13-2026-122

FILED
IMPERIAL COUNTY
Oct 30 2026
CHUCK STOREY, County Clerk
By B Mak
Deputy Clerk

IID
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NOTICE OF EXEMPTION

TO: ☐ **Office of Planning and Research**
1400 Tenth Street, Room 121
Sacramento, CA 95814

■ **County Clerk**
County of Imperial

☐ **File**
IID - ENVIRONMENTAL MITIGATION SECTION

From: (Public Agency)
IMPERIAL IRRIGATION DISTRICT

Address: P.O. BOX 937
IMPERIAL, CA 92251

Project Title: Longer Duration Energy Storage for Community Energy Reliability and Resilience

Project Location - Specific: 32°44'19.8"N 114°42'42.9"W (Assessor Parcel Number [APN] 056-240-032) in unincorporated Imperial County

Project Location – City: Winterhaven **Project Location – County:** Imperial

Description of Nature, Purpose and Beneficiaries of Project:

Construct a 1-MW/10-MWh long-duration energy storage system at the Pilot Knob Hydroelectric Power Plant, including a powerhouse, substation, and associated electrical infrastructure. The purpose is to improve electrical reliability and resiliency for the Winterhaven and Fort Yuma Quechan tribal communities.

Name of Public Agency Approving Project: Imperial Irrigation District

Name of Person or Agency Carrying Out Project: Imperial Irrigation District

Exempt Status: ***(check one)***

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 1526(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ■ Categorical Exemption. State type and section number: §§ 15061(b)(3), 15301, 15303, and 15304
- ☐ Statutory Exemptions. State code number:

Reasons why project is exempt:

The project is exempt under CEQA Guidelines §§ 15061(b)(3), 15301, 15303, and 15304 because it involves the installation of small-scale utility facilities and associated electrical infrastructure within a previously disturbed site. Construction would involve limited grading and trenching, with no significant environmental impacts anticipated.

Lead Agency Contact Person: Jeremy Brooks **Area Code/Telephone Extension:** (760) 339-9632

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project?
   ■ Yes ☐ No

Signature: _____ **Date:** 10/26/2026

Title: General Counsel

☐ **Signed by Lead Agency** ☐ **Signed by Applicant** ☐ **IID Board Approved** _____

Date received for filing at OPR: _____

State of California - Department of Fish and Wildlife

2026 ENVIRONMENTAL DOCUMENT FILING FEE CASH RECEIPT

DFW 753.5a (REV. 01/01/26) Previously DFG 753.5a

Print [redacted] Save

RECEIPT NUMBER:
13-2026-122

STATE CLEARINGHOUSE NUMBER *(If applicable)*

SEE INSTRUCTIONS ON REVERSE. TYPE OR PRINT CLEARLY.

LEAD AGENCY	LEAD AGENCY EMAIL	DATE
IMPERIAL IRRIGATION DISTRICT		10/30/2026
COUNTY/STATE AGENCY OF FILING		DOCUMENT NUMBER
IMPERIAL COUNTY		13-2026-122

PROJECT TITLE

LONGER DURATION ENERGY STORAGE FOR COMMUNITY ENERGY RELIABILITY AND RESILIENCE

PROJECT APPLICANT NAME	PROJECT APPLICANT EMAIL		PHONE NUMBER
IMPERIAL IRRIGATION DISTRICT			(760) 339-9632
PROJECT APPLICANT ADDRESS	CITY	STATE	ZIP CODE
P.O. BOX 937	IMPERIAL	CA	92251

PROJECT APPLICANT *(Check appropriate box)*

☒ Local Public Agency ☐ School District ☐ Other Special District ☐ State Agency ☐ Private Entity

CHECK APPLICABLE FEES:

☐ Environmental Impact Report (EIR)	$ 4,227.50	$
☐ Mitigated/Negative Declaration (MND)(ND)	$ 3,043.75	$
☐ Certified Regulatory Program (CRP) document - payment due directly to CDFW	$ 1,437.25	$

☒ Exempt from fee

- ☒ Notice of Exemption (attach)
- ☐ CDFW No Effect Determination (attach)

☐ Fee previously paid (attach previously issued cash receipt copy)

☐ Water Right Application or Petition Fee (State Water Resources Control Board only)	$ 850.00	$
☒ County documentary handling fee	$ 62.00	$ 62.00
☐ Other		$

PAYMENT METHOD:

☐ Cash ☐ Credit ☐ Check ☒ Other **TOTAL RECEIVED** $ 62.00

SIGNATURE	AGENCY OF FILING PRINTED NAME AND TITLE
X B. Mak	Brie Mak Deputy Clerk

ORIGINAL - PROJECT APPLICANT | COPY - CDFW/ASB | COPY - LEAD AGENCY | COPY - COUNTY CLERK | DFW 753.5a (Rev. 01012026)

ATTACHMENT A – LONGER DURATION ENERGY STORAGE FOR COMMUNITY ENERGY RELIABILITY AND RESILIENCE (LDES FOR CERR) NOTICE OF EXEMPTION (NOE)

[redacted]

NOE Attachment A

Longer Duration Energy Storage for Community Energy Reliability and Resilience (LDES for CERR)
Notice of Exemption (NOE)

The Imperial Irrigation District (IID), as the Lead Agency under the California Environmental Quality Act (CEQA), proposes to construct the "Longer Duration Energy Storage for Community Energy Reliability and Resilience" (LDES for CERR) Project, under the California Energy Commission's (CEC) Community Energy Reliability and Resilience Investment (CERRI) program (Project/Proposed Project).

Project Location:
The Proposed Project is located at the coordinates 32°44'19.8"N 114°42'42.9"W (Assessor Parcel Number [APN] 056-240-032) in unincorporated Imperial County. The Project site has a General Plan land use designation as Recreation/Open Space and is zoned as Indian Reservation. The Project site is located on land owned by the Bureau of Indian Affairs (BIA).

