

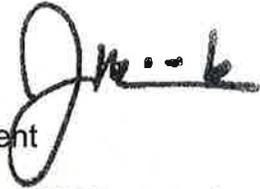


# Imperial County Planning & Development Services Planning / Building /

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**Jim Minnick**  
DIRECTOR

TO: Chairman Mike Goodsell  
Vice Chairman Sandy Carver  
Commissioner Dennis Logue  
Commissioner Kristopher Haugh

FROM: Jim Minnick, Secretary  
Airport Land Use Commission  
Director of Planning & Development 

SUBJECT: Public Hearing to Consider the ORNI 5 exploratory well project proposed to determine consistency with the 1996 Airport Land Use Compatibility Plan (**ALUC 5-19**)

DATE OF REPORT: October 16, 2019

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AGENDA ITEM NO: 1

HEARING DATE: October 16, 2019

HEARING TIME: 6:00 P.M.

HEARING LOCATION: County Administrative Center  
Board of Supervisors Chambers  
940 Main Street  
El Centro, CA 92243

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## SECRETARY RECOMMENDATION

It is the Staff's recommendation that the proposed ORNI 5 exploratory well project to drill 6 exploratory well on private properties near the Salton Sea Airport for Conditional Use Permit #18-0038, is considered an acceptable land use and the project appears to be located within an airport compatibility area, and would be found consistent with the 1996 Airport Land Use Compatibility Plan with restrictions.

**SECRETARY'S REPORT**

**Project Location:**

The proposed well sites are currently vacant, unirrigated, desert land that is sparsely vegetated and primarily flat. Tule Wash and Surprise Ditch flow northeast and eventually empty into the Salton Sea. The well sites were selected to minimize surface disturbance, reduce the potential for adverse environmental effects, and make the best use of existing access within the limitation of testing the targeted geothermal resource. To the degree possible existing roads, trails and disturbances are used for access.

Primary highway access to the proposed well sites are off State Highway 86 to Airpark Drive or County Dump Road (see Figure 1). Existing access roads would be utilized to the extent practical. The access roads would be constructed or improved with gravel and/or maintained as needed to safely accommodate the traffic required for the exploration well drilling activities. Road beds would typically be approximately twenty (20) feet across. Table below shows the land ownership and general information for access to each well site

| Well Site | Assessor's Parcel Number (APN) | Surface Land Owner       | Geothermal Rights Owner  | Well Site Access  | Nearest Residence |
|-----------|--------------------------------|--------------------------|--------------------------|---|-------------------|
| 32-5      | 017-970-001 (209.4 acres)      | Burrtec Waste Industries | Burrtec Waste Industries | Airpark Drive to Dessert Air Court.                                 | 0.34 mile         |
| 47-5      | 017-970-012 (50 acres)         | Burrtec Waste Industries | Burrtec Waste Industries | From Dump Road  | 0.44 mile         |
| 18-32     | 017-010-053 (520 acres)        | ORNI 5                   | State of California      | Airpark Drive to Skywalk Drive to La Guardia Ave to Starlight Drive | 0.40 mile         |
| 47-32     | 017-010-053 (520 acres)        | ORNI 5                   | State of California      | Airpark Drive to Skywalk Drive                                      | 0.20 mile         |
| 14-4      | 017-340-003 (213.6 acres)      | State of California      | State of California      | Airpark Drive to Skywalk Drive                                      | 0.28 mile         |

| Well Site | Assessor's Parcel Number (APN) | Surface Land Owner  | Geothermal Rights Owner | Well Site Access                   | Nearest Residence |
|-----------|--------------------------------|---------------------|-------------------------|------------------------------------|-------------------|
| 17-4      | 017-340-003 (213.6 acres)      | State of California | State of California     | New driveway from County Dump Road | 0.58 mile         |

**Project Description:**

The Applicant proposes to drill and test up to six geothermal exploration wells on private and State lands in the Truckhaven Geothermal Exploration Area, located south-southwest of Salton City in western Imperial County, A number of these proposed wells appear to be located California. Each of the proposed geothermal exploration wells would be located on separate, individual well pads that would be constructed on lands under geothermal lease to the Applicant.

Containment basins would be constructed at each proposed well site for the containment and temporary storage of drilling mud and cuttings and stormwater runoff from the construction site. Each containment basin would be approximately 100 feet by 250 feet by 7 feet deep, and would hold roughly 420,000 gallons with a 2-foot freeboard. Each containment basin would be lined with a 40-milimeter synthetic liner, in accordance with requirements of the CRWQCB. Compliance with California construction stormwater notification and permitting requirements would be performed for each proposed wellsite and new access road.

Geothermal well drilling would be conducted from the constructed well pads described above. Drilling operations would take place for 24 hours per day, 7 days per week. Each geothermal well would take approximately 30 days to complete. The drilling operation would employ about 25 people in 6-person shifts. Well pad construction and drilling would generate a small number of daily one-way vehicle trips (as many as 40 or more trucks and 12 - 16 small trucks/service vehicles/worker vehicles).

The California Department of Conservation, Division of Oil, Gas and Geothermal Resources (CDOGGR) regulates geothermal well drilling operations on private and state lands in California. CDOGGR authorizes the drilling of the wells under a Notice of Intent. CDOGGR reviews and approves the drilling program for each well including the blowout prevention equipment (BOPE) to ensure the drilling operations are safe, protect the community, and protect land and water resources.

**General Plan/ALUCP Analysis:**

Portions of the project area appears to be within the B1/B-2 compatibility areas. Height limits would be restricted near the Salton Sea Airport runway takeoff and landing areas and taxiway areas. The temporary drilling near these areas are temporary and noticing and restricted uses of this airport runway may be required during construction.

The Airport Land Use Compatibility Plan, Policies / Chapter 2, "Scope of Review", Section 2, Types of Actions Reviewed, (3)(g & h) provides that "Building permit applications of projects having a valuation greater than \$500,000 & any other proposed land use action, as determined by the local planning agency, involving a question of compatibility with airport activate.." .

Under the Compatibility Guidelines for Specific Land Uses Appendix D Transportation, Communication, and Utilities, it shows Power Lines and Power Plants as potential Compatible uses with restrictions in the B1/B2 zones.

This project request is brought to the Commission in compliance with ALUC Plan.

Attachments:

- A- Scope of Review Section of ALUC Plan
- B- Site Plan
- C- Applicant comments
- D- EEC package

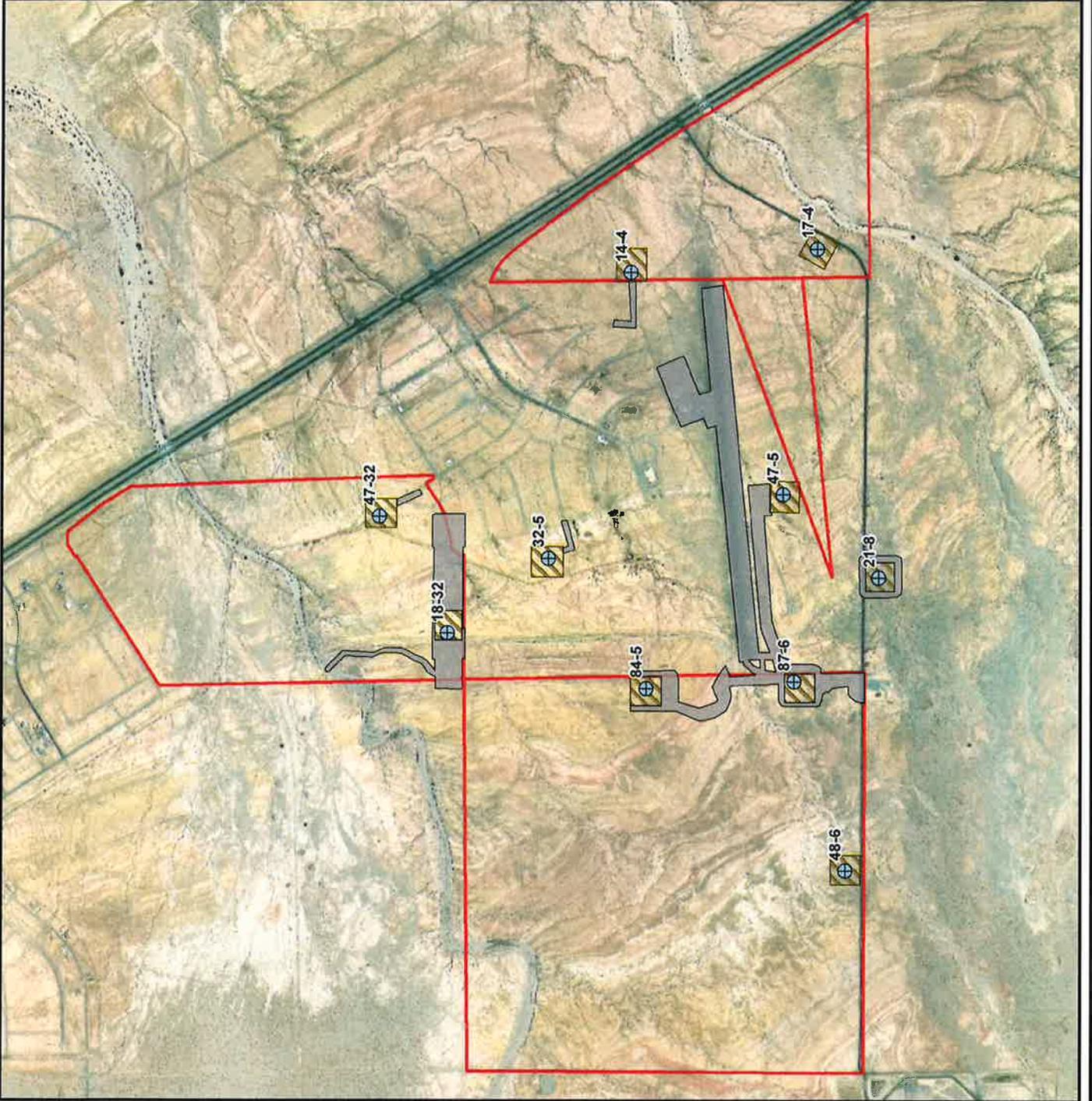
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**Figure 2**  
Geothermal Wells &  
Seismic Testing  
Project Location

**Legend**

-  Project Area
-  Access Roads
-  Preliminary Pads
-  Well Sites





## David Black

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**From:** Scott Kessler <skessler@ormat.com>  
**Sent:** Friday, September 27, 2019 5:00 PM  
**To:** 'Corinne Lytle Bonine'; David Black; 'Carrie L. Sahagun'  
**Subject:** FW: Truckhaven Geothermal  
**Attachments:** Salt Wells\_ROD\_Ormat\_0930111\_Final\_Printer\_Proof\_01.pdf; brochureEnviroVibe.pdf

**CAUTION: This email originated outside our organization; please use caution.**

All, below is a copy of the information I provided to the Navy after the Environmental Review meeting.

Marvin,

Thanks for taking the time to speak with me. I want to clear up some misconceptions regarding the Truckhaven geothermal exploration program. At this time the only project being reviewed by Imperial County and the BLM is for exploration work. It involves seismic trucks in the field for approximately two weeks. After the field data is collected and modeled, subsurface drilling targets will be selected from the pads proposed in the exploration program. Drilling wells will involve two weeks to build a well pad, 10 days to setup the drilling rig, 30-45 days to drill a well and flow test and 10 days to remove the drilling rig. The success rate for projects capable of moving from exploration to construction and operation is only approximately 10%.

In the event the geothermal resource demonstrates sustained generation adequacy a closed loop binary power plant may be built. This technology does not have a steam plume associated with direct use operations that you see elsewhere in the valley. In addition, a facility at Truckhaven would not have a water vapor plume associated with the use of wet cooling towers. To make up for production losses associated with high ambient temperatures, a small 10mw behind the meter solar array would be built to power parasitic operational loads.

A potential facility at this location would have the following attributes;

- 25-30mw generation capacity.
- Closed loop air cooled binary technology as shown on the Youtube videos.
- Up to 20 acres for the power plant site development.
- 6-8 injection and production wells.
- Height is approximately 35-38'.
- It would be located north or north west of the airport runway.
- 10 mw of solar would be built on Ormat owned land immediately north of Salton City and use non-glare panels.
- And the airport will remain unchanged as will existing access roads.

Ormat currently has facilities operational near NAS Fallon at Gabbs Valley, Cold Springs Valley, Brady Hot Springs and Desert Peak. Additionally we permitted a facility at Carson Lake immediately south of the NAS Fallon runway and we are permitting a facility at Dixie Meadows.

<https://player.vimeo.com/video/253211631>

<http://ormat-sp2013/sites/power/BD Presentations/Introduction to Ormat - NNIC 083118.pptx>

<https://www.youtube.com/watch?v=1rn8h1QyGt4>

<https://www.youtube.com/watch?v=uc0skp5OaCc>

Vibriosis equipment can be seen here.

<https://www.youtube.com/watch?v=mVkPGmSPHKE>

<https://www.youtube.com/watch?v=tQxC8ahSdkg>

<https://www.youtube.com/watch?v=DaX4krPTeJs>

<https://www.youtube.com/watch?v=N2KRlhS5f3s>

After looking through the materials it would be good if we could talk again. I will be in Imperial the week of October 7<sup>th</sup> and I could do a short presentation and Q&A for others that may want additional information.

Best regards,



**ORMAT**

**Scott Kessler  
Land & Lease Manager**

**T (775) 356-9029 x32214 M (775) 848-0497  
6140 Plumas St. Reno, NV 89519**

\*\*\*\*\*  
**Confidentiality Warning:**

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\*\*\*\*\*

# RECORD OF DECISION

Salt Wells Energy Projects:

Ormat Technologies Carson Lake Geothermal Project

September 2011



U.S. Department of the Interior  
Bureau of Land Management  
Carson City District  
Stillwater Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701  
775-885-6000





**MITIGATED NEGATIVE DECLARATION**

*Initial Study & Environmental Analysis  
For:*

**Truckhaven Geothermal Exploration Well Project**



*Prepared By:*

**COUNTY OF IMPERIAL**  
**Planning & Development Services Department**  
801 Main Street  
El Centro, CA 92243  
(442) 265-1736  
[www.icpds.com](http://www.icpds.com)

**September 2019**

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## SECTION 1 INTRODUCTION

### A. PURPOSE

This document is a  policy-level,  project level Initial Study for evaluation of potential environmental impacts resulting with the proposed project (Refer to Exhibit "A" & "B").

