverses private land as well as federal land under the jurisdiction of the Bureau of Land Management (BLM) within the California Desert Conservation Area (CDCA) planning area. Table 1 identifies the parcels traversed by the proposed R-Line Upgrades and identifies associated land ownership.

## Project Characteristics

### Titan II BESS

A 40 MW BESS is proposed within the northern half portion of APN 018-170-067. The BESS modules, which could include commercially available lithium or flow batteries, typically consist of International Organization for Standardization (ISO) standard containers (approximately 40-foot-long × 8-foot-wide × 8-foot-high) housed in pad- or post-mounted, stackable metal structures, but may also be housed in a dedicated building(s) in compliance with applicable regulations. The maximum height of a dedicated structure is not anticipated to exceed 25 feet.

### Gen-Tie Line

The project would require a generation tie (gen-tie) line to interconnect with the R-Line. As shown in Figure 3, the gen-tie route would originate from a substation (previously authorized under CUP #17-0006) and extend east to connect to the existing R-Line.

### Site Access

As shown in Figure 3, primary access to the project site is available via an existing private access road from the north off of SR 78. This primary access road is provided with 30-foot double swing gates with a coded entry and "Knox Box"® override for emergency vehicle access. Secondary access to the project site is also a gated, private road from SR 78 for secondary emergency access to the project site.

Internal to the project site, nominal 20-foot-wide roads would be developed between the Titan II Project's photovoltaic (PV) arrays as well as around the perimeter of the project site inside the perimeter security fence. These roads would provide access to all areas for maintenance and emergency vehicles.

### Security

Six-foot-high chain link fencing topped with barbed wire would be installed around the perimeter of the Titan II Project's solar energy facility site at the commencement of construction and site access would be limited to authorized site workers. Points of ingress/egress would be accessed via locked gates. In addition, a motion detection system and closed-circuit camera system may also be installed. The site would be remotely monitored 24 hours per day, 7 days per week. In addition, routine unscheduled security rounds may be made by the security team monitoring the site security.

### Fire Protection/Fire Suppression

Fire protection systems for battery systems would be designed in accordance with California Fire Code and would take into consideration the recommendations of the National Fire Protection Association (NFPA) 855.

Fire suppression agents such as Novec 1230 or FM 2000, or water may be used as a suppressant. In addition, fire prevention methods would be implemented to reduce potential fire risk, including voltage,

current, and temperature alarms. Energy storage equipment would comply with Underwriters Laboratory (UL)-95401 and test methods associated with UL-9540A. The BESS would include lithium-ion batteries. For lithium-ion batteries storage, a system would be used that would contain the fire event and encourage suppression through cooling, isolation, and containment. Suppressing a lithium-ion (secondary) battery is best accomplished by cooling the burning material. A gaseous fire suppressant agent (e.g., 3M™ Novec™ 1230 Fire Protection Fluid or similar) and an automatic fire extinguishing system with sound and light alarms would be used for lithium-ion batteries.

To minimize potential hazards, redundant separate methods of failure detection would be implemented. These would include alarms from the Battery Management System (BMS), including voltage, current, and temperature alarms. Detection methods for off-gas detection would be implemented, as applicable. These are in addition to other potential protective measures such as ventilation, overcurrent protection, battery controls maintaining batteries within designated parameters, temperature and humidity controls, smoke detection, and maintenance in accordance with manufacturer guidelines. Remote alarms would be installed for operations personnel as well as emergency response teams in addition to exterior hazard lighting. In addition, an Incidence Response Plan would be implemented.

## Construction

Construction is estimated to be completed in approximately eight months and would begin in 2027. The following provides the proposed project's construction phases and approximate duration of each phase:

- Site Preparation – 3 weeks.
- Grading/Trenching – 10 weeks.
- Foundations/Equipment Installation/Wiring/Commissioning – 19 weeks.

Dust generated during construction would be controlled by watering and, as necessary, the use of other dust suppression methods and materials accepted by the Imperial County Air Pollution Control District (ICAPCD).

## Operations and Maintenance

Once fully constructed, the BESS would be operated on an unstaffed basis and be monitored remotely, with periodic on-site personnel visitations for security, maintenance, and system monitoring. The project applicant would install video and intrusion surveillance on the project site. Therefore, no full-time site personnel would be required on site during operations. Any required planned maintenance activities would generally consist of equipment inspection and replacement and would be scheduled to avoid peak load periods. Any unplanned maintenance would be responded to as needed, depending on the event.

## IID R-Line Upgrades

The proposed project would include replacing and upgrading equipment along an approximately 34-mile segment of the existing IID 92 kV R-Line, between the Dixieland Substation and Anza Substation. The segment of the R-Line proposed for upgrade is presently supported by wooden transmission poles. The R-Line was originally constructed more than 50 years ago. Decades of wear, exposure to severe weather, and outdated design have reduced its safety, reliability, and capacity. Portions of the R-Line have recently been damaged by storms and high winds.

The project would replace the existing transmission line wooden power poles with galvanized steel monopoles. All existing conductor wire would be replaced with new hardware and higher ampacity. The new steel pole structures would vary between approximately 50 and 80 feet in height in order to provide a minimum ground clearance of 30 feet. New pole structures will either be built on new concrete foundations

or directly buried and backfilled with gravel and/or native backfill. All upgrades would be to the existing IID line and associated facilities, within IID's existing transmission corridor. The majority of the proposed upgrades would be located within the existing transmission line alignment and ROW; however, in a few areas, the existing ROW is limited/narrow and will need to be expanded to accommodate the improvements.

## Construction

Construction is expected to take approximately one year and will be completed in two phases:

- Anza Substation to Superstition Substation.
- Superstition Substation to Dixieland Substation.

Existing wooden pole structures will be removed in their entirety for proper off-site disposal. Each structure location will require a work area that will utilize the area previously disturbed when the pole was installed and maintained. Where possible, new structures will be installed using the hole left following removal of the old pole.

Structures will be delivered by truck to each structure location in two pieces and offloaded for subsequent assembly. Assembly will take place within a couple of days from delivery and will involve joining both structure pieces, installing cross arms, insulators, and associated hardware. Structures will be lifted into place for direct burial or set on foundations using cranes. This work will all be completed in previously disturbed areas. The use of helicopters for construction is not planned at this time.

Vehicles will remain on existing access roads and/or disturbance areas at all times, including areas to turn around, unless otherwise necessitated by future engineering and design.

## Operations and Maintenance

Upon completion, IID will continue to operate, maintain, and eventually decommission the upgraded line in compliance with federal and state requirements.

The upgraded R-Line will be monitored periodically from the ground and occasionally by air. Maintenance will be performed as necessary using existing roads and open routes of travel for access.

## BLM Right-of-Way Approval – Expansion of ROW and Temporary Construction Access

The transmission line route traverses private land as well as federal land under the jurisdiction of the BLM. As noted above, the majority of the proposed R-Line upgrades would be located within the existing transmission line alignment and ROW. However, in a few locations the existing ROW is constrained and would require expansion to accommodate the proposed improvements. Accordingly, the project applicant is seeking an ROW grant from BLM to authorize expansion of the existing ROW on BLM-managed lands, as well as temporary access required to support construction activities.

In order to process the requested authorization, the project applicant would be required to submit a Standard Form 299 (SF-299) Application and an associated Plan of Development to BLM. Review and approval of the ROW application constitutes a federal action; therefore, the proposed R-Line upgrades would be subject to environmental review in accordance with the National Environmental Policy Act (NEPA) and applicable BLM implementing regulations and guidance.

## Required Project Approvals

### Imperial County

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

1. **Conditional Use Permit (CUP #22-0003).** Implementation of the project would require modification of the previously approved CUP #17-0006 to add a 40 MW BESS and gen-tie line to interconnect with the R-Line on APN 018-170-067. The project applicant is also requesting to update the legal description of the project site in the CUP to reflect the Lot Line Adjustment #00322.
2. **Tentative Tract Map (TR #00995).** The project applicant is requesting approval of a Tentative Tract Map to subdivide APN 018-170-067, consisting of approximately 534.09 acres, into two separate lots. Proposed Lot 1 would contain approximately 330.11 acres, and Proposed Lot 2 would contain approximately 203.98 acres.
3. **Certification of the EIR.** After the required public review for the Draft EIR, the County will respond to written comments, edit the document, and produce a Final EIR. The Planning Commission will review and provide recommendations for project approval(s) and certification of the Final EIR to the Board of Supervisors. The Board of Supervisors will certify the Final EIR prior to final determination (e.g., approval) of the project.

Subsequent ministerial approvals may include, but are not limited to:

- Grading and clearing permits.
- Building permits.
- Decommissioning plan.
- Encroachment permits.
- Transportation permit(s).

## Discretionary Actions and Approvals by Other Agencies

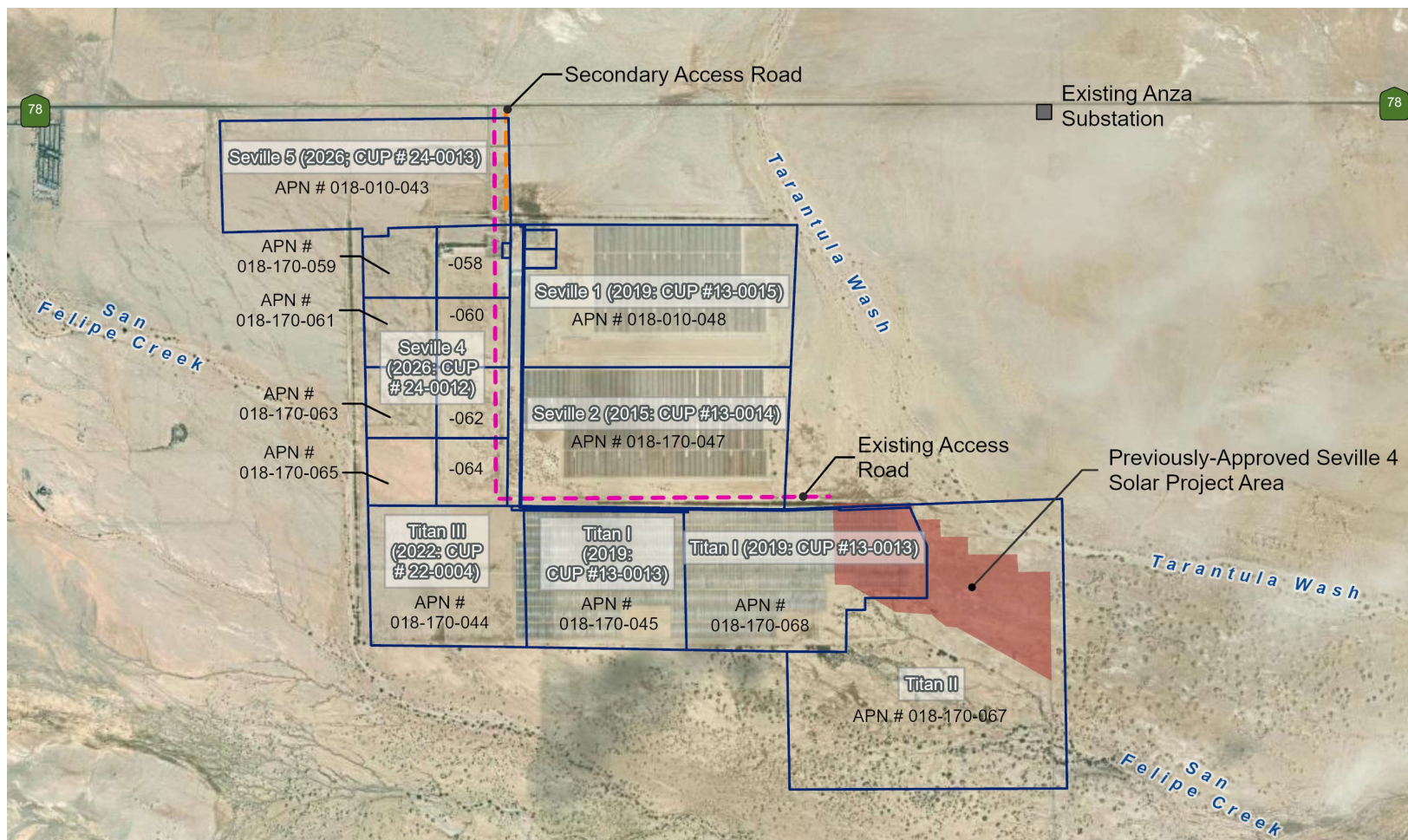
Responsible Agencies are those agencies that have discretionary approval over one or more actions involved with development of a project. Trustee Agencies are state agencies that have discretionary approval or jurisdiction by law over natural resources affected by a project. For the project, these agencies may include, but are not limited to the following:

- Imperial Irrigation District (Responsible Agency) – Pursuant to CEQA Section 21069, the IID has the responsibility of carrying out and/or otherwise approving the proposed R-Line upgrades component of the project.
- California Regional Water Quality Control Board (RWQCB) – Notice of Intent for General Construction Permit, CWA 401 Water Quality Certification.
- California Department of Fish and Wildlife (CDFW) (Trustee Agency) – California Endangered Species Act (CESA) Compliance, Section 1600 Streambed Alteration Agreement.
- United States Fish and Wildlife Service (USFWS) – Federal Endangered Species Act (FESA) Compliance.
- United States Army Corps of Engineers (USACE) – Section 404 of the Clean Water Act (CWA) Permit.
- Bureau of Land Management (NEPA Lead Agency).
  - a. Permanent transmission ROW: The transmission line route traverses private land as well as federal land under BLM jurisdiction. The majority of the proposed R-Line upgrades would be located within the existing transmission line alignment and ROW. However, in a few locations, the existing ROW is constrained and would require

expansion to accommodate the proposed improvements. Accordingly, the project applicant is seeking an ROW grant from BLM to authorize expansion of the existing ROW on BLM-managed lands.