Description of Project:
The Proposed Project would construct and operate a 1-megawatt (MW)/10-megawatt-hour (MWh) long-duration energy storage (LDES) system at the Imperial Irrigation District's (IID's) Pilot Knob Hydroelectric Power Plant. The Proposed Project would utilize the Organic SolidFlow Battery manufactured by CMBlu Energy. This LDES technology uses carbon-based active species in an innovative architecture that combines the advantages of solid-state batteries, such as lithium-ion systems and liquid flow batteries. Manufacturing of the LDES system would not require any rare-earth metals, such as lithium and cobalt, or contain a thermal runway. It emits no toxic fumes and is neither flammable nor explosive (CMBLU 2025).

The LDES system would store excess electricity during periods of low demand and dispatch it when needed, providing more than 10 hours of continuous discharge to improve energy reliability and resiliency for the Winterhaven and Quechan tribal communities. The LDES system would also support grid reliability, renewable energy integration, and operational flexibility without expanding existing generation capacity.

Project improvements would include an approximately 175-foot-by-65-foot building pad and a 125-foot-by-56-foot powerhouse; an adjacent, approximately 60-foot-by-30-foot customer distribution substation; underground trenching and electrical cabling; and an approximately one-quarter mile, 13.8-kilovolt (kV) distribution line connecting the system to the existing Pilot Knob Substation. All improvements would be located within an approximately one-acre site operated and maintained under a perpetual easement on the Fort Yuma Quechan Indian Reservation. Construction would include necessary site preparation, grading, equipment installation, electrical interconnection, and related improvements. Construction trailers may also be placed onsite temporarily, as needed, for Project construction activities.

The existing site contains a concrete foundation pad that will be demolished and replaced with the proposed structures.

On January 7, 1980, the United States Court, Southern District of California, ruled that the United States holds title to the Lands in the area in trust for the Quechan Tribe of Indians as part of the Fort Yuma Indian Reservation. The IID holds an easement from 1954 (No. 14-06-300-149), described as a "permanent and perpetual easement," which was reserved per document 46 FR 11372. The Proposed Project is covered under this easement, as the easement is granted for "construction, reconstruction, alteration, operation and maintenance of works and facilities appurtenant or incident to Pilot Knob Power Plant." The Quechan

Indian Tribe has expressed approval for the Proposed Project in a Letter of Commitment, dated August 5, 2025 (Attachment B). Per the letter, energy resilience is a growing concern for their community, particularly as they experience more frequent extreme weather events and electrical outages that threaten public safety and economic security.

The Project will enable reducing electric power outage frequency, duration, magnitude, and associated impacts in the Imperial Valley, beginning in the Winterhaven area and including the communities of the Fort Yuma Quechan Indian Tribe. The Project will increase the reliability and resiliency of electric power in those California communities.

Design Parameters

The Proposed Project would be implemented according to the following preliminary design parameters:

- Energy Storage Technology: CMBlu Organic SolidFlow Battery
- System Capacity: 1 MWAC / 10 MWhAC
- Discharge Duration: Approximately 10 hours
- Project Site: Approximately 1 acre of previously disturbed land
- Powerhouse Pad: Approximately 175 feet × 65 feet (11,375 square feet)
- Powerhouse Building Footprint: Approximately 125 feet × 56 feet (7,000 square feet)
- Battery Configuration: Approximately 100–200 battery modules; modules arranged on racks within the powerhouse
- Customer Distribution Substation: Approximately 60 feet × 30 feet, adjacent to the powerhouse
- Interconnection Voltage: 13.8 kV
- Interconnection: Approximately 0.25 mile of distribution line connecting the new facilities to the existing 13.8-kV bus at the Pilot Knob Substation
- Electrical Equipment: Combiner boxes, central inverter(s), step-up transformer, medium-voltage switchgear, and Supervisory Control and Data Acquisition (SCADA)/controls equipment
- Foundations: Concrete slab-on-grade for the powerhouse, with rack anchorage per structural design
- Underground Electrical: Electrical trenching between battery module combiner boxes and central inverter(s)/switchgear
- Site Security: Perimeter security fencing and lighting
- Estimated Design Duration: 6–8 months
- Total ground disturbance: 10,500 to 17,400 square feet (approximately 0.24 to 0.4 acres)

The batteries are anticipated to last approximately 20 years. As a standard practice, decommissioning and disposition of materials will be developed as part of the design process.

Project Design Features

The applicant has incorporated into the Project a number of structural elements and practices called project design features (PDFs) to avoid or minimize potential impacts on environmental resources.

PDF-1 **Pre-Construction Survey**. A pre-construction biological clearance survey will be performed by a qualified biologist to minimize impacts on special status plants and wildlife species. A clearance survey is a one-time survey conducted within 30 days of any ground disturbing work to determine if any special status species are present within the construction area. If sensitive biological resources are identified, the qualified biologist would implement appropriate species-specific avoidance procedures, which may include flagging resources for avoidance, establishing construction buffers, installing temporary

fencing, monitoring construction activities, or stopping work if necessary to prevent injury, mortality, or disturbance. If avoidance cannot be maintained, the applicant would consult with the appropriate resource agencies e.g. United States Fish and Wildlife Service [USFWS] and California Department of Fish and Wildlife [CDFW]) regarding applicable species-protection requirements and applicable incidental take permits.

Project Schedule:
Project construction would begin in September 2028 and would have an approximately 12-month duration.

Reason Why Project is Exempt:
The proposed activity is a project subject to CEQA. However, it is exempt from further environmental analysis under a Common Sense, Class 1, Class 3, and Class 4 Exemption (CEQA Guidelines §15061(b)(3), §15301, §15303, and §15304).