### B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's "CEQA Regulations Guidelines for the Implementation of CEQA, as amended", an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), 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 applications will not result in any potentially significant environmental impacts and therefore, a Negative Declaration is deemed as the appropriate document to provide necessary environmental evaluations and clearance as identified hereinafter.

This Initial Study and Negative Declaration are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the

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principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

### **C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION**

This Initial Study and Negative Declaration are informational documents which are 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 Negative Declaration, prepared for the project will be circulated for a period of 20 days (*30-days if submitted to the State Clearinghouse for a project of area-wide significance*) for public and agency review and comments. At the conclusion, if comments are received, the County Planning & Development Services Department will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

### **D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION**

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 applications and those issue areas that would have either a significant impact, potentially significant impact, or no impact.

**PROJECT SUMMARY, LOCATION AND ENVIRONMENTAL SETTINGS** describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

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

#### **SECTION 3**

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

**IV. PERSONS AND ORGANIZATIONS CONSULTED** identifies those persons consulted and involved in preparation of this Initial Study and Negative Declaration.

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**V. REFERENCES** lists bibliographical materials used in preparation of this document.

**VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL**

**E. SCOPE OF ENVIRONMENTAL ANALYSIS**

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

1. **No Impact:** A “No Impact” response is adequately supported if the impact simply does not apply to the proposed applications.
2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.
3. **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 applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

**F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS**

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

**G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE**

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

**1. Tiered Documents**

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

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

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

“Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate

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repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

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

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

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

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

## **2. Incorporation By Reference**

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]). This document incorporates by reference appropriate information from the "Final Environmental Impact Report and Environmental Assessment for the "County of Imperial General Plan EIR" prepared by Brian F. Mooney Associates in 1993 and updates.

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 and updates are 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]). This has been previously discussed in this document.

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## *II. Environmental Checklist*

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1. **Project Title:** Truckhaven Geothermal Exploration Well Project
2. **Lead Agency:** Imperial County Planning & Development Services Department
3. **Contact person and phone number:** \_\_David Black\_\_, Planner \_IV\_, (442)265-1736, ext. 1746\_\_
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** davidblack@co.imperial.ca.us
6. **Project location:**

| Well Site | Assessor's Parcel Number (APN) |
|-----------|--------------------------------|
| 32-5      | 017-970-001 (209.4 acres)      |
| 47-5      | 017-970-012 (50 acres)         |
| 18-32     | 017-010-053 (520 acres)        |
| 47-32     | 017-010-053 (520 acres)        |
| 14-4      | 017-340-003 (213.6 acres)      |
| 17-4      | 017-340-003 (213.6 acres)      |

7. **Project sponsor's name and address:**

ORNI 5  
6225 Neil Road  
Reno, NV 89511

8. **General Plan designation:**

Recreation/Open Space

9. **Zoning:**

S-1 Open Space/Recreational

10. **Description of project:**

The Applicant proposes to drill and test up to six geothermal exploration wells on private and State lands in the Truckhaven Geothermal Exploration Area, located south-southwest of Salton City in western Imperial County, California. Each of the proposed geothermal exploration wells would be located on separate, individual well pads that would be constructed on lands under geothermal lease to the Applicant.

11. **Surrounding land uses and setting:** Briefly describe the project's surroundings:

Surrounding land uses include Light Industrial to the north and Open Space/Recreational to the east, south, and west.

12. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.):

California Department of Conservation, Division of Oil, Gas and Geothermal Resources (CDOGGR)

Imperial County Air Pollution Control District

California Regional Water Quality Control Board, Colorado River Basin Region

California Department of Fish and Wildlife

California State Parks

13. **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**

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**includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?** Yes; the County sent formal AB 52 consultation letters to Torres - Martinez Tribes and Quechan Tribes on August 7<sup>th</sup>, 2019. To date no responses have been received by the County.

**Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21080.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.**

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

**ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION**

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

Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

Found that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier 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.

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

| <u>EEC VOTES</u>          | <u>YES</u>               | <u>NO</u>                | <u>ABSENT</u>            |
|---------------------------|--------------------------|--------------------------|--------------------------|
| PUBLIC WORKS              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ENVIRONMENTAL HEALTH SVCS | <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:

## PROJECT SUMMARY

The Applicant proposes to drill and test up to six geothermal exploration wells on private and State lands in the Truckhaven Geothermal Exploration Area, located south-southwest of Salton City in western Imperial County, California (see Figure 1). Each of the proposed geothermal exploration wells would be located on separate, individual well pads that would be constructed on lands under geothermal lease to the Applicant.

The purpose of the Proposed Project is to drill, complete, test and monitor the proposed geothermal resource wells. The geothermal wells are designed to drill into, and flow test the anticipated underlying geothermal reservoir to confirm the characteristics of the geothermal reservoir and detect if the geothermal resource is commercially viable.

The well sites were selected based on past geologic investigations going back to the 1980's, including geologic mapping, geophysical surveys and temperature gradient holes. Although the six geothermal exploration well targets as best as possible at the present time, as with all geothermal exploration, geothermal reservoir targets are often refilled (and geothermal exploration wells relocated) as more data are collected and analyzed.

### A. Project Location:

The proposed well sites (see Figure 1) are located in the "Truckhaven Geothermal Leasing Area" analyzed by the BLM in the "Final Environmental Impact Statement for the Truckhaven Geothermal Leasing Area" (October 2007). The proposed well sites (see Figure 1) are located in an area analyzed in the Geothermal Overlay Zone for Imperial County's "Final Programmatic Environmental Impact Report - Renewable Energy and Transmission Element Update" (July 2015).

The proposed well sites are currently vacant, unirrigated, desert land that is sparsely vegetated and primarily flat. Tule Wash and Surprise Ditch flow northeast and eventually empty into the Salton Sea. The well sites were selected to minimize surface disturbance, reduce the potential for adverse environmental effects, and make the best use of existing access within the limitation of testing the targeted geothermal resource. To the degree possible existing roads, trails and disturbances are used for access.

Primary highway access to the proposed well sites are off State Highway 86 to Airpark Drive or County Dump Road (see Figure 2). Existing access roads would be utilized to the extent practical. The access roads would be constructed or improved with gravel and/or maintained as needed to safely accommodate the traffic required for the exploration well drilling activities. Road beds would typically be approximately twenty (20) feet across. Table 1 shows the land ownership and general information for access to each well site.

**Table 1: Project Well Land Ownership and Access Information**

| Well Site | Assessor's Parcel Number (APN) | Surface Land Owner       | Geothermal Rights Owner  | Well Site Access  | Nearest Residence |
|-----------|--------------------------------|--------------------------|--------------------------|---|-------------------|
| 32-5      | 017-970-001 (209.4 acres)      | Burrtec Waste Industries | Burrtec Waste Industries | Airpark Drive to Dessert Air Court.                                 | 0.34 mile         |
| 47-5      | 017-970-012 (50 acres)         | Burrtec Waste Industries | Burrtec Waste Industries | From Dump Road  | 0.44 mile         |
| 18-32     | 017-010-053 (520 acres)        | ORNI 5                   | State of California      | Airpark Drive to Skywalk Drive to La Guardia Ave to Starlight Drive | 0.40 mile         |
| 47-32     | 017-010-053 (520 acres)        | ORNI 5                   | State of California      | Airpark Drive to Skywalk Drive                                      | 0.20 mile         |
| 14-4      | 017-340-003 (213.6 acres)      | State of California      | State of California      | Airpark Drive to Skywalk Drive                                      | 0.28 mile         |
| 17-4      | 017-340-003 (213.6 acres)      | State of California      | State of California      | New driveway from County Dump Road                                  | 0.58 mile         |

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**B. Project Summary:**

The Proposed Project includes drilling and testing up to six geothermal exploration wells on private and State lands.

**Vibration Monitoring**

Vibration monitoring would be conducted prior to the drilling activities. Specifically, vibration monitoring services will be conducted to collect peak particle velocity (PPV) measurements while a Vibroseis truck vibrates the ground surface (referred to as a "sweep").

The vibration monitoring would use a Blastmate III vibration monitor (data logger) with a tricomponent (transverse, longitudinal, and vertical) sensor. The sensor would be installed at two locations during vibration monitoring: 25 feet and 50 feet from the Vibroseis truck vibration pad. The sensor would be secured to the ground surface with 3-inch long pins and leveled. The longitudinal axis would be oriented toward the Vibroseis truck (parallel to the length of the truck). Two different operating capacities of the Vibroseis truck would be tested; the Vibroseis truck operating at 70% capacity and at 35% capacity. This allows for a PPV comparison relative to operating capacities of the Vibroseis truck. Several Vibroseis sweeps, which would span approximately 12 seconds with a frequency bandwidth of 6 to 96 Hertz (Hz), would be conducted and monitored.

The vibration monitor is programmed to monitor, record, and save the data internally. The collected data would be later downloaded to a laptop computer. Several roughly 12-second long sweeps would be monitored at each station location. The PPV and corresponding frequency would be stored and the peak vector sum (PVS) calculated. The PVS is the resultant magnitude of the peak particle velocity for the three sensor components (calculated by squaring and adding the magnitudes of the individual components and taking the square root).

Results would be presented for the three components (transverse, vertical and longitudinal) during the multiple sweeps and the corresponding frequency, as well as the PVS. It should be noted that prior to conducting the sweeps, a sample of the background vibrations would be performed. It is assumed for a remote location that the background value would be very low.

The California Department of Transportation (Caltrans) Transportation and Construction Vibration Manual (September 2013) and the USBM OSMRE Blasting Guidance Manual (March 1987) provide velocity attenuation relationships that can be used to estimate PPV at various distances and site conditions. Also included in these Manuals are vibration criteria and standards related to potential impacts from vibrations on structures and people.

The vibration monitoring would be conducted in general accordance with current practice and the standard of care exercised by consultants performing similar tasks in the project area.

**Well Pad Layout and Construction**

Well pad preparation activities would include clearing, earthwork, drainage and other improvements necessary for efficient and safe operation. The site selection process included minimizing cut and fill requirements. Measures to prevent soil erosion and loss of topsoil would include the preparation of an erosion control plan before grading to adequately control erosion during construction.

Each proposed well site would be prepared to create a level pad for the drill rig, and a graded gravel (if needed) surface for the support equipment. Runoff from undisturbed areas around the constructed sites would be directed into ditches and energy dissipaters (if needed) around the proposed well site, consistent with California Regional Water Quality Control Board, Colorado River Basin Region (CRWQCB) and Imperial County, as appropriate, best management practices for stormwater. All machinery, drilling platforms, and oil and fuel storage would be in areas tributary to the containment basin in order to prevent the movement of storm water from these areas off of the construction site. The

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proposed well site would be graded to direct runoff from the pad into the cellar which would be pumped to the containment basin.

Containment basins would be constructed at each proposed well site for the containment and temporary storage of drilling mud and cuttings and stormwater runoff from the construction site. Each containment basin would be approximately 100 feet by 250 feet by 7 feet deep, and would hold roughly 420,000 gallons with a 2-foot freeboard. Each containment basin would be lined with a 40-millimeter synthetic liner, in accordance with requirements of the CRWQCB. Compliance with California construction stormwater notification and permitting requirements would be performed for each proposed wellsite and new access road.

## **Well Drilling**

Proposed activities include the drilling (and re-drilling, if necessary) of up to six geothermal resource exploration wells. Each proposed well would be drilled to a total depth of approximately 5,000 to 7,000 feet (into the geothermal zone) from the constructed well drilling pads.

Geothermal well drilling would be conducted from the constructed well pads described above. Drilling operations would take place for 24 hours per day, 7 days per week. Each geothermal well would take approximately 30 days to complete. The drilling operation would employ about 25 people in 6-person shifts. Well pad construction and drilling would generate a small number of daily one-way vehicle trips (as many as 40 or more trucks and 12 - 16 small trucks/service vehicles/worker vehicles).

The California Department of Conservation, Division of Oil, Gas and Geothermal Resources (CDOGGR) regulates geothermal well drilling operations on private and state lands in California. CDOGGR authorizes the drilling of the wells under a Notice of Intent. CDOGGR reviews and approves the drilling program for each well including the blowout prevention equipment (BOPE) to ensure the drilling operations are safe, protect the community, and protect land and water resources.

Standard geothermal well drilling equipment would be used and well drilling operations conducted for the Proposed Project. The wells would be drilled using a large rotary drilling rig whose diesel engines are permitted under the California Air Resources Board (CARB) Portable Equipment Registration Program (PERP). The wells would be drilled with water- or gel-based drilling mud to circulate the drill cuttings to the surface. During drilling, the top of the drill rig derrick would be as much as 175 feet above the ground surface (including non-LED aircraft safety lighting), and the rig floor could be 20 to 30 feet above the ground surface. The typical drill rig and associated support equipment (rig floor and pipe stands; draw works; derrick; drill pipe; trailers; drilling mud, fuel and water tanks; diesel generators; air compressors; etc.) would be brought to the prepared well pad on approximately 40 or more large tractor-trailer trucks. The placement of this equipment on each prepared well pad would depend on rig-specific requirements and site-specific conditions.

Each geothermal well would also be drilled and cased to the design depth of approximately 5,000 to 7,000 feet. A geothermal well drilling and completion program for each well would be submitted to CDOGGR. Blowout prevention equipment (BOPE) inspected and approved by CDOGGR would be utilized while drilling below the surface casing. Well casing (typically 20") would be cemented to a depth of approximately 1,800 feet below Kelly bushing (kbb). A slotted liner (typically 9-5/8") would be hung from approximately 1,750 feet to near total depth. All these numbers are subject to change and would be formalized when the drilling programs are submitted to CDOGGR or BLM, as appropriate.

The well bore would be drilled using non-toxic, temperature stable gel-based drilling mud or gel and polymer drilling fluid to circulate the rock cuttings to the surface where they are removed from the drilling mud. The mud is then recirculated. Rock cuttings would be captured in the containment basin. Additives would be added to the drilling mud as needed to prevent corrosion, increase mud weight, and prevent mud loss. The inside diameter of the wells would be approximately 30 inches at the top and would telescope with depth. The typical design depth of both the production and injection wells is projected to be about 5,000 to 7,000 feet. Each geothermal well would be drilled and cased to the

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design depth or the depth selected by the project geologist. The final determination of well depth and well completion would be based on geological and reservoir information obtained as wells are drilled.