- b. Temporary ROW: ROW request for temporary construction access.

Figure 1. Location of Previously Approved Seville 4 Solar Project (2019; CUP #17-0006)



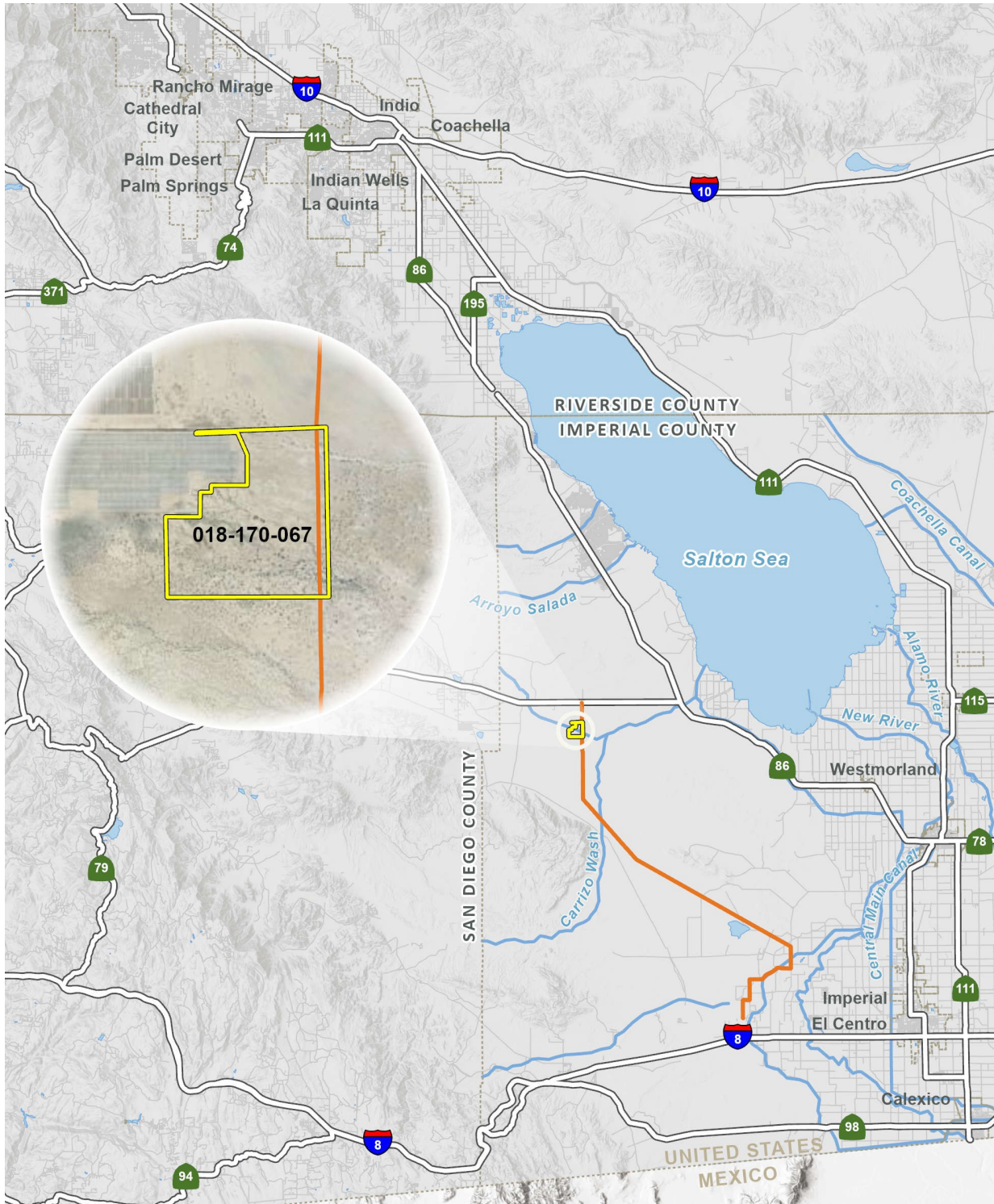
- Previously-Approved Seville 4 Solar Project Area (2019: CUP #17-006)
- Existing Access Road
- Secondary Access Road
- Lot Boundary
- Existing Anza Substation

0 0.5 mi



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Figure 2. Regional Location



- Titan II Project Parcel
- R-Line Alignment

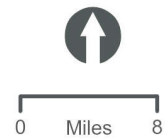
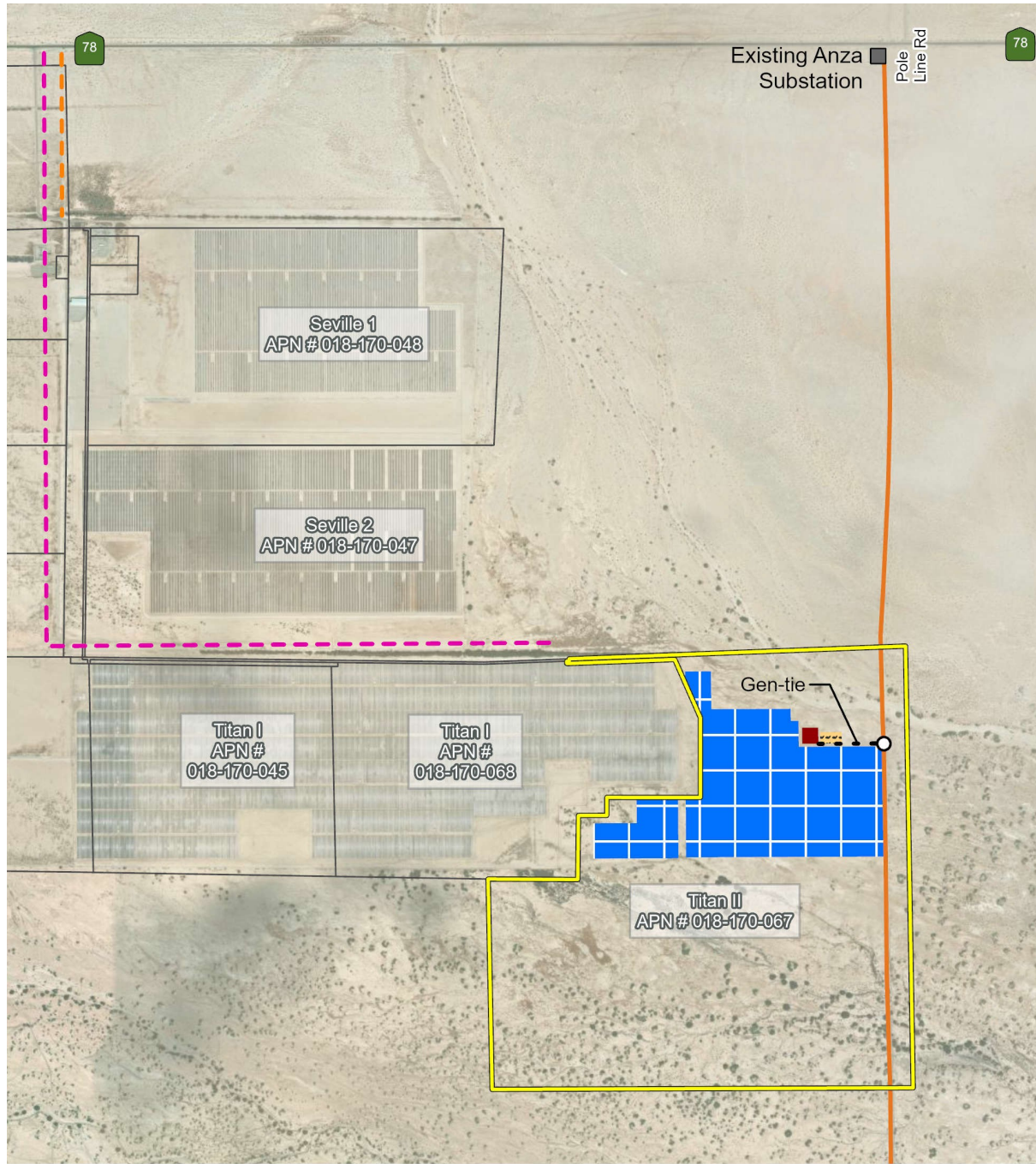


Figure 3. BESS Project Site Location



- Titan II Project Parcel
- Existing Anza Substation
- Upgrade of Existing Transmission Line IID R Line
- Existing Access Road
- Secondary Access Road

**Previously-Approved CUP #17-0006 - Authorized Development**

- Solar Panels
- Substation

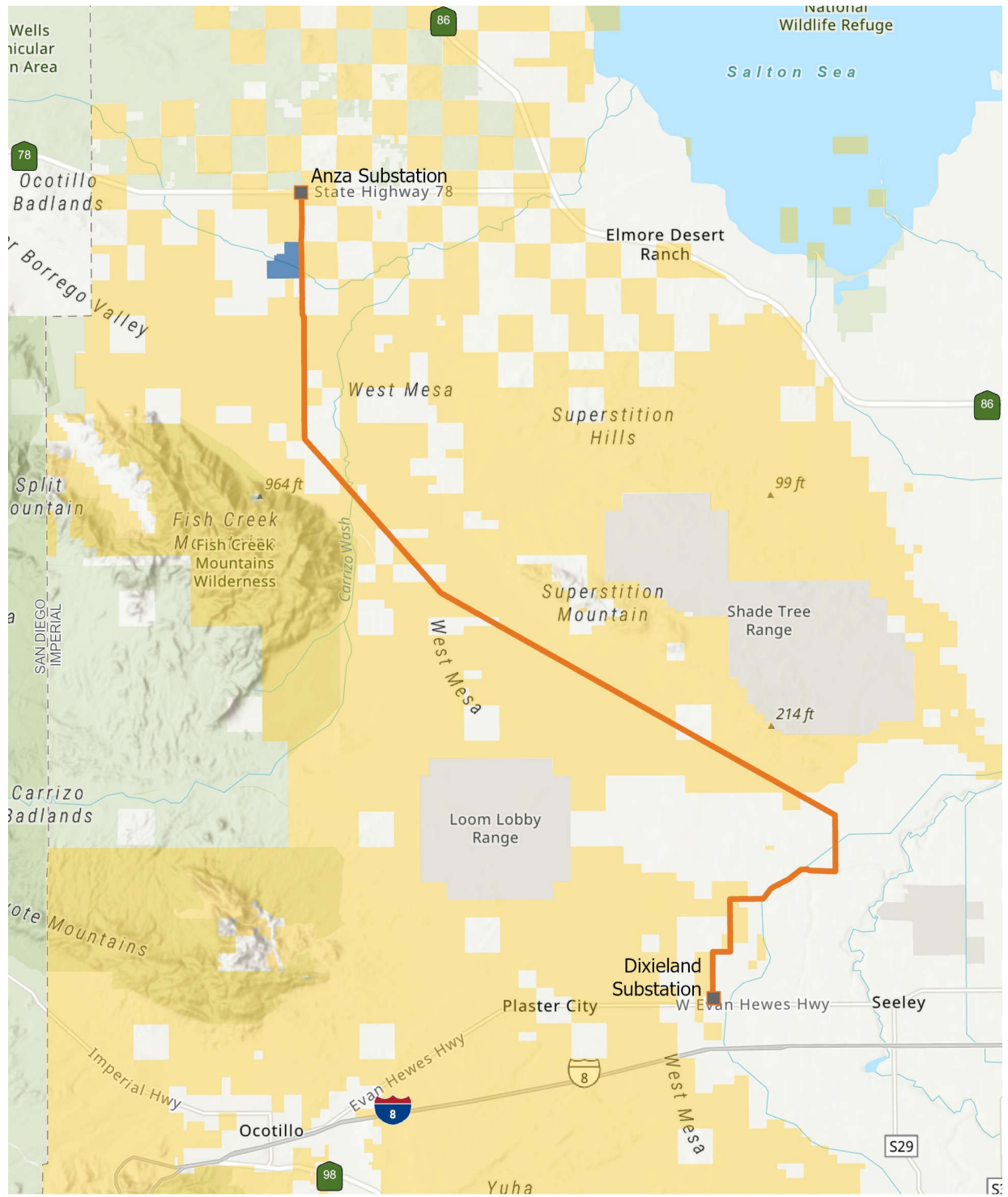
**Proposed Project**

- BESS
- Point of Interconnection
- Gen-tie



0 1,200 Feet

**Figure 4. R-Line Upgrades Location**



- Titan II Project Parcel
- Upgrade of Existing Transmission Line IID R Line
- Bureau of Land Management Land
- Substations

0 4 mi



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**Table 1. Parcels Traversed by the Proposed R-Line Upgrades Project**

Assessor Parcel Number	Land Ownership
018-170-067	Private
018-220-016	Private
018-220-017	Private
018-220-018	Private
018-220-019	Private
018-220-020	Private
018-220-021	Private
033-030-013	Private
033-100-003	Private
033-100-025	Private
033-100-037	Private
033-100-052	Private
033-100-065	Private
033-120-008	Private
033-120-042	Private
033-120-043	Private
033-120-062	Private
033-150-040	Private
034-200-019	Private
034-230-009	Private
034-260-032	Private
034-260-042	Private
034-260-044	Private
034-260-046	Private
034-260-047	Private
034-260-049	Private
034-290-003	Private
034-290-024	Private
034-290-025	Private
034-290-032	Private
034-290-033	Private
034-300-027	Private
034-300-035	Private
034-300-038	Private
034-300-041	Private
034-300-042	Private
034-310-008	Private

Assessor Parcel Number	Land Ownership
034-310-009	Private
034-310-017	Private
034-310-025	Private
034-330-019	Private
034-370-001	Private
034-370-014	Private
034-370-019	Private
051-020-027	Private
051-031-001	Private
018-010-033	Bureau of Land Management
018-170-009	Bureau of Land Management
018-170-037	Bureau of Land Management
033-030-002	Bureau of Land Management
033-030-003	Bureau of Land Management
033-030-012	Bureau of Land Management
033-100-001	Bureau of Land Management
033-100-039	Bureau of Land Management
033-120-010	Bureau of Land Management
033-120-027	Bureau of Land Management
033-120-028	Bureau of Land Management
033-120-044	Bureau of Land Management
033-120-055	Bureau of Land Management
033-150-008	Bureau of Land Management
033-150-032	Bureau of Land Management
033-150-039	Bureau of Land Management
034-170-013	Bureau of Land Management
034-200-001	Bureau of Land Management
034-200-002	Bureau of Land Management
034-200-003	Bureau of Land Management
034-200-009	Bureau of Land Management
034-200-010	Bureau of Land Management
034-200-016	Bureau of Land Management
034-200-017	Bureau of Land Management
034-220-006	Bureau of Land Management
034-230-001	Bureau of Land Management
034-230-002	Bureau of Land Management
034-230-005	Bureau of Land Management
034-230-010	Bureau of Land Management



Assessor Parcel Number	Land Ownership
034-290-002	Bureau of Land Management
034-330-020	Bureau of Land Management

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# Evaluation of Environmental Impacts

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

- b. The mitigation measure identified, if any, to reduce the impact to less than significance.

