DRAFT
Initial Study & Environmental Analysis

For:

Vikings Solar Energy Generation & Storage Project
Conditional Use Permit (#20-0025)
Initial Study (#20-0035)

Prepared By:

COUNTY OF IMPERIAL

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SECTION I. INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level; ☒ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Vikings Solar Energy Generation and Storage Project.

B. CEQA REQUIREMENTS AND THE IMPERIAL COUNTY "GUIDELINES AND REGULATIONS TO IMPLEMENT CEQA AS AMENDED"

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's "Guidelines for the Implementation of CEQA as Amended", 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), Mitigated Negative Declaration, Negative Declaration, or other environmental document, 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 is prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the 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 Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY

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

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

D. CONTENTS OF INITIAL STUDY

This Initial Study is organized as described below 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.

IV. PERSONS AND ORGANIZATION CONSULTED identifies those persons consulted and involved in preparation of this Initial Study.

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

VI. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING AND REPORTING PROGRAM (IF ANY)

E. SCOPE OF ENVIRONMENTAL ANALYSIS

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

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

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study will be conducted under a ☐ policy-level, ☒ project level analysis. Regarding mitigation measures, it is not the intent of this document to "overlap" or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County's jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

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

1. Tiered Documents

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

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

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

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

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

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

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

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

2. Incorporation By Reference

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

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

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines, Section 15150[a]). The General Plan EIR is available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243, phone (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; phone (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 1993 County of Imperial General Plan Final EIR is SCH #93011023.
- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]).

SECTION II. ENVIRONMENTAL CHECKLIST

1.	**Project Title:**	Vikings Solar Energy Generation and Storage Project Conditional Use Permit (#20-0025) Initial Study (#20-0035)
2.	**Lead Agency Name and Address:**	Imperial County Planning & Development Services Department
3.	**Contact Person and Phone Number:**	Diana Robinson, Planner III, 442-265-1736
4.	**Address:**	801 Main Street, El Centro CA, 92243
5.	**E-mail:**	DianaRobinson@co.imperial.ca.us

6. Project Location: The proposed Project would be located on approximately 604 acres of private and Imperial County-owned land located at the intersection of Nelson Pit Road and Graeser Road in the western part of unincorporated Imperial County (Figure 1 and 2). The Project site is located approximately 5.5 miles east of the City of Holtville in Section 36 within Township 15 South, and Range 16 East of the San Bernardino Base and Meridian (SBB&M) of the "Holtville East" topographic quadrangles 7.5-minute (Assessor's Parcel Numbers [APNs] 050-070-018, 050-070-019 and 050-070-021).

7. Project Sponsor's Name and Address: Vikings Energy Farm, LLC

8. General Plan Designation: Two of the parcels (APN 050-070-018; 050-070-019) are designated as Agriculture in the Imperial County General Plan. APN 050-070-021 is designated as "Recreation/Open Space". All are located within a Renewable Energy Overlay Zone.

9. Zoning: Project parcels 050-070-019 and 050-070-018 are both zoned A-2-RE (General Agriculture with Renewable Energy Overlay) and parcel 050-070-021 is zoned GS-RE (Government/Special Public Zone with Renewable Energy Overlay) (Figure 3).

10. Description of Project: Vikings Solar Energy Farm, LLC (Project Applicant) proposes to develop a nominal 150-megawatt (MW) solar photovoltaic (PV) energy generation project with an integrated, not to exceed 300MW, battery storage project. The electrical energy produced would be conducted through the proposed 230 kilovolt (kV) switching station and delivered to the Imperial Irrigation District's (IID) 230 kV KN/KS transmission line via a gen-tie line approximately 120 feet in height. The solar energy generation facility, battery storage system, switching station and gen-tie line are collectively referred to as the "Proposed Project" or "Project."

The Project proposes to utilize either thin film or crystalline solar (PV) technology modules mounted either on fixed frames or horizontal single-axis tracker (HSAT) systems. The fixed frame PV module arrays would be mounted on racks that would be supported by driven piles. The fixed-frame racks would be secured at a fixed tilt of 20 to 30 degrees from horizontal facing a southerly direction. Individual PV modules would be mounted two high on a fixed frame, providing a two-foot ground clearance and resulting in the tops of the panels at approximately 7.5 feet above the ground. The fixed PV modules would be arranged in arrays spaced approximately 15 to 25 feet apart (pile-to-pile) to maximize performance and to allow access for panel cleaning.

If HSAT technology is used, the PV modules would rotate around the north-south HSAT axis so that the PV modules would continue to face the sun as it moves across the sky throughout the day. The PV modules would reach their maximum height (up to nine [9] feet above the ground) at both sunrise and sunset. At noon, or when stowed during high winds, when the HSAT system is rotated so that the PV modules would be horizontal with a nominal height of about six (6) feet above the ground.

The Project includes a battery storage system that would be located on the southern boundary of APN 050-070-019 just north of Nelson Pit Road and would consist of either lithium ion (Li-ion) or flow batteries. Depending on the selection of the battery technology, the batteries would either be housed in storage containers or storage buildings.

The electrical energy produced by the Project would be conducted through a new project substation located on the southern boundary of APN 050-070-019 (See Figure 2). This substation would take the delivery of the up to 34.5 kV power from the project and increase the voltage of the electricity to 230 kV, where it would feed into the interconnection switching station, adjacent to the project substation, for metering and delivery to the IID 230 kV KN/KS Line.

Electricity generated by the facility could be sold under the terms of a power purchase agreement (PPA) with a power purchaser (i.e., utility service provider). At the end of the PPA term, the owner of the facility may choose to enter into a subsequent PPA, update technology and re-commission, or decommission remove the generating facility and its components and restore the property.

11. Surrounding Land Uses and Setting: The Project site is generally located south of Kavanaugh Road, west of Graeser Road, the East Highline Canal and IID's KN/KS 230 kV transmission line, approximately 1.8 miles north of Interstate 8 (I-8). It should be noted however that the northwest portion of the solar energy facility site is bisected by Graeser Road and the East Highline Canal (APN 050-070-019). The solar energy facility site is surrounded by agricultural uses on the west and by open desert on the north, south and east. The Holtville Airport is located 1.6 miles to the north, and the nearest developed or proposed solar PV projects are located approximately 7.25 miles to the south, across State Route 98.

12. Other Public Agencies Whose Approval is Required (e.g., permits, financing approval, or participation agreement): To approve a Conditional Use Permit (CUP), other agency permits and approvals are listed below:

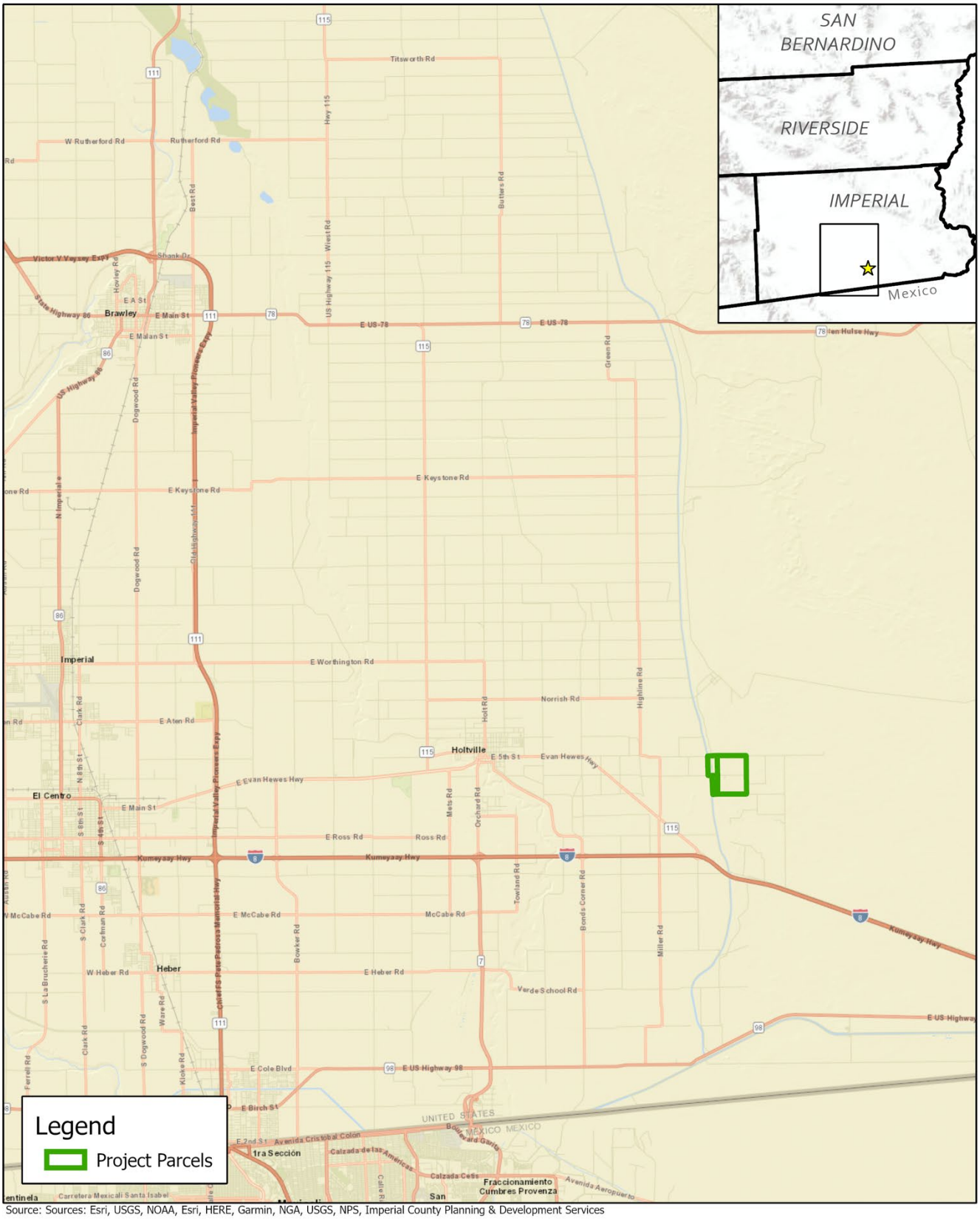
- Section 404 Permit: United States Army Corps of Engineers, Clean Water Act (CWA) Section 404 Permit may be required, as necessary. Section 401 Permit: Colorado Regional Water Quality Control Board CWA Section 401 Permit may be required, as necessary.
- Streambed Alteration Agreement: California Department of Fish and Wildlife Streambed Alteration Agreement under Section 1602 of the California Fish and Game Act may be required, as necessary.
- Transportation Permit for oversized/overweight vehicles: Caltrans
- Encroachment Permit: Imperial Irrigation District.
- Imperial County Air Pollution Control District: Authority to Construct and Permit to Operate.

