

**CHAPTER 6.0
OTHER CEQA REQUIRED
CONSIDERATIONS**

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The California Environmental Quality Act (CEQA) requires the discussion of significant irreversible environmental changes, growth-inducing impacts, and areas of unavoidable significant environmental impacts for the Proposed Action, Alternative 1 - Double Circuit Gen-tie Line Structures, Alternative 2- Reduced CSE Facility Site, Alternative 3 - Use Existing Electric Line Towers and 230-kV Line Looping and Undercrossing, and Alternative 4 - No Action/No Project Alternative. The following discussion addresses these issues as they relate to the development of the Proposed Action.

6.1 PROPOSED ACTION

6.1.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

6.1.1.1 CEQA

Section 15126 (c) of the CEQA Guidelines requires that an EIR address any irreversible changes to the environment that may result from the implementation of the Proposed Action. Several irreversible commitments of limited resources would result from implementation of the Proposed Action. Such resources include, but are not limited to: the loss of productive agricultural land, steel, copper, lead and other metals, sand, gravel, concrete, asphalt, gas and diesel fuel, petrochemical construction materials, and water.

In exchange for the use of these limited resources, the Proposed Action would provide a clean, renewable energy resource. The Proposed Action would meet multiple federal, State, and local goals and policies aimed at reducing reliance on fossil fuels, and encouraging development of renewable energy sources. These goals and policies are identified in Chapter 1.0 of this EIR/EA. The Applicant controls the CSE Facility site through a combination of options to purchase, options to lease, and fee ownership by an affiliate. At the end of the project's useful life or the expiration of the Conditional Use Permit (approximately 30 years in the future), the Applicant would restore the CSE Facility site to a condition to support agricultural production. The restoration would occur in accordance with an Agricultural Reclamation Plan prepared for the site and approved by the Imperial County Department of Planning and Development Services.

6.1.1.2 NEPA

The National Environmental Policy Act (NEPA) requires an analysis of the significant irreversible effects of a Proposed Action. Resources irreversibly or irretrievably committed to a Proposed Action are those used on a long-term or permanent basis. This includes the use of nonrenewable resources such as metal, wood, fuel, paper, and other natural resources. These resources are considered non-retrievable in that they would be used for a Proposed Action when they could have been conserved or used for other purposes. Another impact that falls under the category of irreversible and irretrievable commitment of resources is the unavoidable destruction of natural resources.

The Centinela Solar Energy Project would irretrievably commit resources over the life of the project. After the operational life ends, the project would be decommissioned and the Applicant would restore the site to a condition to support agricultural production. In exchange for using nonrenewable and non-retrievable resources, the project would provide a source of clean, renewable energy. Over the

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operational life of the Centinela Solar Energy Project, it would contribute incrementally to the reduction in demand for fossil fuel based electricity generation. Therefore, the incremental reduction in fossil fuels would be a beneficial effect of the commitment of nonrenewable resources.

6.1.2 GROWTH INDUCING IMPACTS

A project is considered growth-inducing if it can foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines §15126.2(d)). This definition includes projects that would remove obstacles to population growth, such as extending public services into areas not previously served. Growth inducement can also be defined as an action that would encourage an increase in density of development in surrounding areas or encourage adjacent development. According CEQA Guidelines §15126.2(d), growth should not be assumed to be beneficial, detrimental, or of little significance to the environment.

The Proposed Action is located within an unincorporated area of Imperial County. The Proposed Action does not involve the development of a residential component that would result in a direct population growth in the area. The Proposed Action is the construction and operation of a solar facility and Gen-tie Line. The construction workforce will vary over the 22 to 28 month construction period. Employment is expected to reach approximately 100 workers by month 3, and then increase to a peak of approximately 360 workers by month 6. The workforce will decrease as the CSE Facility substation, Gen-tie Line, and common services area facilities are completed. Around month 9, the workforce is expected to average approximately 250 workers and continue to the latter stages of construction. The workforce will decline during the last four months of construction. After the construction of the Proposed Action, no permanent construction workers would be hired. The Proposed Action would only require the employment of five to seven full-time personnel for the operation of the solar facility. As such, the Proposed Action would not induce substantial population growth in the area.

