



Initial Study and Notice of Preparation

Saavi Imperial Power Battery Storage System Project

Initial Study #24-0016

General Plan Amendment #24-0001

Zone Change #24-0002

Conditional Use Permit #24-0011

Imperial County, CA

February 2025

Reviewed by:

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Introduction

A. Purpose

This document is a policy-level; project-level Initial Study for evaluation of potential environmental impacts resulting with the proposed Saavi Imperial Power Battery Storage System Project.

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

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

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

This Initial Study has determined that the proposed Saavi Imperial Power Battery Storage System Project will result in potentially significant environmental impacts and therefore, an EIR is deemed as the appropriate document to provide necessary environmental evaluations and clearance for the proposed approvals under review in this Initial Study.

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

Pursuant to the County of Imperial's CEQA Regulations, Guidelines for the Implementation of CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning

Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. Intended Uses of Initial Study and Notice of Preparation

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

D. Contents of Initial Study and Notice of Preparation

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

SECTION 1

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

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed Saavi Imperial Power Battery Storage System Project 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, necessary entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

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

SECTION 3

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

E. Scope of Environmental Analysis

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

1. No Impact: A “No Impact” response is adequately supported if the impact simply does not apply to the proposed project.
2. Less Than Significant Impact: The proposed project will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.
3. Less Than Significant With Mitigation Incorporated: This applies where incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.”
4. Potentially Significant Impact: The proposed project 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 project and associated entitlement 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/Mitigated Negative Declaration (MND) and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]).

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

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

- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.

The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]).

Environmental Checklist Form

1. **Project Title:** Saavi Imperial Power Battery Storage System Project
2. **Lead Agency Name and Address:** Imperial County Planning & Development Services Department, 801 Main Street, El Centro, CA 92243
3. **Contact Person and Phone Number:** David Black, Imperial County Planning & Development Services Department, 442-265-1736
4. **Project Location:** The project site is located on one privately-owned parcel (Assessor Parcel Number 051-320-012), which is approximately 39.25 acres. The project site is located in the unincorporated Mount Signal area of Imperial County, California. The project site located approximately 12 miles southwest of the City of El Centro and approximately 6.6 miles north of the United States/Mexico international border.
5. **Project Sponsor's Name and Address:** Saavi Imperial Power, LLC, 24 Greenway Plaza, Weslavan Tower Suite 1205, Houston, Texas, 77046
6. **General Plan Designation:** Agriculture
7. **Zoning:** A-3 (Heavy Agriculture)
8. **Description of Project:** The proposed project consists of two primary components: 1) 400-megawatt (MW) battery energy storage system (BESS); and 2) off-site transmission line to connect to San Diego Gas and Electric's (SDG&E) existing Imperial Valley (IV) substation. In addition, the proposed project would include construction of an on-site substation, office warehouse, and a new bridge across Imperial Irrigation District's (IID) Westside Main Canal for vehicular access to the project site. These facilities are collectively referred to as the "proposed project" or "project." A detailed project description is provided in the Project Summary section below.
9. **Surrounding Land Uses and Setting: Briefly describe the project's surroundings:**

The project site is currently vacant and bounded by agricultural land to the north, Bureau of Land Management (BLM) lands to the south and west, and vacant land to the east. The project site is zoned for agricultural uses; however, it has not been used for any agricultural or commercial purpose for over 20 years. Renewable energy facilities are located in proximity to the project site including the Imperial Solar Energy Center West solar facility to the northwest, Campo Verde solar generation facility to the east, and the Westside Canal BESS facility to the southeast. The existing IV substation is located approximately 3.1 miles southeast of the project site. There is an existing 230 kV transmission line that connects the Imperial Solar Energy Center West solar facility to the IV substation.
10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):**
 - California Regional Water Quality Control Board, Colorado River Basin Region
 - Imperial County Air Pollution Control District
 - Imperial County Public Works Department

- Imperial County Airport Land Use Commission
- California Department of Fish and Wildlife
- U.S. Fish and Wildlife Service
- U.S Army Corps of Engineers
- Bureau of Land Management

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

Yes, California Native American tribes that are traditionally and culturally affiliated with the project area were sent an Assembly Bill (AB) 52/Senate Bill (SB) 18 consultation request letter on February 21, 2025.

Environmental Factors Potentially Affected

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

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

Environmental Evaluation Committee Determination

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

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



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

Jim Minnick, Director of Planning/EEC Chairman

Date:



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Project Summary

Project Location

The project site is located on one privately-owned parcel (Assessor Parcel Number 051-320-012), which is approximately 39.25 acres (Figure 1). The project site is located in the unincorporated Mount Signal area of Imperial County, California. The project site is located approximately 12 miles southwest of the City of El Centro and approximately 6.6 miles north of the United States/Mexico international border. The site is also approximately 0.5-mile west of the Mandrapa Road and Hyde Road intersection.

Environmental Setting

The proposed project site is currently vacant, undeveloped, privately owned land and is bound by agricultural land to the north, Bureau of Land Management (BLM) lands to the south and west, and vacant land to the east.

Renewable energy facilities are located in proximity to the project site including the Imperial Solar Energy Center West solar facility to the northwest, Campo Verde solar generation facility to the east, and the Westside Canal BESS facility to the southeast. The existing IV substation is located approximately 3.1 miles southeast of the project site. There is an existing 230 kV transmission line that connects the Imperial Solar Energy Center West solar facility to the IV substation.

Project Components

The proposed project consists of two primary components: 1) 400-megawatt (MW) battery energy storage system (BESS); and 2) off-site transmission line to connect to San Diego Gas and Electric's (SDG&E) existing Imperial Valley (IV) substation. In addition, the proposed project would include construction of an on-site substation, office warehouse, and a new bridge across Imperial Irrigation District's (IID) Westside Main Canal for vehicular access to the project site. These facilities are collectively referred to as the "proposed project" or "project." A detailed project description is provided in the Project Summary section below. These project components and site plan are discussed in detail below and shown in Figure 2 and Figure 3, respectively.

Battery Energy Storage System and On-Site Electrical Substation

The proposed BESS facility will be located within one privately-owned parcel, which is approximately 39.25 acres of land. However, the BESS facility is proposed to be constructed in phases, with the first phase (185 MW) occupying approximately 10 acres on the eastern portion of the parcel. The proposed BESS would consist of either lithium ion or flow batteries. The batteries will either be housed in storage containers or buildings fitted with HVAC and fire suppression systems as necessary, depending on the final selection of battery technology.

The proposed project would include a substation at the southern edge of the project site. Power cables would be routed underground from the individual inverter transformers to carry the 34.5 kV power from the inverters to the project substation. The proposed substation would raise the voltage from the 34.5 kV at the terminals of the inverter transformers to the 230 kV interconnection voltage at the IV substation.

Gen-Tie Line

The proposed BESS facility would connect to the grid via a new 3.1-mile 230 kV gen-tie that would extend from the project site southeast to the existing SDG&E IV substation. The alignment of the gen-tie is proposed to be located adjacent to the existing gen-tie line that connects the Imperial Solar Energy Center West solar facility to the IV substation. Immediately north of the IV substation, the new 230 kV gen-tie line would be connected to one of the two existing 230 kV transmission lines that run from the IV substation south to the Saavi generating facility in Mexico. At this time, no new or additional construction is anticipated inside the SDG&E substation.