## Documents Incorporated by Reference

On January 15, 2019, the Imperial County Board of Supervisors certified the Final EIR and adopted one CUP (CUP #17-0006) for the Seville 4 Solar Project. The Seville 4 Solar Project proposed the construction, operation, and reclamation of a 20 MW solar generation facility on a portion of the site (Lot 8 of Tract Map No. 00988) (Figure 1). The proposed Titan II 40 MW BESS is located within the previously approved Seville 4 Solar Project development footprint. Therefore, this Initial Study incorporates by reference the previously certified Seville 4 Solar Project EIR (SCH No. 2017061062), where appropriate.



## Aesthetics

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

### Impact Analysis

- a) **Titan II BESS – Less than Significant Impact.** The project site is surrounded by undeveloped desert on the north, south, and east and portions of the western boundary. There are no panoramic scenic views from the project area and no scenic vistas or areas with high visual quality would be affected by project development or implementation of the BESS. The proposed BESS modules would be housed in pad- or post-mounted, stackable metal structures, but may also be housed in a dedicated building(s) in compliance with applicable regulations. The maximum height of a dedicated structure is not anticipated to exceed 25 feet and would be located approximately 1.5 miles south of SR 78; therefore, the BESS would not be readily visible to motorists traveling on SR 78. Therefore, implementation of the BESS would not result in adverse effects on a scenic vista. Impacts are considered less than significant. No mitigation is required.

**R-Line Upgrades – Potentially Significant Impact.** According to the *Final Program EIR for the County of Imperial General Plan*, visual resources in Imperial County include desert areas, sand hills, mountains, the Salton Sea and some agricultural areas (County of Imperial 1993). While the existing R-Line traverses predominantly vacant open desert areas that include panoramic views, implementation of the R-Line upgrades would involve replacing existing wooden transmission poles that are approximately 50 to 80 feet in height with steel monopoles within an existing transmission corridor. The new steel pole structures would be of similar height, ranging from approximately 50 to 80 feet. Therefore, the proposed improvements would not be anticipated to result in significant changes to the visual environment when compared to existing

conditions. However, the R-Line crosses federal land under the jurisdiction of the BLM. For the BLM, the Visual Resource Management (VRM) methodology has been developed to evaluate scenic resources under its jurisdiction and to develop management objectives for those resources. The EIR will include an evaluation of the potential aesthetic impacts of the proposed R-Line Upgrades using the BLM's VRM methodology. Therefore, a potentially significant impact is identified for this issue area.

- b) **Titan II BESS – No Impact.** According to the Conservation and Open Space Element, no State scenic highways have been designated in Imperial County (County of Imperial 2016). There are no designated scenic highways in the project area nor is the project site visible from any designated scenic highway. SR 78 is approximately 1.5 miles north of the project site. Although the portion of SR 78 from the junction with SR 86 to the San Diego County line is eligible for scenic highway designation, SR 78 is not officially designated as a scenic highway. The proposed BESS modules would be housed in pad- or post-mounted, stackable metal structures, but may also be housed in a dedicated building(s) in compliance with applicable regulations. The maximum height of a dedicated structure is not anticipated to exceed 25 feet and would be located approximately 1.5 miles south of SR 78; therefore, the BESS would not be readily visible to motorists traveling on SR 78. Therefore, implementation of the BESS would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. No impact would occur.

**R-Line Upgrades – No Impact.** The northern terminus of the existing R-Line corridor lies immediately south of SR 78, an eligible scenic highway (Caltrans 2018). SR 78 is not officially designated as a scenic highway. Implementation of the R-Line upgrades would involve replacing existing wooden transmission poles with steel monopoles within an existing transmission corridor. Therefore, the proposed improvements would not result in significant changes to the visual environment compared to existing conditions and implementation of the R-Line upgrades would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway. No impact would occur.

- c) **Titan II BESS – Less than Significant Impact.** Views of the project site are partially obstructed by a tamarisk windbreak extending east-west along the northern boundary of the project site and the site is barely visible from SR 78. The proposed BESS modules would be housed in pad- or post-mounted, stackable metal structures, but may also be housed in a dedicated building(s) in compliance with applicable regulations. The maximum height of a dedicated structure is not anticipated to exceed 25 feet and would be located approximately 1.5 miles south of SR 78; therefore, the BESS would not be readily visible to motorists traveling on SR 78. While the project would alter existing conditions of the project area, implementation of the BESS would not substantially degrade the existing visual character or quality of the area when considered in the context of the associated PV infrastructure previously analyzed in the Seville 4 Solar Project EIR and the existing solar facilities immediately to the northwest and west of the project site. Therefore, impacts are considered less than significant. No mitigation is required.

**R-Line Upgrades – Potentially Significant Impact.** The existing R-Line traverses an area that is predominantly characterized by vacant open desert lands. Implementation of the R-Line upgrades would involve replacing existing wooden transmission poles with steel monopoles within an existing transmission corridor. Therefore, the proposed improvements would not be anticipated to result in significant changes to the visual environment when compared to existing conditions. However, the R-Line crosses federal land under the jurisdiction of the BLM. For the BLM, the VRM methodology has been developed to evaluate scenic resources under its jurisdiction and to develop management objectives for those resources. The EIR will include an evaluation of the potential aesthetic impacts of the proposed R-Line Upgrades using the BLM's VRM methodology. Therefore, a potentially significant impact is identified for this issue area.

- d) **Titan II BESS – Less than Significant Impact.** The project would not include any substantial source of nighttime light in the vicinity of the project site. Any lighting required for safety and security within the project site would be hooded and oriented downward so as not to spill over into adjacent parcels consistent with Title 9, Division 17, Chapter 2: Specific Standards for all Renewable Energy Projects, of the County's Zoning Ordinance.

The BESS buildings/containers are not highly reflective. Therefore, impacts associated with creation of substantial light and glare are considered less than significant. No mitigation is required.

**R-Line Upgrades – Potentially Significant Impact.** Implementation of the R-Line upgrades would involve replacing existing wooden transmission poles with steel monopoles within an existing transmission corridor. While transmission poles are not typically associated with significant amounts of glare, further analysis is needed. Therefore, although the project is not expected to create a substantial new source of light or glare affecting day or nighttime views, this issue will be addressed in the EIR. Therefore, a potentially significant impact is identified for this issue area.

## Agriculture and Forestry Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i></p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Titan II BESS – No Impact.** According to the farmland maps prepared by the California Department of Conservation (DOC), the BESS site is designated as Other Land (DOC 2022a). Therefore, the proposed BESS component would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agriculture use and no impact is identified.

**R-Line Upgrades – Potentially Significant Impact.** According to the FMMP, the R-Line transmission corridor traverses segments of land designated as Prime Farmland and Farmland of Statewide Importance toward its southern terminus (DOC 2022a). Implementation of the R-Line upgrades would involve replacing existing wooden transmission poles with steel monopoles, primarily within an existing transmission corridor. However, in a few locations the existing ROW is constrained and would require expansion to accommodate the proposed improvements. Therefore, the proposed R-Line upgrades could potentially convert Prime Farmland or Farmland of Statewide Importance, and this issue will be addressed in the EIR. Therefore, a potentially significant impact is identified for this issue area.

- b) **Titan II BESS – No Impact.** All Williamson Act contracts in Imperial County terminated on or before December 31, 2018. As such, no Williamson Act contracts are located on or in the vicinity of the BESS site. Therefore, conversion of land under Williamson Act Contract would not occur and no impact is identified.

**R-Line Upgrades – No Impact.** As stated above, all Williamson Act contracts in Imperial County terminated on or before December 31, 2018. As such, no Williamson Act contracts are located on or in the vicinity of the R-Line transmission corridor. Therefore, conversion of land under Williamson Act Contract would not occur and no impact is identified.

- c) **Titan II BESS – No Impact.** According to the County of Imperial General Plan Conservation and Open Space Element, there are no existing forest lands, timberlands, or timberland zoned Timberland Production either on or near the project site that would conflict with existing zoning. As such, no impact would occur.

**R-Line Upgrades – No Impact.** According to the County of Imperial General Plan Conservation and Open Space Element, the R-Line transmission corridor does not traverse an area containing forest resources. Additionally, the R-Line transmission corridor is not zoned forest lands, timberlands, or timberland zoned Timberland Production. Land uses surrounding the project segment of the IID's existing R-Line are limited to vacant land, open desert within the Recreation/Open Space land use designation, and small pockets of agricultural land at the R-Line's southern terminus. Therefore, implementation of the R-Line upgrades would not 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)). No impact would occur.

- d) **Titan II BESS – No Impact.** According to the County of Imperial General Plan Conservation and Open Space Element, there are no existing forest lands either on site or in the immediate vicinity of the BESS site. Thus, the proposed BESS would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

**R-Line Upgrades – No Impact.** According to the County of Imperial General Plan Conservation and Open Space Element, the R-Line transmission corridor does not traverse an area containing forest resources (County of Imperial 2016). Additionally, the transmission corridor is not zoned forest lands, timberlands, or timberland zoned Timberland Production. Land uses surrounding the project segment of the IID's existing R-Line are limited to vacant land, open desert within the Recreation/Open Space land use designation, and small pockets of agricultural land at the R-Line's southern terminus. Therefore, implementation of the R-Line upgrades would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

- e) **Titan II BESS – No Impact.** As previously discussed above, the BESS site is designated as Other Land (DOC 2022a). Therefore, the proposed BESS component would not result in the indirect conversion of other farmland to a non-agricultural use and this impact is considered less than significant. The proposed BESS would not result in the loss of forest land or conversion of forest land to non-forest use.

**R-Line Upgrades – Potentially Significant Impact.** According to the FMMP, the R-Line transmission corridor traverses segments of land designated as Prime Farmland and Farmland of Statewide Importance towards its southern terminus (DOC 2022a). Implementation of the R-Line upgrades would involve replacing existing wooden transmission poles with steel monopoles, primarily within an existing transmission corridor. However, in a few locations the existing ROW

is constrained and would require expansion to accommodate the proposed improvements. Therefore, the proposed R-Line upgrades could potentially convert Prime Farmland or Farmland of Statewide Importance, and this issue will be addressed in the EIR. Therefore, a potentially significant impact is identified for this issue area.



## Air Quality

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i>				
<i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Titan II BESS – Potentially Significant Impact.** The proposed BESS is located within the Salton Sea Air Basin (SSAB) and is subject to the Imperial County Air Pollution Control District (ICAPCD) Rules and Regulations. Construction of the BESS would create temporary emissions of dust, fumes, equipment exhaust, and other air contaminants that may conflict with the ICAPCD’s rules and regulations. The proposed BESS does not involve any components that would generate stationary source emissions; however, temporary construction emissions have the potential to result in a significant air quality impact. A potentially significant impact is identified related to the proposed project’s consistency with air quality plans and will be included in the EIR analysis.

**R-Line Upgrades – Potentially Significant Impact.** The R-Line transmission corridor is located within the SSAB and is subject to the ICAPCD Rules and Regulations. Construction of the R-Line upgrades would create temporary emissions of dust, fumes, equipment exhaust, and other air contaminants that may conflict with the ICAPCD’s rules and regulations. No stationary source emissions will be generated by the proposed project; however, temporary construction emissions have the potential to result in a significant air quality impact. A potentially significant impact is identified related to the proposed project’s consistency with air quality plans and will be included in the EIR analysis.

- b) **Titan II BESS – Potentially Significant Impact.** Currently, the SSAB is either in attainment or unclassified for all federal and state air pollutant standards, with the exception of the federal ozone (O<sub>3</sub>), particulate matter less than 10 microns in diameter (PM<sub>10</sub>), and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) standards, and state standards for O<sub>3</sub> and PM<sub>10</sub>. Air pollutants transported into the SSAB from the adjacent South Coast Air Basin (Los Angeles County, San Bernardino County, Orange County, and Riverside County) and Mexicali (Mexico) substantially contribute to the non-attainment conditions in the Salton Sea Air Basin. A potentially significant impact is identified for this issue area and will be addressed in the EIR.

**R-Line Upgrades – Potentially Significant Impact.** During construction of the R-Line upgrades, the project may exceed ICAPCD significance thresholds. This is considered a potentially significant impact and further analysis would be undertaken in the EIR. Therefore, a potentially significant impact is identified for this issue area.

- c) **Titan II BESS – Less than Significant Impact.** The BESS site is surrounded primarily by vacant open desert and existing solar development to the northwest. There are no sensitive receptors in the immediate vicinity of the project site. Exhaust generated by diesel equipment during construction, operation and maintenance, and reclamation could result in elevated levels of diesel particulate matter emissions. Because the use of diesel mobile construction equipment would be temporary and there are no sensitive receptors adjacent to areas where construction would occur, diesel particulate matter from construction activities would not be anticipated to result in the exposure of sensitive receptors to levels that exceed applicable standards. Therefore, the BESS would not expose sensitive receptors to substantial pollutant concentrations. Impacts are considered less than significant.