### **Drill Pad and Access Road Aggregate**

Aggregate required for well pad and access road construction would likely be purchased from the Aggregate Products Inc. Salton Sea quarry facility, located approximately two miles west of the town of Salton Sea Beach and ten miles north-northwest of the Proposed Project.

### **Water Requirements and Sources**

Water required for well pad and access road construction and well drilling would typically average about 50,000 gallons per day. Water necessary for these activities would be purchased from the Coachella Water District via a fire hydrant. Water would be picked up from the source and delivered over existing roads to each construction location or drilling site by a water truck which would be capable of carrying approximately 4,000 gallons per load. This includes the water needed for road grading, construction and dust control.

### **Well Testing**

Wells would be initially flow tested while the drill rig is still over the well. The residual drilling mud and cuttings would be flowed from the well bore and discharged into the drilling sump. This cleanout flow test may be followed by one or more short-term flow tests, each lasting from several hours to a day and also conducted while the drill rig is over the well. These tests typically consist of producing the geothermal well into portable steel tanks brought onto the well site while monitoring geothermal fluid temperatures, pressures, flow rates, chemistry and other parameters. Steam and noncondensable gasses from the geothermal fluid would be discharged to the atmosphere. Produced fluid from the short-term flow test would be pumped back into the well.

An injectivity test could also be conducted by injecting the produced geothermal fluid from the steel tanks back into the well and the geothermal reservoir. The drill rig would likely be moved from the well site following completion of these short-term test(s). Following the short-term test(s), all equipment would be removed and the well shut in. Temperature profiles of the wellbore would be measured during the shut in period.

After the rig has moved, a longer-term test could be conducted using a test facility consisting of approximately ten, 21,000-gallon steel tanks, injection pumps, coil tubing, nitrogen pumps, filtration units, flow meters, recorders, and sampling apparatus. This test could last for 30 days. Steam and noncondensable gasses from the geothermal fluid would typically be discharged to the atmosphere. The remaining geothermal fluid would be injected back into either the well from which it was produced or into a second well via temporary pipeline routed above ground along the well site access roads or, if following access roads is not feasible, along other previously disturbed routes (see Figure 2).

### **Geothermal Well Monitoring**

Following completion of the short-term geothermal well testing, all of the drilling and testing equipment would be removed from the site. The surface facilities remaining on the site would typically consist of several valves on top of the surface casing; which would be chained and locked and surrounded by an approximately 12-foot by 12-foot by 6-foot high fence to prevent unauthorized access and vandalism. Pressure and temperature sensors may be installed in the hole at fixed depths to monitor any changes in these parameters over time. A temperature profile of the well may also be run. This monitoring may be continued indefinitely.

### **Abandonment Program**

After drilling operations are completed on each well, the liquids from the containment basin would either be evaporated, pumped back down the well, and/or disposed of in accordance with the requirements of the CRWQCB or Imperial

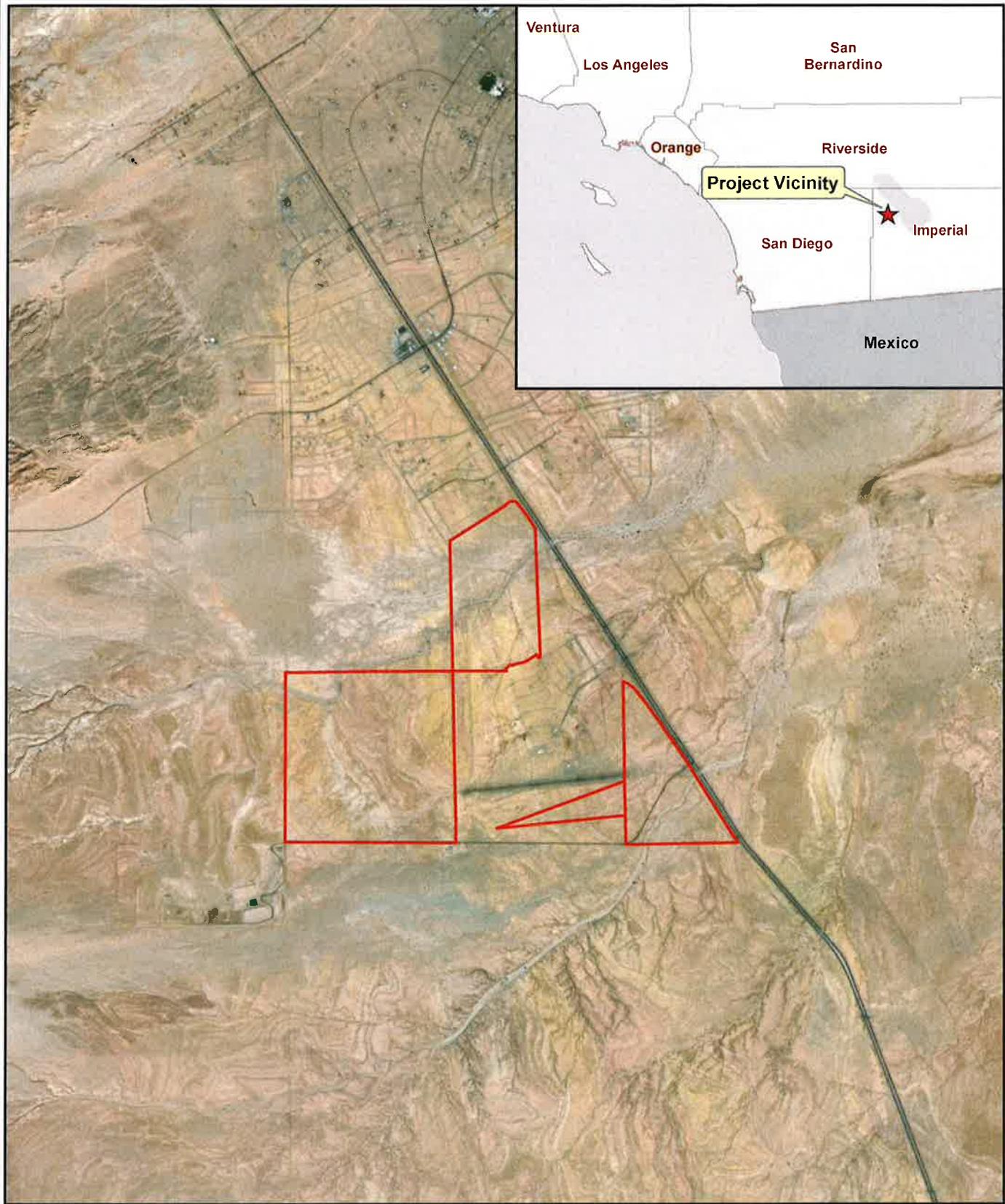
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County Public Health Department, as applicable.

The solid contents remaining in each containment basin, typically consisting of non-hazardous, non-toxic drilling mud and rock cuttings, would be tested as required by the CRWQCB. The solids would be removed and disposed of in a waste disposal facility authorized by the CRWQCB to receive and dispose of these materials. If allowed they may be used as daily cover at the nearby landfill. After the materials in the containment basins have been removed the containment basin area may be reclaimed depending on if there may be a need for its use in the future.

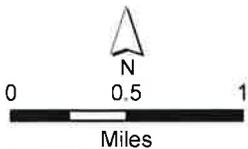
Upon the completion of well drilling and flow testing, a decision would be made by the Applicant regarding the commercial potential of each well. If a well is judged by the Applicant to have any commercial potential, well operations would likely be suspended pending application for and receipt of regulatory approvals to place the well into commercial service through a new pipeline to a new geothermal power plant or direct use facility. The well would likely continue to be monitored while these approvals are being processed. If a well is judged to not have commercial potential, it may continue to be monitored, or it may be abandoned in conformance with the well abandonment requirements of the CDOGGR. Abandonment of a geothermal well involves plugging the well bore with clean drilling mud and cement sufficient to ensure that fluids would not move across into different aquifers. The well head (and any other equipment) would be removed, and the casing cut off at least six feet below ground surface.

Following abandonment of the well, the well site itself would be reclaimed, typically by re-grading the entire well pad and access road area to approximately the same topography as existed prior to construction of the site, including the spreading the topsoil (if any) over the surface. Revegetation would be in conformance with the requirements of the surface managing agency.



**Legend**

 Project Area



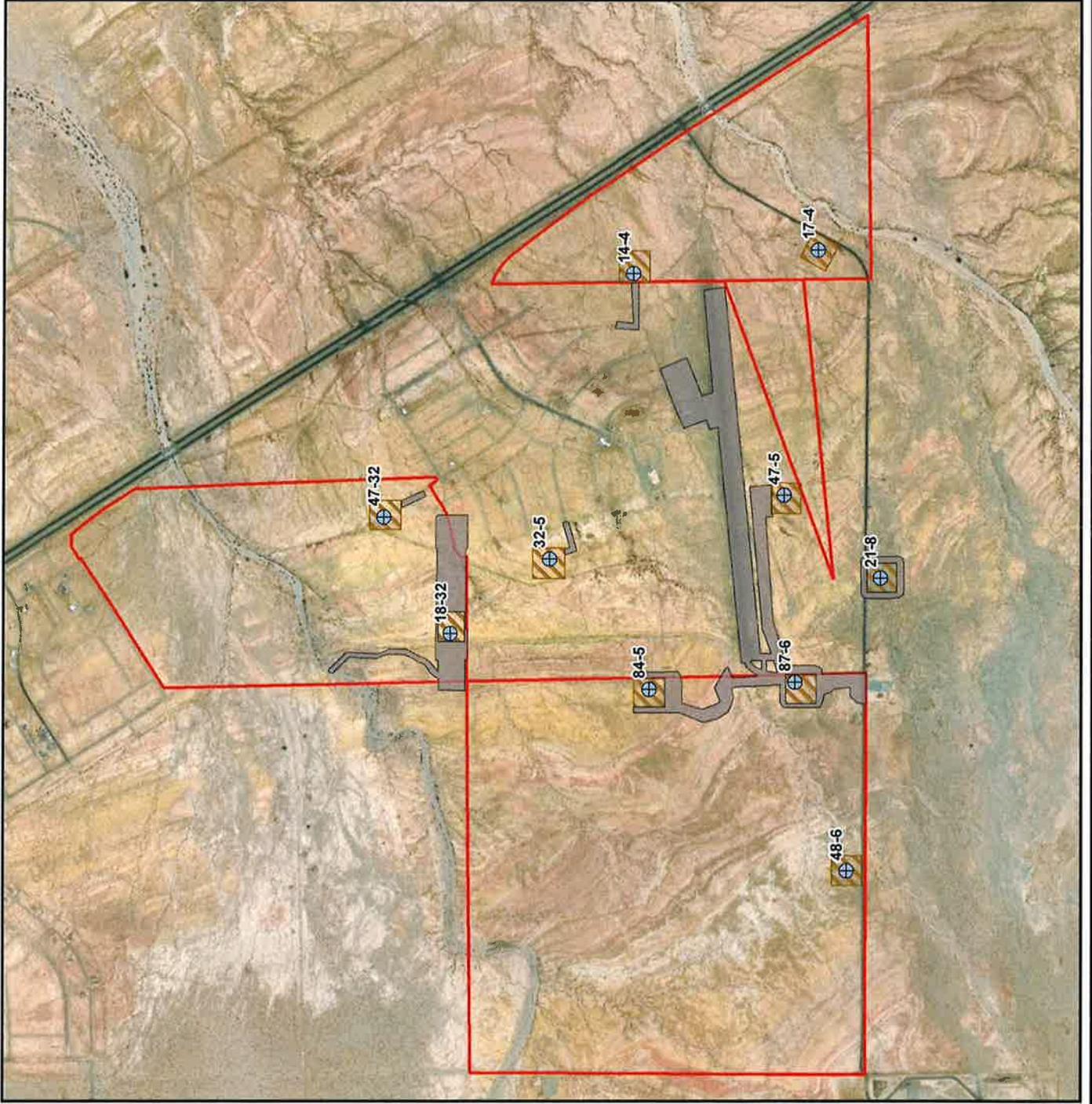
**Figure 1**  
Geothermal Wells & Seismic Testing  
Project Vicinity

# Figure 2

## Geothermal Wells & Seismic Testing Project Location

### Legend

- Project Area
- Access Roads
- Preliminary Pads
- Well Sites



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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

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

**I. AESTHETICS**

Except as provided in Public Resources Code Section 21099, would the project:

- a) Have a substantial adverse effect on a scenic vista?    

a) Imperial County includes over 4,597 square miles between Riverside County to the north, Arizona to the east, Mexico to the south, and San Diego County to the west. The County's visual character varies greatly and includes natural scenic visual resources such as deserts, sand dunes, mountains, and the Salton Sea. Visual character within Imperial County is defined as low, moderate, and high. Areas with a moderate to high value for maintenance of visual quality could represent opportunities for conservation and open space areas. The Imperial County General Plan identifies the proposed well locations as within an area of "Low Value" visual quality (County of Imperial 2016). Although the drilling rig derrick would be as much as 175 feet above the ground surface and the rig floor would be 20 to 30 feet above the ground surface, the Proposed Project is not located within an area identified as high or moderate scenic value; therefore, the Proposed Project would have a less than significant impact associated with a scenic vista.
- b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?    

b) The California Department of Transportation (Caltrans) manages the California Scenic Highway Program. The goal of the program is to preserve and protect scenic highway corridors from changes that would affect the aesthetic value of the land adjacent to the scenic corridor. No State scenic highways have been designated in Imperial County; therefore, no impact associated with a scenic highway would occur.
- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?    

c) The Proposed Project involves the construction, drilling, and testing of six geothermal exploratory wells in an undeveloped area of Imperial County. The construction and drilling of the wells would involve temporary disturbance of the proposed well sites; however, these impacts would be temporary and are not anticipated to change the character of the area substantially. The Proposed Project would result in a minor change in the existing visual character of portions of the Proposed Project area due to the construction of the drill pads; however, the Proposed Project area is located within the Truckhaven Geothermal Leasing Area and wells similar to the wells associated with the Proposed Project are currently active within the Proposed Project area. In addition, there are no existing scenic resources on the Proposed Project site. Therefore, the Proposed Project would result in a less than significant impact to the existing visual character or quality of the site and its surroundings.
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?    

d) The Proposed Project does not include the addition of substantial lighting or glare producing components. During drilling, the top of the drill rig derrick would be as much as 175 feet above the ground surface; non-LED aircraft safety lighting would be located atop the drill rig derrick. Ambient lighting and glare in the nearby areas would not significantly increase above existing conditions. Additionally, temporary construction lighting would be used for illuminating the proposed well sites during construction. Following construction, any construction lighting would be disassembled and removed from the site. This impact is less than significant.