- **Common Sense Exemption:** Per CEQA Guidelines §15061(b)(3), a project is exempt from CEQA if the activity is covered by the common sense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.
    - The Project is exempt under the "common sense" CEQA exemption because the Proposed Project will not:
        - construct on or alter any off-reservation land;
        - impact local air quality;
        - use groundwater resources or otherwise impact any off-reservation water resources;
        - build additional transportation infrastructure;
        - generate additional traffic volumes from commercial activities of the Casino;
        - increase, once the project is complete, ambient noise beyond the existing commercial and industrial activities; or
        - degrade the visual character or quality of off-reservation views, including those of scenic resources or objects of aesthetic significance.
    - Compared with the current supply of energy, the Proposed Project will improve energy resiliency for Tribal facilities and the local electric grid, as well as reduce overall energy demand on the local energy provider and lower fossil fuel usage and greenhouse gas (GHG) emissions. Because the Proposed Project will improve air quality and reduce GHG emissions and does not provide for any physical changes outside of the Fort Yuma Indian reservation, it can be seen with certainty that there is no possibility that the Proposed Project may have a significant effect on the off-reservation environment. Based on all these factors, the Proposed Project meets the CEQA "common sense" exemption.

- **Class 1 – Existing Facilities:** Per CEQA Guidelines §15301, the Class 1 exemption consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. A listed example includes existing facilities of both investor and publicly-owned utilities used to provide electric power, natural gas, sewerage, or other public utility services. The key consideration is whether the project involves negligible or no expansion of use.

- The Project is categorically exempt under Class 1 because it involves the minor alteration and addition of accessory electrical equipment and support facilities serving an existing utility facility with negligible or no expansion of use. The Project would not result in a increase in energy usage, nor would it permanently introduce substantial human activity at the site.

- **Class 3 – New Construction:** Per CEQA Guidelines §15303, the Class 3 exemption consists of construction of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures of one use to another where only minor modifications are made. Listed examples include electrical and other utility facilities and extensions.
  - The Project is categorically exempt under Class 3 because it entails the construction and location of limited small-scale utility structures, modular equipment enclosures, and minor electrical distribution line extensions. The proposed LDES system would be developed as a subordinate component of the existing Pilot Knob Hydroelectric Power Plant, an established hydroelectricity generation and transmission facility. Ground disturbance and new structures would be limited to 0.4 acres.

- **Class 4 – Minor Alterations to Land**: Per CEQA Guidelines §15304, the Class 4 exemption consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. Examples include, but are not limited to:
  - Grading on land with a slope of less than 10 percent, except that grading shall not be exempt in a waterway, in any wetland, in an officially designated (by federal, state, or local government action) scenic area, or in officially mapped areas of severe geologic hazard such as an Alquist Priolo Earthquake Fault Zone or within an official Seismic Hazard Zone, as delineated by the State Geologist.
  - Minor trenching and backfilling where the surface is restored
    - The Project is categorically exempt under Class 4 because grading operations would occur on land with less than a 10 percent slope and would involve minor trenching and backfilling. The Project site is not within a waterway, wetland, scenic area, scenic highway, Alquist Priolo Earthquake Fault Zone, or an official Seismic Hazard Zone (USFWS 2026c; County 2016; Caltrans 2026; DOC 2026; County 2022).

The Proposed Project does not have the potential to trigger any of the exceptions identified in CEQA Guidelines §15300.2. Consequently, as documented below, the Proposed Project is exempt from further CEQA review.

(a) Location. The improvements will occur within the existing disturbed site which is located in a rural area. The existing conditions within the current IID Pilot Knob Hydroelectric Power Plant are disturbed with utility infrastructure, paved ground, and dirt roads and are not considered environmentally sensitive. Minor ground disturbance would occur during the construction but would be limited to previously disturbed surfaces. The Proposed Project would not impact environmentally sensitive areas or an environmental resource of hazardous or critical concern. This exception does not apply to the Proposed Project.

(b) Cumulative Impact. As further discussed below under (c) Significant Effects, the Proposed Project would not have a significant effect on the environment, including those due to unusual circumstances. Accordingly, since the Proposed Project would not result in any significant environmental impacts, Project implementation would not add appreciably to impacts of any existing or foreseeable future projects that could result in a significant cumulative impact. Incremental impacts, if any, would be negligible. Potential future projects would be required to conduct a separate environmental analysis and mitigate any potential impacts to less-than-significant levels. The Proposed Project would not result in any significant cumulative impacts. This exception does not apply to the Proposed Project.

(c) Significant Effect. The demolition of the existing building pad, construction of the new LDES system, and extension of utility infrastructure are not considered unusual circumstances, nor would these activities result in a significant environmental impact.

Air Quality

Construction would result in a temporary increase in air emissions. However, the limited extent and duration of grading and construction work, and implementation of standard Best Management Practices (BMPs), would result in no significant air quality impacts. These activities are not expected to generate emissions levels that would exceed typical thresholds.

The Project would comply with applicable federal air quality requirements administered by the U.S. Environmental Protection Agency (EPA), Region 9, which is the Clean Air Act permitting authority for Tribal lands in California. The Proposed Project would utilize the Organic SolidFlow Battery manufactured by CMBlu Energy. Given the system emits no toxic fumes and is neither flammable nor explosive, air permits are likely not needed. Per EPA standard requirements, a dust control plan will be developed and implemented for construction of the Proposed Project.

GHG emissions associated with Vehicle Miles Traveled (VMT) would be the primary source of air quality impacts. The VMT associated with construction of the Proposed Project would be temporary, and the operation would require infrequent trips for maintenance, resulting in a negligible amount of VMT.