**R-Line Upgrades – Potentially Significant Impact.** Land uses surrounding the project segment of the IID's existing R-Line are predominantly limited to vacant, open desert within the Recreation/Open Space land use designation, and small pockets of agricultural land at the R-Line's southern terminus. While a majority of the project segment is not located within proximity to sensitive receptors, the southern terminus of the transmission corridor is in proximity to several agricultural residences and the Imperial Lakes private gated waterski community. Therefore, sensitive receptors may be exposed to pollutant concentrations during construction of the proposed R-Line upgrades. This is considered a potentially significant impact and would be addressed in the EIR.

- d) **Titan II BESS – Less than Significant Impact.** The use of diesel equipment during construction, operation, and reclamation activities could result in temporary emissions of adverse odors. The most likely potential sources that may emit odors during construction activities are diesel-fueled construction equipment. However, given the rural location of the project, construction activities associated with the BESS would not create objectionable odors affecting a substantial number of people. As such, impacts are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** The use of diesel equipment during construction could result in temporary emissions of adverse odors. The most likely potential sources that may emit odors during construction activities are diesel-fueled construction equipment. However, given the rural location of the R-Line transmission corridor, construction activities would not create objectionable odors affecting a substantial number of people. In addition, the project, as an electrical infrastructure project, is not anticipated to generate objectionable odors. As such, impacts are considered less than significant.



## Biological Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Titan II BESS – Potentially Significant Impact.** The BESS site consists primarily of idle agriculture and disturbed habitat. Construction of the proposed BESS would have the potential to result in short-term or temporary indirect impacts to special-status wildlife species from vegetation removal activities during grading/filling activities associated with construction.

Potential short-term indirect impacts to special-status wildlife may result from construction activities such as emissions (e.g., fugitive dust, chemical pollutants, including herbicides, etc.) and increased human activity. This is considered a potentially significant impact and would be addressed in the EIR.

**R-Line Upgrades – Potentially Significant Impact.** The proposed R-Line upgrades have the potential to result in short-term or temporary indirect impacts to special-status wildlife species from vegetation removal activities during grading/filling activities associated with construction. Potential short-term indirect impacts to special-status wildlife may result from construction activities such as emissions (e.g., fugitive dust, chemical pollutants, including herbicides, etc.) and increased human activity. This is considered a potentially significant impact and would be addressed in the EIR.

- b) **Titan II BESS – No Impact.** The project site consists primarily of idle agriculture and disturbed habitat. No sensitive natural communities occur within the BESS site. Therefore, the proposed BESS component would not impact sensitive natural communities and no impact would occur.

**R-Line Upgrades – Potentially Significant Impact.** According to the NWI, the 34-mile project segment of the IID R-Line transmission corridor traverses several surface water bodies and wetlands, many of which could be associated with riparian, or other sensitive, habitat (NWI 2026). Therefore, construction of the proposed R-Line upgrades may have a substantial adverse effect on riparian habitat. This is considered a potentially significant impact and would be addressed in the EIR.

- c) **Titan II BESS – Less Than Significant Impact.** The project applicant will avoid potential federal and state jurisdictional areas during construction of the proposed BESS. Therefore, impacts to jurisdictional areas are considered less than significant.

**R-Line Upgrades – Potentially Significant Impact.** According to the NWI, the 34-mile project segment of the IID R-Line transmission corridor traverses several surface water bodies and wetlands (NWI 2026). Therefore, construction of the R-Line upgrades may have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. This is considered a potentially significant impact and would be addressed in the EIR.

- d) **Titan II BESS – Less than Significant Impact.** The proposed BESS is located within the previously approved Seville 4 Solar Project development footprint. According to the Seville 4 Solar Project EIR, the Seville 4 Project site consists primarily of idle agriculture and disturbed habitat. The site does not contain suitable vegetation and/or cover to support wildlife movement. Wildlife will be able to continue to use the surrounding open land for movement. Impacts are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** The IID R-Line transmission corridor provides wildlife movement opportunities due to the fact that it traverses open and unimpeded land. While project construction may temporarily disrupt wildlife movement within the project area, the R-Line upgrades include the replacement of the existing wooden transmission poles with steel monopoles primarily within the IID's existing transmission corridor, and, upon operation, any existing wildlife movement corridors would function the same as under existing conditions. While no significant impacts are anticipated, this issue will be addressed in the EIR.

- e) **Titan II BESS – Less than Significant Impact.** The proposed BESS would be constructed and operated in compliance with the County of Imperial's code of ordinances as they apply to the construction and operation of a BESS and supporting infrastructure. Impacts are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** The proposed R-Line upgrades would be constructed and operated in compliance with the County of Imperial's code of ordinances as they apply to the construction and operation of electric infrastructure. While no significant impacts are anticipated, further analysis would be undertaken in the EIR.

- f) **Titan II BESS – No Impact.** Imperial County does not have a Habitat Conservation Plan (HCP). Thus, implementation of the proposed BESS would not conflict with the provisions in an adopted HCP.

**R-Line Upgrades – Potentially Significant Impact.** Imperial County does not have an HCP. Thus, implementation of the proposed R-Line upgrades would not conflict with the provisions in an adopted HCP. Portions of the R-Line transmission corridor are located on BLM lands and may be covered by the CDCA Plan, which includes Areas of Critical Environmental Concern (ACEC). The R-Line upgrades include the replacement of the existing wooden transmission poles with steel monopoles primarily within the IID’s existing transmission corridor. However, in a few locations, the existing ROW is constrained and would require expansion to accommodate the proposed improvements. Therefore, there is a potential that the proposed R-Line upgrades could conflict with the CDCA. A biological resources report that will address the proposed project’s potential impacts on applicable habitat conservation plans will be prepared and included in the EIR analysis.

## Cultural Resources

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

### Impact Analysis

- a) **Titan II BESS – No Impact.** The proposed BESS is located within the previously approved Seville 4 Solar Project development footprint. According to the Seville 4 Solar Project EIR, there are no historic resources on the project site. Therefore, no impact to a historic resource would occur as a result of development of the proposed BESS.

**R-Line Upgrades – Potentially Significant Impact.** The proposed IID R-Line upgrades would occur primarily within an existing transmission corridor that has been previously disturbed. However, in a few locations the existing ROW is constrained and would require expansion to accommodate the proposed improvements. Given the cultural richness of the project area and the length of the R-Line upgrades (34 miles), impacts are considered potentially significant. This issue will be addressed in the EIR.

- b) **Titan II BESS – Potentially Significant Impact.** Construction of the proposed BESS has the potential to disturb and/or destroy both known and previously undiscovered archaeological resources. Impacts are considered potentially significant. This issue will be addressed in the EIR.

**R-Line Upgrades – Potentially Significant Impact.** The proposed IID R-Line upgrades would occur primarily within an existing transmission corridor that has been previously disturbed. However, in a few locations the existing ROW is constrained and would require expansion to accommodate the proposed improvements. Given the cultural richness of the project area and the length of the R-Line upgrades (34 miles), impacts are considered potentially significant.

- c) **Titan II BESS – Potentially Significant Impact.** It is unknown whether are human remains in the project area that could be discovered during construction. Therefore, impacts to subsurface human remains are considered potentially significant.

**R-Line Upgrades – Potentially Significant Impact.** Construction of the R-Line upgrades would require excavation to replace the existing wooden transmission poles with steel monopoles primarily within the IID’s existing transmission corridor. In a few locations the existing ROW is constrained and would require expansion to accommodate the proposed improvements. It is unknown whether are human remains in the project area that could be discovered during construction. Therefore, impacts to subsurface human remains are considered potentially significant.



## Energy

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

### Impact Analysis

- a) **Titan II BESS – Less than Significant.** The proposed project involves the construction and operation of a BESS with up to 40 MW of electrical storage capacity to receive and store excess energy and to return this electricity to the grid at a later time when needed.

Construction activities consume energy through the use of heavy construction equipment and truck and worker traffic. The proposed BESS will use energy-conserving construction equipment, including standard mitigation measures for construction combustion equipment recommended in the ICAPCD CEQA Air Quality Handbook. The use of better engine technology, in conjunction with the ICAPCD’s standard mitigation measures will reduce the amount of energy used during construction of the BESS.

The project would indirectly cause the replacement of fossil fuel energy production facilities and thereby displace criteria pollutants created by existing power generation sources. As such, the operations-related electricity use would provide a significant renewable resource for the County and would help achieve the State’s Renewable Portfolio Standards requirement for non-carbon sources of electricity. Implementation of the BESS would receive and store excess energy and return it to the grid at a later time when needed. Therefore, the proposed BESS would not result in wasteful, inefficient, or unnecessary consumption of energy resources and impacts are considered less than significant.

**R-Line Upgrades – Less than Significant.** The use of energy associated with the R-Line upgrades include both construction and operational activities. Construction activities consume energy through the use of heavy construction equipment and truck and worker traffic. The R-Line upgrades will use energy-conserving construction equipment, including standard mitigation measures for construction combustion equipment recommended in the ICAPCD CEQA Air Quality Handbook. The use of better engine technology, in conjunction with the ICAPCD’s standard mitigation measures will reduce the amount of energy used for the R-Line upgrades.

Implementation and operation of the R-Line upgrades would promote the use of renewable energy and contribute incrementally to the reduction in demand for fossil fuel use for electricity-generating purposes and help California meet its RPS.

Based on these considerations, the R-Line upgrades would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. This is considered a less than significant impact.

- b) **Titan II BESS– No Impact.** The proposed project involves the construction and operation of a BESS with up to 40 MW of electrical storage capacity to receive and store excess energy

generated by the existing 20 MW solar facility and to return this electricity to the grid at a later time when needed. The proposed BESS, in conjunction with the existing solar energy facility, would help California meet its Renewable Portfolio Standard of 60 percent of retail electricity sales from renewable sources by the end of 2030 and 100 percent by 2045. Therefore, the proposed BESS would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact is identified.

**R-Line Upgrades – No Impact.** The R-Line upgrades component of the project would replace the existing transmission line wooden power poles with steel monopoles. The proposed upgrades would improve IID's ability to reliably supply renewable energy from IID's power supply mix to end-use customers. Implementation and operation of the proposed project would promote the use of renewable energy and contribute incrementally to the reduction in demand for fossil fuel use for electricity-generating purposes and help California meet its RPS. The R-Line upgrades would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact is identified.



## Geology and Soils

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

## Impact Analysis

- ai) **Titan II BESS – No Impact.** According to the DOC’s Fault Activity Map of California, the BESS site is not within a designated State of California Alquist-Priolo Earthquake Fault Zone (DOC 2022b). In addition, no known active faults have been identified on the site. Therefore, the potential for active fault rupture at the site is considered very low. Impacts are considered less than significant.

**R-Line Upgrades – Potentially Significant Impact.** According to the DOC’s Fault Activity Map of California, the 34-mile project segment traverses several active faults (DOC 2022b). However, the proposed IID R-Line upgrades include the replacement of transmission poles primarily within an existing transmission corridor that is located in a predominantly rural, desert region of Imperial County. In the unlikely instance of fault rupture within the project area, the proposed R-Line upgrades are unlikely to result in substantial adverse effects, including the risk of loss, injury or death. Additionally, the R-Line upgrades would not increase or exacerbate the potential for fault rupture. While impacts are unlikely to result in substantial adverse effects, this issue will be addressed in the EIR. Therefore, a potentially significant impact is identified for this issue area.

- aii) **Titan II BESS – Potentially Significant Impact.** The project area is located in the seismically active southern California area, and, as a result, the structures may be subject to strong ground shaking in the event of movements along the San Jacinto Fault. As a result, the project site will likely be subjected to a moderate to strong ground motion from earthquakes in the region. This is considered a potentially significant impact and will be addressed in the EIR.

**R-Line Upgrades – Potentially Significant Impact.** The 34-mile project segment of the IID’s R-Line traverses the seismically active southern California area. Therefore, the R-Line’s transmission route could be subject to strong ground motion during a seismic event, but the degree to which the project area could be affected by seismic activity would not be greater than the surrounding properties. The intensity and acceleration of ground motion during a seismic event are dependent on the magnitude of the earthquake, distance of the rupture zone, soil type, and direction of the ground motion. Therefore, the effect of ground motions may vary within the general area and the project area could experience some structural damage, thereby exposing employees to injury given the potentially hazardous nature of the project components (e.g., danger from electrocution). Therefore, a potentially significant impact is identified for this issue area.

- aiii) **Titan II BESS – Less than Significant Impact.** Sand and silty sand are the predominant soils underlying the BESS site. Based on these soil types, the risk of liquefaction-induced settlement on the project site is considered very low. Impacts are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** According to the DOC’s Earthquake Zones of Required Investigation map, the IID R-Line transmission corridor does not traverse any landslide or liquefaction zones (DOC 2022c). The proposed R-Line upgrades would be constructed within a rural, desert portion of Imperial County, and, in the event of seismic-related ground failure, is unlikely to result in substantial loss, injury, or death. Additionally, the project involves upgrades to transmission poles primarily within an existing transmission corridor and would not increase or exacerbate the potential for ground failure. Impacts are considered less than significant.

- aiiv) **Titan II BESS – Less than Significant Impact.** Due to the regional planar topography, the hazard of landslides is unlikely. In addition, no ancient landslides are shown on the geologic maps of the region. Therefore, impacts are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** According to the DOC’s Earthquake Zones of Required Investigation map, the IID R-Line transmission corridor does not traverse any landslide zones (DOC 2022c). The proposed R-Line upgrades would be constructed within a rural, desert portion of Imperial County, and, in the event of seismic-related ground failure, is unlikely to result in substantial loss, injury, or death. Additionally, the project involves upgrades to transmission poles within an existing transmission corridor and would not increase or exacerbate the potential for ground failure, including landslides. Impacts are considered less than significant.