The proposed off-site gen-tie connection to the IV substation would traverse BLM lands. The project applicant would be required to complete a right-of-way (ROW) request by processing a 299 Application and corresponding Plan of Development with the BLM. Therefore, the proposed off-site gen-tie connection would be subject to NEPA clearance. There would be no improvements that involve connections across the U.S. International Border with Mexico (the proposed project would connect to existing 230 kV lines at the IV substation, which already connect south to the Saavi generating facility in Mexico). Therefore, a Presidential Permit covered by Executive Order 10485 of September 3, 1953, in which an application would be filed with the Department of Energy, would not be required.

Site Access/New Bridge Construction

Access to the project site is proposed via Hyde Road; however, the proposed project would involve the construction of a new bridge to cross over IID's Westside Main Canal. Therefore, the IID would be a Responsible Agency as defined by CEQA Guideline 15381 and would participate in the EIR review process in accordance with the CEQA Guidelines (e.g., Section 15096).

Office Warehouse

A small 24 foot by 40-foot building would be constructed in the northern portion of the project site. The building would be used to house spare parts as well as operational control equipment. A parking area would be located adjacent to the building. It is anticipated that the building would receive power from the IID distribution line just north of the project site.

Water Use

The water demand for the proposed project will consist of water needed during construction and water needed for maintenance and fire protection/suppression systems once the project is operational.

Restoration of Project Site

The project CUP would expire 40 years after the Effective Date, at which point the project would undergo decommissioning in accordance with a Decommissioning Plan. As part of the decommissioning activities, all site improvements that are no longer in use and cannot be repurposed will be removed from the project site. Battery modules would be removed from the racks and packaged for return to the manufacturer or their approved Recycling Partner(s) for dismantling, material processing, and recovery. The recycling process would take place entirely off-site. Metals, including copper and aluminum, and metal alloys would be recovered from the process. The electrical substation would also be disassembled and removed from the site. Any spent or surplus hazardous chemicals collected from the decommissioning process would be transported off-site for disposal according to applicable State and County restrictions and laws governing the disposal of hazardous waste similar

to operations. All demolition debris would be transported to an off-site disposal location identified at the time of decommissioning. All infrastructure improvements included as part of the project that can continue to be used or repurposed (e.g., Westside Main Canal bridge, access roads, office warehouse building) would remain onsite after decommissioning of the project based on County approval. Any decommissioning implemented at the end of the project's life would adhere to Imperial County's requirements.

Project Approvals

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

1. **General Plan Amendment (GPA #24-0001).** A General Plan Amendment is proposed that would change the existing General Plan land use designation of "Agriculture" to "Industrial."
2. **Zone Change (ZC #24-0002).** A zone change is proposed that would change the existing zoning designation of the parcel from A-3 (Heavy Agriculture) to M-2 (Medium Industrial).
3. **Conditional Use Permit (CUP #24-0011).** Approval of a CUP would allow for the development and operation of a commercial BESS within the M-2 zone.
 - a. Pursuant to Title 9, Division 5, Chapter 16, the following uses are permitted in the M-2 zone subject to approval of a CUP from Imperial County:
 - g) Battery Storage*
 - t) Major facilities relating to the generation and transmission of electrical energy provided such facilities are not under State or Federal law, to be approved exclusively by an agency, or agencies of the State or Federal government, and provided such facilities shall be approved subsequent to coordination review of the Imperial Irrigation District for electrical matters, meeting the requirements in Division 17. The maximum allowance of battery shall be in a ratio of 2 to 1 compared to solar. Such uses shall include, but not limited to, the following:*
 - Electrical generation plants
 - Facilities for the transmission of electrical energy (100-200 kV)
 - Electrical substations in an electrical transmission system (500 kV/230 kV/161 kV)
4. **Certification of the EIR.** After the required public review for the Draft EIR, the County will respond to written comments, edit the document, and produce a Final EIR to be certified by the Planning Commission and Board of Supervisors prior to making a decision on approval or denial of the project.

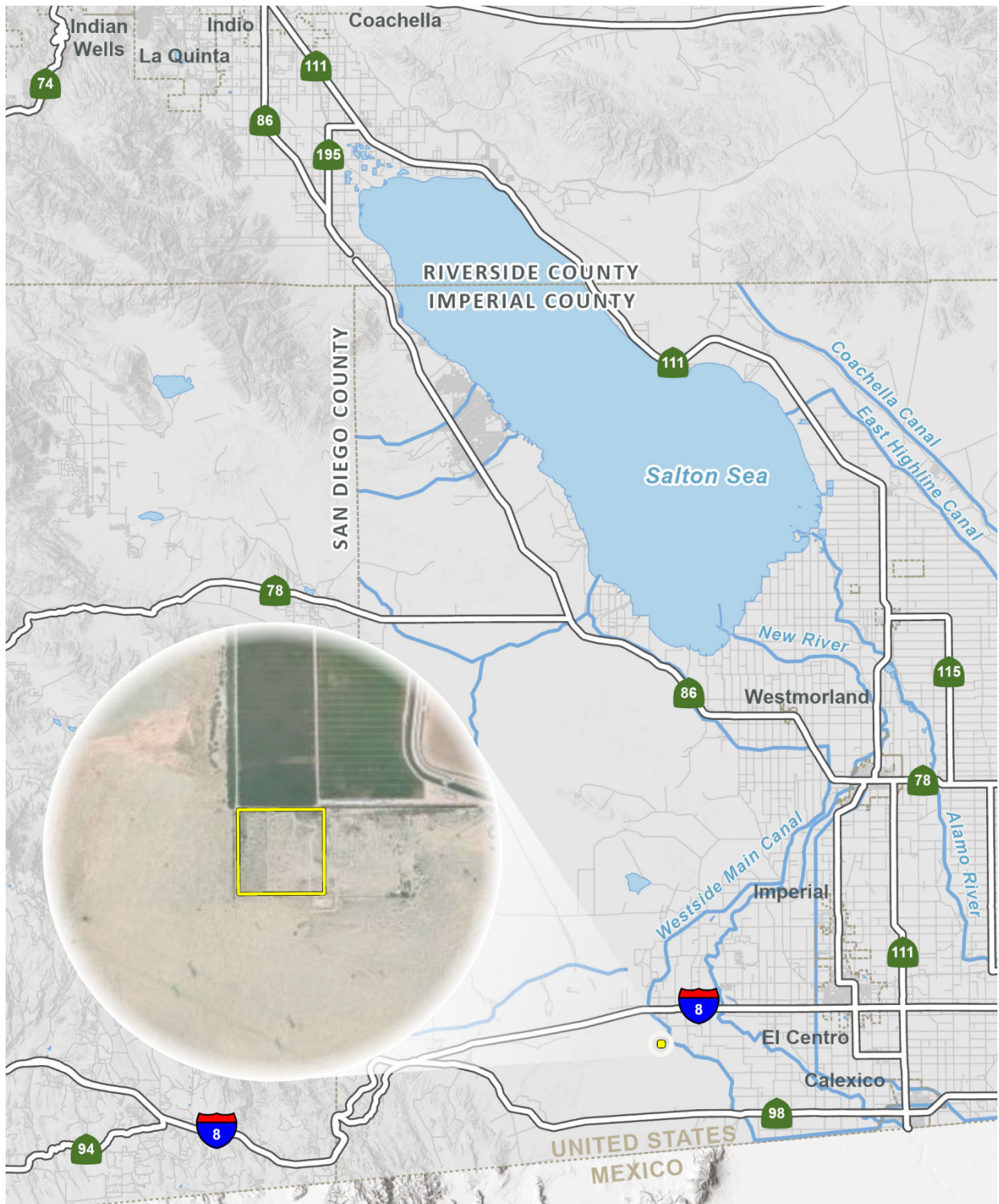
Subsequent ministerial approvals may include, but are not limited to:

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



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Figure 1. Regional Location



Saavi Imperial BESS Project Area

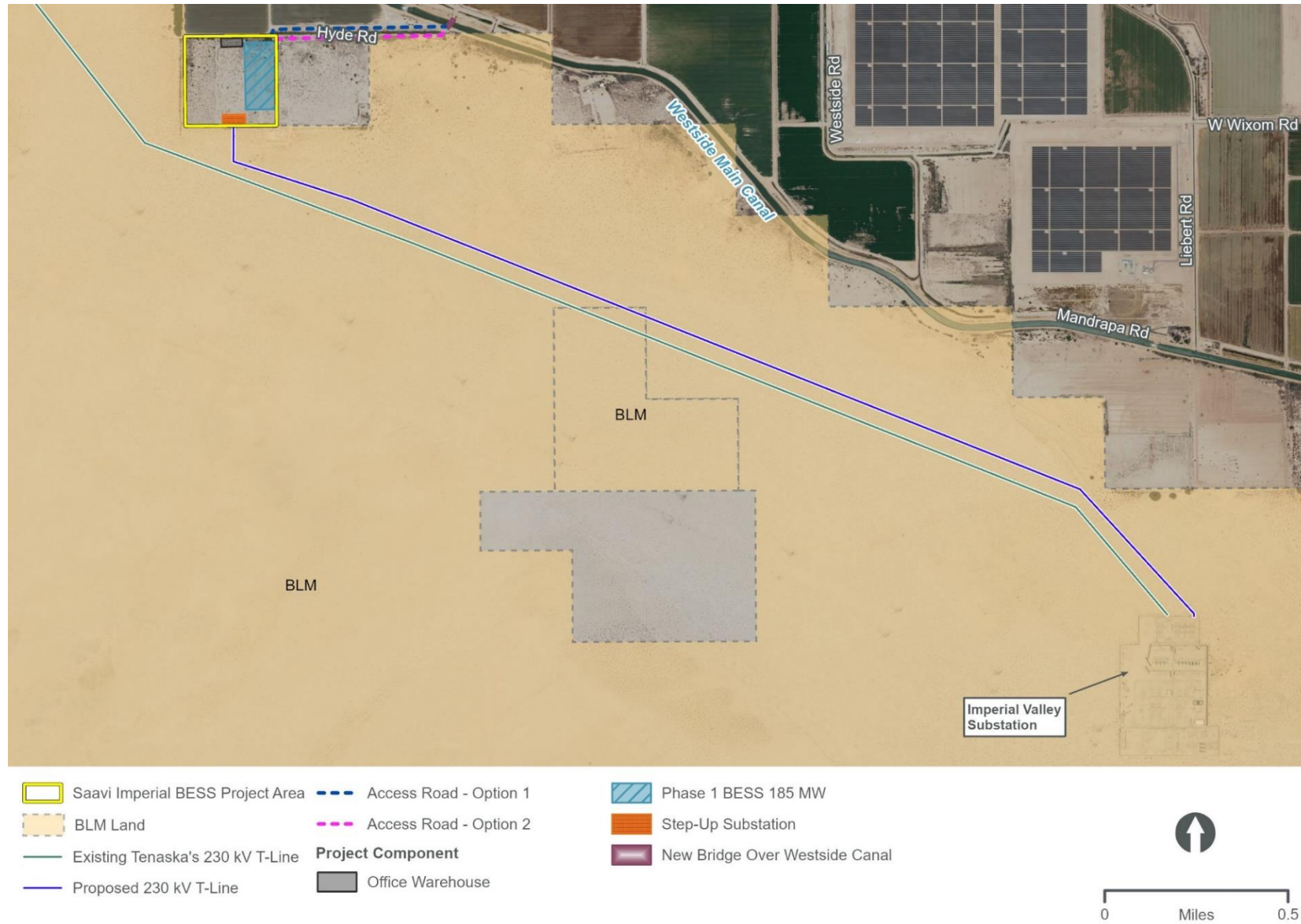


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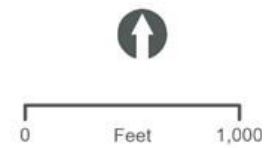
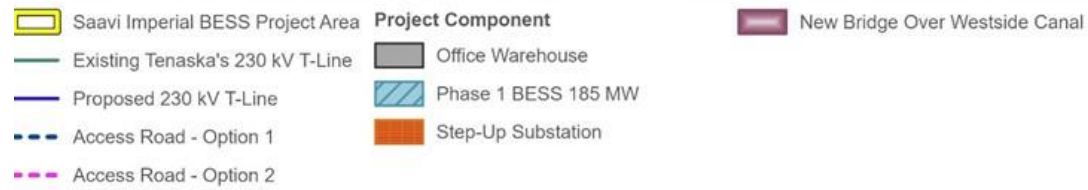
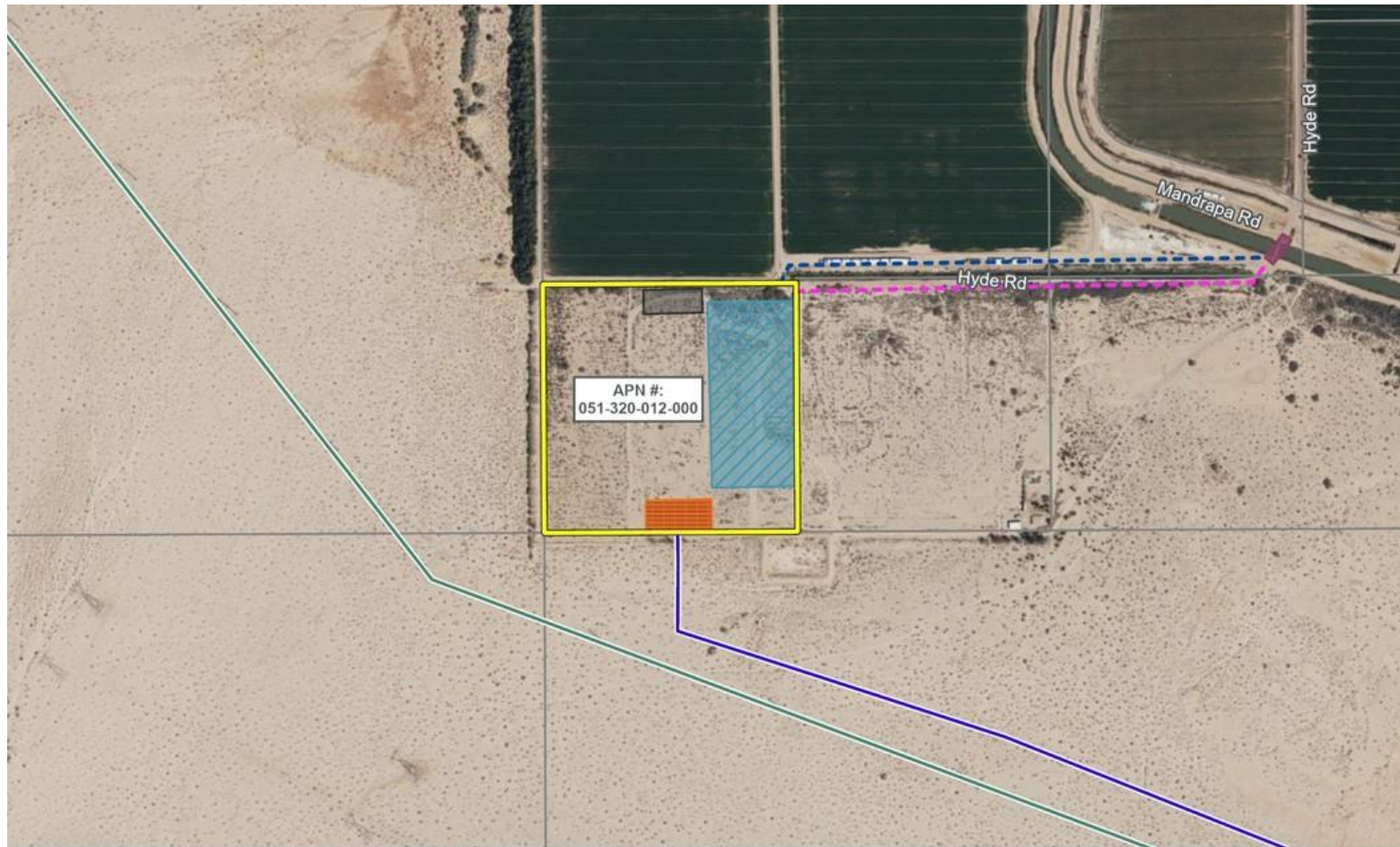
Figure 2. Project Components