**II. AGRICULTURE AND FOREST RESOURCES**

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

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?    

a) None of the proposed well sites are located in an area identified as Prime Farmland, Unique Farmland, of Farmland of Statewide Importance (California Department of Conservation 2019). No impact would occur.

|  | Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI)                      |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?<br>b) None of the proposed well sites are located within an area under a Williamson Act Contract (California Department of Conservation 2016). No impact would occur.   | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" 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))?<br>c) The proposed well sites are zoned Open Space/Recreational and are located within the Imperial County Geothermal Overlay Zone (County of Imperial 2016). Implementation of the Proposed Project would not result in a change to zoning at any of the proposed well sites. No impact would occur. | <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?<br>d) As noted above in Impact c), the proposed well sites are zoned Open Space/Recreational and designated Recreation/Open Space; the proposed well sites are not located on land zoned or designated as forest land (Imperial County 2016). No impact would occur.  | <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?<br>e) As noted above in Impact c) and d), the Proposed Project would not result in the re-zoning or re-designation of any of the proposed well sites. Further, the proposed well sites are not located in areas zoned or designated for agriculture or forest use. No impact would occur.   | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

### iii. AIR QUALITY

This section describes the existing air quality setting and potential effects from project implementation on the site and its surrounding area. Construction-related air quality modeling was performed through use of the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. The model output is provided in Appendix A.

The proposed wells sites are located on the southwest side of Salton City, which is an unincorporated area located in the western portion of Imperial County. The proposed well sites are located within the Salton Sea Air Basin (Air Basin), and air quality regulation is administered by the Imperial County Air Pollution Control District (ICAPCD). The ICAPCD implements the programs and regulations required by the federal and state Clean Air Acts.

#### Atmospheric Setting

Air quality is a function of both the rate and location of pollutant emissions under the influence of meteorological conditions and topographical features. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with physical features of the landscape to determine their movement and dispersal, and consequently, their effect on air quality. The combination of topography and inversion layers generally prevents dispersion of air pollutants in the Air Basin. The following description of climate of Imperial County was obtained from *Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter less than 10 Microns in Diameter*, prepared by ICAPCD, October 23, 2018.

The climate of Imperial County is governed by the large-scale sinking and warming of air in the semi-permanent high-pressure zone of the eastern Pacific Ocean. The high-pressure ridge blocks out most mid-latitude storms, except in the winter, when it is weakest and located farthest south. The coastal mountains prevent the intrusion of any cool, damp air found in California coastal areas. Because of the barrier and weakened storms, Imperial County experiences clear skies, extremely hot summers, mild winters, and little rainfall. The sun shines, on the average, more in Imperial County than anywhere else in the United States.

Winters are mild and dry with daily average temperatures ranging between 65- and 75-degrees Fahrenheit (°F). During winter months it is not uncommon to record maximum temperatures of up to 80 °F. Summers are extremely hot with daily average temperatures ranging between 104 and 115 °F. It is not uncommon to record maximum temperatures of 120 °F during summer months.

The flat terrain of the valley and the strong temperature differentials created by intense solar heating, produce moderate winds and deep thermal convection. The combination of subsiding air, protective mountains, and distance from the ocean all combine to severely limit precipitation. Rainfall is highly variable with precipitation from a single heavy storm able to exceed the entire annual total during a later drought condition. The

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

average annual rainfall is just over three inches with most of it occurring in late summer or mid-winter.

Humidity is low throughout the year, ranging from an average of 28 percent in summer to 52 percent in winter. The large daily oscillation of temperature produces a corresponding large variation in the relative humidity. Nocturnal humidity rises to 50 to 60 percent but drops to about 10 percent during the day.

The wind in Imperial County follows two general patterns. Wind statistics indicate prevailing winds are from the west-northwest through southwest; a secondary flow maximum from the southeast is also evident. The prevailing winds from the west and northwest occur seasonally from fall through spring and are known to be from the Los Angeles area. Occasionally, Imperial County experiences periods of extremely high wind speeds. Wind speeds can exceed 31 miles per hour (mph) and this occurs most frequently during the months of April and May. However, speeds of less than 6.8 mph account for more than one-half of the observed wind measurements.

### Regulatory Setting

The Proposed Project site lies within the Air Basin, which is managed by the ICAPCD. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been established for the following criteria pollutants: carbon monoxide (CO), ozone, sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), inhalable particulate matter (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>), and lead. The CAAQS also set standards for sulfates, hydrogen sulfide, and visibility.

Areas are classified under the Federal Clean Air Act as either "attainment" or "nonattainment" areas for each criteria pollutant, based on whether the NAAQS have been achieved or not. Attainment relative to the state standards is determined by the California Air Resources Board (CARB). The Air Basin has been designated by the Federal Environmental Protection Agency (EPA) as a nonattainment area for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. Currently, the Air Basin is in attainment with the NAAQS for CO, SO<sub>2</sub>, and NO<sub>2</sub>. Table 2 presents the designations and classifications applicable to the Proposed Project area.

**Table 2: Designations/Classifications for the Project Area**

| Pollutant                                    | National Classification   | California Standards <sup>2</sup> |
|--|---------------------------|-----------------------------------|
| Ozone (O <sub>3</sub> ) - 2008 Standard      | Non-Attainment (Moderate) | Non-Attainment                    |
| Particulate Matter (PM <sub>10</sub> )       | Non-Attainment (Serious)  | Non-Attainment                    |
| Fine Particulate Matter (PM <sub>2.5</sub> ) | Non-Attainment (Moderate) | Attainment                        |
| Carbon Monoxide (CO)                         | Attainment                | Attainment                        |
| Nitrogen Dioxide (NO <sub>2</sub> )          | Attainment                | Attainment                        |
| Sulfur Dioxide (SO <sub>2</sub> )            | Attainment                | Attainment                        |

Sources: <https://ww3.arb.ca.gov/desig/adm/adm.htm>; and <https://ww3.arb.ca.gov/planning/sip/planarea/imperial/staffreport121318.pdf>

The ICAPCD has addressed each of three nonattainment pollutants in separate State Implementation Plans (SIPs). For ozone the most current SIP is the *Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard* (2017 Ozone SIP), prepared by ICAPCD, September 2017, which was prepared to detail measures to reduce ozone precursors (i.e. ROG and NOx) within the County in order to meet the 2008 NAAQS for 8-hour ozone standard of 0.075 parts per million (ppm) by July 20, 2018. Although the Ozone 2017 SIP demonstrates that the County met the 8-hour ozone standard 0.075 ppm by the July 20, 2018 requirement, it should be noted that in 2015 the EPA further strengthened its 8-hour ozone standard to 0.070 ppm, which will require an updated SIP for the County to meet the new ozone standard.

Since PM<sub>10</sub> in the County has met the 24-hour NAAQS other than for exceptional events that include storms as well as from substantial PM<sub>10</sub> concentrations blowing into the County from Mexico, the most current PM<sub>10</sub> plan is the *Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter less than 10 Microns in Diameter* (2018 PM<sub>10</sub> Plan), prepared by ICAPCD, October 23, 2018. The 2018 PM<sub>10</sub> Plan shows that the monitoring of PM<sub>10</sub> in the County found that other than exceptional events, no violation of the 24-hour PM<sub>10</sub> NAAQS of 150 µg/m<sup>3</sup> occurred over the 2014 to 2016 time period. As such, the ICAPCD has requested the EPA to redesignate the Air Basin to maintenance. The redesignation is anticipated to occur sometime in the year 2020.

For PM<sub>2.5</sub> the most current SIP is the *Imperial County 2018 Annual Particulate Matter less than 2.5 Microns in Diameter State Implementation Plan* (2018 PM<sub>2.5</sub> SIP), prepared by ICAPCD, April 2018, which was prepared to detail measures to meet the 2012 NAAQS for annual PM<sub>2.5</sub> standard of 12 µg/m<sup>3</sup> by the end of 2021 for the portion of Imperial County (approximately from Brawley to Mexico border) that is designated nonattainment. The PM<sub>2.5</sub> Plan found that the only monitoring station in the County that has recorded an exceedance of PM<sub>2.5</sub> is the Calexico Monitoring Station that is likely caused by the transport of PM<sub>2.5</sub> across the Mexico border. It is anticipated that the ICAPCD will submit a redesignation request for PM<sub>2.5</sub> in the near future.

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

**Monitored Air Quality**

The air quality at any site is dependent on the regional air quality and local pollutant sources. The air quality at any location in the Air Basin is determined by the release of pollutants throughout the Air Basin as well as from air pollutants that travel from the coastal areas and Mexico to the Air Basin. The ICAPCD operates a network of monitoring stations throughout the County that continuously monitor ambient levels of criteria pollutants in compliance with federal monitoring regulations.

Since not all air monitoring stations measure all of the tracked pollutants, the data from the following two monitoring stations, listed in the order of proximity to the Proposed Project site have been used: Niland – English Road Monitoring Station (Niland Station) and El Centro – 9<sup>th</sup> Street Monitoring Station (El Centro Station).

The Niland Station is located approximately 23 miles east of the proposed well sites at 7711 English Road, Niland and the El Centro Station is located approximately 38 miles southeast of the proposed well sites at 150 9<sup>th</sup> Street, El Centro. It should be noted that due to the air monitoring stations distances from the proposed wells sites, recorded air pollution levels at the air monitoring stations reflect with varying degrees of accuracy local air quality conditions at the Proposed Project site. Table 3 below presents the composite of gaseous pollutants monitored from 2016 through 2018.

**Table 3: Ambient Air Quality Monitoring Summary**

| Air Pollutant  | 2016         | 2017         | 2018         |
|--|--------------|--------------|--------------|
| <b>Ozone (O<sub>3</sub>)<sup>1</sup></b>                 |              |              |              |
| Max 1 Hour (ppm)   | 0.079        | 0.072        | 0.060        |
| Days > CAAQS (0.09 ppm)                                  | 0            | 0            | 0            |
| Max 8 Hour (ppm)   | 0.066        | 0.061        | 0.055        |
| Days > NAAQS (0.070 ppm)                                 | 0            | 0            | 0            |
| Days > CAAQS (0.070 ppm)                                 | 0            | 0            | 0            |
| <b>Nitrogen Dioxide (NO<sub>2</sub>)<sup>2</sup></b>     |              |              |              |
| Max 1 Hour (ppb)   | 50.9         | 48.8         | 34.1         |
| Days > NAAQS (100 ppb)                                   | 0            | 0            | 0            |
| Days > CAAQS (180 ppb)                                   | 0            | 0            | 0            |
| <b>Particulate Matter (PM<sub>10</sub>)<sup>1</sup></b>  |              |              |              |
| Max Daily California Measurement                         | <b>225.7</b> | <b>345.8</b> | <b>331.5</b> |
| Days > NAAQS (150 µg/m <sup>3</sup> )                    | <b>1</b>     | <b>4</b>     | <b>11</b>    |
| Days > CAAQS (50 µg/m <sup>3</sup> )                     | <b>14</b>    | <b>ND</b>    | <b>7</b>     |
| State Average (20 µg/m <sup>3</sup> )                    | <b>40.7</b>  | <b>ND</b>    | <b>ND</b>    |
| <b>Particulate Matter (PM<sub>2.5</sub>)<sup>2</sup></b> |              |              |              |
| Max Daily National Measurement                           | 31.3         | 23.2         | 22.4         |
| Days > NAAQS (35 µg/m <sup>3</sup> )                     | 0            | 0            | 0            |
| National Average (12 µg/m <sup>3</sup> )                 | 9.4          | 8.4          | 8.6          |
| State Average (12 µg/m <sup>3</sup> )                    | 9.5          | 8.4          | 8.7          |

Abbreviations:

> = exceed      ppm = parts per million      ppb = parts per billion      µg/m<sup>3</sup> = micrograms per cubic meter

CAAQS = California Ambient Air Quality Standard      NAAQS = National Ambient Air Quality

ND = Insufficient or No Data

**Bold** = exceedance

<sup>1</sup> Measurement taken from Niland Mesa Station

<sup>2</sup> Measurement taken from El Centro Station

Source: <http://www.arb.ca.gov/adam/>

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

- a) Conflict with or obstruct implementation of the applicable air quality plan?

**a)** The Proposed Project would not conflict with the applicable air quality plans, which include the 2017 Ozone SIP, 2018 PM10 Plan, and 2018 PM2.5 SIP that are described above in the air quality regulatory setting. The CEQA Air Quality Handbook, prepared by ICAPCD, November 2007, requires large residential and commercial developments that are required to develop an EIR. Projects that have the potential to exceed the ICAPCD thresholds of significance for its operations are considered large developments and are

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required to demonstrate consistency with the regional air quality plans. The Proposed Project consists of development of six exploratory wells and would not include any residential or commercial development, nor does the project require the preparation of an EIR. Accordingly, the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan.

- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- b) As shown above in

Table, the Proposed Project area is designated as a federal and/or state nonattainment area for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. The ICAPCD has prepared the *CEQA Air Quality Handbook* (ICAPCD, 2007), in order to assist lead agencies in making a determination of significance for air quality impacts. The screening criteria in the CEQA Handbook can be used to demonstrate that a project's total emissions would not result in a significant impact as defined by CEQA. Table 4 shows the ICAPCD screening thresholds for both construction and operations.

**Table 4: ICAPCD Thresholds of Significance**

|              | Pollutant Emissions (Pounds/Day) |                 |     |                 |                  |                   |
|--------------|----------------------------------|-----------------|-----|-----------------|------------------|-------------------|
|              | ROG                              | NO <sub>x</sub> | CO  | SO <sub>2</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
| Construction | 75                               | 100             | 550 | 150             | 150              | 55                |
| Operation    | 55                               | 55              | 550 | 150             | 150              | 55                |

Notes:

<sup>1</sup> Since the ICAPCD does not provide a construction threshold for SO<sub>2</sub> and PM<sub>2.5</sub>, the operation threshold has been utilized to provide a conservative analysis.

Source: ICAPCD, <http://www.co.imperial.ca.us/AirPollution/PlanningDocs/CEQAHandbk.pdf>

**Construction Emissions**

Construction of the Proposed Project would create air emissions primarily from equipment exhaust and fugitive dust. The air emissions from the proposed Project were analyzed through use of the CalEEMod model (see Appendix A). Construction activities for the Proposed Project are anticipated to begin in early 2020 and each well would take approximately two months to complete, or approximately one year for all six wells as it is anticipated that after a well is completed the crew would move to the next well location, so no concurrent well construction activities are anticipated. The anticipated construction phases for each well location would include: 1) Well pad and access road construction; 2) Well drilling; 3) Well testing; and 4) Well clean-up.