- b) Titan II BESS – Less than Significant Impact.** Soil erosion can result during construction as grading and construction can loosen surface soils and make soils susceptible to wind and water movement across the surface. Although erosion occurs naturally in the environment, primarily from weathering by water and wind, improperly managed construction activities can substantially accelerate erosion, which is detrimental to the environment. However, because the proposed project would disturb at least 1 acre of land during construction, the project would be subject to the requirements of the State Water Resources Control Boards General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). In accordance with the Construction General Permit, the project would be required to develop a construction Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would describe specific construction Best Management Practices (BMPs) that address pollutant source reduction and provide control measures for sediment and erosion control and other BMPs. The project-specific SWPPP(s) would be prepared in accordance with the site-specific sediment risk analyses based on the grading plans, with erosion and sediment controls proposed for each phase of construction. The phases of construction would define the maximum amount of soil disturbed, the appropriate size for sediment basins, and other control measures to accommodate all active soil disturbance areas and the appropriate monitoring and sampling plans. Adherence to BMPs would ensure that the proposed project does not result in substantial soil erosion or the loss of topsoil. Therefore, impacts are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** Soil erosion can result during construction as grading and construction can loosen surface soils and make soils susceptible to wind and water movement across the surface. Although erosion occurs naturally in the environment, primarily from weathering by water and wind, improperly managed construction activities can substantially accelerate erosion, which is detrimental to the environment. However, because the proposed project would disturb at least 1 acre of land during construction, the project would be subject to the requirements of the State Water Resources Control Boards General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). In accordance with the Construction General Permit, the project would be required to develop a construction SWPPP. The SWPPP would describe specific construction BMPs that address pollutant source reduction and provide control measures for sediment and erosion control and other BMPs. Adherence to BMPs would ensure that the proposed project does not result in substantial soil erosion or the loss of topsoil. Therefore, impacts are considered less than significant.

- c) Titan II BESS – Less than Significant Impact.** The risk of landslide, liquefaction, and settlement on site is considered low and impacts would be addressed sufficiently through design. Impacts are considered less than significant.

**R-Line Upgrades – Potentially Significant Impact.** As previously discussed, the IID R-Line does not traverse an area susceptible to landslides or liquefaction. The R-Line upgrades would include the replacement of the existing wooden transmission poles with steel monopoles primarily within the IID's existing transmission corridor. Given the drilled pier foundations required and the length (34 miles) of the project segment, further analysis of underlying geologic units is required. Therefore, a potentially significant impact has been identified for this topic.

- d) Titan II BESS – Less than Significant Impact.** The near surface soils in the BESS site are silty sand and sandy silts. These soils are considered non-expansive. Therefore, impacts associated with expansive soils are considered less than significant.

**R-Line Upgrades – Potentially Significant Impact.** The R-Line upgrades would include the replacement of the existing wooden transmission poles with steel monopoles supported on drilled pier foundations primarily within the IID's existing transmission corridor. Given the drilled pier foundations required and the length (34 miles) of the project segment, further analysis of underlying geologic units is required. Therefore, a potentially significant impact has been identified for this topic.

- e) Titan II BESS – No Impact.** Project construction and operation would not require implementation of a septic system. Portable toilets would be located on site during construction and sanitary waste would be removed from the site by a local contractor. Sanitary waste generated during

project maintenance operations would be handled by bringing portable toilets to the project site with waste removed periodically by a local contractor. As such, no impact would occur.

**R-Line Upgrades – No Impact.** The proposed R-Line upgrades would include the replacement of the existing wooden transmission poles with steel monopoles primarily within the IID's existing transmission corridor. R-Line Construction and operation of the R-Line upgrades would not require a septic system. Portable toilets would be provided at construction staging area(s) during construction and no sanitary waste would be generated during operation of the R-Line. No impact would occur.

- f) **Titan II BESS – Potentially Significant Impact.** Construction has the potential to destroy previously undiscovered paleontological resources during grading and excavation activities. Therefore, a potentially significant impact has been identified for this topic.

**R-Line Upgrades – Potentially Significant Impact.** The proposed R-Line upgrades would include the replacement of the existing wooden transmission poles with steel monopoles supported on drilled pier foundations primarily within the IID's existing transmission corridor. Although the transmission corridor is previously disturbed and the probability of unearthing or destroying previously undiscovered paleontological resources is relatively low, construction of new monopoles has the potential to destroy previously undiscovered paleontological resources in the unlikely event that they are unearthed. Therefore, a potentially significant impact has been identified for this topic.



## Greenhouse Gas Emissions

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

### Impact Analysis

- a) **Titan II BESS – Less than Significant Impact.** The proposed BESS would generate GHG emissions during construction and operation. It is unlikely that the construction and operation of the proposed BESS would exceed SCAQMD’s 10,000 MT of CO<sub>2</sub>e per year. In the long term, the proposed project is expected to provide a benefit with respect to reduction of GHG emissions. The proposed BESS would contribute to the continued reduction of GHG emissions in the interconnected California and western U.S. electricity systems, as the energy stored by the BESS would displace GHG emissions that would otherwise be produced by existing business-as-usual power generation resources (including natural gas, coal, arid renewable combustion resources). Therefore, the proposed BESS would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts are considered less than significant.

**R-Line Upgrades – Potentially Significant Impact.** Construction-related activities that would generate GHG emissions include worker commute trips, haul trucks carrying supplies and materials to and from the R-Line upgrades project area, and off-road construction equipment (e.g., water trucks, boom trucks, cranes). Thus, a potentially significant impact is identified for this issue area. The GHG emissions associated with the construction and operation of the R-Line upgrades will need to be modeled to determine whether emissions would exceed SCAQMD’s significance threshold of 10,000 MT of CO<sub>2</sub>e per year. This issue will be addressed in the EIR.

- b) **Titan II BESS – No Impact.** As discussed above, it is unlikely that the construction and operation of the proposed BESS would exceed SCAQMD’s 10,000 MT of CO<sub>2</sub>e per year. In the long term, the proposed project is expected to provide a benefit with respect to reduction of GHG emissions. The energy stored by the BESS would displace GHG emissions that would otherwise be produced by existing business-as-usual power generation resources (including natural gas, coal, arid renewable combustion resources). The proposed BESS would not conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions. No impact would occur.

**R-Line Upgrades – Potentially Significant Impact.** The GHG emissions associated with the construction and operation of the R-Line upgrades will need to be modeled to determine whether emissions would exceed SCAQMD’s significance threshold of 10,000 MT of CO<sub>2</sub>e per year. This issue will be addressed in the EIR.

## Hazards and Hazardous Materials

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Titan II BESS – Less than Significant Impact.** Construction of the proposed BESS will involve the limited use of hazardous materials, such as fuels and greases to fuel and service construction equipment. No extremely hazardous substances are anticipated to be produced, used, stored, transported, or disposed of during construction. Operation of the proposed BESS would be conducted remotely. Therefore, no habitable structures (e.g., housing) are proposed on the project site.

Regular and routine maintenance of the proposed BESS may result in the potential to handle hazardous materials. However, the hazardous materials handled on site would be limited to small amounts of everyday use cleaners and common chemicals used for maintenance. The applicant will be required to comply with State laws and County Ordinance restrictions, which regulate and control hazardous materials handled on site. Such hazardous wastes would be transported off site for disposal according to applicable State and County restrictions and laws governing the disposal of hazardous waste during construction and operation of the proposed BESS. Furthermore, as described in the Public Services section of this Initial Study, the applicant would be required to implement conditions of approval related to fire service as a component of the Conditional Use Permit. Based on these considerations, this is considered a less than significant impact.

**R-Line Upgrades – Less than Significant Impact.** Construction of the proposed R-Line upgrades may involve the limited use of hazardous materials, such as fuels and greases to fuel and service construction equipment. No extremely hazardous substances are anticipated to be produced, used, stored, transported, or disposed of during construction. Operation of the R-Line would not involve the routine use of hazardous materials.

Additionally, any hazardous materials handled on site would be limited to small amounts of everyday use cleaners and common chemicals used for maintenance. The applicant will be required to comply with State laws and County Ordinance restrictions, which regulate and control hazardous materials handled on site. Such hazardous wastes would be transported off site for disposal according to applicable State and County restrictions and laws governing the disposal of hazardous waste during construction and operation of the proposed R-Line upgrades. Therefore, impacts are considered less than significant.

- b) **Titan II BESS – Less than Significant Impact.** A portion of the project site was historically used for agricultural production. However, given that the project site has not been farmed for over a decade, the likelihood of dangerous levels of pesticides is considered low. Therefore, the potential for the BESS to create a hazard through reasonably foreseeable upset or release of hazardous materials is considered a less than significant impact.

**R-Line Upgrades – Less than Significant Impact.** As previously described, construction of the proposed R-Line upgrades will involve the replacement of wooden transmission poles with steel monopoles primarily within the IID's existing transmission corridor. Construction of the R-Line upgrades may involve the limited use of hazardous materials, such as fuels and greases to fuel and service construction equipment. No extremely hazardous substances are anticipated to be produced, used, stored, transported, or disposed of during construction. Construction-related hazards such as fuels, lubricants, adhesives, solvents, and asphalt wastes would be employed during construction of the project. However, the applicant will be required to comply with State laws and County Ordinance restrictions, which regulate and control hazardous materials handled on site.

In addition, all materials would be used in stable applications and contained in accordance with applicable regulatory requirements, which include the Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response Compensation and Liability Act (CERCLA), Hazardous Materials Transportation Act, International Fire Code, and Title 22 and Title 27 of the California Code of Regulations. This is considered a less than significant impact.

- c) **Titan II BESS – No Impact.** The BESS site is not located within one-quarter mile of an existing school. Therefore, the proposed BESS would not 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 would occur.

**R-Line Upgrades – No Impact.** The R-Line transmission corridor traverses a rural, desert portion of Imperial County and is not located within one-quarter mile of an existing school. Therefore, the proposed R-Line upgrades would not 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 would occur.

- d) **Titan II BESS – No Impact.** Based on a review of the Department of Toxic Substances' EnviroStor database, the BESS site is not located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

**R-Line Upgrades – Potentially Significant Impact.** A review of the Department of Toxic Substances' EnviroStor database identified several military sites in proximity to the transmission corridor (DTSC 2026). While the proposed R-Line upgrades would occur within an existing transmission corridor, this issue will be addressed in the EIR. Therefore, a potentially significant impact is identified for this topic.

- e) **Titan II BESS – No Impact.** The proposed BESS is not located within two miles of a public airport or a private airstrip. The Salton Sea Airport is approximately 9 miles northeast of the project site and the Ocotillo Airport is approximately 6.75 miles to the northwest. Thus, no impact would occur.

**R-Line Upgrades – Potentially Significant Impact.** The R-Line upgrades alignment is located within 2 miles of the El Centro Naval Facility. There is a potential that the proposed R-Line upgrades would result in a safety hazard or excessive noise for people residing or working in the project area. This is considered a potentially significant impact and will be analyzed in the EIR.

- f) **Titan II BESS – Less than Significant Impact.** The proposed BESS is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project applicant will be required, through the conditions of approval, to prepare a street improvement plan for the project that will include emergency access points and safe vehicular travel. In addition, local building codes would be followed to minimize flood, seismic, and fire hazard. Therefore, the proposed BESS would result in a less than significant impact associated with the possible impediment to emergency plans.

**R-Line Upgrades – Less than Significant Impact.** The proposed R-Line upgrades would replace existing wooden transmission poles with steel monopoles primarily within the IID's existing transmission corridor. The R-Line transmission corridor traverses predominantly vacant, desert land uses and construction would occur within the existing ROW for the transmission corridor, and, as such, would not interfere with any adopted emergency response plans or emergency evacuation plans during construction or operation. A less than significant impact is identified.

- g) **Titan II BESS – Less than Significant Impact.** The BESS site is not characterized as an urban/wildland interface and the project site does not fall into an area characterized as either: (1) a wildland area that may contain substantial forest fire risk and hazard; or (2) a very high fire hazard severity zone.

Protection for the BESS would be provided as part of the project design by housing the battery units in enclosed structures to provide containment in the event of fire. Any potential fire risk that the traditional lithium-ion cells have will most likely be caused by overcharging or through short-circuit due to age. This risk will be mitigated through monitoring and a fire suppression system that includes water and or a suppression agent (e.g., FM-200, Novatech) with smoke detectors, control panel, alarm, piping, and nozzles. The fire protection system will be designed by a certified fire protection engineer and installed by a fire protection system contractor licensed in California and in accordance with all relevant building and fire codes in effect in the County at the time of building permit submission. Fire protection systems for battery systems would be designed in accordance with California Fire Code and would take into consideration the recommendations of the National Fire Protection Association (NFPA) 855.

The fire protection plan is anticipated to include a combination of prevention, suppression, and isolation methods and materials. The general approach to fire mitigation at the project site would be prevention of an incident, followed by attempts to isolate and control the incident to the immediately affected equipment, then to suppress any fire with a clean agent so as to reduce damage to uninvolved equipment. Fire suppression agents such as Novec 1230 or FM 2000, or water may be used as a suppressant. In addition, fire prevention methods would be implemented to reduce potential fire risk, including voltage, current, and temperature alarms. Energy storage equipment would comply with Underwriters Laboratory (UL)-95401 and test methods associated with UL-9540A. For lithium-ion batteries storage, a system would be used that would contain the

fire event and encourage suppression through cooling, isolation, and containment. Suppressing a lithium-ion (secondary) battery is best accomplished by cooling the burning material. A gaseous fire suppressant agent (e.g., 3M™ Novec™ 1230 Fire Protection Fluid or similar) and an automatic fire extinguishing system with sound and light alarms would be used for lithium-ion batteries.