The Proposed Project would improve energy resiliency for Tribal facilities and the local electric grid, as well as reduce overall energy demand on the local energy provider and lower fossil fuel usage and GHG emissions. This is because the LDES system would store excess electricity (particularly renewable energy) generated during periods of low demand and discharge it when demand is higher. This allows the local energy system to reduce reliance on fossil fuel energy during peak use periods.

Furthermore, substantially larger energy storage projects within California have demonstrated to be well below local and regional criteria air pollutant thresholds for construction and operations, including:

- Marci Battery Energy Storage System Facility (SCH #2025120872)
    - 400-megawatt energy storage system with a 9.2-acre development footprint
- Covina Reliability Battery Energy Storage System Project (SCH #2026010039)
    - 110-megawatt energy storage system with a 3.4-acre development footprint
- NorthStar 2 Solar and Battery Storage Project (SCH #2026040229)

  - 130-megawatt solar photovoltaic facility and a 175-megawatt BESS facility with a 614-acre development footprint
- VEGA SES 6 Solar and Battery Storage Project (SCH #2022070146)
  - 80-megawatt photovoltaic solar facility and a 160 MW battery storage system on a 320-acre development footprint

Therefore, the Proposed Project would not pose a significant air quality impact, and this exception does not apply.

Biological Resources

The most recent records from CDFW's California Natural Diversity Database (CNDDB; CDFW 2026), and the USFWS's Sensitive Species Occurrence Data and Critical Habitat Mapper (USFWS 2026b) were reviewed within a 5-mile radius of the Project site. The most recent records of the California Native Plant Society's (CNPS) Electronic Inventory (CNPSEI) of Rare and Endangered Vascular Plants of California (CNPS 2026) were reviewed for the following California USGS 7.5-minute quadrangles containing and surrounding the Project site: Yuma West, Greys Well NE, Ogilby Araz, Bard, Yuma East, Gadsden, Somerton, and Yuma SE California. These databases contain records of reported occurrences of federal- or state- listed endangered or threatened species, California Species of Special Concern (SSC), or otherwise special status species or habitats that may occur within or in the immediate vicinity of the Project site. In addition, the USFWS's Information for Planning and Conservation (IPaC) site was searched for federally listed threatened or endangered species and critical habitat that could potentially be affected by the Project (USFWS 2026d).

Factors used to determine species' Potential for Occurrence (PFO) within the Project site included habitat suitability, site disturbance, and the timing and spatial relevance of CNDDB and USFWS occurrence records. The results of this literature review are summarized in the table below.

Table 1. Summary of Biological Literature Review Results

Species	FESA Status	CESA Status	Other Status	PFO
Wildlife				
Monarch butterfly (*Danaus plexippus*)	Candidate Threatened			Absent
southwestern willow flycatcher (*Empidonax traillii extimus*)	Endangered	Endangered		Absent
Yuma Ridgway's Rail (*Rallus obsoletus yumanensis*)	Endangered	Threatened		Absent
desert tortoise (Gopherus agassizii)	Threatened	Endangered		Low
Western Yellow-Billed Cuckoo (*Coccyzus americanus occidentalis*)	Threatened	Endangered		Absent
Sonoran Desert toad (*Incillus alvarius*)			SSC	Low
Banded Gila Monster (*Heloderma suspectum cinctum*)			SSC	Low
flat-tailed horned Lizard (*Phrynosoma mcallii*)			SSC	Low

Species	FESA Status	CESA Status	Other Status	PFO
Sonoran Mud Turtle (*Kinosternon sonoriense*)			SSC	Absent
Arizona Bell's Vireo (*Vireo bellii arizonae*)		Endangered		Absent
Burrowing owl (*Athene cunicularia*)		**Candidate Endangered**	**SSC**	**Moderate**
California Black Rail (*Laterallus jamaicensis coturniculus*)		Threatened		Absent
Gila Woodpecker (*Melanerpes uropygialis*)		Endangered		Low
Gilded Flicker (*Colaptes chrysoides*)		Endangered		Low
American Badger (*Taxidea taxus*)			SSC	Low
Townsend's big-eared bat (*Corynorhinus townsendii*)			SSC	Low
Yuma Hispid Cotton Rat (*Sigmodon hispidus eremicus*)			SSC	Absent
Plants				
Harwood's milk-vetch (Astragalus insularis var. harwoodii)			**CRPR 2B.2**	**Moderate**
Wiggins' croton (Croton wigginsii)		Rare	CRPR 2B.2	Low
Algodones Dunes sunflower (Helianthus niveus ssp. tephrodes)		Endangered	CRPR 1B.2	Absent
mud nama (Nama stenocarpa)			CRPR 2B.2	Low
giant spanish-needle (Palafoxia arida var. gigantea)			CRPR 1B.3	Absent
roughstalk witch grass (Panicum hirticaule ssp. hirticaule)			CRPR 2B.1	Low
narrow-leaf sandpaper-plant (Petalonyx linearis)			CRPR 2B.3	Low
sand food (Pholisma sonorae)			CRPR 1B.2	Low

Notes
SSC = California Department of Fish and Wildlife's Species of Special Concern
CPPR = California Rare Plant Rank
PFO = Potential for Occurrence

Soils

One soil type is known to occur within and/or adjacent to the Project area. No hydric soils were mapped within the Project area. The soil type is described below.

Indio Silt Loam, strongly saline, 0 to 1 percent slopes

This soil occurs within the entirety of the proposed work area. They are well drained soils typically found in linear positions at elevations from 80 to 600 ft above mean sea level (amsl). The soil profiles are composed of silt loam and very fine sandy loam derived from mixed alluvium. The soils do not have a hydric soil rating, and typically have moderately high to high permeability, resulting in very low runoff. The soil is more than 80 inches to bedrock (USDA 2026).

Vegetation Communities

The dominant vegetation community within the Project area is Blue Palo Verde Woodland, with dispersed patches of Creosote Bush – White Bur-sage Scrub. Based on available aerial imagery and desktop review, these communities appear to be in a disturbed condition, potentially

associated with previous development within the Project area. Individuals appear to be sparse and occur intermittently throughout the proposed disturbance area.