Table 5 shows the estimated worst-case summer or winter daily emissions that would be predicted from each phase of the Proposed Project for one well site, which is based on the construction equipment provided by the applicant of what is anticipated to be used during construction activities.

**Table 5: Construction-Related Criteria Pollutant Emissions from One Well Site**

| Activity                                    | Pollutant Emissions in pounds/day |                 |              |                 |                  |                   |
|---|-----------------------------------|-----------------|--------------|-----------------|------------------|-------------------|
|   | ROG                               | NO <sub>x</sub> | CO           | SO <sub>2</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
| Well Pad & Access Road Construction         | 2.07                              | 22.61           | 11.20        | 0.02            | 22.67            | 4.35              |
| Well Drilling                               | 3.75                              | 33.21           | 30.92        | 0.07            | 108.06           | 12.18             |
| Well Testing                                | 1.99                              | 18.12           | 16.09        | 0.03            | 9.62             | 1.82              |
| Well Clean-Up                               | 0.87                              | 9.35            | 6.78         | 0.01            | 16.95            | 2.05              |
| <b>Maximum Daily Construction Emissions</b> | <b>3.75</b>                       | <b>33.21</b>    | <b>30.92</b> | <b>0.07</b>     | <b>108.06</b>    | <b>12.18</b>      |
| <b>ICAPCD Construction Thresholds</b>       | <b>75</b>                         | <b>100</b>      | <b>550</b>   | <b>150</b>      | <b>150</b>       | <b>55</b>         |
| Exceed Thresholds?                          | No                                | No              | No           | No              | No               | No                |

Source: CalEEMod Version 2016.3.2.

As shown in Table 5, the Proposed Project's emissions for one well site would not exceed ICAPCD's construction-related criteria pollutant thresholds. In addition, construction emissions would be short-term, limited only to the period when construction activity is taking place

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|--------------------------------------|--|-------------------------------------|----------------|
|--------------------------------------|--|-------------------------------------|----------------|

and all construction activities are required to comply with ICAPCD regulations for controlling fugitive dust emissions, including: Rule 800 – General Requirements for Control of PM<sub>10</sub>; Rule 802; Rule 802 – Bulk Materials; Rule 803 – Carry-Out and Track-Out; Rule 804 – Open Areas; and Rule 805 – Unpaved Roads. As such, construction-related emissions would be less than significant for the Proposed Project.

**Operational Emissions**

The Proposed Project consists of development of six exploratory geothermal wells, which would be tested after completion of the well drilling phase in order to determine the commercial potential of each well. If a well is judged to have commercial potential, well monitoring may be continued indefinitely until the applicant proceeds with the approval process to place the well into commercial service. Therefore, the operational emissions would be limited to well monitoring activities that may be limited to weekly or monthly vehicle trips to the well sites to obtain pressure and temperature measurements. As such, only nominal air emissions would be created from the on-going operation of the Proposed Project and operations-related emissions would be less than significant for the Proposed Project.

Accordingly, the Proposed Project would not result in a cumulative considerable net increase of any criteria pollutant.

- c) Expose sensitive receptors to substantial pollutants concentrations?

c) The nearest sensitive receptor to the Proposed Project is a single-family home located on Skyway Drive that is as near as 0.20 mile to the southeast of proposed well site 47-32. As discussed above in (b), the criteria pollutant emissions have been calculated for construction activities, which were found to be within the ICAPCD's allowable construction thresholds. Due to the limited amount of criteria pollutants created from construction activities and the distances to the nearest sensitive receptors to the Proposed Project, construction emissions would not expose sensitive receptors to substantial concentrations of criteria pollutants.

In addition, to the criteria pollutant emissions, construction activities have the potential to expose nearby sensitive receptors to toxic air contaminants (TACs), which would be created from the operation of diesel-powered equipment in the form of diesel particulate matter (DPM). According to SCAQMD methodology, health effects from TACs are usually described in terms of "individual cancer risk". "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the Proposed Project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0 or Tier 1 equipment and by January 2023, no commercial operator is allowed to purchase Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the Proposed Project.

As discussed above in (b), operational emissions would be limited to weekly or monthly well monitoring activities that are anticipated to create nominal levels of emissions and would not result in a substantial increase in traffic volumes, which have the potential to create CO hotspots. As such, operation of the Proposed Project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

Therefore, implementation of the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

- d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?

d) Any diesel equipment used during construction of the Proposed Project would consist of mobile equipment that would be changing locations, allowing the odors to disperse rapidly and not impact any nearby receptors. Should diesel equipment be required during maintenance at the proposed well sites, it would also change locations, allowing the odors to disperse rapidly and not impact any nearby receptors. Well construction activities would also result in the discharge of drilling mud that will be stored onsite in the containment basins. It is anticipated that due to the climate of the project site, any drilling mud would evaporate and harden quickly, which upon hardening will cease the release of odors. In addition, well testing activities have the potential to release geothermal gases that are a known source of odors. Since most well testing activities are anticipated to be limited to less than a day, the well testing odors would be temporary and the odor impacts would be likely not be noticeable at the nearest sensitive receptors that are located 0.2 mile or farther from the proposed well sites. Therefore, construction and operation of the Proposed Project would not create objectionable odors affecting a substantial number of people, and impacts would be less than significant.

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

**IV. BIOLOGICAL RESOURCES *Would the project:***

The following section is based on the Biological Resources Evaluation Report (2018) and the Botanical Survey Report (2017) prepared by Power Engineers for the Proposed Project. These reports are included as Appendix B and Appendix C respectively.

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

a) Surveys to document special status flora and fauna species were conducted in 2016, 2017, and 2018 by Power Engineers. Power Engineers provided a wildlife biologist and a botanist for the surveys. The role of the wildlife biologist was to record observations of wildlife species, with emphasis on special-status species such as flat-tailed horned lizard (*Phrynosoma mcallii*) and burrowing owl (*Athene cunicularia*), and record active or potential burrows for a variety of wildlife species.

The botanist was tasked with creating a vegetation map of the corridors that were surveyed, extending as far as they could reliably determine using line-of-sight and aerial imagery, and identifying and recording plant species encountered, with emphasis on special-status plant species. Botanists also recorded occurrences of seeps encountered.

All detected wildlife and botanical species were recorded, as were observed vegetation communities within and adjacent to the survey corridors. Wildlife species were detected either by observation, by vocalization, or by sign (e.g., tracks, burrows, scat). The botanical inventory was floristic in nature, meaning that all plants observed were identified to the taxonomic level needed to determine whether they were special-status plant species. Vegetation communities were classified according to Holland (1986).

Vegetation communities consisted primarily of Sonoran creosote bush scrub and desert saltbush scrub. Seven special-status plant species were observed within the Proposed Project area during the surveys. A list of plant species observed during the field surveys is provided in Appendix A. One special-status, wildlife species, flat-tailed horned lizard, was detected within the Proposed Project area. Few wildlife species were observed within the Proposed Project area, but wildlife sign was observed more frequently. Burrows of varying sizes were present intermittently throughout the Proposed Project area, including rodent and potential burrowing owl burrows. A small number of unoccupied bird nests were also observed.

**Special Status Plant Species**

A total of 38 plant species have the potential to occur within the Proposed Project area. Of the 38 plant species considered to have a potential to occur, seven were observed during the survey. Three species were determined to have a moderate potential for occurrence within the Proposed Project area, and seven had a low potential, while the remaining were determined to be absent. Potential for occurrence was based on habitat, elevation, soil, and proximity to known recorded occurrences of a species. Table 6 provides the potential for occurrence of special-status plant species. A plant was considered to be of special-status if it met one or more of the following criteria:

- Listed, proposed for listing, or candidates for listing as threatened or endangered under the Federal Endangered Species Act (50 Code of Federal Regulations Part 17.12 [listed plants]);
- Listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (CDFW 2017);
- Identified by the CDFW as species of concern or fully protected species, including fish and wildlife that do not have State or federal threatened or endangered status, but may still be threatened with extinction (CDFW 2017);
- Included in the CNPS Rare Plant Inventory (CNPS 2017);
- Otherwise defined as rare, threatened, or endangered under the California Environmental Quality Act;
- Identified by State Parks Ocotillo Wells Field Office as a sensitive species; or
- Identified by the BLM or the BLM El Centro Field Office as a sensitive species.

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

**Table 6: Potential for Occurrence – Special Status Plant Species**

| Species   | Status   | Habitat   | Blooming Period   | Potential for Occurrence   |
|---|--|---|-------------------|--|
| <i>Abronia villosa</i> var. <i>aurita</i><br>chaparral sand-verbena               | Fed: None<br>State: None<br>CNPS: 1B.1<br>BLM: S   | Annual herb occurring in chaparral, Coastal scrub, and Desert dunes, on sandy soils. From 245 to 5,250 feet in elevation.   | March – September | <b>Moderate</b> Suitable habitat occurs within the Proposed Project area, and observed within 0.5-miles.                       |
| <i>Astragalus crotalariae</i><br>Salton milk-vetch                                | Fed: None<br>State: None<br>CNPS: 4.3              | Perennial herb occurring in desert wash and Sonoran desert scrub, on sandy or gravelly soils. From 195 to 820 feet in elevation.  | January – April   | <b>Present.</b> Observed within the Proposed Project area during the survey.   |
| <i>Astragalus insularis</i> var. <i>harwoodii</i><br>Harwood's milk-vetch         | Fed: None<br>State: None<br>CNPS: 2B.2             | Annual herb occurring on desert dunes, desert wash, and Mojavean desert scrub, on sandy or gravelly soils. From 0 to 2,330 feet in elevation.   | January – May     | <b>Moderate.</b> Suitable habitat occurs within the Proposed Project area.   |
| <i>Astragalus magdalenae</i> var. <i>peirsonii</i><br>Peirson's milk-vetch        | Fed: <b>THR</b><br>State: <b>END</b><br>CNPS: 1B.2 | Perennial herb occurring on desert dunes. From 195 to 740 feet in elevation.  | December – April  | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area.  |
| <i>Bursera microphylla</i><br>littleleaf elephant tree                            | Fed: None<br>State: None<br>CNPS: 2B.3             | Perennial deciduous tree occurring in desert wash, Sonoran desert scrub, on rocky soils. From 655 to 2,300 feet in elevation.   | June – July       | <b>Absent.</b> The Proposed Project area is below the known elevation range for the species.                                   |
| <i>Castela emoyi</i><br>crucifixion thorn   | Fed: None<br>State: None<br>CNPS: 2B.2             | Perennial deciduous shrub occurring on alkali playa, desert wash, Mojavean desert scrub and Sonoran desert scrub, on gravelly soils. From 300 to 2,380 feet in elevation.                   | June – July       | <b>Low.</b> Suitable habitat occurs on site, but the Proposed Project area is below the known elevation range for the species. |
| <i>Chaenactis carphoclinia</i> var. <i>peirsonii</i><br>Peirson's pincushion      | Fed: None<br>State: None<br>CNPS: 1B.3             | Annual herb occurring in Sonoran desert scrub, on sandy soils. From 10 to 1,640 feet in elevation.  | March – April     | <b>Moderate</b> Suitable habitat occurs within the Proposed Project area, and observed within 0.5-miles.                       |
| <i>Chaenactis glabriuscula</i> var. <i>orcuttiana</i><br>Orcutt's pincushion      | Fed: None<br>State: None<br>CNPS: 1B.1<br>BLM: S   | Annual herb occurring in coastal bluff scrub and coastal dunes. From 0 to 330 feet in elevation.  | January – August  | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area.  |
| <i>Chorizanthe polygonoides</i> var. <i>longispina</i><br>long-spined spineflower | Fed: None<br>State: None<br>CNPS: 1B.2<br>BLM: S   | Annual herb occurring in chaparral, coastal scrub, meadows and seeps, valley and foothill grassland, ultramafic soils, and vernal pools in clay soils. From 100 to 5,020 feet in elevation. | April – June      | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area.  |
| <i>Croton wigginsii</i><br>Wiggin's croton  | Fed: None<br>State: <b>Rare</b><br>CNPS: 2B.2      | Perennial shrub occurring on desert dunes and Sonoran desert scrub, on sandy soils. From 165 to 330 feet in elevation.  | March – May       | <b>Moderate.</b> Suitable habitat occurs within the Proposed Project area.   |

|  |   |  | Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI)  | No Impact (NI) |
|--|---|--|--------------------------------------|--|--|----------------|
|  | BLM: S  |  |                                      |  |  |                |
| <i>Cylindropuntia fosbergii</i><br>pink teddy-bear cholla            | Fed: None<br>State: None<br>CNPS: 1B.3<br>BLM: S        | Perennial stem succulent occurring in Sonoran desert scrub. From 280 to 2,790 feet in elevation.   |                                      | March – May  | <b>Low.</b> Suitable habitat occurs on site, but the Proposed Project area is below the known elevation range for the species.   |                |
| <i>Cylindropuntia munzii</i><br>Munz's cholla                        | Fed: None<br>State: None<br>CNPS: 1B.3<br>BLM: S        | Perennial stem succulent occurring Sonoran desert scrub, on sandy or gravelly soils. From 490 to 1,970 feet in elevation.  |                                      | May  | <b>Low.</b> Suitable habitat occurs on site, but the Proposed Project area is below the known elevation range for the species.   |                |
| <i>Dieteria asteroides var. lagunensis</i><br>Mount Laguna aster     | Fed: None<br>State: <b>Rare</b><br>CNPS: 2B.1<br>BLM: S | Perennial herb occurring in cismontane woodland and lower montane coniferous forest. From 2,590 to 7,875 feet in elevation.  |                                      | July – August  | <b>Absent.</b> The Proposed Project area is below the known elevation range for the species.   |                |
| <i>Euphorbia abramsiana</i><br>Abram's spurge                        | Fed: None<br>State: None<br>CNPS: 2B.2                  | Annual herb occurring in Mojavean desert scrub and Sonoran desert scrub, on sandy soils. From -15 to 4,300 feet in elevation.  |                                      | August – November  | <b>Moderate.</b> Suitable habitat occurs within the Proposed Project area.   |                |
| <i>Euphorbia platysperma</i><br>flat-seeded spurge                   | Fed: None<br>State: None<br>CNPS: 1B.2<br>BLM: S        | Annual herb occurring in desert dunes and Sonoran desert scrub, on sandy soils. From 215 to 330 feet in elevation.   |                                      | February – September   | <b>Low.</b> Suitable habitat occurs on site, but the Proposed Project area is below the known elevation range for the species, and there are no known occurrences within 10 miles. |                |
| <i>Fremontodendron mexicanum</i><br>Mexican flannelbush              | Fed: <b>END</b><br>State: <b>Rare</b><br>CNPS: 1B.1     | Perennial evergreen shrub occurring in chaparral, cismontane woodlands, and closed-cone coniferous forest, on gabbroic, metavolcanic, or serpentinite soils. From 30 to 2,350 feet in elevation. |                                      | March – June   | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area.  |                |
| <i>Grindelia hallii</i><br>San Diego sunflower                       | Fed: None<br>State: None<br>CNPS: 1B.2<br>BLM: S        | Perennial herb occurring in chaparral, lower montane coniferous forest, meadows and seeps, and valley and foothill grassland. From 605 to 5,725 feet in elevation.                               |                                      | May – October  | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area, and is below the known elevation range for the species.  |                |
| <i>Helianthus niveus ssp. tephrodes</i><br>Algodones Dunes sunflower | Fed: None<br>State: <b>END</b><br>CNPS: 1B.2<br>BLM: S  | Perennial herb occurring on desert dunes. From 165 to 330 feet in elevation.   |                                      | September – May  | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area.  |                |