To mitigate potential hazards, redundant separate methods of failure detection would be implemented. These would include alarms from the BMS, including voltage, current, and temperature alarms. Detection methods for off-gas detection would be implemented, as applicable. These are in addition to other potential protective measures such as ventilation, overcurrent protection, battery controls maintaining batteries within designated parameters, temperature and humidity controls, smoke detection, and maintenance in accordance with manufacturer guidelines. Remote alarms would be installed for operations personnel as well as emergency response teams in addition to exterior hazard lighting. In addition, an Incidence Response Plan would be implemented.

Furthermore, as described in the Public Services section of this Initial Study, the applicant would be required to implement conditions of approval related to fire service as a component of the Conditional Use Permit. In this context, impacts would be considered less than significant for this impact area.

**R-Line Upgrades – Less than Significant Impact.** According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the R-Line transmission corridor is not located in or near lands classified as very high hazard severity zones (CALFIRE 2026). Heat or sparks from vehicles or equipment have the potential to ignite dry vegetation and cause a fire. Vehicles and equipment will primarily use existing roads to access the transmission poles, all of which will be cleared of brush to reduce the fire potential. In addition, smoking will only be permitted in vehicles or cleared areas and appropriate firefighting equipment will be on site. As a result, the potential for fire from construction of the R-Line upgrades is low and considered less than significant. Operations and maintenance work, which includes regular vegetation clearing to minimize the potential for fire, will continue in the same manner as it did prior to construction of the R-Line upgrades. As a result, there will be no change in the fire potential in the area. This is considered a less than significant impact.

## Hydrology and Water Quality

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in substantial erosion or siltation on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Titan II BESS – Less than Significant Impact.** Implementation of the project would generate small amounts of runoff during construction and operation. In addition, the project would comply with County of Imperial requirements and the general construction permit with the State Water Resources Control Board (SWRCB) and the required SWPPP. The proposed BESS would also

implement project-specific recommended site design and source control measures. As such, impacts are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** The R-Line upgrades would require construction activities that would disturb soils. Pollutants typical of construction work, such as sediments, trash, petroleum products, concrete waste, sanitary waste, and chemicals could significantly affect water quality. Construction activities would be primarily confined to IID’s existing transmission corridor and limited to the area immediately surrounding transmission poles. The R-Line upgrades would be subject to the requirements of the SWRCB’s General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). The R-Line upgrades would be required to implement typical construction BMPs that may include sediment control practices (e.g., fiber rolls, gravel bag berms) and construction site waste management (e.g., street sweeping, concrete washout). In addition, construction areas would be returned to pre-project conditions. In this context, implementation of the R-Line upgrades would result in a less than significant impact.

- b) **Titan II BESS – Less than Significant Impact.** It is anticipated that the project applicant will purchase groundwater for construction and operational water demands. Because of the relatively short construction period for the BESS, construction water demand is anticipated to have a less than significant impact on long-term groundwater supply and recharge. Water demand during operation of the BESS will be nominal compared to the solar facility (i.e., solar panel washing). Therefore, impacts to groundwater supplies and recharge are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** The proposed R-Line upgrades would involve the replacement of existing wooden transmission poles with steel monopoles primarily within an existing transmission corridor. While some municipal water, purchased for project construction, may be sourced from groundwater, water demand for project construction would be relatively minor. Additionally, upon operation, the R-Line would function the same as under existing conditions and would not require notable water supplies. Therefore, the R-Line upgrades would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts are considered less than significant.

- ci) **Titan II BESS – Less than Significant Impact.** As previously discussed, the proposed BESS would be subject to the requirements of the SWRCB’s General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). In accordance with the Construction General Permit, the project would be required to develop a construction SWPPP. The SWPPP would describe specific construction BMPs that address pollutant source reduction and provide control measures for sediment and erosion control and other BMPs. The project-specific SWPPP(s) would be prepared in accordance with the site-specific sediment risk analyses based on the grading plans, with erosion and sediment controls proposed for each phase of construction. The phases of construction would define the maximum amount of soil disturbed, the appropriate size for sediment basins, and other control measures to accommodate all active soil disturbance areas and the appropriate monitoring and sampling plans. Adherence to BMPs would ensure that the proposed BESS does not result in substantial soil erosion. Therefore, impacts are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** Soil erosion can result during construction as grading and construction can loosen surface soils and make soils susceptible to wind and water movement across the surface. Although erosion occurs naturally in the environment, primarily from weathering by water and wind, improperly managed construction activities can substantially accelerate erosion, which is detrimental to the environment. However, because the proposed project would disturb at least 1 acre of land during construction, the project would be subject to the requirements of the SWRCB’s General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). In accordance with the Construction General Permit, the project would be required to develop a construction SWPPP. The SWPPP would describe specific construction BMPs that address pollutant source reduction and provide control measures for sediment and erosion control and other BMPs. Adherence to BMPs would ensure that the proposed R-Line upgrades do not result in substantial soil erosion. Therefore, impacts are considered less than significant.

- cii) **Titan II BESS – Less than Significant Impact.** Implementation of the project would generate on-site runoff. However, existing drainage patterns would be maintained and the project site would remain largely pervious. The proposed project would be designed to comply with the *County of Imperial Engineering Design Guidelines Manual for the Preparation and Checking of Street Improvements, Drainage and Grading Plans within Imperial County* (County of Imperial 2008). The County requirement to provide 3 inches of detention per tributary acre would be met and detained runoff would infiltrate the underlying soil. Therefore, impacts associated with flooding or exceedance of existing drainage capacity are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** The R-Line upgrades would not involve the construction of substantial impervious surfaces that would increase the rate of runoff. Construction activities would be localized to eligible transmission poles and foundations and the surrounding pervious surface would remain similar to pre-project conditions. Water will continue to percolate through the ground, as a majority of the surfaces on the project site will remain pervious. In this context, the R-Line upgrades would not result in substantial increases in runoff. This is considered a less than significant impact.

- ciii) **Titan II BESS – Less than Significant Impact.** Water will continue to percolate through the ground, as a majority of the surfaces on the BESS site will remain pervious. The proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This is considered a less than significant impact.

**R-Line Upgrades – Less than Significant Impact.** The R-Line upgrades would involve the replacement of existing wooden transmission line poles with steel monopoles. Maintenance of the transmission line poles would not create substantial amounts of runoff that would exceed wastewater drainage. Water will continue to percolate through the ground, as a majority of the surfaces on the project site will remain pervious. The R-Line upgrades would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This is considered a less than significant impact.

- civ) **Titan II BESS – Less than Significant Impact.** The BESS site is not located in a flood zone. However, the area to the north is located in flood zone A (an area of special flood hazard). To minimize flood hazards and risk, the BESS site will be located outside the flood zone. Furthermore, the surrounding areas designed as flood zone A are blocked from runoff by an existing 7-foot-high berm located immediately west of the Titan II Project site. Thus, project design would ensure that the BESS would not impede or redirect flood flows. Impacts are considered less than significant.

**R-Line Upgrades – Potentially Significant Impact.** The 34-mile transmission corridor traverses multiple flood zones, including areas that are zoned A (an area of special flood hazard) (FEMA 2008). Therefore, there is potential to impede or redirect flood flows in the event of a flood event and this issue will be further analyzed in the EIR. As such, a potentially significant impact has been identified for this topic.

- d) **Titan II BESS – Less than Significant Impact.** No bays or lakes are located within a 2-mile radius of the project area. Furthermore, the project area is over 75 miles inland from the Pacific Ocean. Therefore, the proposed BESS would not risk release of pollutants due to inundation by tsunami or seiche.

As described above, the BESS site is not located in a flood zone. However, the area to the north is located in flood zone A (an area of special flood hazard). As runoff flows over developed surfaces, water can entrain a variety of potential pollutants including, but not limited to, oil and grease, pesticides, trace metals, and nutrients. These pollutants can become suspended in runoff and carried to receiving waters. If they are not intercepted or are left uncontrolled, the polluted runoff would otherwise freely sheet flow and could result in the accumulation of these pollutants in the receiving waters. Implementation of the proposed project has the potential to release pollutants due to inundation by flood. However, the proposed project would be required to implement typical construction BMPs that may include sediment control practices (e.g., fiber rolls, gravel bag berms) and construction site waste management (e.g., street sweeping, concrete washout). In this context, a less than significant impact would occur.

**R-Line Upgrades – Potentially Significant Impact.** The 34-mile transmission corridor traverses multiple flood zones, including areas that are zoned A (an area of special flood hazard) (FEMA 2008). Therefore, there is potential for flood events and this issue will be further analyzed in the EIR. As such, a potentially significant impact has been identified for this topic.

- e) **Titan II BESS – Less than Significant Impact.** It is anticipated that the project applicant will purchase groundwater for construction and operational water demands. Because of the relatively short construction period for the BESS, construction water demand is anticipated to have a less than significant impact on long-term groundwater supply and recharge. Additionally, with adherence to State and County laws and regulations pertaining to water quality, including the SWRCB's General Permit for Discharges of Storm Water Associated with Construction Activity and SWPPP during construction, the proposed BESS would not result in significant impacts to surface or groundwater quality. Therefore, the proposed BESS would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** The proposed R-Line upgrades would involve the replacement of existing wooden transmission poles with steel monopoles primarily within an existing transmission corridor. While some municipal water, purchased for project construction, may be sourced from groundwater, water demand for project construction would be relatively minor and, upon operation, the R-Line would function the same as under existing conditions and would not require notable water supplies. Additionally, with adherence to State and County laws and regulations pertaining to water quality, including the SWRCB's General Permit for Discharges of Storm Water Associated with Construction Activity and SWPPP during construction, the R-Line upgrades would not result in significant impacts to surface or groundwater quality. Therefore, the R-Line upgrades would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts are considered less than significant.

## Land Use and Planning

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Titan II BESS – No Impact.** The proposed BESS is surrounded by existing solar facilities and open, desert land. There are no established communities in the project vicinity. Thus, the proposed BESS would not divide an established community. No impact would occur.

**R-Line Upgrades – No Impact.** The proposed R-Line upgrades would include the replacement of wooden transmission poles with steel monopoles primarily within an existing transmission corridor. Additionally, the project segment of the R-Line transmission corridor traverses predominantly vacant, desert land uses. Therefore, the proposed R-Line upgrades would not divide an established community. No impact would occur.

- b) **Titan II BESS – Less than Significant Impact.** The existing General Plan land use designation and zoning designation for the BESS component is Agriculture and General Agricultural (A-2), respectively. Pursuant to Title 9, Division 5, Chapter 8, battery storage facilities are permitted uses in the A-2 zone, subject to approval of a CUP from Imperial County. Implementation of the project would require modification of the originally approved CUP #17-0006 to allow construction and operation of a 40 MW BESS on the previously approved Seville 4 Solar Project development footprint. Therefore, with approval of the modified CUP, the proposed BESS would not conflict with applicable land use plans, policies, or regulations. Impacts are considered less than significant.

**R-Line Upgrades – Potentially Significant Impact.** The R-Line upgrades route traverses private land as well as federal land under BLM jurisdiction. The majority of the proposed R-Line upgrades would be located within the existing transmission line alignment and ROW. However, in a few locations, the existing ROW is constrained and would require expansion to accommodate the proposed improvements. Accordingly, the project applicant is seeking an ROW grant from BLM to authorize expansion of the existing ROW on BLM-managed lands, as well as temporary access required to support construction activities. The expansion of the existing ROW has the potential to conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, this is considered a potentially significant impact and will be analyzed in the EIR.



## Mineral Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b><i>Would the project:</i></b>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### ***Impact Analysis***

- a) **Titan II BESS – No Impact.** According to the Conservation and Open Space Element of the County of Imperial General Plan, no known mineral resources occur within the BESS site nor does the BESS site contain any mapped mineral resources. Thus, no impact is identified with regard to mineral resources.

**R-Line Upgrades – No Impact.** The proposed R-Line upgrades would involve the replacement of existing wooden transmission poles with steel monopoles primarily within an existing transmission corridor. The transmission corridor is not used for mineral resource production under existing conditions. In addition, based on the DOC’s California Geologic Survey Mineral Land Classification Mapper, no mineral resources have been mapped in the project area (DOC 2024). Therefore, the proposed R-Line upgrades would not result in the loss of availability of any known mineral resources that would be of value to the region and the residents of California. No impact would occur.

- b) **Titan II BESS – No Impact.** No known mineral resources occur within the BESS site, nor does the BESS site contain any mapped mineral resources. Thus, no impact would occur.

**R-Line Upgrades – No Impact.** The proposed R-Line upgrades would involve the replacement of existing wooden transmission poles with steel monopoles primarily within an existing transmission corridor. The transmission corridor is not used for mineral resource production under existing conditions. In addition, based on the DOC’s California Geologic Survey Mineral Land Classification Mapper, no mineral resources have been mapped in the project area (DOC 2024). Therefore, the proposed R-Line upgrades would not result in the loss of availability of a locally important mineral resource. No impact would occur.

## Noise

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project result in:</b>				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Titan II BESS – Less than Significant Impact.** Activities associated with construction of the BESS would increase short-term noise levels on the project site and in the vicinity of the project area. However, the proposed BESS is surrounded by existing solar facilities and open, desert land. There are no established communities or sensitive receptors in the project vicinity. Due to the lack of sensitive receptors nearby, impacts are not anticipated to be significant. Furthermore, the Imperial County Title 9 Land Use Ordinance, Division 7, Chapter 2, Section 90702.00 - Sound level limits, establishes one-hour average sound level limits for the County's land use zones. Agricultural/industrial operations are required to comply with the noise levels prescribed under the general industrial zones. Therefore, the proposed project will be required to maintain noise levels below 75 decibels (dB) (averaged over one hour) during any time of day. The proposed project will also be expected to comply with the Noise Element of the General Plan, which states that construction noise, from a single piece of equipment or a combination of equipment, shall not exceed 75 dB, when averaged over an eight-hour period, and measured at the nearest sensitive receptor. Construction equipment operation is also limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. on Saturday.