Blue Palo Verde Woodland

Blue Palo Verde Woodland is found along desert arroyo margins, seasonal watercourses and washes, bottomlands, middle and upper bajadas and alluvial fans, and lower slopes. Soils are sandy, well- drained, and derived from alluvium or colluvium (Sawyer et al. 2009). Blue palo verde (*Parkinsonia florida*) is dominant in the tree or tall shrub canopy. Trees are typically less than 14 meters tall with a canopy that is open to continuous. The shrub layer is intermittent or open with an herbaceous layer that is sparse with seasonal annuals (Sawyer et al. 2009).

Based on available aerial imagery and desktop review, the community appears to be in a disturbed condition, potentially associated with previous development within the area. Blue palo verde individuals appear to be sparse and occur intermittently throughout the work area; however, field verification has not been conducted.

Creosote Bush – White Bur-sage Scrub

Creosote Bush White Bur-sage Scrub can be found in washes and rills, alluvial fans, bajadas, valleys, basins, upland slopes, mesas, and erosional highlands (Sawyer et al. 2009). Soils in this community are well-drained, alluvial, colluvial, sandy, sometimes underlain by a hardpan that may be calcareous, igneous and/or covered with desert pavement. Both creosote bush (*Larrea tridentata*) and white bur-sage (*Ambrosia Dumosa*) have greater than 1% absolute coverage in the shrub canopy with both species exceeding two times the coverage of other shrub species (Keeler- Wolf et al. 1998). Creosote bush and white bur-sage are co-dominant in the shrub canopy. Emergent trees or tall shrubs may be present at low cover. The shrub layer is intermittent or open with an herbaceous layer that is sparse with seasonal annuals (Sawyer et al. 2009).

Based on available aerial imagery and desktop review, the community appears to be in a disturbed condition, potentially associated with previous development within the area. Individuals appear to be sparse and occur intermittently throughout the work area; however, field verification has not been conducted.

Special Status Plant Species

Based on the results of a literature review, eight special status plant species were identified as historically occurring within 5 miles of the Project vicinity that are listed as threatened, endangered, and/or rare under the California Endangered Species Acts (CESA), or otherwise considered California Rare Plant Rank (CRPR) list 1 or 2 (CDFW 2026; USFWS 2026a). No plant species listed under the Federal Endangered Species Act (FESA) were identified as historically occurring near the Project site.

Two species are listed under CESA; Algodones Dunes sunflower (*Helianthus niveus* ssp. *tephrodes*), listed as endangered, and Wiggins' croton (*Croton wigginsii*), listed as rare. The remaining six species are listed under the Califonria Rare Plant Rank list: Harwood's milk-vetch (*Astragalus insularis var. harwoodii*), mud nama (*Nama stenocarpa*), giant spanish-needle (*Palafoxia arida var. gigantea*), roughstalk witch grass (*Panicum hirticaule ssp. hirticaule*), narrow-leaf sandpaper-plant (*Petalonyx linearis*), sand food (*Pholisma sonorae*).

The eight listed plants species historically documented to occur in the Project area vicinity were analyzed for their Potential for Occurrence (PFO) within the Project area. Based on this analysis, Algodones Dunes sunflower and giant spanish-needle (*Palafoxia arida* var. *gigantea)* are considered **absent** due to the lack of suitable habitat required for these species within the Project area. Mud nama (*Nama stenocarpa*) is considered **low** since it requires habitat along riverbanks which are present nearby, but not within the proposed work area. Additionally, narrow-leaf sandpaper-plant (*Petalonyx linearis*), roughstalk witch grass (*Panicum hirticaule* ssp. *hirticaule*), sand food (*Pholisma sonorae*), and Wiggins' croton are assigned a **low** PFO based on a single occurrence record for each species in the vicinity of the Project area; suitable Sonoran Desert Scrub habitat is present.

Harwood's milk-vetch (*Astragalus insularis* var. *harwoodii*) has a **moderate** PFO due to sandy soils within Mojavean desert scrub being present throughout the proposed work area. The species is not federally or state listed; however, it is assigned a California Rare Plant Rank of 2B.2, meaning it is rare, threatened, or endangered in California but more common elsewhere and moderately threatened in California.

The Project includes PDF-1 as a component of the proposed construction activities. Before any ground-disturbing work, a qualified biologist would conduct a biological clearance survey within the construction area to identify Harwood's milk-vetch and other special-status plants or wildlife that may be present. If Harwood's milk-vetch or another sensitive biological resource is identified, the qualified biologist would delineate the resource and establish appropriate avoidance areas using methods such as flagging or construction fencing. Construction activities would remain outside the identified avoidance areas. If avoidance cannot be maintained, the applicant would consult with the appropriate resource agencies, including CDFW and/or USFWS, regarding applicable species-protection requirements.

Because the Project area is already disturbed and the pre-construction survey and resource-avoidance procedures are incorporated into the Project as standard design and construction practices, the Project would not result in significant impacts to special-status species.

Special Status Wildlife Species

Based on the results of the literature review, 17 special-status wildlife species were identified as historically occurring within 5 miles of the Project area. Of these 17 species, five species are listed as threatened, endangered, or proposed for listing, or are candidates for listing under the FESA. Nine species are listed under CESA. Eight species are designated as California Species of Special Concern (SSC).