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Figure 3. Proposed Site Plan





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Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

I. Aesthetics

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

Impact Analysis

- a) **No Impact.** According to the Conservation and Open Space Element of the Imperial County General Plan, the project site is not located within an area that has been formally identified as a federal, state, or county scenic vista (County of Imperial 2016). No scenic vistas or areas with high visual quality would be disrupted. Thus, no impact is identified for this issue area and no further analysis is warranted.
- b) **No Impact.** According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System (Caltrans 2018), the project site is not located within a state scenic highway corridor, nor are there any state scenic highways located in proximity to the project site. The nearest eligible State scenic highway is the segment of Sunset Cliffs Boulevard/State Route (SR) 98 near Coyote Wells located over 15 miles west of the project site. The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway. Therefore, no impact is identified for this issue area and no further analysis is warranted.
- c) **Potentially Significant Impact.** Although the project site is not located near a scenic highway or designated scenic vista, the proposed project may result in a change to the look and rural character of the area. Therefore, a potentially significant impact is identified for this

issue area. A visual assessment will be prepared for the project and this issue will be addressed in the EIR.

- d) Less than Significant Impact.** The proposed project is located in a rural area of Imperial County and is developed with agricultural uses and utility-scale solar generation facilities. There are no established residential neighborhoods immediately adjacent to the project site. Minimal lighting is required for project operation and is limited to safety and security functions. All lighting will be directed away from any public right-of-way. The proposed project is not expected to create a new source of substantial light or glare affecting day or nighttime views. Therefore, impacts are considered less than significant.

II. Agriculture and Forestry Resources

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

Impact Analysis

- a) **No Impact.** According to the California Department of Conservation's (DOC) California Important Farmland Finder, the project site is not located on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California DOC 2020). The project site is mapped as "Other Land". Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use and no impact would occur.

- b) **Potentially Significant Impact.** The project site is currently zoned A-3 (Heavy Agriculture) and has an existing General Plan land use designation of “Agriculture.” Therefore, the proposed project would require a General Plan Amendment and Zone Change for the entire project area. Approval of the General Plan Amendment would change the existing General Plan land use designation from “Agriculture” to “Industrial” and the Zone Change from A-3 to M-2 (Medium Industrial) to allow for the construction and operation of a commercial BESS facility. Because the project site is located on land designated for agricultural uses, a potentially significant impact has been identified and this issue will be analyzed in further detail. A Land Evaluation Site Assessment (LESA) will be prepared as part of the EIR.

As of December 31, 2018, all Williamson Act contracts in Imperial County have been terminated. The project site is not located on Williamson Act contracted land. Therefore, the proposed project would not conflict with a Williamson Act contract and no impact is identified.

- c) **No Impact.** There are no existing forest lands, timberlands, or timberland zoned “Timberland Production” within or immediately adjacent to the project site that would conflict with existing zoning or cause rezoning. Therefore, no impact is identified for this issue area.
- d) **No Impact.** There are no existing forest lands within or immediately adjacent to the project site. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area.
- e) **No Impact.** As discussed in Response II. a) above, the Saavi BESS project site is not located on land designated as Important Farmland and the project would not result in the conversion of farmland to non-agriculture use. As discussed in Response II. d) above, there are no existing forest lands either on site or in the immediate vicinity of the project site or transmission line upgrade area. Therefore, the proposed project would not result in the conversion of forest land to non-forest use. Thus, no impact is identified for this issue area.

III. Air Quality

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

Impact Analysis

- a) **Potentially Significant Impact.** The project site is located within the jurisdiction of Imperial County Air Pollution Control District (ICAPCD) in the Imperial County portion of the Salton Sea Air Basin. Construction of the proposed project would create temporary emissions of dust, fumes, equipment exhaust, and other air contaminants that may conflict with the ICAPCD's rules and regulations. No stationary source emissions would be generated by the proposed project; however, temporary construction emissions have the potential to result in a significant air quality impact. An air quality analysis will be prepared to analyze the proposed project's consistency with air quality plans, and will be included in the EIR analysis.
- b) **Potentially Significant Impact.** Currently, the Salton Sea Air Basin is either in attainment or unclassified for all federal and state air pollutant standards, with the exception of the federal ozone (O₃), particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) standards, and state standards for O₃ and PM₁₀. Air pollutants transported into the Salton Sea Air Basin from the adjacent South Coast Air Basin (Los Angeles County, San Bernardino County, Orange County, and Riverside County) and Mexicali (Mexico) substantially contribute to the non-attainment conditions in the Salton Sea Air Basin. A potentially significant impact is identified for this issue area. An air quality analysis will be prepared to analyze the proposed project's potential air quality impacts and will be included in the EIR analysis.
- c) **Potentially Significant Impact.** The project site is located in a rural agricultural area of Imperial County; however, the area has been developed with utility-scale solar projects. The nearest sensitive land use to the project site is a single-family residence located along West

Vaughn Road approximately 1.3 miles northeast from the project site boundary. This issue will be addressed in the air quality analysis included in the EIR.