- State Water Resources Control Board: National Pollutant Discharge Elimination System General Construction Stormwater Permit.
- Regional Water Quality Control Board (Region 7): Waste Discharge Requirements.

13. Native American Consultation: Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1?

In compliance with Assembly Bill 52 (Chapter 532, Statutes 2014), the ICPDSD sent letters to one (1) California Native American Tribe on March 26, 2021, providing notification of the Project and an invitation to participate in consultation. Under AB-52, California Native American Tribes have 30 days from the date of receipt of the notice to request consultation.

On April 8, 2021, the Quechan Tribe Historic Preservation Officer requested consultation with the County and the County is currently trying to arrange a meeting with Tribe.

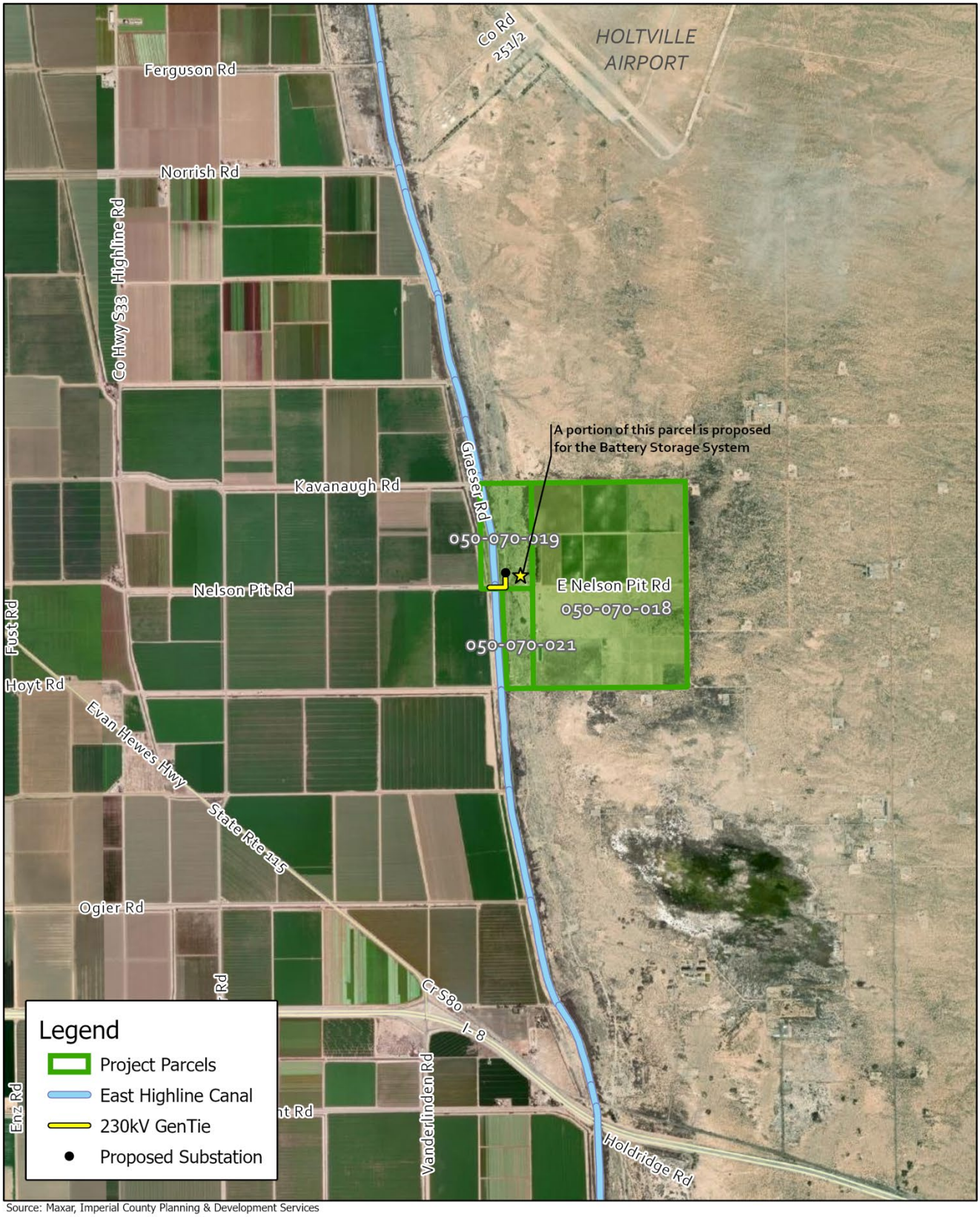


Source: Sources: Esri, USGS, NOAA, Esri, HERE, Garmin, NGA, USGS, NPS, Imperial County Planning & Development Services

Regional Location

Vikings Solar Energy Generation and Storage Project

Figure 1

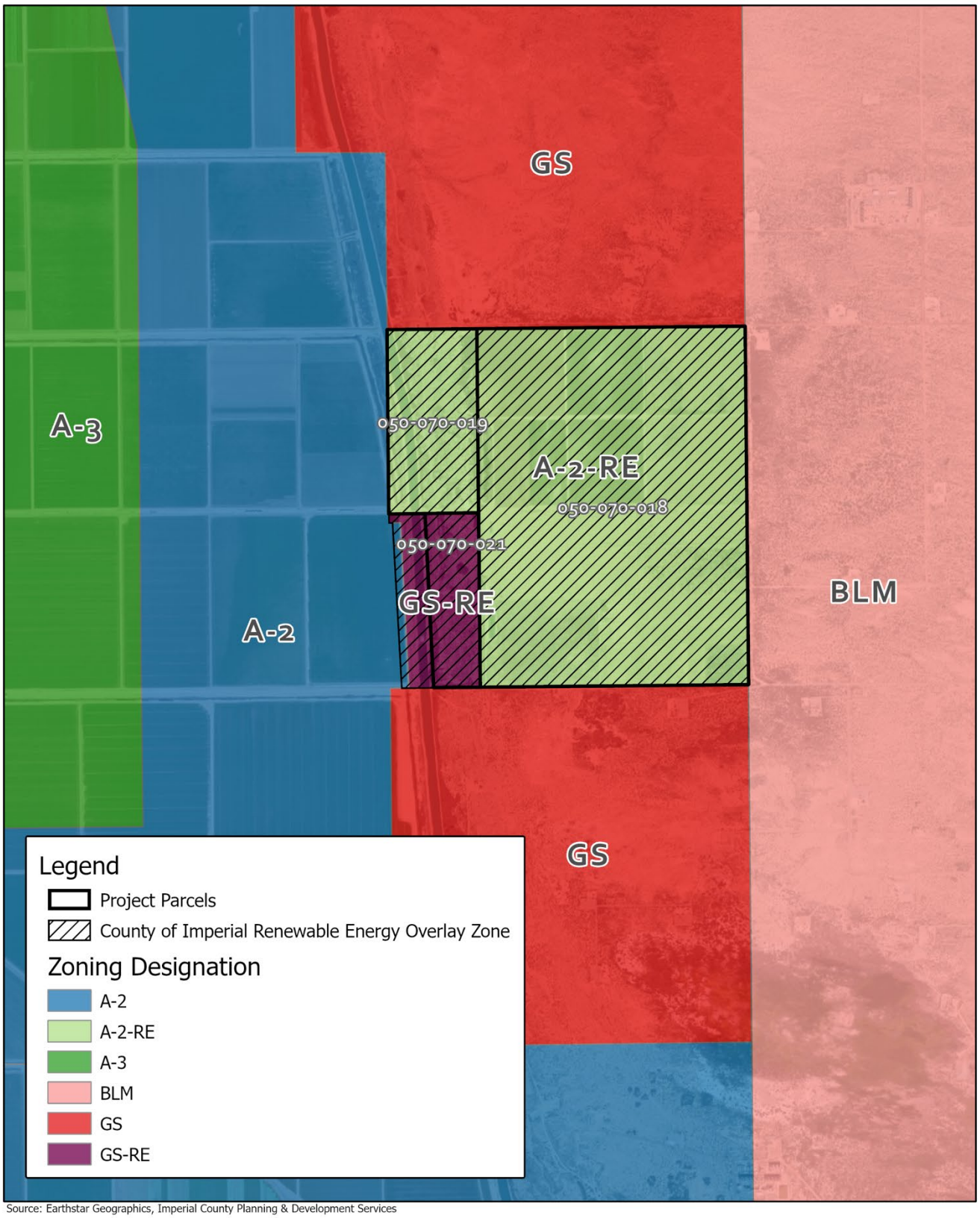


Source: Maxar, Imperial County Planning & Development Services

Project Location

Vikings Solar Energy Generation and Storage Project

Figure 2



Source: Earthstar Geographics, Imperial County Planning & Development Services

N

0 0.4 0.8 Miles

Existing Zoning Designation

Vikings Solar Energy Generation and Storage Project

Figure 3

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

After Review of the Initial Study, the Environmental Evaluation Committee 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 Final EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Final EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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

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

Jim Minnick, Director of Planning/EEC Chairman

Date:

PROJECT SUMMARY

Project Location

The proposed Project would be located on approximately 604 acres of private and Imperial County-owned land located at the intersection of Nelson Pit Road and Graeser Road in the western part of unincorporated Imperial County (Figure 3-1 and 3-2). It is approximately 5.5 miles east of the City of Holtville in Section 36 within Township 15 South, and Range 16 East of the San Bernardino Base and Meridian {SBB&M) of the "Holtville East" topographic quadrangles 7.5-minute (Assessor's Parcel Numbers [APNs]) 050-070- 018, 050-070-019 and 050-070- 021.