Based on the results of the literature review and an evaluation of habitat conditions within the Project area, eight species are considered **absent** due to the lack of suitable habitat within the Project area. Although suitable habitat for some of these species occurs in the vicinity, including along the adjacent river corridors, these habitats are outside the Project area and are separated from the proposed work area by existing development, river channels, limited crossing points, and an interstate freeway. These species include Arizona Bell's vireo (*Vireo bellii arizonae*), California black rail (*Laterallus jamaicensis coturniculus*), monarch butterfly, Sonoran mud turtle (*Kinosternon sonoriense*), southwestern willow flycatcher (*Empidonax traillii extimus)*, western yellow-billed cuckoo (*Coccyzus americanus occidentalis)*, Yuma hispid cotton rat (*Sigmodon hispidus eremicus*), and Yuma Ridgway's rail (*Rallus obsoletus yumanensis).*

Eight species are considered to have **low** PFO. These species include American badger (*Taxidea taxus*), banded Gila monster (*Heloderma suspectum cinctum*), flat-tailed horned lizard (*Phrynosoma mcallii*), Gila woodpecker (*Melanerpes uropygialis*), gilded flicker (*Colaptes chrysoides*), Mojave desert tortoise, Sonoran Desert toad (*Incilius alvarius*), and Townsend's big-eared bat (*Corynorhinus townsendii*). Potentially suitable habitat is present within portions of the Project area or surrounding vicinity; however, the Project area is highly disturbed and fragmented by existing development, roads, an interstate freeway, and adjacent river channels. Additionally, known occurrences are limited or relatively distant from the Project area for several species. These conditions reduce the likelihood of occurrence within the proposed work area compared to less-disturbed habitat in the surrounding region.

The burrowing owl (*Athene cunicularia*) is the only species considered to have **moderate** PFO. The Project area contains open, sparsely vegetated, and disturbed areas that provide potentially suitable foraging and nesting habitat for the species. Although the Project area is fragmented by existing development, roads, an interstate freeway, and adjacent river channels, suitable habitat is present within the proposed work area.

The site also contains potential nesting habitat for noncovered bird and raptor species protected under the Migratory Bird Treaty Act (MBTA) and Sections 3503 and 3503.5 of the California Fish and Game Code.

The Proposed Project will comply with applicable federal and California wildlife-protection laws governing burrowing owls and their nests. The western burrowing owl is currently a candidate species under CESA and is afforded the same legal protection as a threatened or endangered species. CESA prohibits the unauthorized take of protected species. In addition, California Fish and Game Code sections 3503, 3503.5, and 3513 prohibit the taking, possession, or destruction of protected birds, raptors, nests, and eggs.

In compliance with existing law, before ground-disturbing activities begin, a qualified biologist will conduct a burrowing owl take-avoidance survey in suitable habitat and will identify any occupied burrows or owls that could be affected by Project activities. The survey will be conducted consistent with the California Department of Fish and Wildlife's *Staff Report on Burrowing Owl Mitigation* (CDFW 2012), including a survey no less than 14 days before ground disturbance and a final survey within 24 hours of disturbance if work is delayed or interrupted. In addition, in compliance with the MBTA, if work occurs during nesting bird season (August 15-September 15), a qualified biologist shall survey the work area and immediately adjacent suitable nesting habitat before disturbance begins.

If an owl, active nest, or occupied burrow is identified, the Project will comply with applicable take prohibitions by avoiding the occupied feature, establishing an appropriate exclusion area, and suspending or modifying work as necessary until the qualified biologist determines that activities can proceed without violating applicable law. Burrow exclusion, closure, or relocation will not occur unless conducted by qualified personnel during an appropriate period, after confirming that the burrow is unoccupied, and in accordance with any required CDFW authorization.

Compliance with existing Federal and State law would ensure that impacts to biological resources are less than significant.

United States Fish and Wildlife Service Critical Habitat
Designated Critical Habitat includes areas containing physical or biological features essential to the conservation of federally listed species. Based on a review of the USFWS Critical Habitat WebGIS data, the Project area does not overlap designated Critical Habitat (USFWS 2026b).

Wetlands
According to the National Wetlands Inventory (NWI) Mapper by USFWS, there are no state or federally protected wetlands or water features on the Project site (USFWS 2026c). The Project site is proximal to multiple water features, including the All-American Canal 0.15 miles to the northwest, and the Colorado River 0.22 miles to the southeast. There is also Freshwater Forested/Shrub Wetland and Freshwater Emergent Wetland identified adjacent to the Colorado River, approximately 0.13 miles east of the Project site. Because Project construction and operation activities would only occur within the 0.4-acre disturbance footprint, no impacts to state or federally protected wetland habitat would occur. Standard construction BMPs, such temporary perimeter sediment barriers, would prevent runoff into nearby water bodies. Therefore, impacts would be less than significant, and this exception does not apply.

Cultural Resources
The Proposed Project would have no potential to affect cultural resources because all construction would occur within an approximately 0.4-acre, previously developed and/or disturbed area associated with the existing Pilot Knob Hydroelectric Power Plant and its existing concrete foundation pad, electrical infrastructure, and utility corridors. The Project would replace the existing pad and install new facilities, trenching, and cabling within areas that have already been subject to ground disturbance. Demolition and replacement of the existing concrete pad would not affect a historic property because the pad is a modern utilitarian feature without recognized historical significance. The Project would also not alter the setting or integrity of any nearby cultural resource because the new improvements would be concentrated within the vicinity an existing industrial facility (the Pilot Knob Hydroelectric Power Plant).

The Quechan Indian Tribe, which is the primary tribe that has cultural affiliation with the Project site, has expressed approval for the Proposed Project in a Letter of Commitment, dated August 5, 2025 (Attachment B). Per the letter, energy resilience is a growing concern for their community, particularly as they experience more frequent extreme weather events and electrical outages that threaten public safety and economic security. Although not required for the purposes of a CEQA exemption, IID will provide the opportunity for tribal monitoring during ground-disturbing activities, pending further communication with the Quechan Indian Tribe.