- d) **No Impact.** Land uses commonly considered to be potential sources of odorous emissions include wastewater treatment plants, sanitary landfills, food processing facilities, chemical manufacturing plants, rendering plants, paint/coating operations, and concentrated agricultural feeding operations and dairies. The operation of a battery storage system is not an odor producer. Therefore, no impact is identified for this issue.

IV. Biological Resources

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

Impact Analysis

- a) **Potentially Significant Impact.** According to the Conservation and Open Space Element of the General Plan (County of Imperial 2016), numerous special-status species occur in the County, and of particular concern is the western burrowing owl which may have the potential to occur within the project site. Burrowing owls, a candidate species under the California Endangered Species Act, are commonly found along canals and drains. The project site is in

relative proximity to the Westside Main Canal and proposed access to the site would take place either immediately north or south of a smaller canal. Therefore, the project site has the potential to be used as burrowing owl foraging habitat, as burrowing owls and burrows are commonly found along canals and drains. Thus, a potentially significant impact is identified for this issue area. A biological resources technical report that will address the proposed project's potential impacts on biological resources will be prepared and this issue will be addressed in the EIR.

- b) **Potentially Significant Impact.** Refer to response IV. a) above.
- c) **Potentially Significant Impact.** The project site is located in an area that contains large agricultural fields, and the project site and surrounding areas are traversed by a network of drains, canals, and other irrigation infrastructure administered by the IID, some of which constitute potentially jurisdictional features. An aquatic resources delineation that will address the proposed project's potential impacts on state or federally protected wetlands will be prepared and included in the EIR analysis.
- d) **Less than Significant Impact.** Refer to response IV. a) above.
- e) **Potentially Significant Impact.** Refer to response IV. a) above.
- f) **No Impact.** The project site is not located in a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact is identified for this issue area.

V. Cultural Resources

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

Impact Analysis

- a) **Potentially Significant Impact.** Currently, the project site is vacant and bounded by agricultural land to the north, BLM lands to the south and west, and vacant land to the east. According to the Conservation and Open Space Element of the General Plan (County of Imperial 2016), the project site is located in an area of heightened prehistoric and historic sensitivity due to its proximity to the Salton Sea. Initial cultural resources records search indicates that there are previously recorded cultural resources located within the project site. A cultural resources report that will address the proposed project's potential impacts on historic and prehistoric resources will be prepared and this issue will be addressed in the EIR.
- b) **Potentially Significant Impact.** Refer to response V. a) above.
- c) **Potentially Significant Impact.** There is a potential for unknown human remains to be unearthed during earthwork activities based on initial cultural resources records search results. This issue is potentially significant and will be addressed in the EIR.

VI. Energy

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Potentially Significant Impact.** The proposed project includes the construction of a 400-MW BESS on approximately 39.25 acres of vacant land. In addition, the project would include an off-site transmission line that would connect to SDG&E’s existing IV substation.

The use of energy associated with the proposed project includes both construction and operational activities. Construction activities consume energy through the use of heavy construction equipment and truck and worker traffic. However, construction of the proposed project would involve the use of energy- and fuel-efficient construction equipment that would help minimize inefficient or wasteful use of energy and increase conservation during construction.

Although the project would directly support the Renewable Portfolio Standards (RPS) goal for increasing the percentage of electricity procured from renewable sources, the energy used during construction and operations will be evaluated in further detail as part of the greenhouse gas (GHG) emissions assessment which includes an energy analysis. Therefore, this issue will be addressed as potentially significant in the EIR.

- b) **Less than Significant Impact.** Implementation and operation of the project would promote the use of renewable energy and contribute incrementally to the reduction in demand for fossil fuel use for electricity-generating purposes and help California meet its RPS. Additionally, the project would be consistent with the County’s General Plan Conservation and Open Space Element, Objective 9.2 which encourages renewable energy developments. The proposed project would directly support state and local plans for renewable energy development and would be considered a less than significant impact.

VII. Geology and Soils

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- ai) **No Impact.** According to the California Earthquake Hazards Zone Application (California DOC 2019), the project site is not located within a State of California, Alquist-Priolo Earthquake Fault Zone. The proposed project would not result in the construction of any structure intended for human occupancy and all structures and on-site facilities would be designed in accordance with the most recent California Building Code (CBC). Therefore, the proposed project will not result in an impact associated with the rupture of a known earthquake fault.
- a ii) **Potentially Significant Impact.** Southern California is a seismically active region, therefore it is highly likely that regional earthquakes would occur that could affect the proposed project site. However, as previously mentioned above, no active faults are underlying or adjacent to the project site. All structures and on-site facilities would be designed in accordance with the most recent CBC to withstand peak site ground acceleration. However, the project site could be affected by the occurrence of seismic activity to some degree but no more than the surrounding properties. A potentially significant impact has been identified for this issue area. A geotechnical report that will address the proposed project's potential impacts on geology and soils will be prepared and this issue will be addressed in the EIR.
- a iii) **Less than Significant Impact.** Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as vibratory motion produced by earthquakes. With strong ground shaking, an increase in pore water pressure develops as the soil tends to reduce in volume. If the increase in pore water pressure is sufficient to reduce the vertical effective stress (suspending the soil particles in water), the soil strength decreases, and the soil behaves as a liquid (similar to quicksand). Liquefaction can produce excessive settlement, ground rupture, lateral spreading, or failure of shallow bearing foundations.
- Four conditions are generally required for liquefaction to occur, including: 1) saturated soil, 2) loosely packed soil, 3) relatively cohesionless soil, and 4) groundshaking of sufficient intensity must occur to trigger the mechanism.
- All four conditions listed above may exist to some degree at the project site. Therefore, there is a potentially significant impact associated with liquefaction. A geotechnical report that will be prepared and will address the proposed project's potential impacts on geology and soils. This issue will be addressed in the EIR.
- a iv) **No Impact.** According to Figure 3: Landslide Activity in the Seismic and Public Safety Element of the General Plan (County of Imperial 2022), the project site is not located in an area that is prone to landslide hazards. Furthermore, with the exception of incised drainages that traverse the project site, the project site and surrounding area is relatively flat and no steep slopes have been identified on the site. Therefore, no impact is identified for this issue area.
- b) **Potentially Significant Impact.** The project site is within a generally flat area with low levels of natural erosion. However, soil erosion can result during construction as grading and construction can loosen surface soils and make soils susceptible to wind and water movement across the surface. Erosion would be controlled on-site in accordance with Imperial County standards including preparation, review, and approval of a grading plan by the Imperial County Engineer. However, due to the size of the area subject to construction and soil disturbing activities, this impact is considered potentially significant and will be addressed in further detail in the EIR.
- c) **Potentially Significant Impact.** Near surface soils within the project site will need to be identified to determine if the soils are unstable. Therefore, this issue is potentially significant and will be analyzed in the EIR.

- d) **Potentially Significant Impact.** Near surface soils within the project site will need to be identified to determine if they consist of soils having expansion potential. Therefore, this issue is potentially significant and will be analyzed in the EIR.
- e) **No Impact.** The proposed project would not require the installation of septic tanks or alternative wastewater disposal systems. The proposed battery storage system would be remotely operated, controlled and monitored and with no requirement for daily on-site employees. Therefore, no impact is identified for this issue area.
- f) **Potentially Significant Impact.** Many paleontological fossil sites are recorded in Imperial County and have been discovered during construction activities. Paleontological resources are typically impacted when earthwork activities, such as mass excavation cut into geological deposits (formations) with buried fossils. It is not known if any paleontological resources are located on the project site. The proposed project's potential to impact paleontological resources will be addressed in the EIR.