**R-Line Upgrades – Less than Significant Impact.** The proposed R-Line upgrades would involve the replacement of existing wooden transmission poles with steel monopoles primarily within an existing transmission corridor. The R-Line transmission corridor traverses an area that is predominantly rural, open desert and agricultural land uses. While construction would temporarily increase noise levels in proximity to the project site, due to the lack of sensitive receptors nearby, impacts are not anticipated to be significant. Nonetheless, further analysis is warranted in the EIR.

- b) **Titan II BESS – Less than Significant Impact.** Groundborne vibration and noise could originate from earth movement during the construction phase of the proposed project. However, significant vibration is typically associated with activities such as blasting or the use of pile drivers, neither of

which would be required during project construction. Construction activities most likely to cause vibration include heavy construction equipment and site grading operations. Although all heavy, mobile construction equipment has the potential to cause at least some perceptible vibration when operating close to buildings, the vibration is usually short term and is not of sufficient magnitude to cause building damage. As previously noted, there are no established communities or sensitive receptors in the project vicinity. Heavy equipment such as dozers, loaders, and drill rig equipment would not be operated near any residences or structures to cause vibration impact. Therefore, impacts would be less than significant.

**R-Line Upgrades – Less than Significant Impact.** The proposed R-Line upgrades would involve the replacement of existing wooden transmission poles with steel monopoles primarily within an existing transmission corridor. The R-Line transmission corridor traverses an area that is predominantly rural, open desert and agricultural land uses. While construction would temporarily increase noise levels in proximity to the project site, due to the lack of sensitive receptors nearby, impacts are not anticipated to be significant.

- c) **Titan II BESS – No Impact.** The BESS site is not located in proximity to a public airport or a private airstrip. The Salton Sea Airport is approximately 9 miles northeast of the project site and the Ocotillo Airport is approximately 6.75 miles to the northwest. Thus, no impact would occur.

**R-Line Upgrades – Less Than Significant Impact.** The R-Line upgrades alignment is located within 2 miles of the El Centro Naval Facility. However, no new residents are proposed as part of the project and there would only be short-term, temporary construction workers associated with the project. The potential that the proposed R-Line upgrades would result in a safety hazard or excessive noise for people residing or working in the project area is considered less than significant.

## Population and Housing

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

### Impact Analysis

- a) **Titan II BESS – No Impact.** The proposed BESS would not induce unplanned population growth. The proposed project involves the construction and operation of a BESS facility on a vacant parcel. No development of new roads or infrastructure is proposed that would introduce new populations to the project site. No impact would occur.

**R-Line Upgrades – No Impact.** The R-Line upgrades involve improvements to an approximately 34-mile segment primarily within an existing transmission corridor and would not include population-inducing elements (e.g., housing and businesses) that would induce substantial population growth. No impact would occur.

- b) **Titan II BESS – No Impact.** The proposed BESS site is vacant. As a result, development of the proposed BESS would not displace substantial numbers of existing housing or people requiring construction of replacement housing elsewhere. No impact would occur.

**R-Line Upgrades – No Impact.** The R-Line upgrades involve improvements to an approximately 34-mile segment primarily within an existing transmission corridor that traverses predominantly vacant desert land uses. The R-Line upgrades would not displace substantial numbers of existing housing or people requiring construction of replacement housing elsewhere. No impact would occur.



## Public Services

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Impact Analysis

**ai) Titan II BESS – Less than Significant Impact.** Fire protection and emergency medical services in the project area are provided by the Imperial County Fire Department. The project has the potential to increase response times, as energy storage facilities (i.e., the proposed BESS), have the potential to create hazards related to risk of explosion, flammable gases, toxic fumes, water-reactive materials, electrical shock, corrosives, and chemical burns. Utility-scale BESS requires specialized and reliable equipment to perform firefighting operations to NFPA recommendations, OSHA requirements, and ICFD standards. The project applicant will have a certified fire engineer review the proposed facility and existing fire response infrastructure to determine if the existing fire response facilities are adequate or if additional facilities (i.e., hydrants, access points) are necessary. The project will have a thorough Emergency Response Plan (ERP) created with consultation from the Imperial County Fire Department. The project ERP will address all emergencies likely to occur at the site and requires an Emergency Coordinator who can work with County Fire Protection. Therefore, impacts would be less than significant.

**R-Line Upgrades – Less than Significant Impact.** The proposed R-Line upgrades would involve the replacement of existing wooden transmission poles with steel monopoles primarily within an existing transmission corridor. Fire protection and emergency medical services in the area are provided by the Imperial County Fire Department. The project would result in fire risk that would be comparable to that of the transmission line that is being replaced and upgraded. The R-Line upgrades project area would continue to be adequately supported by the existing fire protection services since the construction and operation of the project would not induce growth in the project area and the fire risk would not create the need for new or physically altered fire protection facilities. In addition, operation and maintenance would not affect the ability of fire personnel to respond to fires. Based on these considerations, the R-Line upgrades would not result in a need for fire facility expansion and a less than significant impact is identified for this issue area.

- a ii) Titan II BESS – Less than Significant Impact.** Police protection services in the project area is provided by the Imperial County Sheriff’s Department. The proposed BESS would not require police services during construction or operation and maintenance beyond routine patrols and response. The project would also include public safety mechanisms such as fences and gates to protect the facility and reduce unauthorized visits. In addition, there will be a security service that monitors the property. Furthermore, construction and operation of the proposed project would not induce growth in the project area that would result in the permanent, and increased need of police protection services.

**R-Line Upgrades – Less than Significant Impact.** Police protection services in the R-Line upgrades project area is provided by the Imperial County Sheriff’s Department. The R-Line upgrades would not require police services during construction or operation and maintenance beyond routine patrols and response. As with fire services discussed above, the construction and operation of the R-Line upgrades would not induce growth in the project area, would not result in a need for additional police facilities, or affect response times or other service performance. This is considered a less than significant impact.

- a iii) Titan II BESS – No Impact.** The proposed BESS would not result in a substantial increase in population because it neither includes a residential component nor would it generate the need for new housing to accommodate workforce population. Based on the nature of the project as a BESS facility, no increase in schools is anticipated. As such, the proposed BESS would not have an adverse physical effect on the environment resulting from construction of a new school. Therefore, no impact would occur.

**R-Line Upgrades – No Impact.** The proposed R-Line upgrades would not result in a substantial increase in population because it neither includes a residential component nor would it generate the need for new housing to accommodate workforce population. Based on the nature of the project as an electrical transmission line upgrades project, no increase in schools is anticipated. As such, the proposed R-Line upgrades would not have an adverse physical effect on the environment resulting from construction of a new school. Therefore, no impact would occur.

- a iv) Titan II BESS – No Impact.** The proposed BESS would not result in a substantial increase in population because it neither includes a residential component nor would it generate the need for new housing to accommodate workforce population. Based on the nature of the project as a BESS facility, no increase in parks is anticipated. As such, the proposed BESS would not have an adverse physical effect on the environment resulting from construction of new parks. Therefore, no impact is identified for this issue area.

**R-Line Upgrades – No Impact.** The R-Line upgrades involve improvements to an approximately 34-mile segment primarily within an existing transmission corridor and would not include population-inducing elements (e.g., housing and businesses) that would result in the need for new neighborhood and/or regional parks or other recreational facilities. No impact would occur.

- a v) Titan II BESS – No Impact.** The proposed BESS would not result in a substantial increase in population because it neither includes a residential component nor would it generate the need for new housing to accommodate workforce population. Based on the nature of the project as a BESS facility, no increase in public facilities such as libraries are anticipated. As such, the proposed BESS would not have an adverse physical effect on the environment resulting from project construction on public facilities. Therefore, no impact is identified for this issue area.

**R-Line Upgrades – No Impact.** The R-Line upgrades involve improvements to an approximately 34-mile segment primarily within an existing transmission corridor and would not include population-inducing elements (e.g., housing and businesses) that would result in the need for new government facilities. No impact would occur.



## Recreation

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

### Impact Analysis

- a) **Titan II BESS – No Impact.** The proposed BESS would not increase the use of existing neighborhood parks and regional parks or other recreational facilities. The proposed project would not induce new populations that would result in the substantial physical deterioration of recreational facilities. No impact would occur.

**R-Line Upgrades – No Impact.** The R-Line upgrades project area is not used for formal recreational purposes. The number of on-site construction workers for the transmission line upgrades is not expected to require a substantial number of workers as they move from transmission line pole to pole. Furthermore, no full-time employees are required to operate the project. It is anticipated that maintenance of the transmission line will be minimal to perform periodic visual inspections and minor repairs. As such, the R-Line upgrades would not significantly increase the use or accelerate the deterioration of regional parks or other recreational facilities. Additionally, the R-Line upgrades does not include or require the expansion of recreational facilities. No impact would occur.

- b) **Titan II BESS – No Impact.** The proposed BESS would not include recreational facilities or require the construction or expansion of recreational facilities. The proposed BESS would not induce new populations that would require new recreational facilities. No impact would occur.

**R-Line Upgrades – No Impact.** The R-Line upgrades involve improvements to an approximately 34-mile segment primarily within an existing transmission corridor and would not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the proposed R-Line upgrades would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. No impact would occur.

## Transportation

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

### Impact Analysis

- a) **Titan II BESS – Less than Significant Impact.** Construction of the BESS would be temporary, and the traffic volumes generated by construction would be minor. Once the proposed BESS facility is operational, there would be no increase in automobile trips to the area. While it is anticipated that the proposed BESS facility would require periodic maintenance, it would be minimal and require a negligible number of traffic trips on an annual basis. Therefore, the potential for the proposed project to cause an increase in traffic to the existing traffic load and capacity of the street system would be negligible and this is considered a less than significant impact.

The proposed BESS site is generally located in a rural setting. There is no regular bus service or bicycle infrastructure in the general area and project-related construction and operations would not impact alternative modes of transportation. Therefore, the proposed BESS would result in a less than significant impact related to a conflict with a program plan, ordinance or policy addressing transit, bicycle, and pedestrian facilities.

**R-Line Upgrades – Less than Significant Impact.** The proposed R-Line upgrades would involve the replacement of existing wooden transmission poles with steel monopoles primarily within an existing transmission corridor that traverses predominantly vacant, desert land uses with very low traffic volumes. During construction, trucks transporting structure components would travel on local and regional roadways, as well as designated BLM access routes, resulting in a temporary increase in construction-related vehicle traffic. Upon operation, the transmission line would function the same as when compared to existing conditions. As such, construction and operation of the proposed R-Line upgrades is not anticipated to conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

- b) **Titan II BESS – Less than Significant Impact.** Section 15064.3(b) of the CEQA Guidelines provides guidance on determining the significance of transportation impacts and focuses on the use of vehicle miles traveled (VMT), which is defined as the amount and distance of automobile travel associated with a project. Construction of the project would be temporary and the traffic volumes generated by construction would be minor. Given the nature of the project, after

construction, there would be a nominal number of vehicle trips generated by the project. Once the proposed BESS facility is operational, there would be no increase in automobile trips to the area. While it is anticipated that the proposed BESS facility would require periodic maintenance, it would be minimal and require a negligible number of traffic trips on an annual basis. Therefore, the proposed project would result in a less than significant VMT impact.

**R-Line Upgrades – Less than Significant Impact.** Once the R-Line upgrades are implemented, there would be no increase in automobile trips to the area. While it is anticipated that the transmission line would require intermittent maintenance, it would be minimal and require a negligible number of traffic trips on an annual basis. The R-Line upgrades would result in less than significant VMT impacts.

- c) **Titan II BESS – Less than Significant Impact.** The existing access road from SR 78 would be used to access the BESS site. No new driveways or other design features are proposed that would impact SR 78 or infringe upon emergency access. Therefore, the proposed BESS is not anticipated to substantially increase hazards due to a design feature and this impact is considered less than significant.

**R-Line Upgrades – Potentially Significant Impact.** The proposed R-Line upgrades would include the replacement of wooden transmission poles with steel monopoles primarily within an existing transmission corridor. During construction, trucks transporting transmission structure components would travel on local and regional roadways, as well as designated BLM access routes, resulting in a temporary increase in construction-related vehicle traffic. The presence of large, slow-moving vehicles could temporarily affect traffic flow and increase the potential for vehicle conflicts, particularly where haul routes intersect with public roadways. Delivery trucks may need to decelerate, turn, or temporarily stop near structure locations to offload materials, which could result in short-term disruptions to traffic flow and increased potential for conflicts with other roadway users.

Offloading activities may require partial lane encroachments, shoulder use, or brief traffic control measures, depending on roadway conditions and proximity of structure locations to public roads. These activities could temporarily increase the risk of vehicle collisions, particularly in areas with limited sight distance, narrow roadways, or higher traffic volumes.

Use of BLM access routes could also involve travel on unpaved or narrow roads with limited sight distances. Without appropriate controls, construction traffic on these routes could increase the potential for roadway hazards, including reduced visibility, dust generation, and conflicts with other authorized users of public lands.

This is considered a potentially significant impact and will be analyzed in the EIR.

- d) **Titan II BESS – Less than Significant Impact.** The existing access road from SR 78 would be used to access the BESS site. The final site plan for the BESS would be designed in accordance with the Imperial County Fire Department requirements for access and would not impact the ability to provide emergency access to the site. The proposed BESS is not anticipated to hinder the ability of fire or law enforcement to access nearby properties. Thus, a less than significant impact is identified.

**R-Line Upgrades – Less than Significant Impact.** The proposed R-Line upgrades would include the replacement of wooden transmission poles with steel monopoles primarily within an existing transmission corridor. During construction, the contractor would be required to maintain adequate access for emergency vehicles as required by the County. Upon operation, the R-Line would function the same compared to existing conditions. Therefore, the proposed R-Line upgrades would not result in inadequate emergency access and a less than significant impact is identified.