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| <i>Hulsea californica</i><br>San Diego sunflower                                   | Fed: None<br>State: None<br>CNPS: 1B.3<br>BLM: S | Perennial herb occurring in chaparral, lower montane coniferous forest, and upper montane coniferous forest in openings and burned areas. From 3,000 to 9,560 feet in elevation. | April – June      | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area, and is below the known elevation range for the species. |
|--|--|--|-------------------|---|
| <i>Johnstonella costata</i><br>(= <i>Cryptantha costata</i> )<br>ribbed cryptantha | Fed: None<br>State: None<br>CNPS: 4.3<br>BLM: S  | Annual herb occurring in desert dunes, Mojavean desert scrub, and Sonoran desert scrub, on sandy soils. From -195 to 1,640 feet in elevation.                                    | February – May    | <b>Moderate</b> Suitable habitat occurs within the Proposed Project area, and observed within 0.5-miles.                            |
| <i>Lepidium flavum</i> var.<br><i>felipense</i><br>Borrego Valley pepper-grass     | Fed: None<br>State: None<br>CNPS: 1B.2<br>BLM: S | Annual herb occurring in pinon and juniper woodlands and Sonoran desert scrub, on sandy soils. From 1,490 to 2,755 feet in elevation.  | March – May       | <b>Absent.</b> The Proposed Project area is below the known elevation range for the species.  |
| <i>Lupinus excubitus</i> var.<br><i>medius</i><br>Mountain Springs bush lupine     | Fed: None<br>State: None<br>CNPS: 1B.3           | Perennial shrub occurring in pinyon and juniper woodlands and Sonoran desert scrub. From 1,395 to 4,495 feet in elevation.   | March – May       | <b>Absent.</b> The Proposed Project area is below the known elevation range for the species.  |
| <i>Lycium parishii</i><br>Parish's desert-thorn                                    | Fed: None<br>State: None<br>CNPS: 2B.3           | Perennial shrub occurring in coastal scrub and Sonoran desert scrub. From 440 to 3,280 feet in elevation.  | March – April     | <b>Absent.</b> The Proposed Project area is below the known elevation range for the species.  |
| <i>Malperia tenuis</i><br>brown turbans  | Fed: None<br>State: None<br>CNPS: 2B.3           | Annual herb occurring in Sonoran desert scrub, on sandy or gravelly soils. From 50 to 1,100 feet in elevation.   | March – April     | <b>Low.</b> Suitable habitat occurs within the Proposed Project area, but there are no known occurrences within 10 miles.           |
| <i>Monardella nana</i> ssp.<br><i>leptosiphon</i><br>San Felipe monardella         | Fed: None<br>State: None<br>CNPS: 1B.2<br>BLM: S | Perennial rhizomatous herb occurring in chaparral and lower montane coniferous forest. From 3,940 to 6,085 feet in elevation.  | June – July       | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area, and is below the known elevation range for the species. |
| <i>Monardella robisonii</i><br>Robison's monardella                                | Fed: None<br>State: None<br>CNPS: 1B.3<br>BLM: S | Perennial rhizomatous herb occurring in pinon & juniper woodlands. From 2,000 to 4,920 feet in elevation.  | April – September | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area, and is below the known elevation range for the species. |
| <i>Palafoxia arida</i> var.<br><i>gigantea</i><br>giant Spanish needle             | Fed: None<br>State: None<br>CNPS: 1B.3<br>BLM: S | Annual to perennial herb occurring on desert dunes. From 50 to 330 feet in elevation.  | February – May    | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area.   |

|  |  |   | Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI)  | No Impact (NI) |
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| <i>Pholisma sonora</i><br>sand food                                      | Fed: None<br>State: None<br>CNPS: 1B.2<br>BLM: S         | Perennial parasitic herb occurring on desert dunes and Sonoran desert scrub on sandy soils. From 0 to 655 feet in elevation.  | April – June                         |  | <b>Moderate.</b> Suitable habitat occurs within the Proposed Project area.   |                |
| <i>Ptilostyles thurberi</i><br>Thurber's pilostyles                      | Fed: None<br>State: None<br>CNPS: 4.3                    | Perennial parasitic herb occurring on <i>Psoralea</i> in Sonoran desert scrub. From 0 to 1,120 feet in elevation.   | December – April                     |  | <b>Moderate</b> Suitable habitat occurs within the Proposed Project area, and observed within 1-mile.  |                |
| <i>Salvia greatae</i><br>Orocopia sage                                   | Fed: None<br>State: None<br>CNPS: 1B.3<br>BLM: S         | Perennial evergreen shrub occurring in desert wash, Mojavean desert scrub, and Sonoran desert scrub. From -130 to 2,705 feet in elevation.  | March – April                        |  | <b>Low.</b> Suitable habitat occurs within the Proposed Project area, but all known populations occur on northeastern portion of the Salton Sea. |                |
| <i>Schoenoplectus americanus</i><br>Olney's three-square bulrush         | Fed: None<br>State: None<br>CNPS: None<br>State Parks: S | Perennial rhizomatous herb occurring in mineral-rich or brackish marshes, shores, fens, seeps, and springs. Up to 7,220 feet in elevation.  | May - August                         |  | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area.  |                |
| <i>Senna covesii</i><br>Cove's senna                                     | Fed: None<br>State: None<br>CNPS: 2B.2                   | Perennial herb occurring in sandy desert washes and slopes, and in Sonoran desert scrub. From 740 to 4,250 feet in elevation.   | March – June                         |  | <b>Absent.</b> The Proposed Project area is below the known elevation range for the species.   |                |
| <i>Streptanthus campestris</i><br>Southern jewel-flower                  | Fed: None<br>State: None<br>CNPS: 1B.3<br>BLM: S         | Perennial rhizomatous herb occurring in chaparral, lower montane coniferous forest, and pinon and juniper woodlands, on rocky soils. From 2,950 to 7,545 feet in elevation.   | May – July                           |  | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area, and is below the known elevation range for the species.              |                |
| <i>Symphotrichum defoliatum</i><br>San Bernardino aster                  | Fed: None<br>State: None<br>CNPS: 1B.2<br>BLM: S         | Perennial rhizomatous herb occurring in cismontane woodland, coastal scrub, lower montane coniferous forest, marsh and swamps, meadows and seeps, and valley and foothill grassland. From 5 to 6,690 feet in elevation. | July – November                      |  | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area.  |                |
| <i>Thermopsis californica</i> var. <i>semota</i><br>velvety false lupine | Fed: None<br>State: None<br>CNPS: 1B.2<br>BLM: S         | Perennial rhizomatous herb occurring in cismontane woodland, lower montane coniferous forest, meadows and seeps, valley and foothill grassland, and wetlands. From 3,280 to 6,150 feet in elevation                     | March – June                         |  | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area, and is below the known elevation range for the species.              |                |
| <i>Thysanocarpus rigidus</i><br>ridge fringe-pod                         | Fed: None<br>State: None<br>CNPS: 1B.2<br>BLM: S         | Annual herb occurring in pinon and juniper woodlands, often on dry rocky slopes. From 1,970 to 7,220 feet in elevation.   | February – May                       |  | <b>Absent.</b> No suitable habitat occurs within the Proposed Project area, and is below the known elevation range for the species.              |                |

|   |  | Potentially Significant Impact (PSI)   | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI)   | No Impact (NI) |
|---|--|--|--|---|----------------|
| <i>Xylorhiza cognata</i><br>Mecca aster           | Fed: None<br>State: None<br>CNPS: 1B.2<br>BLM: S | Perennial herb occurring in Sonoran desert scrub. From 65 to 1,310 feet in elevation.                | January – June   | Low. Suitable habitat occurs within the Proposed Project area, but all known populations occur on northeastern portion of the Salton Sea. |                |
| <i>Xylorhiza orcuttii</i><br>Orcutt's woody aster | Fed: None<br>State: None<br>CNPS: 1B.2<br>BLM: S | Perennial herb occurring in desert wash and Sonoran desert scrub. From 0 to 1,200 feet in elevation. | March – April  | Moderate Suitable habitat occurs within the Proposed Project area, and observed within 0.5-miles.   |                |

**Absent:** Species or sign not observed on the site, outside of the known range, and conditions unsuitable for occurrence.

**Low:** Species or sign not observed on the site, but conditions marginal for occurrence.

**Moderate:** Species or sign not observed on the site, but conditions suitable for occurrence and/or an historical record exists in the vicinity.

**High:** Species or sign not observed on the site, but reasonably certain to occur on the site based on conditions, species ranges, and recent records.

**Present:** Species or sign of their presence recently observed on the site.

**Federal status**

END = listed as Endangered under the federal Endangered Species Act

Delisted = previously listed under the federal Endangered Species Act but now removed

**State status**

END = listed as Endangered under the California Endangered Species Act

**BLM status**

S = designated as a Sensitive species

**State Parks status**

S = designated as a Sensitive species

**SRPR State Rare Plant Rank**

1A: Plants presumed extirpated in California and either rare or extinct elsewhere.

1B: Considered rare, threatened, or endangered in California and elsewhere.

2A: Plants presumed extirpated in California, but more common elsewhere

2B: Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere

3: Plants About Which More Information is Needed – A Review List

4: Plants of Limited Distribution - A Watch List

**Threat Ranks/ Decimal notations: A California Native Plant Society extension added to the SSRPR**

.1 Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)

.2 Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)

.3 Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

**Special Status Wildlife Species**

A total of 12 wildlife species have the potential to occur within the Proposed Project area. Of the 12 wildlife species, one species had a high potential for occurrence within the Proposed Project area, two had a moderate potential, five had a low potential, and the remainder were determined to be absent. Their habitat description, status, and potential for occurrence within the Proposed Project area are provided in Table 7.

No special-status wildlife species were detected during the field surveys. However, small mammal burrows occur throughout the Proposed Project area that can provide suitable cover for a variety of wildlife species, including flat-tailed horned lizard and burrowing owls.

**Table 7: Potential for Occurrence – Special Status Wildlife Species**

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

| Species  | Status                                      | Habitat   | Potential for Occurrence  |
|--|---|---|---|
| <i>Antrozous pallidus</i><br>pallid bat                                | Fed: None<br>State: SSC<br>BLM: S           | Occurs in chaparral, coastal scrub, desert wash, Great Basin grassland, Great Basin scrub, Mojavean desert scrub, riparian woodland, Sonoran desert scrub, upper montane coniferous forest, and valley and foothills grassland. Most common in open, dry habitats with rock areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites. | <b>Low.</b> This species has been detected within the SVRA within five miles of the BSA (personal communication, State Parks 2017), and suitable foraging habitat for this species occurs within the BSA, but roosting habitat is of low quality, combined with frequent anthropogenic disturbance. |
| <i>Athene cucularia</i><br>burrowing owl                               | Fed: None<br>State: SSC<br>BLM: S           | Occurs in open, dry annual or perennial grasslands, deserts, and scrublands with low-growing vegetation. This includes a wide variety of vegetation communities, including coastal prairies, coastal scrub, Great Basin grassland, Great Basin scrub, Mojavean desert scrub, Sonoran desert scrub, and valley and foothill grasslands. Depends on fossorial mammals for burrows.                  | <b>Moderate.</b> There is only one record of this species in the general Project vicinity (CDFW 2017). There were occasional suitable burrows within the survey area that could support this species, but there were few insects observed for prey.   |
| <i>Charadrius alexandrinus nivosus</i><br>western snowy plover         | Fed: <b>THR</b><br>State: SSC<br>BLM: S     | Occurs in Great Basin standing waters, sand shores, salt pond levees and shores of large alkali lakes, and wetlands. Requires sandy, gravelly, or friable soils for nesting.  | <b>Absent.</b> No suitable habitat is present within the BSA.   |
| <i>Charadrius montanus</i><br>mountain plover                          | Fed: None<br>State: SSC<br>BLM: S           | Occurs in chenopod scrub, short grasslands, freshly-plowed fields, newly-sprouting grain fields, and occasionally sod farms. Needs a mixture of short vegetation and bare ground, along with flat topography. Prefers grazed areas and areas with fossorial rodents.  | <b>Absent.</b> No suitable habitat is present within the BSA.   |
| <i>Falco mexicanus</i><br>prairie falcon                               | Fed: None<br>State: WL                      | Occurs in Great Basin grassland, Great Basin scrub, Mojavean desert scrub, Sonoran desert scrub, and valley and foothill grassland.   | <b>Low.</b> Some suitable habitat for this species occurs within the BSA.   |
| <i>Lasiurus blossevillii</i><br>western red bat                        | Fed: None<br>State: SSC                     | Occurs in cismontane woodland, lower montane coniferous forest, riparian forest, and riparian woodland. Roosts primarily in trees 2-40 feet above ground, preferring habitat edges and mosaics with trees that are protected from above and open below with opens areas for foraging.   | <b>Low.</b> This species has been detected within the SVRA within five miles of the BSA (personal communication, State Parks 2017), but no suitable foraging or roosting habitat for this species occurs within the BSA.  |
| <i>Oliarces clara</i><br>cheeseweed owlfly                             | Fed: None<br>State: None                    | Occurs in the lower Colorado River drainage. It is found under rocks or in flight over streams. <i>Larrea tridentata</i> is the suspected larval host.  | <b>Low.</b> <i>Larrea tridentata</i> occurs within the BSA, but one confirmed observation in the vicinity is more than five miles from the site.  |
| <i>Pelecanus occidentalis californicus</i><br>California brown pelican | Fed: Delisted<br>State: <b>FP</b><br>BLM: S | This colonial rooster and nester generally occurs on coastal islands outside of the survey line, but also nests on small islands of small to moderate size which afford immunity from attack by ground-dwelling predators.  | <b>Absent.</b> No suitable habitat is present within the BSA.   |
| <i>Perognathus longimembris bangsi</i><br>Palm Springs pocket mouse    | Fed: None<br>State: SSC<br>BLM: S           | Occurs in desert riparian, desert washes and Sonoran desert scrub. Most common in desert scrub dominated by creosote. Rarely found on rock sites.   | <b>Moderate.</b> Suitable habitat for this species occurs within the BSA.   |