Project Summary

The Project proposes to utilize either thin film or crystalline solar photovoltaic (PV) technology modules mounted either on fixed frames or horizontal single-axis tracker (HSAT) systems. The fixed frame PV module arrays would be mounted on racks that would be supported by driven piles. The fixed-frame racks would be secured at a fixed tilt of 20 to 30 degrees from horizontal facing a southerly direction. Individual PV modules would be mounted two high on a fixed frame, providing a two-foot ground clearance and resulting in the tops of the panels at approximately 7.5 feet above the ground. The fixed PV modules would be arranged in arrays spaced approximately 15 to 25 feet apart (pile-to-pile) to maximize performance and to allow access for panel cleaning .

If HSAT technology is used, the PV modules would rotate around the north-south HSAT axis so that the PV modules would continue to face the sun as it moves across the sky throughout the day. The PV modules would reach their maximum height (up to nine [9] feet above the ground) at both sunrise and sunset. At noon, the HSAT system is rotated so that the PV modules would be horizontal with a nominal height of about six (6) feet above the ground. The individual PV systems would be arranged in large arrays by placing them in columns spaced approximately 10 feet apart.

The battery storage system would be constructed as a multiple structure facility, consisting of up to 20 battery modules at full build out, the footprint of which would be up to 450 square feet per module. Each module will house the batteries, mounting racks and associated electrical equipment. Each module will be of a metal frame construction, retrofitted to add insulation, air-conditioning, and fire suppression for battery reliability, with separate rooms for the electronic controls, inverters, and rectifiers. Due to the slightly positive pressure required within each module to ensure functionality of the fire suppression system, the modules will not be vented. Each module will utilize a supply and return air conditioning system; this system has a fresh air (economizer mode) intake system and is also referred to as a closed loop system.

The electrical energy produced by the project would be conducted through a new project substation would be constructed on the southern boundary of APN 050-070-019. This substation would take the delivery of the up to 34.5 kV power from the project and increase the voltage of the electricity to 230 kV, where it would feed into the interconnection switching station for metering and delivery to the IID 230 kV KN/KS Line.

Environmental Setting

The Project area is located on a combination of private land (two parcels) and County-owned land (one parcel) in the western part of unincorporated Imperial County. The Project area is idle land and agriculture. The Project area is located at the intersection of Nelson Pit Road and Graeser Road and is accessible from I-8 via Evan Hewes Highway and Graeser Road. The northwest portion of the solar energy facility site is bisected by Graeser Road and the East Highline Canal (APN 050-070-019). The Holtville Airport is located 1.6 miles to the north, and the nearest developed or proposed solar PV projects are located approximately 7.25 miles to the south, across State Route 98.

General Plan Consistency

The Project is located within the unincorporated area of Imperial County. Two of the parcels (APN 050-070-018 and 050-070-019) are designated as Agriculture in the Imperial County General Plan. APN 050-070-021 is designated as "Recreation/Open Space". All are located within a Renewable Energy Overlay Zone (Figure 3). The Project would be consistent with the goals and objectives of the Renewable Energy and Transmission Element of the County's General Plan (2015).

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

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

	Potentially Significant Impact **(PSI)**	Potentially Significant Unless Mitigation Incorporated **(PSUMI)**	Less Than Significant Impact **(LTSI)**	No Impact **(NI)**
I. AESTHETICS.				
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion:

a) No Impact. There are no designated scenic vistas in the Project vicinity. A visual resources impact assessment was prepared for the Project and it was determined that the Project would not have a substantial adverse effect on the expansive views from the three key observation points (KOPs) selected for analysis (SWCA 2021a). Rather, the thin horizontal edge of solar arrays and rectangular geometric shapes of the project facilities would be absorbed into the existing vegetation and built features with similar lines, forms, and colors that comprise the landscape. No adverse impacts on a scenic vista have been identified and this environmental parameter is not proposed for further analysis in the EIR.

b) No Impact. There are no designated or eligible scenic highways in the project vicinity. The nearest highway is Highway 115 located 1.4 miles southwest of the Project site. This highway is not a designated scenic highway. The nearest eligible state scenic highway according to Caltrans California State Scenic Highway System Map is Route-78, located 39.82 miles northwest of the Project site.

The Project vicinity does not contain any rock outcroppings and has very few trees. According to the Class III Cultural Resources Inventory Report prepared for the Project, there are no historic buildings within the project vicinity (SWCA 2021e). As such, construction of the Project is not anticipated to substantially damage scenic resources. No impacts have been identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

c) Less than Significant Impact. The existing visual character from public viewpoints would not be substantially altered in the project vicinity. From KOP 1, which represents an elevated view overlooking the Project site, the proposed gen-tie line would be visible but would be mostly unnoticed due to the current existing structures that

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

obscure the view. From KOP 2, the Project would visually blend in with the existing built features and irrigated agricultural fields between the viewer and the Project site. The view from KOP 3 is mostly blocked by existing vegetation, residential and agricultural structures, and transmission lines running east to west across the landscape. As previously described, the Project would not substantially degrade the existing visual character or quality of public views from this distance; rather, the horizontal and rectangular project facilities would appear to be absorbed into the existing vegetation and built features that comprise the broader landscape. The project would not substantially degrade existing visual character and quality and the impact would be less than significant (SWCA 2021a).

d) Less than Significant Impact. The Project would not include any substantial source of nighttime light in the Project vicinity. Any lighting required for safety and security within the Project area would be hooded and oriented downward. The glare analysis for the Project concluded that viewers at KOP 3 may experience glare from the northeastern-most project array area if no vegetation or structures are in the field of view, and that the other array areas will not produce glare. KOP 3 will have potential for glare for approximately 10 minutes a day for 2 months a year (SWCA 2021a). However, given the presence of existing vegetation and structures, it likely that these effects would be less than significant.

A Visual Resource Assessment for the Vikings Solar Energy Storage Project has been prepared for the Project and the EIR will evaluate potential impacts associated with security lighting and potential glint and glare from the solar panels.

II. AGRICULTURAL AND FOREST RESOURCES.

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

a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☒	☐	☐	☐
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or	☐	☐	☐	☒

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timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Discussion:

a) Potentially Significant Impact. According to the most recent California Department of Conservation Farmland Mapping (2018) the Project site contains: Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance and Other Land. All 18.36 acres of Prime Farmland and 236.8 acres of Farmland of Local Importance are located within parcel 050-070-018. Parcel 050-070-019 contains 0.47 acres of Farmland of Statewide Importance with the remainder being Other Land. Parcel 050-070-021 contains only Other Land. There are no Williamson Act lands within or adjacent to the project area.

The Land Evaluation Site Assessment (LESA) performed for the Project resulted in a Land Evaluation score of 21.42 and a Site Assessment score of 26.25, for a cumulative total of 47.67 points out of 100 (SWCA 2020a). Based on the California Agricultural LESA Model methodology and final score, the Project site is considered to represent a significant agricultural resource and its temporary conversion to a non-agricultural use would result in a significant impact on agricultural resources. The County Department of Agriculture provided comments on the CUP application regarding providing mitigation for the loss of this farmland. The EIR will evaluate the project's conversion of important farmland to a non-agricultural use and propose feasible mitigation, as appropriate, to reduce the impacts to less-than-significant levels.

b) No Impact. Project parcels 050-070-019 and -018 are both zoned A-2-RE (General Agriculture with Renewable Energy Overlay) and parcel 050-070-021 is zoned GS-RE (Government/Special Public Zone with Renewable Energy Overlay). Solar energy facilities are allowed with the A-2-RE and GS-RE zones, subject to a CUP. For these reasons, the proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impacts are identified for this issue area. This environmental parameter is not proposed for detailed analysis in the EIR.

c) No Impact. Neither the Project area nor surrounding areas are used for timber production or are defined as forest lands. The proposed Project would not conflict with any zoning designations designed to preserve timber or agricultural resources. No impacts are identified for this issue area. This environmental parameter is not proposed for further analysis in the EIR.

d) No Impact. There are no existing forest lands either on-site or in the Project vicinity. The proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur under this threshold. This environmental parameter is not proposed for further analysis in the EIR.