## Tribal Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b><i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i></b>				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Titan II BESS – Potentially Significant Impact.** The proposed BESS is located within the previously approved Seville 4 Solar Project development footprint. As part of the Seville 4 Solar Project, the County conducted the appropriate outreach to Native American Tribes in June 2017. The County did not receive any responses for consultation. Due to the County initiating preparation of an EIR that addresses both the BESS and upgrades proposed along an approximately 34-mile segment of the IID’s R-Line, additional AB 52 consultation request letters were sent on June 2, 2026.

**R-Line Upgrades – Potentially Significant Impact.** The proposed IID R-Line upgrades would occur primarily within an existing transmission corridor that has been previously disturbed. As such, the potential for the project to result in significant impacts to previously unknown tribal cultural resources is relatively low. Nonetheless, given the cultural richness of the project area and the length of the project segment (34 miles), impacts are considered potentially significant. Due to the County initiating preparation of an EIR that addresses both the BESS and upgrades proposed along an approximately 34-mile segment of the IID’s R-Line, additional AB 52 consultation request letters were sent on June 2, 2026.

A cultural resources report will be prepared to address potential impacts on historic and prehistoric resources and this issue will be addressed in the EIR.

- b) **Titan II BESS – Potentially Significant Impact.** See Response for Impact a) above.

**R-Line Upgrades – Potentially Significant Impact.** See Response for Impact a) above.



## Utilities and Service Systems

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Titan II BESS – Less than Significant Impact.** The BESS site does not currently contain any public utilities or services. The proposed BESS would not require the construction of any water, wastewater, stormwater, or energy facilities to accommodate the demand of the project.

**Water.** The project's water use would be limited to the construction phase, and no infrastructure would be required to provide water to the project site. Groundwater would be purchased for construction and operational water demand.

**Wastewater.** Portable toilets would be located on site during construction and sanitary waste would be removed from the site by a local contractor. Sanitary waste generated during project maintenance operations would be handled by bringing portable toilets to the project site with waste removed periodically by a local contractor. Therefore, no new or expanded wastewater treatment facilities are anticipated.

**Stormwater.** The proposed BESS would not generate stormwater runoff. Thus, the project will not substantially alter the existing drainage pattern of the site, substantially increase the rate of runoff, or contribute runoff water that would exceed the capacity of the existing drainage system. Therefore, no new or expanded wastewater treatment facilities are anticipated.

**Natural Gas.** Project construction and operation would not require the use of natural gas resources. Therefore, the proposed BESS would not require the relocation or construction of new natural gas facilities.

**Electric Power.** No habitable structures are proposed on the BESS site. Therefore, the proposed BESS would not require or result in the relocation or construction of new or expanded electric power.

#### **R-Line Upgrades – Potentially Significant Impact.**

**Water.** Construction water needs would be limited to earthwork, soil conditioning, dust suppression, and compaction efforts. Water supply for the proposed R-Line upgrades would be purchased from a local retail supplier and trucked to the site. Upon operation, the project would not require water. The project would not result in the relocation or construction of new or expanded water facilities.

**Wastewater.** Portable toilets would be located on site during construction and sanitary waste would be removed from the site by a local contractor. Upon operation, no wastewater would be generated by the proposed R-Line upgrades. Therefore, no new or expanded wastewater treatment facilities are anticipated.

**Stormwater.** The proposed R-Line upgrades would not generate stormwater runoff. The proposed R-Line upgrades will not substantially alter the existing drainage pattern of the site, substantially increase the rate of runoff, or contribute runoff water that would exceed the capacity of the existing drainage system. Therefore, no new or expanded stormwater treatment facilities are anticipated.

**Natural Gas.** Project construction and operation would not require the use of natural gas resources. Therefore, the proposed project would not require the relocation or construction of new natural gas facilities.

**Electric Power.** No habitable structures are proposed on the project site. Therefore, the proposed R-Line upgrades would not require or result in the relocation or construction of new or expanded electric power. However, the proposed project includes the replacement of electrical transmission infrastructure, the construction of which has the potential to result in significant environmental impacts and which would be analyzed in the EIR. Therefore, a potentially significant impact has been identified for this topic.

- b) **Titan II BESS – Less than Significant Impact.** It is anticipated that the project applicant will purchase groundwater for construction and operational water demands. The project's water use would be limited to grading and dust control during the construction phase. Operation of the BESS facility would not require significant amount of water and would be limited to general maintenance activities. Therefore, this impact is considered less than/ significant.

**R-Line Upgrades – Potentially Significant Impact.** Construction water needs would be limited to earthwork, soil conditioning, dust suppression, and compaction efforts. Water supply for the project would be purchased from a local retail supplier and trucked to the site. Upon operation, the project would not require water. Although the proposed R-Line upgrades are not anticipated to result in a significant increase in water demand/use, the potential impacts on water supplies will be addressed in the EIR analysis.

- c) **Titan II BESS – No Impact.** Portable toilets would be located on site during construction and sanitary waste would be removed from the site by a local contractor. The project does not propose any feature that would generate wastewater. Thus, no impact to a wastewater treatment provider would occur.

**R-Line Upgrades – No Impact.** Portable toilets would be located on site during construction and sanitary waste would be removed from the site by a local contractor. Upon operation, no

wastewater would be generated by the proposed R-Line upgrades. Thus, no impact to a wastewater treatment provider would occur.

- d) **Titan II BESS – Less than Significant Impact.** Minor amounts of solid waste would be generated during construction and operation of the proposed BESS. However, such materials would be hauled to an appropriate disposal facility in accordance with State and local regulations. As with construction waste, all trash, litter, garbage, and other solid waste generated during project operation is anticipated to be disposed of at the nearest landfill, the Salton City Landfill. According to CalRecycle, the Salton City Landfill has a remaining capacity of approximately 1,264,170 million cubic yards and closure date of December 31, 2038 (CalRecycle 2026). Therefore, there is ample landfill capacity in the County to receive the minor amount of solid waste generated by construction and operation of the proposed BESS. Thus, impacts are considered less than significant.

**R-Line Upgrades – Less than Significant Impact.** Solid waste would be generated during demolition and construction of the proposed R-Line upgrades. However, such materials would be hauled to an appropriate disposal facility in accordance with State and local regulations. During operations of the proposed project, waste generation would be minor. Solid wastes would be disposed of using a locally licensed waste hauling service. Thus, impacts are considered less than significant.

- e) **Titan II BESS – Less than Significant Impact.** Refer to response d) above.

**R-Line Upgrades – Less than Significant Impact.** Refer to response d) above.

## Wildfire

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b><i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i></b>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Titan II BESS – No Impact.** The potential for a major fire in the unincorporated areas of the County is generally low and the project area is not located in an area characterized as either (1) a wildland area that may contain substantial forest fire risk and hazard; or (2) very high fire hazard severity zone. Implementation of the project would not impair an adopted emergency response or evacuation plan because the proposed circulation plan for the project site will be required to provide emergency access points and safe vehicular travel. In addition, local building codes would be followed to minimize flood, seismic, and fire hazard. Thus, the proposed BESS would not impair the implementation of, or physically interfere with, any adopted emergency response plans or emergency evacuation plans. No impact would occur.

**R-Line Upgrades – No Impact.** According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the proposed R-Line upgrades route is not located in or near state responsibility areas or lands classified as very high hazard severity zones (CALFIRE 2026). The R-Line traverses predominantly vacant, desert land uses, and construction would primarily occur within the existing ROW for the transmission corridor, and, as such, would not interfere with any adopted emergency response plans or emergency evacuation plans during construction or operation. No impact would occur.

- b) **Titan II BESS – Less than Significant Impact.** Protection for the BESS would be provided as part of the project design by housing the battery units in enclosed structures to provide containment in the event of fire. Any potential fire risk that the traditional lithium-ion cells have

will most likely be caused by overcharging or through short-circuit due to age. This risk will be mitigated through monitoring and a fire suppression system that includes water and or a suppression agent (e.g., FM-200, Novatech) with smoke detectors, control panel, alarm, piping and nozzles. The fire protection system will be designed by a certified fire protection engineer and installed by a fire protection system contractor licensed in California and in accordance with all relevant building and fire codes in effect in the County at the time of building permit submission. Fire protection systems for battery systems would be designed in accordance with California Fire Code and would take into consideration the recommendations of NFPA 855.

The fire protection plan is anticipated to include a combination of prevention, suppression, and isolation methods and materials. The general approach to fire mitigation at the project site would be prevention of an incident, followed by attempts to isolate and control the incident to the immediately affected equipment, then to suppress any fire with a clean agent to reduce damage to uninvolved equipment. Fire suppression agents such as Novec 1230 or FM 2000, or water may be used as a suppressant. In addition, fire prevention methods would be implemented to reduce potential fire risk, including voltage, current, and temperature alarms. Energy storage equipment would comply with UL-95401 and test methods associated with UL-9540A. For lithium-ion batteries storage, a system would be used that would contain the fire event and encourage suppression through cooling, isolation, and containment. Suppressing a lithium-ion (secondary) battery is best accomplished by cooling the burning material. A gaseous fire suppressant agent (e.g., 3M™ Novec™ 1230 Fire Protection Fluid or similar) and an automatic fire extinguishing system with sound and light alarms would be used for lithium-ion batteries.

To mitigate potential hazards, redundant separate methods of failure detection would be implemented. These would include alarms from the BMS, including voltage, current, and temperature alarms. Detection methods for off-gas detection would be implemented, as applicable. These are in addition to other potential protective measures such as ventilation, overcurrent protection, battery controls maintaining batteries within designated parameters, temperature and humidity controls, smoke detection, and maintenance in accordance with manufacturer guidelines. Remote alarms would be installed for operations personnel as well as emergency response teams in addition to exterior hazard lighting. In addition, an Incidence Response Plan would be implemented. In this context, impacts would be considered less than significant for this impact area.

**R-Line Upgrades – Less than Significant Impact.** According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, proposed R-Line upgrades route is not located in or near lands classified as very high hazard severity zones (CALFIRE 2026). The proposed project is subject to review and approval from Imperial County. All new construction shall comply with the current Uniform Fire Code requirements and all applicable statutes, codes, ordinances, and standards of Imperial County. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the County. Upon operation, the R-Line would function in the same way when compared to existing conditions. Therefore, the R-Line upgrades would not exacerbate wildfire risks and expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

- c) **Titan II BESS – Less than Significant Impact.** See response b) above.

**R-Line Upgrades – Less than Significant Impact.** The proposed R-Line upgrades would replace existing wooden transmission poles with steel monopoles primarily within IID's existing transmission corridor. Fire protection and emergency medical services in the area are provided by the Imperial County Fire Department. The R-Line upgrades would result in fire risk that would be comparable to that of the transmission line that is being replaced and upgraded. The R-Line upgrades project area would continue to be adequately supported by the existing fire protection services. In addition, operation and maintenance would not affect the ability of fire personnel to respond to fires. The R-Line upgrades would not exacerbate fire risk. This is considered a less than significant impact.

- d) **Titan II BESS – Less than Significant Impact.** The project would implement an SWPPP, which would include erosion and sediment control BMPs during construction, thereby reducing the potential of erosion and siltation during construction and would control potential flooding events

that could occur during construction. During operation, the project would not substantially increase the rate or amount of surface runoff that would lead to flooding. As such, the project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

**R-Line Upgrades – Less than Significant Impact.** The proposed R-Line upgrades are subject to review and approval from Imperial County. All new construction shall comply with the current Uniform Fire Code requirements and all applicable statutes, codes, ordinances, and standards of Imperial County. Upon operation, the R-Line would function in the same way when compared to existing conditions. Additionally, the project would implement an SWPPP, which would include erosion and sediment control BMPs during construction, thereby reducing the potential of erosion and siltation during construction and would control potential flooding events that could occur during construction. During operation, the project would not substantially increase the rate or amount of surface runoff that would lead to flooding. Therefore, the R-Line upgrades would not expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.



## Mandatory Findings of Significance

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

a) **Titan II BESS – Potentially Significant Impact.** The proposed BESS has the potential to result in significant environmental effects on biological resources, cultural resources, and tribal cultural resources, which could directly or indirectly cause adverse effects on the environment. These issues will be further evaluated in the EIR.

**R-Line Upgrades – Potentially Significant Impact.** The proposed R-Line upgrades have the potential to result in significant environmental effects on biological resources, cultural resources, and tribal cultural resources, which could directly or indirectly cause adverse effects on the environment. These issues will be further evaluated in the EIR.

b) **Titan II BESS – Potentially Significant Impact.** Implementation of the BESS has the potential to result in impacts related to air quality, biological resources, cultural resources, geology/soils, tribal cultural resources, and utilities/service systems. The proposed project has the potential to result in cumulative impacts with regard to the identified issue areas. Cumulative impacts will be discussed and further analyzed in the EIR.

**R-Line Upgrades – Potentially Significant Impact.** Implementation of the proposed R-Line upgrades has the potential to result in impacts related to aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise and vibration, tribal cultural resources, and utilities/service systems. The proposed project has the potential to result in cumulative impacts with regard to the identified issue areas. Cumulative impacts will be discussed and further analyzed in the EIR.

- c) **Titan II BESS – Potentially Significant Impact.** Implementation of the BESS has the potential to result in impacts related to air quality and geology/soils. These potential environmental effects could cause substantial adverse effects on human beings. These issues will be further evaluated in the EIR.

**R-Line Upgrades – Potentially Significant Impact.** Implementation of the proposed R-Line upgrades has the potential to result in impacts related to air quality, geology/soils, hazards and hazardous materials, and noise. These potential environmental effects could cause substantial adverse effects on human beings. These issues will be further evaluated in the EIR.

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