Furthermore, under 43 C.F.R. § 10.5, if human remains or cultural items are inadvertently discovered on Tribal lands, any person who knows or has reason to know of the discovery must immediately report it in person or by telephone to the Tribe's designated official and to the BIA or the Federal agency with primary management authority. The discoverer must make reasonable efforts to secure and protect the discovery, including stabilizing or covering it when appropriate. Written documentation must be provided within 24 hours and must identify the location, describe the discovery, and summarize the protective measures taken.

If the discovery is associated with construction or another ongoing activity, the person responsible for the activity must immediately stop any work that could threaten the discovery. The written

notification must identify the activity and potential threats, confirm that work has stopped, and state that work will not resume until written authorization or certification is issued under the regulation.

The Tribe's designated official must respond no later than three days after receiving the written notification, make reasonable efforts to protect the discovery, verify that nearby activity has stopped, and notify the BIA or applicable Federal agency. On Tribal lands in the continental United States, the Tribe may delegate its responsibilities to the BIA or Federal agency through a written agreement.

Where a Federal agency is responsible for the discovery, a plan of action must be approved and signed in consultation with the appropriate Tribe or lineal descendant. Before construction resumes, the appropriate official must issue written certification identifying the protective instructions, providing any applicable plan of action or agreement, and specifying the date on which lawful activity may resume. Therefore, through compliance with Federal law, the Proposed Project would not result in significant impacts to cultural resources.

Noise

The Project site is surrounded by vacant land, the Colorado River, the existing Pilot Knob Hydroelectric Power Plant, and other IID-operated infrastructure. There are no sensitive receptors, such as schools or homes, in the immediate vicinity. The nearest sensitive receptor is mobile homes located 1-mile southwest of the Project site.

Short-term construction noise would be temporary and intermittent, limited to standard activities such as equipment operation, trenching, and installation, and would attenuate substantially due to the approximately one-mile distance and intervening topography between the Project site and the nearest residences. As passively operating equipment, the LDES system would generate only limited, low-level operational noise from equipment such as inverters, transformers, and cooling systems. This noise would be comparable to the existing industrial noise generated by the Pilot Knob Hydroelectric Power Plant and other IID-operated infrastructure. Given the Project's isolated location and the one-mile distance to the nearest residences, operational noise would substantially attenuate before reaching those receptors and would not result in a significant noise impact.

Traffic

Vehicle trips associated with the construction of the Project will be temporary, and the operation of the Project will result in a negligible number of regular operational trips for maintenance. The Project would not build additional transportation infrastructure, nor would it generate additional traffic volumes from commercial activities of the Quechan Casino Resort, located approximately 0.62 miles west of the Project site.

Visual Resources

All upgrades associated with the Proposed Project would conform with the visual appearance of the surrounding IID infrastructure. The installation and operation of the Project would not substantially degrade the existing visual character or quality of off-reservation visual resources, as the system components are small (<1 acre), limited in height, and thus are not visually obtrusive. The Project does not create substantial light or glare that could adversely affect day or

nighttime views in the area. Due to intervening topography, the Project would not be visible from the Interstate 5 (0.30 miles north) or Algodones Rd (0.30 miles west).

Additionally, the facility would not block views of the Colorado River or other scenic resources from public vantage points as the LDES would be limited in height. The Project site is not open to general public access. Access is restricted to the property owner, authorized personnel, and easement holders, including IID, for purposes authorized under the applicable easement agreements. The easement does not provide a general public right of access to the property.

Water Resources

As mentioned above in the *Biological Resources* section, the Project site does not contain any wetland habitat or water features. The site is proximal to water features including the Colorado River, All-American Canal, and associated Freshwater Forested/Shrub Wetland and Freshwater Emergent Wetland; however, because Project construction and operation activities would only occur within the Project site, no impacts to state or federally protected wetlands or water features would occur.

Water quality on BIA-owned lands is regulated by the U.S. EPA. The Proposed Project would introduce approximately 0.24 to 0.4 acres of impervious surface area; therefore, it would not be subject to EPA's National Pollutant Discharge Elimination System (NPDES) General Construction Permit as the EPA's threshold of disturbance is one acre. Additionally, the Project would implement construction BMPs, such temporary perimeter sediment barriers, to reduce the potential for groundwater degradation and surface runoff. Given the limited footprint and passive operation, the Project would not involve groundwater withdrawal, interfere with groundwater recharge, nor would it substantially alter the existing drainage pattern or significantly create or contribute to runoff water. The Project does not involve housing or other buildings within a 100-year flood hazard area. Through implementation of BMPs, no adverse effects on on- or off-site water quality would occur.

No reasonable possibility exists that the Proposed Project would have a significant effect on the environment due to unusual circumstances. Therefore, this exception does not apply to the Proposed Project.

(d) Scenic Highways. The nearest eligible state scenic highway is a segment of Route 78, located 71 miles northwest of the Project site. The nearest designated state scenic highway is a segment of Route 78, located 90 miles northwest of the Project site (Caltrans 2026). Due to intervening development and topography, the Project site is not visible from either a designated or eligible state scenic highway. The proposed demolition of the existing concrete pad and the construction of the new facility would not directly or indirectly affect an officially designated scenic highway or scenic resources near a scenic highway. Therefore, this exception does not apply to the project.

(e) Hazardous Waste Sites. The Project would occur on a previously developed site that has not been identified as a hazardous waste site pursuant to Section 65962.5 of the Government Code (DTSC 2026; SWRCB 2026).

A hazardous waste permit is not expected to be required. The system would use non-flammable, non-hazardous, water-based organic electrolytes (CMBLU 2026). The Project site is not within a mapped Fire Hazard Severity Zone (CAL FIRE 2026).

Routine construction fluids and materials will be managed in accordance with standard BMPs. Once constructed, operational manuals and safety guidelines for the LDES system will be developed by CMBlu and IID. Therefore, this exception does not apply to this project.