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

|  |                                    |  |   |
|--|------------------------------------|--|---|
| <i>Phrynosoma mcallii</i><br>flat-tailed horned lizard   | Fed: None<br>State: SSC<br>BLM: S  | Occurs in desert dunes, Mojavean desert scrub, and Sonoran desert scrub in central Riverside, eastern San Diego, and Imperial Counties.  | <b>High.</b> Suitable habitat for this species occurs within the BSA.                             |
| <i>Toxostoma lecontei</i><br>Le Conte's thrasher   | Fed: None<br>State: SSC            | Occurs primarily in open desert wash, desert scrub, alkali desert scrub, and desert succulent scrub habitats. Commonly nests in dense, spiny shrubs or densely-branched cacti.   | <b>Low.</b> Some suitable habitat for this species occurs within the BSA.                         |
| <i>Xantusia gracilis</i><br>sandstone night lizard   | Fed: None<br>State: None<br>BLM: S | Known only from the Truckhaven Rocks in the eastern part of Anza-Borrego State Park. Found in fissures or under slabs of exfoliating sandstone and rodent burrows in compacted sandstone and mudstone.   | <b>Absent.</b> The Truckhaven Rocks is a highly localized area more than five miles from the BSA. |
| <p><b>Absent:</b> Species or sign not observed on the site, outside of the known range, and conditions unsuitable for occurrence.<br/> <b>Low:</b> Species or sign not observed on the site, but conditions marginal for occurrence.<br/> <b>Moderate:</b> Species or sign not observed on the site, but conditions suitable for occurrence and/or an historical record exists in the vicinity.<br/> <b>High:</b> Species or sign not observed on the site, but reasonably certain to occur on the site based on conditions, species ranges, and recent records.<br/> <b>Present:</b> Species or sign of their presence recently observed on the site.</p> |                                    | <p><b>Federal status</b><br/> END = listed as Endangered under the federal Endangered Species Act<br/> THR = listed as Threatened under the federal Endangered Species Act<br/> <b>State status</b><br/> END = listed as Endangered under the California Endangered Species Act<br/> THR = listed as Threatened under the California Endangered Species Act<br/> SSC = designated as a Species of Concern<br/> FP = designated as a Fully Protected species<br/> WL = watch list species<br/> <b>BLM status</b><br/> S = designated as a Sensitive species<br/> <b>Other</b><br/> CNDDDB = this species is only listed by the CNDDDB and may be locally sensitive or its occurrences may be monitored to see if further protection is needed</p> |   |

The Applicant will secure all the necessary permits, memorandums of understanding, or permissions identified in Section II of this document. Impacts to special-status species would be avoided where feasible, and where not feasible, impacts would be reduced via implementation of the mitigation measures identified below.

Due to the potential for the Proposed Project to impact special-status species, the following mitigation measures would be implemented to ensure that impacts to special-status species would be reduced to a level below significant. Following implementation of the mitigation measures identified below would result in a less than significant impact associated with special-status species.

**MM-BIO-1:** A qualified biologist(s) will monitor all construction activities to ensure that standard and special-status species-specific avoidance and minimization recommendations are adhered to. The monitor will retain stop work authority in the event there is the likelihood of eminent take of special-status species. The biological monitor will conduct a general preconstruction survey no more than 14 days prior to the start of construction to verify that no special-status species are in the Proposed Project area or its buffers. The monitor shall also conduct a daily survey in and around work areas before activities start.

**MM-BIO-2:** A worker education program (WEAP) will be prepared and presented to all employees working on the Proposed Project in listed species habitat. The education program will include identification of target species and their habitats, any project mitigation measures and stipulations, reporting requirements, and penalties for failure of compliance.

**MM-BIO-3:** Should construction activities occur between February 15 and August 15, the time period typically referenced in California for the general bird nesting season, preconstruction nesting surveys will be conducted in the Proposed Project area by a qualified biologist within two weeks of the start of construction. If no active bird nests are found within this area, no further mitigation is required. If an active nest is found, a buffer shall be instated around the nest if it belongs to a non-listed or migratory bird. If the nest belongs to a listed or fully-protected species, a larger buffer shall be instated around the nest, at a distance approved prior to construction activities.

**MM-BIO-4:** Avoid burrows that may be utilized by special-status wildlife species with a minimum buffer of 20-feet from burrows suitable for flat-tailed horned lizard and a minimum buffer of 30-feet from burrows suitable for burrowing owls.

| Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI) |
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**MM-BIO-5:** If flat-tailed horned lizards are observed within the construction area, the qualified biological monitor, with prior approval through project acquired permits or permissions, will relocate the individual out of the construction area, adjacent to where it was moved from.

**MM-BIO-6:** If burrowing owls are observed within the Project area prior to or during construction activities, occupied burrows shall not be disturbed during the owl nesting season, February 1 and August 31. If burrows are found, the appropriate CDFW-recommended buffer, or a buffer deemed appropriate by the qualified biological monitor, shall be instated until occupancy status is determined. If the buffer cannot be maintained during the non-breeding season, owls may be evicted from the burrows using accepted methodology as approved by resource agencies. Eviction will not occur during the breeding season.

**MM-BIO-7:** Avoid special-status perennial plant species with a minimum buffer of 5 to 10 feet, depending on the root structure and as determined by the biological monitor.

**MM-BIO-8:** Access to proposed well sites will be via pre-existing access routes, to the greatest extent possible, and the work area boundaries will be delineated with staking, flagging, or other comparable markings to minimize surface disturbance associated with vehicle straying. Signs and/or fencing will be placed around the Proposed Project area to restrict access to project-related vehicles.

**MM-BIO-9:** Project-related equipment will be washed prior to entering the project area for the first time to reduce the chance of transporting noxious weed seeds from outside the area.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

**b)** The Botanical Survey Report (2017) prepared for the Proposed Project did not identify any riparian habitat throughout the Proposed Project area; therefore, the Proposed Project would not result in any impacts to riparian habitat. No impact would occur.

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?

**c)** The Proposed Project has the potential to impact state and/or federally protected wetlands. Proposed well sites 18-32, and 47-32 would require access roads that are located within a 100-year Federal Emergency Management Administration (FEMA) floodplain. Prior to construction, a Waters of the US determination would be required to determine the appropriate permitting requirements. It is possible that the Proposed Project would require compliance with Section 401 and 404 of the Clean Water Act (CWA) and Fish and Game Code 1600. If it is determined the Proposed Project would result in impacts to jurisdictional waters, the appropriate permits will be secured prior to impacts to the waters. This impact is less than significant.

Due to potential impacts associated with construction of the access roads for proposed well pads 47-32 and 18-32, the Proposed Project would implement Mitigation Measures MM-BIO-10 to reduce impacts associated with state or federally protected wetlands.

**MM-BIO-10:** Prior to construction activities associated with proposed well sites 47-32 and 18-32, the Applicant will conduct jurisdictional delineations to determine the presence of state or federally protected wetlands. Should impacts to state or federally protected wetlands occur, the Applicant will prepare the appropriate permit applications (401, 404, 1600) as necessary.

d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

**d)** The Proposed Project area is currently vacant. The Proposed Project area does not provide for any substantial movement of wildlife species through a land-based corridor. However, as identified in the Biological Resources Evaluation Report (2018) prepared by Power Engineers, there is potential for nesting birds to occur within the Proposed Project area; a potential exists for avian species covered by the Migratory Bird Treaty Act (MBTA) to nest onsite. During the surveys for the Biological Resources Evaluation Report no active or old avian nests were observed. If construction activities are to occur during bird breeding season, nesting bird surveys will be required in accordance with the MBTA, as described in Mitigation Measure MM-BIO-3, above.

e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?

**e)** Implementation of the Project is not anticipated to conflict with any local policies or ordinances protecting biological resources during construction of the Proposed Project. The County of Imperial General Plan Open Space Conservation Policy requires detailed investigations to be conducted to determine the significance, location, extent, and condition of natural resources in the County. If any

|  | Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI) |
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rare, sensitive, or unique plant or wildlife habitat will be impacted by a project, the County must notify the agency responsible for protecting plant and wildlife before approving the project. Consistent with this policy, appropriate studies have been prepared for the Proposed Project area. Additionally, implementation of Mitigation Measures MM-BIO-1 through MM-BIO-9 would reduce any potential impacts to rare, sensitive, or unique plant or wildlife habitat to less than significant; therefore, this impact is less than significant.

- 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?

f) The Proposed Project area is not located within an area that is subject to an adopted Habitat Conservation Plan and Natural Community Conservation Plan. No impacts are expected to occur.

**V. CULTURAL RESOURCES Would the project:**

This section is based on the Class III Archaeological Survey prepared by Power Engineers, Inc (POWER) for the Proposed Project in August 2019; this report is included as Appendix D.

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

a) A Class III Archaeological Survey for the Proposed Project was prepared by Power Engineers, Inc (POWER) in August 2019. A record search with the South Coast Information Center (SCIC) for the Proposed Project determined a total of 31 cultural resource studies have been conducted in and within one-half mile of the Proposed Project area. Three of the previous surveys identified by the SCIC occurred in the past 10 years, and the rest occurred between 11 and 45 years ago. The earliest studies were associated with the widening of State Route 86 and represent the first modern archaeological studies in this region.

The records search identified 219 archaeological sites and 183 historic-era isolates within one-half mile of the Proposed Project area. In 2017, POWER recorded 12 sites and 12 isolates during the 2017 field season as part of the Proposed Project. Seven of these sites are in the Proposed Project area. Because the Proponents' geophysical contractor and POWER archaeological staff were tasked with moving Proposed Project features away from archaeological sites listed by the SCIC, no cultural resources are located within a feature of the Proposed Project.

The archaeological sites previously recorded in and within one-half mile from the Proposed Project site consist mainly of artifact scatters, although sites bearing stacked rock features and what appears to be habitation foundations are plentiful near large washes, especially the wash banks just west of State Route 86. No sites have been recorded on the floor of any wash, although a few isolates are known. Sites bearing the remnants of prehistoric fish traps or weir foundations, which in this area take the form of V- or J-shaped single-coursed cobble alignments (Dice et.al. 2018) are also recorded in the Proposed Project area. Many of these can be seen on high-resolution aerial photographs. Historic trash and metal debris do occur near older roads, including dummy bombs and rounds that may have been dropped by World War II training planes between approximately 1940 and 1943 within the Proposed Project area. Trash litters both sides of the State Route 86 right-of-way and some of this is mixed with debris that may be more than 50 years old.

Attempts were made before any fieldwork began to move projected location of project features into locations where no sites had been previously located. Nonetheless, the inventory encountered 175 archaeological resources and 91 isolated artifacts. Proposed Project features have been moved to positions that would avoid the recorded site boundaries; however, construction of the access road associated with proposed well site 87-6 has the potential to impact a historic resource. To minimize impacts to historic resources associated with the construction of the access road for proposed well site 87-6, the mitigation measures listed below would be implemented; the resulting impact would be reduced to less than significant.

**MM-CUL-1:** A temporary track will be placed over the historic site within the access road for proposed well site 87-6 in the three different locations the Applicant would like to cross over the historic resource. Once the need to cross the area associated with the historic resource has concluded, the temporary cover can be removed.

**MM-CUL-2:** Prior to construction, the Applicant shall prepare a mitigation and monitoring plan specific to Cultural resources. The mitigation and monitoring plan shall identify procedures for monitoring and the implementation of a discovery plan.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

b) As noted above, POWER prepared a Class III Archaeological Survey for the Proposed Project. Prior to any fieldwork associated with the Class III Archaeological Survey, the Applicant relocated project features into locations where no sites had been previously located. Although all archaeological sites have been avoided, aside from the site located within the access road for proposed well site 87-6, there remains potential to impact unknown archaeological resources. Implementation of the mitigation measures below would reduce any potential impacts associated with an archaeological resource to less than significant.

| Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI) |
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**MM-CUL-3:** The Applicant shall retain qualified archaeological monitors for all ground disturbing activities associated with the development of access roads and construction of the drill pads. If a significant cultural resource site is found during ground disturbing activities associated with well pad or access road construction the Project features will either be moved, or the resource will be protected in place, or data recovery will be initiated, consistent with the mitigation and monitoring plan required by MM-CUL-2.

- c) Disturb any human remains, including those interred outside of dedicated cemeteries?

c) There is no publicly available information indicating that human remains may occur within the Proposed Project area; however, given the cultural sensitivity of the area, it remains possible to uncover human remains. In the event that the discovery of human remains occurs during ground-disturbing activities, the following regulations must be followed to reduce the impact to less than significant.

**MM-CUL-4:** California State law (California Health and Safety Code 7050.5) and federal law and regulations (Archaeological Resources Protection Act [ARPA], 16 United States Code [U.S.C.] 470 and 43 Code of Federal Regulations, [CFR] 7, Native American Graves Protection and Repatriation Act [NAGPRA] 25 U.S.C. 3001 and 43 CFR 10, and Public Lands, Interior 43 CFR 8365.1-7) require a defined protocol if human remains are discovered in the state of California regardless if the remains are modern or archaeological. Upon discovery of human remains, all work within a minimum of 200 feet of the remains must cease immediately, and the County Coroner must be notified. The appropriate land manager/owner or the site shall also be notified of the discovery. If the remains are located on federal lands, the federal land manager(s), federal law enforcement, and/or federal archaeologist should also be notified. If the human remains are determined by the Coroner to be prehistoric, the appropriate federal archaeologist must be called. The archaeologist will initiate the proper procedures under ARPA and/or NAGPRA. If the remains can be determined to be Native American, the steps as outlined in NAGPRA 43 CFR 10.6 Inadvertent Discoveries must be followed.

