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## SENT VIA ELECTRONIC MAIL

December 20, 2024

David Black
Planner IV
Imperial County Planning and Development Services Department
801 Main Street
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RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE WILDCAT ENERGY FARM PROJECT DATED NOVEMBER 20, 2024, STATE CLEARINGHOUSE NUMBER 2024110680

Dear David Black,

The Department of Toxic Substances Control (DTSC) reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Wildcat Energy Farm Project (Project). The Project proposes to construct and operate an 800-megawatt (MW) photovoltaic (PV) solar facility with an integrated 800 MW (3,200 MW hour) battery energy storage system on approximately 5,900 acres of privately-owned land. The proposed Project would be comprised of approximately 1,964,000 PV modules, associated collector and inverter facilities, an on-site groundwater well, and access roads. The proposed project would include upgrades to the existing Imperial Irrigation District's "L" Line from 161 kilovolt (kV) to 230 kV and upgrades to the Wildcat Line from 12 to 34.5 kV to 230 kV. DTSC recommends and requests consideration of the following comments:

1. There are several areas/sites which DTSC has regulatory oversight over that are within the proposed Project site, whether they are listed as having documented contamination, land use restrictions, are subject to a Hazardous Waste Facility

Permit, or have the potential for the Project site to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, DTSC recommends further coordination with the Department in the event that the proposed project may impact any of the areas that may fall under DTSC's oversight. Please review the Project area in <a href="EnviroStor">EnviroStor</a>; DTSC's public-facing database and coordinate with the Department if any suspected decisions may impact these areas of which DTSC oversees.

- 2. The proposed Project is located in close proximity to several formerly used defense sites (FUDS) in which munitions testing during the World War II era occurred. Due to the nature of historical site use, and the potential that over time, unexploded ordnance (UXO), munitions of explosive concern (MEC) and/or munitions debris (MD) may be exposed from receding coastline of the Salton Sea, proper health and safety measures are recommended prior to intrusive activities. If UXO, MEC or MD is/are encountered, follow the 3 R's of Explosives Safety: Recognize, Retreat and Report:
  - Recognize when you have encountered munitions;
  - Retreat note your location as you are backing away. Do not approach,
     touch, or disturb a suspect munitions, safely leave the area, and;
  - Report, immediately what was found to state and or local law enforcement – call 911.

DTSC appreciates the opportunity to comment on the NOP of a DEIR for the Wildcat Energy Farm Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via <a href="mailto:ema

David Black December 20, 2024 Page 3

Sincerely,

Tamara Purvis

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cc: (via email)

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David Black December 20, 2024 Page 4

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