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

e) No Impact. The proposed Project does not include changes in the existing environment which, due to their location or nature, would result in the conversion of neighboring farmland to non-agricultural use. Proximate publicly owned lands include the U.S. Bureau of Land Management (BLM) Imperial Sand Dunes Recreational Area (i.e., Algodones Dunes), located approximately 12 miles to the east; BLM Hot Springs, located approximately 2 miles south of the project site (BLM 2021); and several wildlife areas and wildlife refuges located approximately 22 miles to the northwest of the Project site (California Department of Fish and Wildlife 2015). There are no publicly owned lands or other existing easements in the neighboring areas; therefore, for the purposes of this assessment, there is no protected resource land within the neighboring areas. No impacts are identified for this issue area. This environmental parameter is not proposed for further analysis in the EIR.

III. AIR QUALITY.

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

a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

Discussion:

a) Less Than Significant Impact. The Project area is located within the jurisdiction of the Imperial County Air Pollution Control District (ICAPCD), in the Salton Sea Air Basin (SSAB). The SSAB is classified by the State as a nonattainment area for ozone (O3) as well as a nonattainment area for the State standards pertaining to particulate matter less than 10 microns (PM10). In addition, the SSAB is classified as a serious nonattainment area for the PM10 standard. An air quality and greenhouse gas emission analysis has been prepared for the Project (SWCA 2021b) and the EIR will evaluate potential air quality impacts.

The ICAPCD provided comments on the CUP application regarding the need to prepare a Tier 1 Preliminary Analysis as well as other requirements. With or without the implementation of any proposed mitigation measures, the Project's emissions from both short-term construction and long-term operation are not anticipated to exceed the applicable ICAPCD thresholds of significance nor the South Coast Air Quality Management District (SCAQMD) Greenhouse Gas (GHG) annual threshold of significance, thus the Project is not anticipated to conflict

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with or obstruct implementation of the applicable air quality plan and impacts would be less than significant (SWCA 2021b).

b) Less Than Significant Impact. The SSAB is classified by the State as a nonattainment area for O3 as well as a nonattainment area for the State standards pertaining to PM10. In addition, the SSAB is classified as a serious nonattainment area for the PM10 standard. With or without the implementation of mitigation measures, the Project's emissions from both short-term construction and long-term operation are not anticipated to exceed the applicable ICAPCD thresholds of significance nor the SCAQMD GHG annual threshold of significance, thus the impacts to air quality are considered less than significant (SWCA 2021b). The EIR will evaluate Project-related increases of criteria pollutant emissions.

c and d) Less Than Significant Impact. The Project area does not contain any permanent residents or sensitive receptors. Although impacts would be less than significant, the ICAPCD CEQA Air Quality Handbook contains standard mitigation measures for construction equipment and fugitive PM10 that shall be implemented at all construction sites, as appropriate and feasible, regardless of site size. The ICAPCD CEQA Air Quality Handbook also contains discretionary measures for fugitive PM10 control that shall be implemented at non-residential construction sites greater than five acres and residential construction sites greater than ten acres. The Project is non-residential and is greater than 5 acres; therefore, all standard and discretionary measures for construction-related emissions shall apply. The Project is considered a Tier 1 project and is required to implement all standard operational mitigation measures.

Potential sources of odors during construction activities include diesel exhaust from construction equipment and diesel vehicles. These odors would not affect a substantial number of people and dissipate as a function of distance from the source. While the proposed Project's odor impact is expected to be less than significant, and the Project is not expected to expose sensitive receptors to substantial pollutant concentrations, these impacts will be further evaluated in the EIR.

IV. BIOLOGICAL RESOURCES.

Would the project:

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

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c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐
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 native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion:

a) Potentially Significant Unless Mitigation Incorporated. Nine special-status plant species were identified as potentially occurring in the Project area. The occurrence potential is considered to be low to unlikely for all of these, based on habitat conditions within the project site (SWCA 2021c).

Fifteen special-status species of fauna were reported as having the potential to occur within the Project area. One special-status wildlife species was found on-site during the December 2020 survey, a western burrowing owl (Athene cunicularia) (non-nesting) (SWCA 2021c).

One mammal, the Yuma hispid cotton rat (*Sigmodon hispidus eremicus*), is considered to be unlikely to occur on the Project site, and to have a moderate potential for occurrence near the project site. Project implementation would result in the direct removal of habitat on-site. While the majority of the site is characterized as disturbed/ruderal and active agriculture with scattered areas of creosote and white bursage scrub, it could provide foraging habitat for birds and mammals, neither of which are anticipated to be directly impacted by Project construction. Because of their mobility, these animals generally move out of harm's way and thus unlikely to be injured or killed during grading and construction (SWCA 2021c).

Nesting birds could occur anywhere within or adjacent to the Project site, and as such could be directly or indirectly impacted during project construction. Pre-construction nest surveys are recommended if work is scheduled during the breeding bird season, generally considered to be from 1 February to 31 August. If found, nests must be protected either by buffer areas or timing to avoid disturbance to active nests. Impacts during operations are not anticipated. There are specific survey requirements for burrowing owls, known to nest in the

vicinity (SWCA 2021c). The EIR will present the results of the Biological Resources Technical Report (SWCA 2021c) and the Aquatic Resources Technical Report (SWCA 2021d) and identify feasible mitigation measures to reduce impacts to below a level of significance.

b) Potentially Significant Impact. Riparian vegetation consists of broadleaf cattail (*Typha latifolia*), arrow weed (*Pluchea sericea*), giant wild rye (*Arundo donax*), and saltcedar (*Tamarix* sp.). The Aquatic Resources Technical Report (SWCA 2021d) identified 2.8 acres of Wetland Waters of the U.S., 8.4 acres of Non-Wetland Waters of the U.S., 0.6 acres of non-wetland Waters of the State and 6.58 acres of CDFW Jurisdictional Streambed in the project area. While the layout has been designed to avoid all drainages, wetlands, and riparian habitats in the immediate vicinity, the current location of the battery storage component could result in potential impacts to unnamed Reservoir Number 3 which has 0.836 acres of CDFW Jurisdictional Streambed. Thus, there would be Potentially Significant impacts.

c) Potentially Significant Impact. The Project site contains 6.508 acres (3,020 linear feet) of CDFW jurisdictional streambed and 2.872 acres (2,420 linear feet) of Waters of the U.S. However, these areas would be avoided and there would be no impact. The Project layout has been designed to avoid all drainages, wetlands, and riparian habitats in the immediate vicinity. However, the current location of the battery storage component could result in potential impacts to unnamed Reservoir Number 3 which has 0.836 acres of CDFW Jurisdictional Streambed. Indirect impacts to drainages may result from erosion and stormwater flows from the Project site into drainages below the project elevation. However, the Project proponent will be required to prepare a storm water pollution prevention plan (SWPPP) which will include best management practices (BMPs) to avoid and/or control site runoff, sedimentation and erosion. These measures should be sufficient to prevent impacts to aquatic resources (SWCA 2021d).

d) Less Than Significant Impact. The Project site currently provides unrestricted wildlife movement for animals of all sizes within the property. There are no federal, state, or local parks or designated wildlife corridors or conservation areas on or adjacent to the subject property. Similarly, there are no U.S. Fish and Wildlife (USFWS)-designated critical habitat or Habitat Conservation Plan and no California Department of Fish and Wildlife (CDFW) Natural Community Conservation Plan at or adjacent to the Project site. The Project will not interfere substantially with the currently restricted 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 native wildlife nursery sites (SWCA 2021c). Thus, the impact would be less than significant.

e) Potentially Significant Unless Mitigation Incorporated. The Imperial County General Plan Open Space and Conservation Element (County of Imperial 2016) contains an Open Space Conservation Policy that requires detailed investigations to be conducted to determine the significance, location, extent, and condition of natural resources in the County, and to notify any agency responsible for protecting plant and wildlife before approving a project which would impact a rare, sensitive, or unique plant or wildlife habitat. As noted above, implementation of the Project has the potential to result in significant impacts to candidate, sensitive, or special status species, and washes and ephemeral streams. Such impacts could conflict with Open Space and Conservation Element and are considered potentially significant.

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f) No Impact. The Project Area is not located within an area that is subject to a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

V. CULTURAL RESOURCES.

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5?	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐

Discussion:

a, b, and c) Potentially Significant Impact. A confidential records search of the California Historical Resources Information System (CHRIS), a Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC), archival research, and a pedestrian field survey were used to evaluate the presence or likelihood of the presence of cultural resources within the Project area. A record search conducted by the SCIC identified 50 previously recorded resources within a 0.8- km (0.5-mile) radius of the Project area. Of these 50 resources, three are mapped within the Project area itself. The search of the SLF maintained by the NAHC was negative within the Project area (SWCA 2021e). The NAHC noted that negative results may not indicate the absence of Native American cultural resources in the area and provided a contact list of 16 Native American tribal organizations that may have knowledge of cultural resources in or near the study area. The County, as lead agency, is conducting its own Native American consultation for the Project, as part of its AB 52 responsibilities.

The locations of the three previously recorded resources were investigated but two of them (P-13-000304/CA-IMP-304 and P-13-003213/CA-INY-3213) were unable to be relocated. Both are presumed either misplotted or destroyed. As a consequence, the two resources will not be impacted by the Project (SWCA 2021e).

The third previously recorded resource (P-13-008333/CA-INY-7835) is the East Highline Canal, which has been previously recommended eligible for the California Register of Historical Resources (CRHR). It therefore qualifies as a historical resource under CEQA, and any adverse impacts to the resources could constitute a significant impact on the environment. This resource will be left in place and avoided and as a consequence will not be impacted by the Project (SWCA 2021e).

Project-related ground disturbing activities could cause a substantial adverse change in a historical or archaeological resource. Although unlikely, there is a potential for unknown human remains to be unearthed during earthwork activities. Therefore, a potentially significant impact is identified for these resources. The findings

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

of the cultural resources report will be included in the EIR analysis and feasible mitigation measures identified that would avoid or reduce significant impacts to below a level of significance.