(f) **Historical Resources.** According to the CEQA Guidelines regarding historical resources, a substantial adverse change in the significance of a historical resource amounts to a significant impact on the environment (Guidelines § 15064.5(b)). Accordingly, a substantial adverse change means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings resulting in the significance of the resource being materially impaired. The significance of an historical resource is materially impaired when a project:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The Project proposes the demolition of the existing building pad, addition of an LDES system and, and a quarter-mile expansion of transmission line. The existing concrete pad is not a listed resource in the California Register of Historic Resources (CRHR) or the National Register of Historic Places (NRHP) (OHP 2026; NPS 2026).

The existing concrete pad does not possess historic value because it is a utilitarian site feature without distinctive architectural, engineering, or artistic characteristics. It is not associated with a significant historical event, person, or period, and it does not independently convey important information about the site's history or development. Therefore, there is no possibility for the Project to demolish, destruct, relocate, or alter any historical resources. This exception does not apply to the Proposed Project.

Therefore, none of the exceptions to categorical exemptions listed in CEQA Guidelines section 15300.2 apply to this project and this project will not have a significant effect on the environment.

NOE Attachment A

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NOE Attachment A

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ATTACHMENT B – QUECHAN INDIAN TRIBE LETTER OF COMMITTMENT

[redacted]

Fort Yuma Quechan Indian Tribe

Letter of Commitment/Support	**# 4 of 18 for**	**Imperial Irrigation District (IID) "LDES for CERR"**
Type of Letter	☐ Commitment Tribal Commitment Letter	☐ Support
Commitment Letter Subject Matter *(select one or more as appropriate)*	☐ Match Funding ☐ Project Partner	☐ Pilot Test/Demonstration/ Deployment Site
Type of Match Funding *(if applicable)*	☐ Cash in hand ☐ Equipment ☐ Materials ☐ Information technology services	☐ Travel ☐ Subcontractor costs ☐ Contractor/project partner in-kind labor costs ☐ Advanced practice costs
Author of Letter (name and title)	Jonathan E. Koteen, President	
Phone Number and Email Address of Author	760-919-3600 ext. 201 president@quechantribe.com	
Address of Author (city, state, and zip code)	Yuma, AZ 85366-1899	

QUECHAN INDIAN TRIBE
Ft. Yuma Indian Reservation

P.O. Box 1899
Yuma, Arizona 85366-1899
Phone (760) 919-3600
Fax (760) 919-3662

August 5, 2025

Ms. Sabrina Barber
Manager of Distribution Services & Maintenance Operations
Imperial Irrigation District
333 E. Barioni Blvd.
Imperial, CA 92251-9633

To Whom It May Concern:

The Fort Yuma Quechan Indian Tribe (the "Quechan Tribe") is pleased to submit this **Letter of Commitment** in support of the Imperial Irrigation District (IID)'s proposed project titled **"Longer Duration Energy Storage for Community Energy Reliability and Resilience" (LDES for CERR)**, under the California Energy Commission's **Community Energy Reliability and Resilience Investment (CERRI)** program, GFO-23-312r2.

The Fort Yuma Quechan Indian Tribe is a federally recognized sovereign tribal nation located in the Lower Colorado River region, at the border of California and Arizona. Our tribal lands span more than 45,000 acres, with a population of over 3,500 enrolled members. The Quechan people have deep historical and cultural connection to the land, with a long-standing tradition of stewardship and sustainability.

As caretakers of our natural resources and community well-being, the Quechan Tribe has prioritized investments in infrastructure, emergency preparedness, and environmental resilience. We actively collaborate with regional and state agencies to enhance energy reliability, support economic development, and protect the health and safety of our members. Energy resilience is a growing concern for our community, particularly as we experience more frequent extreme weather events and electrical outages that threaten public safety and economic security.

The Quechan Tribe welcomes opportunities to engage in innovative, forward-looking projects that align with our values of sovereignty, sustainability, and community empowerment.

We understand the LDES for CERR project will deploy a long-duration energy storage system capable of delivering 10 hours of continuous discharge. This system will utilize California-based, CMBlu Energy's patented Organic SolidFlow™ technology, which combines the benefits of both solid-state and conventional flow batteries. CMBlu's solution offers a safe, sustainable, and secure carbon-based electrochemical storage system and represents a major advancement in energy resiliency infrastructure.

The Quechan Tribe is particularly supportive of this project for its potential to reduce the frequency, duration, and severity of electric power outages. Further, the project would enhance the reliability and resilience of electric service in tribal and surrounding communities. Lastly, the project could create workforce and engagement opportunities for tribal members and create use of tribal facilities for outreach and education events.

To demonstrate our commitment to the project, the Quechan Tribe plans to contribute in the following ways:

1. Collaborate with IID and CMBlu during the preparation of IID's application to California Energy Commission
2. Provide clarification and support regarding tribal participation during the CEC's screening or evaluation processes
3. Participate in any clarification interviews requested by the CEC concerning role in the project
4. Engage in consultation with IID and CMBlu during grant agreement negotiation should receive a Notice of Proposed Award
5. Participate in project kick-off activities upon execution of the grant agreement
6. Offer ongoing consultation and engagement with IID and CMBlu throughout the project implementation
7. Provide access to tribal facilities for project-related meetings and engage tribal community members in project outreach and staffing activities

In addition to the Quechan Tribe's participation, we understand that the project has garnered strong support from a wide range of community organizations, educational institutions, and elected officials, including those representing our tribal communities.

The Quechan Tribe strongly supports funding of the LDES for CERR under the CERRI program. We believe this project will significantly enhance energy resilience in our region, create meaningful local workforce opportunities, and benefit both tribal and non-tribal communities alike.

Thank you for your consideration.

Sincerely,

Jonathan E. Koteen, President
Quechan Indian Tribe