VIII. Greenhouse Gas Emissions

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

Impact Analysis

- a) **Potentially Significant Impact.** In the long-term, the proposed project is expected to provide a benefit with respect to reduction of greenhouse gas emissions. However, the proposed project has the potential to generate greenhouse gas emissions during construction, in addition to construction worker trips to and from the project site. Thus, a potentially significant impact is identified for this issue area. An air quality and greenhouse gas emissions assessment will be prepared for the proposed project, and this issue will be addressed in the EIR.
- b) **Potentially Significant Impact.** Refer to response VIII. a) above.

IX. Hazards and Hazardous Materials

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

Impact Analysis

- a) **Potentially Significant Impact.** Construction of the proposed project (including proposed off-site transmission line upgrades) will involve the limited use of hazardous materials, such as fuels and greases to fuel and service construction vehicles and equipment. Project construction activities that would disturb soils would include the use of construction vehicles and equipment and their associated grease, oil, and fuels. Vehicle fuels, oils, and grease have the potential to be released into the environment through natural events or human error.

No extremely hazardous substances are anticipated to be produced, used, stored, transported, or disposed of as a result of project construction. Operation of the proposed project will be conducted remotely. Therefore, no habitable structures (e.g. housing or operation and maintenance [O&M] building) are proposed on the project site. Regular and routine maintenance of the proposed project may result in the potential to handle hazardous materials. However, the hazardous materials handled on-site would be limited to small amounts of everyday use cleaners and common chemicals used for maintenance. The applicant will be required to comply with State laws and County Ordinance restrictions, which regulate and control hazardous materials handled on-site. Such hazardous wastes would be transported off-site for disposal according to applicable State and County restrictions and laws governing the disposal of hazardous waste during construction and operation of the project. A less than significant impact would occur for hazardous materials related to the PV solar panels and associated facilities.

However, the proposed project includes a 400-MW BESS which would consist of lithium ion or flow batteries. The batteries will either be housed in storage containers or buildings fitted with HVAC and fire suppression systems as necessary, depending on the final selection of battery technology. The U.S. Department of Transportation (DOT) regulates transport of lithium-ion batteries under the DOT's Hazardous Materials Regulations (HMR) (49 CFR Parts 171-180). The HMR apply to any material DOT determines is capable of posing an unreasonable risk to health, safety, and property when transported in commerce. Lithium-ion batteries must conform to all applicable HMR requirements when offered for transportation or transported by air, highway, rail, or water. Additionally, carbon (as graphite) is flammable and could pose a fire hazard. Fire protection is achieved through project design features, such as monitoring, diagnostics and a fire suppression system. The project would be required to comply with state laws and county ordinance restrictions, which regulate and control hazardous materials handled on site. The project will also be required to comply with Imperial County Fire Department Fire Prevention Bureau CUP Conditions of Approval for BESS systems. The potential hazard associated with the proposed BESS system will be addressed in the EIR.

- b) **Potentially Significant Impact.** Refer to response IX. a) above.
- c) **No Impact.** The project site is not located within 0.25 mile of any existing or proposed schools. The nearest school is Westside Elementary School located approximately 1.76 miles to the northeast of the project site at 2294 West Vaughn Road. Therefore, the proposed project would not pose a risk to nearby schools and no impact would occur.
- d) **No Impact.** Based on a review of the Cortese List conducted in November 2024, the project site is not listed as a hazardous materials site (DTSC 2024). Therefore, implementation of the proposed project would result in no impact related to the project site being located on a listed hazardous materials site pursuant to Government Code Section 65962.5.
- e) **No Impact.** The project site is not located within two miles of a public airport. Therefore, implementation of the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area. No impact is identified for this issue area.
- f) **No Impact.** The proposed project does not involve blocking or restricting any access routes. The proposed access road would be designed in accordance with fire department standards. Therefore, the proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan. No impact is identified for this issue area.

- g) **No Impact.** Based on a review of the California Department of Forestry and Fire Protection's fire hazard severity zone map, the project site is not located within a fire hazard severity zone (California Department of Forestry and Fire Protection 2022). The proposed project would not introduce features that directly or indirectly increase the risk of wildfire on the project site. No impact is identified for this issue area.

X. Hydrology and Water Quality

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

Impact Analysis

- a) **Potentially Significant Impact.** The proposed project would require construction activities that would disturb soils such as the use of construction vehicles and equipment and their associated grease, oil, and fuels. Vehicle fuels, oils, and grease have the potential to be released into the environment through natural events or human error and therefore, could significantly affect water quality.

As runoff flows over developed surfaces, water can entrain a variety of potential pollutants including, but not limited to, oil and grease, pesticides, trace metals, and nutrients. These pollutants can become suspended in runoff and carried to receiving waters. If they are not intercepted or are left uncontrolled, the polluted runoff would otherwise freely sheet flow from the project site to the IID Imperial Valley Drains and could result in the accumulation of these pollutants in the receiving waters. Potentially significant water quality impacts have been identified and will be addressed in the EIR.

- b) **No Impact.** The proposed project would not involve the use of groundwater resources. No groundwater wells will be drilled, nor will the project require the use of ground water. No impact on groundwater supply or recharge would occur.
- ci) **Less than Significant Impact.** The proposed project would result in the creation of impervious surfaces. Soil erosion could result during construction and earthmoving as well as during site reclamation. However, the project applicant is required to comply with the Construction General Permit and the Industrial General Permit, as well as Imperial County Land Use Ordinance, Title 9, Chapter 10 – Grading Regulations. County standards and compliance with the NPDES require the creation of a Stormwater Pollution Prevention Plan (SWPPP), and the use of best management practices (BMPs) to reduce impacts to surface and ground water quality attributed to erosion or siltation to a level less than significant. Applicant compliance with Imperial County and State standards would ensure the project does not significantly alter the site's drainage resulting in erosion or siltation on-or off-site, and impacts would be less than significant.
- cii) **Less than Significant Impact.** Refer to Response X. ci) above.
- ciii) **Less than Significant Impact.** Refer to Response X. ci) above.
- civ) **Less than Significant Impact.** According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (Map Number 06025C2025C), the project site is located within Zone X (FEMA 2021). Flood Zone X is an area determined to be outside of the 0.2 percent annual chance of a flood. The proposed project would not involve the placement of structures within a 100-year flood hazard area. Therefore, the proposed project would not impede or redirect flood flows and this is considered a less than significant impact.
- d) **No Impact.** According to the FEMA Flood Insurance Rate Map (Map Number 06025C2025C), the project site is within Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain (FEMA 2008). In addition, there are no large bodies of water near the project site. The Salton Sea is the closest body of water near the project site but is over 25 miles away from the site, and the Pacific Ocean is over 90 miles away. Therefore, the project would not risk release of pollutants due to project inundation by flood, tsunami or seiche. No impact would occur.
- e) **Less Than Significant Impact.** No groundwater wells will be drilled, nor will the project require the use of ground water. Any water needed for fugitive dust control, or other BMPs that require water will be obtained through the project applicant's existing IID contract. Furthermore, the project is required to comply with County, State, and Federal water quality standards. The proposed project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This is considered a less than significant impact.