VI. ENERGY.

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Discussion:

a) Less Than Significant. No wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation would occur. This is considered a less than significant impact and will be further evaluated in the EIR.

b) No Impact. Construction of the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and no impacts would occur under this criteria.

VII. GEOLOGY AND SOILS.

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
1) 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?	☐	☐	☒	☐
2) Strong seismic ground shaking?	☐	☒	☐	☐
3) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
4) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or	☐	☒	☐	☐

	Potentially Significant Impact **(PSI)**	Potentially Significant Unless Mitigation Incorporated **(PSUMI)**	Less Than Significant Impact **(LTSI)**	***No Impact*** **(NI)**
off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Discussion:

a.1) Less Than Significant Impact. The Project area is located in southern California, an area known to be geologically active, and which is subject to seismic events. The Project site does not lie within a currently delineated State of California, Alquist-Priolo Earthquake Fault Zone (Landmark Consulting 2021). Well-delineated fault lines cross through this region as shown on California Geological Survey [CGS] maps; however, no active faults are mapped in the immediate vicinity of the site. Therefore, active fault rupture is unlikely to occur at the Project site. However, because of the high tectonic activity and deep alluvium of the region, the potential for surface rupture cannot be precluded on undiscovered or new faults that may underlie the site. A soils and geology report was prepared for the Project (Terraphase Engineering, 2019) and will be discussed in the EIR. The EIR will evaluate the potentially significant adverse impacts related to seismicity, fault-rupture and ground failure.

a.2) Potentially Significant Impact Unless Mitigation Incorporated. The Project site is located in the seismically active Imperial Valley of southern California with numerous mapped faults traversing the region including the San Andreas, San Jacinto, and Elsinore Fault Zones in southern California. The Imperial fault represents a transition from the more continuous San Andreas fault to a more nearly echelon pattern characteristic of the faults under the Gulf of California). A search of known faults or seismic zones that lie within a 62- mile (100-kilometer) radius of the Project site was conducted. The criterion for fault classification adopted by the CGS defines Earthquake Fault Zones along Holocene-active or pre-Holocene faults. Earthquake Fault Zones are regulatory zones that address the hazard of surface fault rupture. A Holocene-active fault is one that has ruptured during Holocene time (within the last 11,700 years). A pre-Holocene fault is a fault that has not ruptured in the last 11,700 years. Pre-Holocene faults may still be capable of surface rupture in the future, but are not regulated by the Alquist-Priolo act (Landmark Consulting, 2021).

A review of the current Earthquake Fault Zone maps indicates that the nearest zoned fault to the Project site is the Rico fault located approximately 7.1 miles west and the Imperial fault located approximately 7.9 miles west to

southwest. The primary seismic hazard at the Project site is the potential for strong groundshaking during earthquakes along the Rico, Imperial and Brawley Faults (Landmark Consulting 2021).

a.3) Potentially Significant Unless Mitigation Incorporated. Liquefaction is the loss of soil strength from sudden shock (usually earthquake shaking), causing the soil to become a fluid mass. Liquefaction describes a phenomenon in which saturated soil loses shear strength and deforms as a result of increased pore water pressure induced by strong ground shaking during an earthquake. Dissipation of the excess pore pressures will produce volume changes within the liquefied soil layer, which can cause settlement. Shear strength reduction combined with inertial forces from the ground motion may also result in lateral migration (lateral spreading). Factors known to influence liquefaction include soil type, structure, grain size, relative density, confining pressure, depth to groundwater (typically occurs in the upper 50 feet), and the intensity and duration of ground shaking. Soils most susceptible to liquefaction are saturated, loose sandy soils and low plasticity clay and silt (Landmark Consulting 2021).

Groundwater at the project site is likely to be present at the interface between surface sands and underlying clays. There is uncertainty in the accuracy of short-term water level measurements, particularly in fine grained soil. The referenced groundwater levels should not be interpreted to represent permanent condition. Groundwater levels may fluctuate with precipitation, East Highline Canal water stage, site watering, drainage, and site grading (Landmark Consulting 2021).

The soils encountered at the points of exploration included saturated sands and silty sands that could liquefy during a Maximum Considered Earthquake. Liquefaction can occur within a three-foot thick sand layer at a depth of 26 feet below ground surface and two isolated silt and sand layers at depths of 15 and 42 feet. The likely triggering mechanism for liquefaction appears to be strong ground shaking associated with the rupture of the Rico and Imperial faults (Landmark Consulting 2021).

Liquefaction Induced Settlements. Based on empirical relationships, total induced settlements are estimated to be about ½ inch should liquefaction occur. Differential settlement is estimated at be two-thirds of the total potential settlement in accordance with *California Special Publication 117*. Accordingly, there is a potential for inch of liquefaction induced differential settlement at the Project site. The differential settlement based on seismic settlements is estimated at 1 inch over a distance of 100 feet. Foundations should be designed for a maximum deflection of L/720. Because of the depth of the liquefiable layer, the 15 foot thick non-liquefiable layer may act as a bridge over the liquefiable layer resulting in a fairly uniform ground surface settlement; therefore, wide area subsidence of the soil overburden would be the expected effect of liquefaction rather than bearing capacity failure of the proposed structures (Landmark Consulting 2021).

Liquefaction Induced Ground Failure. Small ground fissure or sand boil formation is unlikely because of the thickness of the overlying unliquefiable soil. Sand boils are conical piles of sand derived from the upward flow of groundwater caused by excess porewater pressures created during strong ground shaking. Sand boils are not inherently damaging by themselves, but are an indication that liquefaction occurred at depth. Liquefaction induced lateral spreading is not expected to occur at this site due to the planar topography. If the liquefiable layer lies at a depth greater that about twice the height of a free face, lateral spread is not likely to develop. No slopes or free

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faces occur at this site except for the shallow retention basin, which depths are substantially above the first liquefiable layer (Landmark Consulting 2021).

a.4) Less Than Significant. The hazard of landsliding is unlikely due to the regional planar topography. No ancient landslides are shown on geologic maps of the region and no indications of landslides were observed during site investigations (Landmark Consulting 2021).

b) Potentially Significant Impact Unless Mitigation Incorporated. The Project would result in changes to the current topography because of grading and site preparation activities. Although these changes will be designed to meet stringent regulatory requirements, there is a potential for soil erosion, loss of topsoil, and geologic instability. The EIR will evaluate these potentially significant adverse impacts.

c) Potentially Significant Impact Unless Mitigation Incorporated. As discussed in a. 3 and 4, the proposed Project risk for on- or off-site landslide, lateral spreading, subsidence, or collapse are expected to be less than significant. However, the proposed Project risk for on- or off-site liquefaction are expected to be potentially significant unless mitigation is incorporated. These issues will be addressed in the EIR.

d) Less Than Significant Impact. Expansive soils are characterized by their ability to undergo significant volume change (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from rainfall, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors, and may cause unacceptable settlement or heave of structures, concrete slabs supported-on-grade, or pavements supported over these materials. Depending on the extent and location below finished subgrade, expansive soils can have a detrimental effect on structures. The near surface soils in the Project site are sands which are considered non-expansive. The EIR will evaluate the potential impacts related to expansive soils.

e) No Impact. A septic system and leach field are not proposed as part of the Project. No impacts are expected.

f) Less Than Significant Impact. Geologic mapping shows the surficial geology of the Project area consists of alluvial, lacustrine, and eolian deposits that date from recent times to the late Pleistocene. The Los Angeles County Museum (LACM) records search indicates the museum has a number of localities in similar sediments in the vicinity of the project area. A review of the scientific literature provided context for these and other fossil discoveries. Project activities would entail grading and trenching, which could impact sediments with high paleontological potential in the subsurface. Regulatory compliance and adherence to these measures will reduce impacts of the project on paleontological resources to a less-than-significant level as required by CEQA. Thus, potential impacts to paleontological resources would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS.

Would the project:

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

	Potentially Significant Impact **(PSI)**	Potentially Significant Unless Mitigation Incorporated **(PSUMI)**	Less Than Significant Impact **(LTSI)**	***No Impact*** **(NI)**
b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion:

a) Less Than Significant. Greenhouse gases (GHGs) emitted by human activity are implicated in global climate change or global warming. The principal GHGs are Carbon Dioxide (CO2), Methane (CH4), Nitrous Oxide (N2O), and Fluorinated Gases. The transportation sector (e.g., on-road motor vehicles, off-highway vehicles, aircraft) is the single largest source of GHG emissions and accounts for one-half of GHG emissions globally. With or without the implementation of the proposed mitigation measures, the Project's emissions from both short-term construction and long-term operation do not exceed the applicable ICAPCD thresholds of significance nor the SCAQMD GHG annual threshold of significance, thus the impacts to air quality are considered less than significant (SWCA 2021b). Construction emissions would not exceed the 3,000 MT CO2E annual threshold of significance. Therefore, the Project's direct and indirect GHG emissions would have a less than significant impact on the environment.

b) Less Than Significant. The Project would not conflict with any local or state plan, policy, or regulation aimed at reducing GHG emissions from land use and development. Thus, impacts would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use	☐	☐	☒	☐

	Potentially Significant Impact **(PSI)**	Potentially Significant Unless Mitigation Incorporated **(PSUMI)**	Less Than Significant Impact **(LTSI)**	***No Impact*** **(NI)**
airport, would the project result in a safety hazard or excessive noise for people residing or working in the Project Area?				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

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

Discussion:

a) Less Than Significant Impact. The Project area is characterized as an agricultural and open desert area that is currently vacant. The proposed Project would require the limited transport, storage, and use of fuels, and other fluids for the fueling/servicing of construction equipment.