The Proposed Action will involve only the extension of electricity-related infrastructure off-site (i.e. no residential development is proposed). This would be limited to the extension of the Gen-tie Line from the solar energy facility to the Imperial Valley Substation. The Gen-tie Line would serve regional energy needs, integrating into the grid, and would not be available to directly serve surrounding areas.

While the Proposed Action would contribute to energy supply, which indirectly supports population growth, the impetus for the Proposed Action is the State's need for renewable energy to meet its Renewable Portfolio Standard. Unlike a gas-fired power plant, the Proposed Action is not being developed as a source of base-load power in response to growth in demand for electricity. The power generated would be added to the State's electricity grid with the intent that it would displace fossil fueled power plants and their associated environmental impacts (e.g. greenhouse gas emission).

The Proposed Action would supply energy to accommodate and support existing demand and projected growth, but would not foster new growth. This would occur for several reasons. First, the additional energy would be used to ease the burdens of meeting existing statewide energy demands within and beyond the area of the project. Next, the energy would be used to support projected growth. Finally, the factors affecting growth are so diverse that any potential connection between additional energy production and growth would be too speculative and uncertain to merit further analysis.

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Under CEQA, an EIR should consider potentially significant energy implications of a project (CEQA Guidelines Appendix F (II); Pub. Res. Code Section 21100(b) (3)). Under NEPA, indirect effects including growth-inducing effects must be analyzed (40 CFR Section 1508.8(b)). However, the relationship between the Proposed Action's increased electrical capacity and the growth-inducing impacts outside the surrounding area is too speculative and uncertain to warrant further analysis. When a project's growth-inducing impacts are speculative, the lead agency should consider 14 Cal Code Regs §15145, which provides that, if an impact is too speculative for evaluation, the agency should note this conclusion and terminate discussion of the impact. As the court explained in *Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal. App.4th 342, 368: "Nothing in the Guidelines, or in the cases, requires more than a general analysis of projected growth." *Napa Citizens*, 91 CA 4th at 369. The problem of uncertainty of the Proposed Action's growth-inducing effects cannot be resolved by collection of further data because there are multiple factors affecting growth.

While this EIR/EA has considered that the Proposed Action, as an renewable energy project, could lend to regional growth, specific growth that could be attributed to the Proposed Action is unpredictable, due to the multitude of variables, including uncertainty about the nature, extent, and location of growth and the effect of other contributors to growth in addition to the Proposed Action. No accurate and reliable data is available that could be used to predict the amount of growth outside the area that would result from the Proposed Action's contribution of additional electrical capacity. Neither the BLM nor the Imperial County has adopted a threshold of significance for determining when an energy project is growth-inducing. Further evaluation of this impact is not required under CEQA or NEPA.

Additionally, the project would not involve the development of any new roadways, new water systems, or sewer. Potable water supply would be provided from a bottled water or similar water delivery service. The CSE Facility will collect wastewater from sanitary facilities such as sinks and toilets in the operations and maintenance building. This waste stream will be sent to an onsite sanitary waste septic system and leach field. Therefore, infrastructure improvements to serve the project are limited and would not be available to serve surrounding areas. For these reasons, the project would not be growth-inducing.

6.1.3 UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL IMPACTS

Analysis of environmental impacts caused by the Proposed Action has been completed and is included in Chapter 4.0 of this EIR/EA. Where significant impacts have been identified, mitigation measures are proposed that when implemented would reduce the impact to a level less than significant under CEQA. A summary of the impacts and mitigation measures contained for each subject area in Chapter 4.0, Environmental Consequences are provided in the Executive Summary, Table ES-1 at the beginning of this document. No unavoidable significant environmental impacts were identified for the Proposed Action, Alternative 1 - Double Circuit Gen-tie Line Structures, Alternative 2- Reduced CSE Facility Site, or Alternative 3 - Use Existing Electric Line Towers and 230-kV Line Looping and Undercrossing. No development is proposed under Alternative 4 - No Action/No Project Alternative. Likewise, no impacts or mitigation measures were identified for this Alternative.