XI. Land Use and Planning

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

Impact Analysis

- a) **No Impact.** The project site is located in a sparsely populated, agriculturally zoned portion of Imperial County. There are no established residential communities located within or in the vicinity of the project site. The nearest established residential community is the community of Seeley located north of the project site and north of Interstate 8 (I-8). Therefore, implementation of the project would not divide an established community and no impact would occur.
- b) **Potentially Significant Impact.** The project applicant is requesting a zone change for the project site to be rezoned from A-3 to M-2 (Medium Industrial). Pursuant to Title 9, Division 5, Chapter 16, the following uses are permitted in the M-2 zone subject to approval of a CUP from Imperial County:

g) Battery Storage

t) Major facilities relating to the generation and transmission of electrical energy provided such facilities are not under State or Federal law, to be approved exclusively by an agency, or agencies of the State or Federal government, and provided such facilities shall be approved subsequent to coordination review of the Imperial Irrigation District for electrical matters, meeting the requirements in Division 17. The maximum allowance of battery shall be in a ratio of 2 to 1 compared to solar. Such uses shall include, but not limited to, the following:

- *Electrical generation plants*
- *Facilities for the transmission of electrical energy (100-200 kV)*
- *Electrical substations in an electrical transmission system (500 kV/230 kV/161 kV)*

Implementation of the project requires an amendment to the County's General Plan, Zone Change, and approval of a CUP, as described below:

- **General Plan Amendment:** A General Plan Amendment is proposed that would change the existing General Plan land use designation of "Agriculture" to "Industrial."

- **Zone Change:** The project site is currently zoned Heavy Agriculture (A-3). The applicant is requesting a Zone Change to be rezoned to M-2.
- **Conditional Use Permit:** Implementation of the project would require the approval of a CUP by the County to allow for the construction and operation of the proposed commercial BESS facility on land zoned M-2.

In summary, the proposed General Plan Amendment and Zone Change may result in a conflict with an applicable land use plan, policy or regulation. A potentially significant impact has been identified for this issue, and this issue will be addressed in the EIR.

XII. Mineral Resources

Environmental Issue Area:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **No Impact.** The project site is not used for mineral resource production. According to Figure 8: Imperial County Existing Mineral Resources of the Conservation and Open Space Element of the General Plan (County of Imperial 2016), no known mineral resources occur within the project site nor does the project site contain mapped mineral resources. Therefore, the proposed project would not result in the loss of availability of any known mineral resources that would be of value to the region and the residents of California nor would the proposed project result in the loss of availability of a locally important mineral resource. Thus, no impact is identified for this issue area and no further analysis is warranted.
- b) **No Impact.** As noted in Response XII. a), implementation of the proposed project would not result in any impacts to known mineral resources or mineral resource recovery sites. Additionally, the proposed project would not preclude future mineral resource exploration throughout the project site. No impact would occur.



XIII. Noise

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

Impact Analysis

- a) **Potentially Significant Impact.** The Imperial County Title 9 Land Use Ordinance, Division 7, Chapter 2, Section 90702.00 - Sound level limits, establishes one-hour average sound level limits for the County’s land use zones. Agricultural/industrial operations are required to comply with the noise levels prescribed under the general industrial zones. Therefore, the proposed project will be required to maintain noise levels below 75 decibels (dB) (averaged over one hour) during any time of day.

In addition to adhering to the County’s sound level limits, the proposed project will also be expected to comply with the Noise Element of the General Plan which states that construction noise, from a single piece of equipment or a combination of equipment, shall not exceed 75 dB, when averaged over an eight-hour period, and measured at the nearest sensitive receptor. Construction equipment operation is also limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. on Saturday. Nevertheless, the proposed project will result in the increase in ambient noise levels during construction, which in some locations, would be in relative proximity to existing residential uses. A noise report that will address the proposed project’s potential noise impacts will be prepared and this issue will be addressed in the EIR.

- b) **Potentially Significant Impact.** The County of Imperial does not regulate vibrations associated with construction. However, significant vibration is typically associated with activities such as blasting or the use of pile drivers, neither of which would be required during project construction. Construction activities most likely to cause vibration include heavy construction equipment and site grading operations. Although all heavy, mobile construction

equipment has the potential to cause at least some perceptible vibration when operating close to buildings, the vibration is usually short term and is not of sufficient magnitude to cause building damage. Heavy equipment such as dozers, loaders, and drill rig equipment have the potential to be operated in proximity to residences or structures so as to cause vibration impact. Operation of the project would not result in vibrations perceptible to nearby receptors. Potential noise impacts will be addressed in the EIR.

- c) **No Impact.** The project site is not located within an airport land use plan nor is it within two miles of a public airport or public use airport. As such, no impact would occur to people residing or working in the project area related to excessive noise levels.

XIV. Population and Housing

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

Impact Analysis

- a) **No Impact.** The project site is currently vacant. Development of residential uses is not proposed. Project construction would involve the use of temporary workforce, however, once operational, the project will only involve a limited number of employees for periodic maintenance activities. It is assumed that the workforce would be from southern California and would likely not require accommodations. The project would not appear to induce population growth; therefore, the proposed project would have no impact.
- b) **No Impact.** No housing exists within the project site. Therefore, the proposed project would not displace any existing people or housing, which would require the construction of replacement housing elsewhere. No impact is identified for this issue area.

XV. Public Services

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

Impact Analysis

- ai) **Less than Significant Impact.** Fire protection and emergency medical services in the area are provided by the Imperial County Fire Department. The project would not likely impact or displace the location of existing fire protection facilities. The project applicant will have a certified fire engineer review the proposed facilities and existing fire response infrastructure to determine if the existing fire response facilities are adequate or if additional facilities (i.e., hydrants, access points) are necessary. The proposed project will also be reviewed by the Imperial County Fire Department and will be required to adhere to applicable fire protection ordinances, and special conditions identified by the Fire Department as part of the CUP review process. Therefore, impacts would be less than significant.
- a ii) **Less Than Significant Impact.** The project would not likely impact or displace the location of existing police protection facilities. The project would also include public safety mechanisms such as fences to protect the facilities and reduce unauthorized visitations. Furthermore, the project applicant would be required to pay their share of local infrastructure improvement costs. Therefore, impacts would be less than significant.
- a iii) **Less Than Significant Impact.** The proposed project does not include the development of residential land uses that would result in an increase in population or student generation. Also, the number of construction and operational workers coming to the region is low, and would be temporary, and is therefore not expected to increase demand for schools or require the construction of new schools. Therefore, impacts would be less than significant.

- aiv) **Less Than Significant Impact.** The number of construction and operational workers coming to the region is low, and would be temporary, and is therefore not expected to increase demand on existing or future parks. Therefore, impacts would be less than significant.
- av) **Less Than Significant Impact.** The number of construction and operational workers coming to the region is low, and would be temporary, and is therefore not expected to increase demand for any public services (such as post offices). Therefore, impacts would be less than significant.