Transportation, storage, and disposal/recycling of such products are extensively regulated at the local, state and federal levels. Construction and operations will be required to be in compliance with these regulations. The hazardous materials handled onsite 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 waste 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 project. Disposal of hazardous wastes on the Project site is not proposed. However, these issues will be addressed in the EIR. The Imperial County Department of Environmental Health did not have any comments on the proposed Project in their letter on the CUP application.

b) Less Than Significant Impact. Based on a search of the Government Code Section 65962.5 "Cortese" list, there are no hazardous materials sites listed on the Cortese Knox list. According to the State Water Resources Control Board, there are no Underground Storage Tanks in the vicinity of the landfill. This Phase I ESA revealed the following recognized environmental conditions (REC's) in connection with the property:

- There is a potential of buried asbestos concrete (transite) pipe existing onsite for irrigation water distribution piping. The pipe material is only considered "friable" when disturbed. The piping material is not required to be removed, but if disturbed, requires proper handling with respiratory protection and if removed should be properly disposed by a qualified ACM abatement contractor.

- Old tires, household debris and concrete debris piles are found in the western portion of the subject site. This debris should be cleaned up and properly disposed.

This assessment has revealed the following "de minimis" environmental conditions (REC's) in connection with the property:

- Pesticide residues (low concentrations) typical to agricultural crop applications are present in the near surface soils.

- Pole-mounted sealed electrical transformers owned and maintained by the Imperial Irrigation District (IID) exist on this subject property. All IID transformers containing PCB's have been replaced. If the transformers begin to leak, the IID should be notified, and the transformers replaced. (GS Lyon 2021).

c) No Impact. Construction of the proposed Project would not emit hazardous emissions, handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The

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

nearest school, Holtville Middle School, is located 6 miles west of the Project site. No impacts would occur, and this environmental parameter is not proposed for further analysis in the EIR.

d) No Impact. Based on a search of the Government Code Section 65962.5 "Cortese" list, there are no hazardous materials sites listed on the Cortese Knox list. While no impacts are anticipated to occur, this environmental parameter will be further discussed in the EIR (GS Lyon 2021).

e) Less Than Significant Impact. The nearest airport to the Project site is the Holtville Airport located less than 2 miles north of the project site. The Holtville Airport consists of a long and wide runway, but it has essentially no other facilities. There are no hangars or other significant structures on the property. According to the *Imperial County Airport Land Use Commission (ALUC) Compatibility Plan* (Imperial County 1996), the Project parcels are outside the compatibility zones of the Holtville Airport. The Project site is approximately 1.4 miles south of the boundary line of Compatibility Zone C. Nonetheless, the EIR will determine whether the height of the any of the proposed components will require notification in accordance with Federal Aviation Administration (FAA) requirements.

f) Potentially Significant Impact Unless Mitigation Incorporated. Construction of the Project would generate construction trips and the potential for temporary roadway lane closures during construction of proposed traffic improvements, which could temporarily affect an emergency response or evacuation plan. This impact is considered potentially significant and will be addressed in the EIR.

g) Less than Significant. The Project site is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan, the potential for a major fire in the unincorporated areas of the County is generally low (County of Imperial, n.d.). This is considered a less than significant impact and will be addressed in the EIR

X. HYDROLOGY AND WATER QUALITY.

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:				
1) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐

	Potentially Significant Impact **(PSI)**	Potentially Significant Unless Mitigation Incorporated **(PSUMI)**	Less Than Significant Impact **(LTSI)**	***No Impact*** **(NI)**
2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

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

Discussion:

a) Potentially Significant Impact Unless Mitigation Incorporated. Construction of the Project facilities would involve excavation, soil stockpiling, grading, and the installation of solar arrays and access roads. There are multiple construction related activities that could have potential direct or indirect impacts on the water quality of local surface water features and shallow groundwater resources including; sedimentation, erosion, handling hazardous materials, and dewatering. Disturbing the geomorphic characteristics and stability of the channel bed and banks may initiate chronic erosion in natural and engineered channels thereby resulting in increased turbidity. A similar circumstance could occur upon decommissioning of the Project prior to site restoration. In both cases, such impacts could be exacerbated if surface vegetation is not reestablished and stabilized prior to the next high-flow or precipitation event and could result in significant direct impacts within the immediate vicinity of construction and indirect impacts on water quality further downstream. This is considered a significant impact. The Imperial Irrigation District provided a comment letter on the CUP application addressing potential impacts to IID drains from project runoff.

Hazardous materials associated with construction would be limited to substances associated with mechanized equipment, such as gasoline and diesel fuels, engine oil, and hydraulic fluids. If precautions are not taken to contain contaminants, accidental spills of these substances during construction could produce contaminated stormwater runoff (nonpoint source pollution), a major contributor to the degradation of water quality in surface waters. Without proper containment and incident response measures in place, the operation of construction equipment could result in significant direct and indirect impacts on water quality. This is considered a significant impact.

Construction of the Project could, at times, also require dewatering of shallow, perched groundwater in the immediate vicinity of excavations and installation of underground features at a limited number of areas where groundwater depths are shallow. Groundwater withdrawn from the construction areas could be subsequently discharged to local drainage ditches or via land application. These discharges may contain sediments, dissolved solids, salts, and other water quality constituents found in the shallow groundwater, which could degrade the quality of receiving waters. Degradation of local receiving waters from the introduction of shallow groundwater during construction dewatering could result in a significant impact on receiving waters. This is considered a significant impact.

Post-construction runoff from the constructed facilities would carry two main water quality impacts that could impact surface water drainages and drains. The first is caused by an increase in the type and quantity of pollutants in storm water runoff. 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. These effects are commonly referred to as non-point source water quality impacts.

Long-term operation of the solar facility poses a limited threat to surface water quality after the completion of construction. The Project would be subject to the County's Grading Regulations as specified in Section 91010.02 of the Ordinance Code. However, since the Project site is located in unincorporated Imperial County and not

subject to a Municipal Separate Storm Sewer System (MS4) or National Pollutant Discharge Elimination System (NPDES) General Industrial Permit, there is no regulatory mechanism in place to address post construction water quality concerns. Based on this consideration, the Project has the potential to result in both direct and indirect water quality impacts that could be significant. Long-term point discharges from the Project would be minimal; however, reductions in water quality could occur where the water released is of lower quality than ambient conditions. These discharges would be infrequent, but could include landscape irrigation, uncontaminated pumped ground water, and discharges of potable water during water tank cleaning [as defined in 40 CFR 35.2005(21)]. In this context, long-term water quality impacts from point sources would be less than significant.

The second potential impact from post-construction runoff is a potential increase in the quantity of water delivered to adjacent or nearby water bodies during storms, referred to as hydromodification. Increased impervious surfaces from surfaces such as asphalt, concrete, and other compacted surfaces can interrupt the natural cycle of gradual percolation of water through vegetation and soil. Instead, large volumes of water runoff collects and is routed to drainage systems where it is discharged to the nearest receiving water. This process can contribute to stream bank scouring and downstream flooding, resulting in impacts on aquatic life and damage property. For these reasons, the Project could result in on- and off-site discharges that could indirectly impact downstream surface waters by increasing drain scour and/or sedimentation. Therefore, this indirect impact is considered significant.

b) Less than Significant. Groundwater recharge in the area will not be significantly affected because of the fact that the majority of the Project site will feature a pervious landscape in both the existing and proposed conditions. Retention basins will also provide infiltration and groundwater recharge. During the construction phase, a significant amount of construction dewatering is not expected to be required. Potential construction that may require dewatering includes footings and foundations for the Project substation and overhead collection system poles. Dewatering associated with these portions of construction will be localized to transmission pole locations or the substation and will not result in a significant decrease in production rates of existing or planned wells. In the post construction condition, no pumping of groundwater is anticipated. Groundwater at/near the Project site is not used for beneficial uses, such as municipal, domestic, or industrial supply. Water needs would be provided by adjacent Imperial Irrigation District (IID) Canals and are expected to be much less than the needs of the existing agricultural land. As a result, no significant impacts on groundwater levels are expected. Potential impacts to groundwater resources are expected to be less than significant and will be addressed in the EIR.

c.1), c.2) and c.3) Less Than Significant Impact. The proposed drainage patterns and general drainage system would be similar to the existing site conditions. Drainage from the construction zone would be routed to the detention basins for detention and infiltration. The remainder of the site would follow existing drainage patterns with storm flows conveyed toward existing IID Drains. Because of the postponement of agricultural irrigation during the life of the Project, it is anticipated that the annual runoff from the project site would decrease when compared to the existing condition, which is similar to when agricultural fields are fallowed and/or abandoned. Therefore, the proposed Project would result in no significant impacts associated with the alteration of drainage patterns resulting in substantial erosion or siltation on or off site.

Existing drainage patterns would not be substantially altered because of the proposed Project. The majority of the site would sheet flow through the pervious native soils, toward the shallow ponding areas. Peak flow runoff from

the Project would be collected in shallow ponding areas. The Project facilities would be designed in anticipation of this ponding, and there is no potential for increased flooding onsite or in offsite IID drains. Because of the use of infiltration, it is anticipated that the annual runoff from the Project site would decrease when compared to the existing condition. The Project will be designed to meet County of Imperial storage requirements for storm water runoff, which will result in an impoundment of runoff in excess of the anticipated volume of runoff to be generated by the 100-year storm event. Therefore, the proposed Project would result in no significant impacts associated with the alteration of drainage patterns resulting in on- or off-site flooding.

Under proposed conditions, the existing drainage characteristics of the Project site would remain substantially the same. To retain the total volume of a 3-inch precipitation covering the solar energy facility site with no reduction from infiltration, storm water retention basins would be constructed on the solar energy facility site. Because of the implementation of infiltration, it is anticipated that the annual runoff from the Project site would decrease when compared to the existing condition. Therefore, the proposed project would not 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. This is considered a less than significant impact.

d) Less Than Significant Impact. In recognition of the Project site's inland location, the threat of tsunamis or seiche originating from the Salton Sea is considered negligible. The topography within the vicinity of Project site is generally level and, therefore, the hazard of mudflows adversely affecting the Project facilities is very low. For this reason, no significant impact would occur.

e) Less than Significant. The Project area is located within the Colorado River Hydrologic Region, which includes the lower Colorado River system; the Salton Sea drainage system; and several internal basins. The Project site lies within the Salton Sea watershed southeastern portion of the irrigated portion of the Imperial Valley. Imperial County is a desert region with less than six inches of rainfall per year, but rainfall can be concentrated and lead to flooding. Most of the surface-water supplies in the area are a result of irrigation from the Colorado River. The water is diverted from the Colorado River at the Palo Verde Weir north of Blythe by the Palo Verde Irrigation District for use in the Palo Verde Valley of northeast Imperial County and southeast Riverside County; and at the Imperial Dam into the All-American Canal by the IID and the Bard Irrigation District for use in the Imperial, Yuma, Bard, and Coachella Valleys. The IID manages over 3,000 miles of canals and drains in the area and is the largest irrigation district in the United States. Since 1942, the area has received its water through the All-American Canal, which runs 82 miles from the Imperial Dam on the Colorado River west to agricultural areas and cities in the Imperial Valley. The 82-mile All-American Canal has several main canals that branch off, including the Westside Main canal. These three canals supply water service to Imperial Valley and are operated and maintained by IID. The IID serves irrigation water and electric power to farmers and residents in the lower southeastern portion of California's desert.

The EIR will identify regional and local hydrology and summarize federal, state, and local laws, policies, and regulations that are applicable to the Project.

	Potentially Significant Impact **(PSI)**	Potentially Significant Unless Mitigation Incorporated **(PSUMI)**	Less Than Significant Impact **(LTSI)**	***No Impact*** **(NI)**
XI. LAND USE AND PLANNING.				
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion:

a) No Impact. The Project site is located in a sparsely populated, agriculturally zoned portion of eastern Imperial County. The Project site is surrounded by agricultural lands to the west and open desert to the north, south, and east. There are no established residential communities located within or in the vicinity of the Project site. The County Department of Public Works (DPW) provided comments on the CUP letter that were mostly related to preserving the County's survey monuments as well as a desire to see lot tie agreements since the APNs are owned by multiple land owners. Construction of the Project would not divide an established community; no impact would occur, and this environmental parameter is not proposed for further analysis in the EIR.

b) No Impact. Project parcels 050-070-019 and 050-070-018 are both zoned A-2-RE (General Agriculture with Renewable Energy Overlay) and parcel 050-070-021 is zoned GS-RE (Government/Special Public Zone with Renewable Energy Overlay). All parcels are located within the Renewable Energy Overlay Zone. Project parcels 050-070-019 and 050-070-018 are both designated by the General Plan as Agriculture and parcel 050-070-021 is Recreation/Open Space. The current land use is idle land and agriculture. The Project would not conflict with any applicable land use plan, policy, or regulation. There are no adopted habitat conservation plans or natural community conservation plans encompassing the Project site therefore there is no potential for the Project to conflict with any land use plan, policy or regulation. The EIR will evaluate the existing and proposed land uses, land use designations and zone classifications within the Project site and the surrounding area to identify the proposed Project's consistency with the goals, objectives, policies and programs of each General Plan Element. The proposed Project's compatibility with relevant goals, policies, and programs of the General Plan will be presented in a General Plan Consistency Analysis (included as an Appendix to the EIR) and in each resource section of the EIR.

XII. MINERAL RESOURCES.				
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b) Result in the loss of availability of a locally important mineral resource recovery site	☐	☐	☒	☐

	Potentially Significant Impact **(PSI)**	Potentially Significant Unless Mitigation Incorporated **(PSUMI)**	Less Than Significant Impact **(LTSI)**	***No Impact*** **(NI)**
delineated on a local general plan, specific plan or other land use plan?				

Discussion:

a, b) Less Than Significant Impact. According to Figure 8: Imperial County Existing Mineral Resources of the Conservation and Open Space Element of the General Plan (County of Imperial 2016), the Project site appears to be near sand and gravel, construction mines. Given this information, the EIR will evaluate whether the Project would result in the loss of availability of a known mineral resource.

XIII. NOISE.

Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion:

a and b) Less Than Significant Impact. There are no sensitive receptors within one mile of the Project site. Construction would be performed in discrete steps, each of which has its own mix of equipment, and consequently its own noise characteristics. These various sequential phases would change the character of the noise generated on site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

Construction of the proposed Project would require the use of earthmovers, bulldozers, loaders, scrapers, cranes, forklifts, pile drivers, water trucks, and pickup trucks. This equipment would be used on the Project site. The maximum noise level generated by each earthmover on the Project site is assumed to be 88 dBA Lmax at 50 feet from the earthmover. Each bulldozer would also generate 88 dBA Lmax at 50 feet. The maximum noise level generated by water and pickup trucks is approximately 86 dBA Lmax at 50 feet from these vehicles. While full sized pile drivers can generate noise levels in excess of 96 dBA Lmax, the post driver required for the solar panel mounts would generate noise levels of 85 to 88 dBA Lmax. Each doubling of a sound source with equal strength

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

increases the noise level by 3 dBA. As each piece of construction equipment operates as an independent noise source, the combined noise level during construction would be 91 dBA Lmax at a distance of 50 feet.

The variation in power and usage of the various equipment types creates complexity in characterizing construction noise levels. The estimated composite site noise level is based on the assumption that all equipment would operate at a given usage load factor, for a given hour (i.e., front end loaders are assumed to be used for up to 40 percent of 1 hour, or 24 minutes), to calculate the composite average daytime hourly Leq. Using a conservative load factor of 40 percent for all on-site equipment, the average noise level at the existing residence would be 73 dBA Leq. This noise level would not exceed the County's 75 dBA Leq construction noise threshold. Furthermore, the project must comply with County standards regarding construction hours (i.e., construction limited to normal weekday working hours, 7 a.m. to 7 p.m., Monday through Friday). Therefore, impacts from construction noise are considered less than significant.

Traffic noise associated with construction of the proposed Project is not anticipated to be a significant source of noise. Traffic noise is not greatly influenced by lower levels of traffic, such as those associated with the proposed Project's construction effort. For example, traffic levels would have to double in order for traffic noise on area roadways to increase by 3 dBA. The proposed Project's construction traffic on area roadways would increase hourly traffic volumes by much less than double; therefore, impacts from traffic noise are considered less than significant.

c) No Impact. The proposed Project is located within the vicinity of the Holtville Airport, which is located two (2) miles north of the Project site. According to the *Imperial County Airport Land Use Commission (ALUC) Compatibility Plan* (Imperial County, 1996), the project parcels are outside the compatibility zones of the Holtville Airport. The Project site is approximately 1.4 miles south of the boundary line of Compatibility Zone C. As discussed above the noise level would not exceed the County's 75 dBA Leq construction noise threshold. Furthermore, the Project must comply with County standards regarding construction hours (i.e., construction limited to normal weekday working hours, 7 a.m. to 7 p.m., Monday through Friday). Therefore, impacts from construction noise are considered less than significant. For these reasons, the Project would not expose people residing or working in the area to excessive noise levels; therefore, no impact would occur, and this environmental parameter is not proposed for further analysis in the EIR.

XIV. POPULATION AND HOUSING.

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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

Discussion:

a) No Impact. The County Executive Office provided comments on the CUP application related to the development of a fiscal and economic impact analysis and The Project would not result in any full-time employees on the site at the conclusion of construction. Thus, there would be no unplanned population growth in the Project vicinity. There would be no impact and this environmental parameter is not proposed for further analysis in the EIR.

b) No Impact. There are no year-round residents within the Project area. The proposed Project would not result in the displacement of any residents. There would be no impact and this environmental parameter is not proposed for further analysis in the EIR.

XV. PUBLIC SERVICES.

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 public services:

Fire protection?	☐	☒	☐	☐
Police protection?	☐	☒	☐	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

Discussion:

Fire and Police) Potentially Significant Impact Unless Mitigation Incorporated. Fire protection services are provided to the Project area by the County of Imperial Fire Department through the Holtville Fire Department Station, located in the City of Holtville approximately 6.5 miles to the west.

The County of Imperial Sheriff's Department provides law enforcement to the Project area. Sheriff's officers that patrol the project area are based at the Holtville Police Department in the City of Holtville located approximately 6.5 miles west of the Project area.

The County Fire Department provided a comment letter on the CUP application related to the need for additional full time equivalents and new fire apparatus as a result of the Project. The County Executive Officer also provided a comment letter outlining the for a Development Agreement or a Public Benefit Agreement. The County of Imperial has a Development Impact Fee (DIF) which is authorized by County of Imperial Ordinance No. 4.32. This fee is applied to all development projects in incorporated and unincorporated County of Imperial land. Payment of the DIF is required of developers to fund public facilities such as fire protection facilities and sheriff facilities. When the Project is constructed, DIF fees will be required to ensure that resources will be available for capital improvements to implement the County's capital and operational funding of future facilities. Potential impacts on fire and police services could be potentially significant and will be evaluated in the EIR.