XVI. Recreation

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

Impact Analysis

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

XVII. Transportation

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

Impact Analysis

- a) **Potentially Significant Impact.** Construction of the proposed project would result in a small increase of traffic to the area, which may result in a potentially significant impact. Therefore, a traffic impact study that will address the proposed project's potential impacts on traffic during construction will be prepared, and this issue will be addressed in the EIR.
- b) **Potentially Significant Impact.** Section 15064.3(b) of the CEQA Guidelines provides guidance on determining the significance of transportation impacts and focuses on the use of vehicle miles traveled (VMT), which is defined as the amount and distance of automobile travel associated with a project. Given the nature of the project, after construction, there would be a nominal amount of vehicle trips generated by the project. Once the proposed project is implemented, the project would require intermittent maintenance requiring a negligible amount of traffic trips on an annual basis. However minimal, the proposed project would increase the number of vehicular trips related to construction and the need for intermittent maintenance on an annual basis. Therefore, this issue is potentially significant and will be addressed in the traffic impact study and EIR analysis.
- c) **Potentially Significant Impact.** The proposed project would not result in any changes to any roads, intersections, streets, highways, nor would it provide any incompatible uses to the street and highway system. Access to the project site is proposed via Hyde Road; however, the proposed project would involve the construction of a new bridge to cross over IID's Westside Main Canal. IID would be a Responsible Agency as defined by CEQA Guideline 15381 and would participate in the EIR review process in accordance with the CEQA Guidelines (e.g., Section 15096). Therefore, this issue is potentially significant and will be addressed in the traffic impact study and EIR analysis.

In addition, all vehicles that would be used for travel to and from the project site would be licensed and comply with all appropriate transportation laws and regulations including

obtaining and adhering to provisions of any required permits for oversized loads. Proposed project facilities would be designed, constructed, and operated in accordance with applicable fire protection, California Public Utilities Commission (CPUC) safety standards, and other environmental, health, and safety requirements.

- d) **No Impact.** All proposed facilities would be constructed within the property boundaries of the project site and would not affect emergency vehicle access to the facility or any roadway. Emergency vehicle access identified and designated in the project site, would not be changed as result of the proposed project. Therefore, no impacts to emergency access to the plant site or surrounding area would occur under the project.



XVIII. Tribal Cultural Resources

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

Impact Analysis

a-b) **Potentially Significant Impact.** Assembly Bill 52 was passed in 2014 and took effect July 1, 2015. It established a new category of environmental resources that must be considered under CEQA called tribal cultural resources (Public Resources Code 21074) and established a process for consulting with Native American tribes and groups regarding those resources. Assembly Bill 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.

In accordance with AB 52, Imperial County, as the CEQA lead agency, sent an AB 52/SB 18 consultation request letter to California Native American tribes that are traditionally and culturally affiliated with the project area on February 21, 2025. This issue will be further analyzed in the EIR.

XIX. Utilities and Service Systems

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

Impact Analysis

- a) **Less than Significant Impact.** Operational use of water resources for the proposed project would be limited to domestic use within operations and maintenance buildings, solar panel washing, and fire protection services. Impacts associated with water facilities would be less than significant. Construction of the proposed facilities would not generate/discharge any wastewater. Impacts associated with water facilities would be less than significant.

No natural gas facilities are located near the project and no natural gas hookup is required for the project. No impacts associated with natural gas facilities would occur. The project will not have an impact on any telecommunications.

The project would not 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, impacts would be less than significant.

- b) **Potentially Significant Impact.** During project construction, water will be needed for dust control and soil conditioning during installation of the battery storage unit and related infrastructure. During the operational phase, water will be needed for routine maintenance activities. IID would provide the water required for operations and maintenance and potable water will be trucked onto the site. Thus, a potentially significant impact is identified for the availability of sufficient water supplies to serve the proposed project for the reasonably foreseeable future. The proposed project's potential impacts on water supplies will be analyzed in the EIR.
- c) **No Impact.** The proposed project would not generate wastewater that would need to be treated by a wastewater treatment facility. On-site wastewater needs will be accommodated by the use of portable toilets that would be removed from the project site once construction is complete. No impact would occur.
- d) **Less than Significant Impact.** Solid waste generation would be minor for the construction and operation of the proposed project. Trash would likely be hauled to the Calexico Solid Waste Site (13-AA-0004) located at New River and Highway 98 in the City of Calexico. As of August 31, 2024, the Calexico Solid Waste Site has approximately 1,518,070 cubic yards of remaining capacity and is estimated to remain in operation through 2179 (CalRecycle 2025). Therefore, there is ample landfill capacity in Imperial County to receive the minor amount of solid waste generated by construction and operation of the proposed project.

Additionally, because the proposed project would generate solid waste during construction and operation, the project will be required to comply with state and local requirements for waste reduction and recycling; including the 1989 California Integrated Waste Management Act and the 1991 California Solid Waste Reuse and Recycling Access Act of 1991. Also, conditions of the conditional use permits will contain provisions for recycling and diversion of Imperial County construction waste policies. Therefore, a less than significant impact is identified for this issue area.

- e) **Less than Significant Impact.** The proposed project would comply with all applicable statutes and regulations related to solid waste. As discussed in Response XIX. d) above, solid waste generated by the proposed BESS facility is expected to be minimal. This impact is considered less than significant.

XX. Wildfire

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

Impact Analysis

- a) **No Impact.** According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the proposed project 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 2022). Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact is identified for this issue area.
- b) **No Impact.** The proposed project 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 2022). Therefore, the proposed project would not exacerbate wildfire risks. No impact is identified for this issue area.
- c) **Less than Significant Impact.** Fire protection and emergency medical services in the area are provided by the Imperial County Fire Department. The proposed project 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 2022). Further, the proposed project is located in an area of Imperial County which has a generally low potential for a major fire (County of Imperial 2016).

The project involves the installation of a commercial BESS facility, an on-site substation, and an aboveground transmission line. Proposed project facilities would be designed, constructed, and operated in accordance with applicable fire protection, CPUC safety standards, and other environmental, health, and safety requirements. Primary access roads would be constructed to meet the County Fire Department's standards. Further, water for emergency fire suppression is proposed to be provided by the IID. Therefore, operation and maintenance would not affect the ability of fire personnel to respond to fires or exacerbate fire risk and would continue to be adequately supported by the existing fire protection services. A less than significant impact is identified for this issue area.

- d) **No Impact.** The proposed project 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 2022). Additionally, the proposed 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 no further analysis is warranted.

XXI. Mandatory Findings of Significance

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

Impact Analysis

- a) **Potentially Significant Impact.** The proposed project has the potential to result in significant environmental effects on biological resources and cultural resources, which could directly or indirectly cause adverse effects on the environment. These issues will be further evaluated in the EIR.
- b) **Potentially Significant Impact.** Implementation of the proposed project has the potential to result in impacts related to: aesthetics, agricultural resources, air quality, biological resources, cultural resources, energy, geology/soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use/planning, noise, transportation, tribal cultural resources, and utilities/service systems. The proposed project has the potential to result in cumulative impacts with regards to the identified issue areas. Cumulative impacts will be discussed and further analyzed in the EIR.
- c) **Potentially Significant Impact.** Implementation of the proposed project has the potential to result in impacts related to: air quality, hazards, geology/soils, GHG emissions, and noise.



These potential environmental effects could cause substantial adverse effects on human beings. These issues will be further evaluated in the EIR.

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