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

Schools, Parks, and Other Public Facilities) No Impact. Construction of the Project would not include the provision of, or the need for, new schools, parks or other public facilities. The Project would not result in new long-term housing. There would not be a permanent increase in the population. Because the Project would not result in a substantial increase in population, it does not require additional schools, parks, or other public facilities beyond that which already exists. No physical impacts related to the provision of schools, parks, or other facilities would occur and this environmental parameter is not proposed for further analysis in the EIR.

XVI. RECREATION.

Would the project:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion:

a, and b) No Impact. There are no existing neighborhood or regional parks within the Project area. The proposed Project would not result in an increase in the population of the area. There would be no impact to recreation and this environmental parameter is not proposed for further analysis in the EIR.

XVII. TRANSPORTATION / TRAFFIC.

Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☒	☐	☐	☐

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

Discussion:

a) Less than Significant. Construction of the Project is anticipated to be consistent with the County of Imperial General Plan and is not anticipated to conflict with a program, plan, ordinance or policy addressing roadway, transit, bicycle or pedestrian facilities. Construction of the Project would temporarily increase the number of vehicle trips in the area and the number of on-site personnel. However, these increases are not expected to be substantial. Project conflicts with applicable programs, plans, ordinance or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities will also be addressed in the EIR.

b) Less Than Significant. A transportation impact analysis (TIA) was prepared to determine and evaluate traffic impacts on the local circulation system due to construction of the Project. construction traffic would not result in congestion and excessive delays at study intersections and roadways. In compliance with Senate Bill 743 (SB 743) and CEQA Section 15064.3b, the TIA included an assessment of Project-related changes in vehicle miles traveled (VMT) compared to existing conditions. The Office of Planning and Research (OPR) provides screening criteria that allow small projects (from a traffic standpoint) to screen out of a detailed VMT analysis based on the number of daily trips it generates. Projects that generate fewer than 110 trips per day can be presumed to result in less than significant VMT impacts.

The proposed Project would be remotely controlled. No employees would be based at the Project site. Security related monitoring would be done remotely. Personnel may conduct unscheduled security rounds, and maintenance workers may access the site periodically to clean the panels and maintain the equipment and project area. The public would not have access to the facility. Thus, the Project will not generate more than 110 trips per day. Therefore, the Project meets the small project screening criteria, and it will not have significant VMT impact (Kittleson and Associates, 2021).

c) Less Than Significant Impact. The Project site would include one primary access driveway, currently contemplated on Nelson Pit Road, bisecting the Project area and a secondary access driveway (if required) with a location that is yet to be determined. This driveway would be provided with a minimum of 30-foot double swing gates with a “Knox Box” for keyed entry. Internal to the Project site, up to 30-foot-wide roads would be provided between the crystalline solar photovoltaic arrays, as well as around the perimeter of each Project site inside the perimeter security fence to provide access to all areas of each site for maintenance and emergency vehicles. Design features that would result in transportation-related hazards or safety concerns are not anticipated (Kittleson and Associates, 2021).

d) Potentially Significant. Construction of the Project would generate construction trips and the potential for temporary roadway lane closures exists. It is anticipated that emergency access would be maintained at all times, and appropriate detours would be provided, as necessary. Nonetheless, impacts related to emergency access are considered potentially significant and will be addressed in the EIR.

XVIII. TRIBAL CULTURAL RESOURCES.

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

	Potentially Significant Impact **(PSI)**	Potentially Significant Unless Mitigation Incorporated **(PSUMI)**	Less Than Significant Impact **(LTSI)**	***No Impact*** **(NI)**
defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
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.	☒	☐	☐	☐

Discussion:

a) and b) Potentially Significant. In compliance with Assembly Bill 52 (Chapter 532, Statutes 2014), the ICPDSD sent letters to one (1) California Native American Tribe on March 26, 2021, providing notification of the Project and an invitation to participate in consultation. Under AB-52, California Native American Tribes have 30 days from the date of receipt of the notice to request consultation. On April 8, the Quechan Tribe Historic Preservation Officer requested consultation with the County. Results of any Native American consultation will be included in the EIR. As discussed under Response to Item V. Cultural Resources, implementation of the Project could have potentially significant impacts to archaeological resources, which could be considered a significant resource to a California Native American tribe.

XIX. UTILITIES AND SERVICE SYSTEMS.

Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☒	☐	☐
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the	☐	☐	☐	☒

	Potentially Significant Impact **(PSI)**	Potentially Significant Unless Mitigation Incorporated **(PSUMI)**	Less Than Significant Impact **(LTSI)**	***No Impact*** **(NI)**
project's projected demand in addition to the provider's existing commitments?				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Discussion:

a) Less Than Significant Impact. Water for construction (primarily dust control) would be obtained from local 11D irrigation canals or laterals in conformance with IID construction water acquisition requirements. Water would be picked up from a nearby lateral canal and delivered to the construction location by a water truck which would be capable of carrying approximately 4,000 gallons per load. It is estimated that up to 275 acre-feet of water would be needed for site grading and dust control over the expected Project construction period. The IID provided a comment letter on the CUP application regarding the acquisition of a water supply agreement for the Project. Potable drinking water will be obtained for the duration of the Project from a state-approved provider. Therefore, the proposed Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities. This is considered a less than significant impact.

b) Potentially Significant Impact Unless Mitigation Incorporated. Construction

As described in Chapter 3, Project Description, construction of the Project would take up to 11 months. Water for construction (primarily dust control) would be obtained from local 11D irrigation canals or laterals in conformance with IID construction water acquisition requirements. Water would be picked up from a nearby lateral canal and delivered to the construction location by a water truck which would be capable of carrying approximately 4,000 gallons per load. It is estimated that up to 275 acre-feet of water would be needed for site grading and dust control over the expected Project construction period. The IID provided a comment letter on the CUP application regarding the acquisition of a water supply agreement for the Project. Potable drinking water will be obtained for the duration of the Project from a state-approved provider.

Operations and Maintenance

Panel washing and operational water required for O&M of the project will be provided by IID. Up to three 10,000 gallon fire water tanks would be constructed across the solar energy facility site and kept filled during operations for on-site fire protection. Water will also be used for periodic cleaning of the solar PV panels. It is anticipated that the solar PV panels will be washed up to two times per year to ensure optimum solar absorption by removing dust particles and other buildup. Water for washing the PV modules, if required, would be purchased from the IID and delivered to the project site by water trucks. The volume of water to be used for PV module washing and dust control, if needed, is estimated at up to 10 acre-feet per year.

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

Decommissioning

Water may also be required during decommissioning of the Project and site restoration at the end of the Project's life. Total water demand during decommissioning is estimated to be 50 AF.

Total and Annual Water Demand

A Water Supply Assessment would be prepared in accordance with SB-610. The Water Supply Assessment would determine the anticipated water demand for construction, operation, and decommissioning of the Project.

c, d, and e) No Impact. Relatively small amounts of trash would be generated during construction from packaging materials delivered to the site. Construction related waste would be transported to a local landfill authorized to receive this waste for disposal. Portable toilets would be located on-site during construction and sanitary waste would be removed from the site by a local contractor. Impacts associated with water quality will be addressed in the EIR under the Hydrology/Water Quality section.

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

XX. WILDFIRE.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Discussion:

a) No Impact. According to the Draft Fire Hazard Severity Zone Map for Imperial County prepared by the California Department of Forestry and Fire Protection, the Project area is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). As noted under Hazards and Hazardous Materials (Response IX. f) the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

b) No Impact. The Project area is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). Therefore, the proposed Project would not exacerbate wildfire risks. No impact is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

c) No Impact. The Project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). The proposed Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that would result in temporary or ongoing impacts to the environment. No impact is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

d) Less than Significant. The Project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). The proposed

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

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. No impact is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

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

Revised 2009- CEQA
Revised 2011- ICPDS
Revised 2016 – ICPDS
Revised 2017 – ICPDS
Revised 2019 – CEQA

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

SECTION III. MANDATORY FINDINGS OF SIGNIFICANCE

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

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
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 project, and the effects of probable future projects.)	☒	☐	☐	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion:

a) Potentially Significant Impact. The EIR's biological resources section will discuss direct and indirect impacts on plants and wildlife species. The EIR will also evaluate direct and indirect impacts on cultural and tribal cultural resources. Finally, the EIR will evaluate the Project's contribution to cumulative impacts, identify whether the contribution is cumulatively considerable, and propose feasible mitigation, as appropriate, to reduce such impacts to less-than-significant levels.

b) Potentially Significant Impact. The Project has the potential to contribute to cumulative impacts related to air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, transportation and traffic, tribal cultural resources, and utilities and service systems. The EIR will evaluate the project's contribution to cumulative impacts in these areas as well as other areas as further impacts are identified.

c) Less Significant Impact. The Project could potentially result in less than significant environmental effects on human beings, either directly or indirectly. These impacts will be fully addressed in the EIR.

SECTION IV. PERSONS & ORGANIZATIONS CONSULTED/ REFERENCES

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Asst. Director of Planning & Development Services
- Diana Robinson, Planner III
- Mariela Moran, Planner II
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Agricultural Commissioner
- Environmental Health Services
- Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

- CDFW
- IID
- USFWS
- RWQCB
- SWRCB
- NAHC

C. REFERENCES

California Department of Fish and Wildlife. 2015. Inland Deserts Region Imperial Wildlife Area, Imperial County. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=87823&inline. Accessed December 2020. California Department of Forestry and Fire Protection, 2007. Fire Hazards and Severity Zones Map, Imperial County.

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SWCA 2021d.Aquatic Resources Technical Report Vikings Solar Energy Storage Project Imperial County, California. January.

SWCA 2021e.Cultural Resources Technical Report Vikings Solar Energy Storage Project Imperial County, California. January.

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