**VI. ENERGY Would the project:**

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

a) Construction of the Proposed Project would result in the need for energy resources. The amount of energy resources required for the construction of the Proposed Project would be contingent on the well location because the total acreage of disturbance would vary; therefore, the energy requirements for each site is unknown at this time. However, energy use for the Proposed Project would be temporary in nature and minimal. Operation of the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources because the Proposed Project would not include the construction of structures (residential, commercial, or industrial) that would require daily usage of energy resources. This impact is less than significant.

- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

b) The County of Imperial prepared a Renewable Energy and Conservation Element (Element) that provides objectives in innovating renewable energy systems within the County. The proposed project would not conflict or obstruct a renewable energy or energy efficiency plan because implementation of the Proposed Project would occur within the Truckhaven Geothermal Leasing area, consistent with the Element. Therefore, impacts would be less than significant with regard to energy usage and renewable energy plans.

**VII. GEOLOGY AND SOILS Would the project:**

- a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving:

- 1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?

1) In accordance with the Alquist - Priolo Special Studies Zone Act (Chapter 7.5, Division 2, Public Resources Code, State of California, effective May 4, 1975) the Office of State Geologist delineated Special Study Zones which encompass potentially and recently active traces of four major faults (San Andreas, Calaveras, Hayward and San Jacinto). The Alquist - Priolo Special Study Zone Act is enforced by the County to assure that homes, offices, hospitals, public buildings, and other structures for human occupancy which are built on or near active faults, or if built within special study areas, are designed and constructed in compliance with the County of Imperial Codified Ordinance.

| Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI) |
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Implementation of the Proposed Project would not result in the construction of any structure intended for human occupancy. Additionally, the Proposed Project area is not located within or adjacent to any earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map (County of Imperial 1997).

- 2) Strong Seismic ground shaking?

**2)** California rests on the boundary between the North American Plate and the Pacific Plate. The San Andreas Fault system is located where the northwesterly drifting Pacific Plate grinds along and is subducted by the southwesterly drifting North American Plate. Baja, and California west of the fault system, are part of the Pacific Plate and move northwest compared to the rest of California and North America. Because Southern California is a seismically active region, it is highly likely that regional earthquakes would occur that could affect the Proposed Project area (County of Imperial 1997); however, as noted above, there are no active faults underlying or adjacent to the Proposed Project area. A less than significant impact would occur.

As noted above in the Project Summary Section of this document, vibration monitoring would be conducted prior to construction to determine areas appropriate for drilling. The California Department of Transportation (Caltrans) Transportation and Construction Vibration Manual (September 2013) and the USBM OSMRE Blasting Guidance Manual (March 1987) provide velocity attenuation relationships that can be used to estimate PPV at various distances and site conditions. Also included in these Manuals are vibration criteria and standards related to potential impacts from vibrations on structures and people. The vibration monitoring would be conducted in general accordance with current practice and the standard of care exercised by consultants performing vibration monitoring tasks within the Proposed Project area. Additionally, all structures and onsite facilities would be designated in accordance with the California Building Code (CBC) for the peak site ground acceleration. Since the design and construction of the Proposed Project would be required to conform to the specific mandated structural design requirements to protect against strong seismic shaking, the potential impacts due to strong seismic ground shaking are a less than significant impact.

- 3) Seismic-related ground failure, including liquefaction and seiche/tsunami?

**3)** The geology that makes up Imperial County includes young, unconsolidated sediments of the Salton Trough that are subject to failure during earthquakes, especially throughout the irrigated portions of Imperial Valley where the soil is generally saturated. Liquefaction, and related loss of foundation support, is a common hazard in these areas (County of Imperial 1997); however, the Proposed Project area is not located within the irrigated portion of Imperial Valley.

A seiche is a to and from vibration of a body of water like the slopping of water in a jolted basin. Once initiated, the water body continues to oscillate independently. Seiches can be triggered by seismic events such as earthquakes. The most likely location for a significant seiche to occur is the Salton Sea. While there have been a number of seismic events since the formation of the Salton Sea, no significant seiches have occurred to date (County of Imperial 1997). Additionally, the Proposed Project area is too far from the nearest ocean, the Pacific Ocean, to be at risk of experiencing a tsunami. Impacts associated with seismic-related ground failure, including liquefaction and seiche/tsunami are less than significant.

- 4) Landslides?

**4)** A landslide refers to slowly to very rapidly descending rock or debris caused by the pull of gravity. Landslides affect humans in many ways. A very rapid landslide could result in casualties and devastating property damage while a slow landslide could result in the nuisance of having a fence slowly pulled apart. The cost in lives and property from landslides is surprisingly high. According to the U.S. Geological Survey, more people in the United States died from landslides during the last three months of 1985 than were killed by all other geologic hazards, such as earthquakes and volcanic eruptions. The damage to property from landslides each year exceeds the cost of earthquake damage for the last twenty years (County of Imperial 1997).

The Proposed Project area is located in a relatively flat portion of Imperial County and is not identified as an area at risk of landslide (County of Imperial 1997); therefore, impacts associated with landslides are considered less than significant.

- b) Result in substantial soil erosion or the loss of topsoil?

**b)** Erosion is the removal of rock fragments or soil by the action of running water, glacial ice, or wind. Human activities can accelerate erosion. The areas in Imperial County that are most subject to erosion are the Algodones Sand Dunes paralleling the East Mesa and Superstition Mountain, and the Chocolate, Picacho, Cargo Muchacho, and Coast Range Mountains. The remainder of Imperial County is generally flat and experiences low levels of natural erosion (County of Imperial 1997).

Although the Proposed Project area is relatively flat and in an area identified as having low erosion potential (County of Imperial 1997), the preparation of a SWPPP would be required due to the size of the disturbed area exceeding one acre. The SWPPP would identify BMPs that would reduce any impacts associated with soil erosion or loss of topsoil to less than significant; therefore, this impact is less than significant.

- c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and

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potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?

c) As noted above, the Proposed Project area is relatively flat and in an area with low risk of landslide and liquefaction.

Subsidence is the gradual, local settling or sinking of the earth's surface with little or no horizontal motion. Subsidence is usually the result of gas, oil, or water extraction, hydrocompaction, or peat oxidation, and not the result of a landslide or slope failure. Ground surface effects related to subsidence are generally restricted to long surface structures such as canals, drains, and sewers, which are sensitive to slight changes in elevation. Subsidence from earthquakes and other activities, including geothermal resources development, can disrupt drainage systems and cause localized flooding.

Well field programs covering production and injection plans are required by the Bureau of Land Management (BLM) and the California Division of Oil and Gas (CDOG) for each major geothermal project. Detrimental subsidence from geothermal development needs to be avoided through careful permit review by CDOG and the County, establishment of standards for each project, and through impact mitigation and monitoring programs. Compliance with the well field program and adherence to standards established via coordination with CDOG and the County would reduce any impacts associated with subsidence to a level less than significant; therefore, this impact is less than significant.

d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property?

d) Expansive soils are soils that expand when water is added, and shrink when they dry out. This continuous change in soil volume can cause structures built on this soil to move unevenly and crack; expansive soils are commonly associated with clay rich soils. The soils underlying the Proposed Project area are sedimentary rock. Additionally, implementation of the Proposed Project would not result in the establishment of permanent structures, unless a viable geothermal resource is identified. Therefore, impacts associated with expansive soils are less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

e) The Proposed Project would not require the use of septic systems or alternative wastewater systems to accommodate wastewater needs. No impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

f) A Paleontological Resource Assessment and Survey Report was prepared for the Proposed Project by Applied Earthworks, Inc. in March 2017 and an Addendum to the report was prepared by Rincon Consultants, Inc. in December 2018.

The 2017 Paleontological Resource Assessment and Survey Report assessment included a comprehensive review of published and unpublished literature and museum collections records maintained by the Natural History Museum of Los Angeles County. The purpose of the literature review and museum records search was to identify the geologic units underlying the Proposed Project area and to determine whether previously recorded paleontological localities occur either within the Proposed Project boundaries or within the same geologic units elsewhere. The museum records search was supplemented by a search of the University of California Museum of Paleontology's online collections database. Using the results of museum records search and literature review, the paleontological resource potential and Potential Fossil Yield Classification (PFYC) of geologic units within the Project area was recommended in accordance with the Society of Vertebrate Paleontology (2010) and BLM (2008) guidelines, respectively.

As a result of the 2017 study, the Pliocene to Holocene geologic units underlying the Proposed Project area have a recommended paleontological sensitivity of low (PFYC Class 2) to very high (PFYC Class 5). Consequently, the likelihood of impacting scientifically significant vertebrate fossils as a result of Proposed Project development is high. Although a review of available online museum records indicated that no paleontological resources have been found within the Proposed Project area, geologic units underlying the Project area have been known to yield significant fossils nearby.

The 2018 Addendum to the Paleontological Resource Assessment and Survey Report was prepared to summarize the results of Rincon's supplemental paleontological field survey, discuss the potential for impacts to paleontological resources, and provide additional mitigation measures, as necessary. The findings of the paleontological field survey described in the addendum are consistent with the results of the 2016 paleontological survey described in the paleontological resource assessment and survey for the project (Applied EarthWorks 2017). The report determined the Proposed Project area is underlain by geologic units with PFYC 2 to 5 (low to very high paleontological sensitivity), in accordance with SVP (2010) and BLM (2016) guidelines.

In general, the potential for a given project to result in adverse impacts to paleontological resources is directly proportional to the amount of ground disturbance associated with the project. The Proposed Project entails the drilling, completion, testing and monitoring

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of the proposed wells and construction of associated access roads. Each of the proposed geothermal exploration wells would be located on separate, individual well pads. Ground disturbing activities are anticipated and the likelihood of impacting fossils is related to both the type and extent of disturbance and the geologic unit in which the disturbance occurs. Ground disturbances are proposed along areas underlain by previously undisturbed Arroyo Diablo Formation, Borrego Formation, Brawley Formation, Lake Cahuilla deposits, and Quaternary older alluvium, which have proven to yield vertebrate remains throughout the western Colorado Desert, including Imperial County, eastern San Diego County, and southern Riverside County. Ground disturbance is also planned for portions of the Proposed Project area that are underlain Quaternary alluvium, which will likely impact previously undisturbed lithology in those deposits. Significant fossils have not been reported within these deposits, but they may shallowly overlie older sensitive units at an unknown depth. Implementation of the mitigation measures below would reduce impacts associated with paleontological resources to a less than significant level and would also be consistent with other federal and local laws and regulations. This impact is less than significant with mitigation incorporated.

**MM-PAL-1:** All Project personnel and other on-site workers shall receive environmental awareness training on paleontological resources prior to the start or continuation of any elements of the Project that include ground disturbing activities. The training will be conducted by a qualified, BLM- and DPR-permitted paleontologist and will provide a description of the fossil resources that may be encountered in the Project area, outline steps to follow in the event that a fossil discovery is made, and provide contact information for the Project Paleontologist. The training may be conducted concurrent with other environmental training (e.g., cultural and natural resources awareness training, safety training, etc.) and may also be videotaped or presented in an informational brochure for future use by field personnel not present at the start of the Project. The workers should be informed that any unlawful collection of paleontological resources may be subject to a misdemeanor, a fine, or both.

**MM-PAL-2:** Prior to the commencement of ground-disturbing activities, a qualified professional paleontologist shall be retained to prepare and implement a Paleontological Resource Mitigation Plan (Plan) for the Project. The Plan should address the recommended approach to additional specimen collection, the specific locations and intensity of monitoring recommended for each geologic unit, and monitoring intensity.

Paleontological monitoring will be required for all ground disturbing activities within the previously undisturbed Arroyo Diablo Formation, Borrego Formation, Brawley Formation, Lake Cahuilla deposits, and Quaternary older alluvium, which underlies the Project area. Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected.

**MM-PAL-3:** Upon completion of fieldwork, all significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossils specimens will be identified to the lowest taxonomic level, cataloged, analyzed, and curated. Fossil specimens collected from BLM managed land remain the property of the Federal government and they must be placed in the approved museum repository identified on the Paleontological Resource Use Permit. Fossil specimens collected from DPR-managed land remain the property of the State of California and must also be delivered to an accredited regional museum repository for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of Ormat.

At the conclusion of laboratory work and museum curation, a final report will be prepared to describe the results of the paleontological mitigation monitoring efforts associated with the Project. The report will include a summary of the field and laboratory methods, an overview of the Project area geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the curation facility.

## VIII. GREENHOUSE GAS EMISSION

### Introduction

This section describes the regulatory setting and potential global climate change effects from implementation of the Proposed Project. GHG emission modeling was performed through use of the CalEEMod Version 2016.3.2. The CalEEMod model output files are provided in Appendix G.

### Regulatory Setting

Significant legislative and regulatory activities directly and indirectly affect climate change and GHGs in California. The primary climate change legislation in California is AB 32, the California Global Warming Solutions Act of 2006. AB 32 focuses on reducing greenhouse gas emissions in California, and AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In addition to AB 32, Executive Order B-30-15 was issued on April 29, 2015 that aims to reduce California's GHG emissions 40 percent below 1990 levels by 2030. In September 2016,

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AB 197 and SB 32 codified into statute the GHG emission reduction targets provided in Executive Order B-20-15.

CARB is the state agency charged with monitoring and regulating sources of emissions of GHGs in California that contribute to global warming in order to reduce emissions of GHGs. The CARB Governing Board approved the 1990 GHG emissions level of 427 million tons of CO<sub>2</sub> equivalent (MtCO<sub>2e</sub>) on December 6, 2007. Therefore, in 2020, annual emissions in California are required to be at or below 427 MtCO<sub>2e</sub>. The CARB Board approved the Climate Change Scoping Plan (Scoping Plan) in December 2008, the First Update to the Scoping Plan in May 2014, and California's 2017 Climate Change Scoping Plan in November 2017. The Scoping Plans define a range of programs and activities that will be implemented primarily by state agencies but also include actions by local government agencies. Primary strategies addressed in the Scoping Plans include new industrial and emission control technologies; alternative energy generation technologies; advanced energy conservation in lighting, heating, cooling, and ventilation; reduced-carbon fuels; hybrid and electric vehicles; and other methods of improving vehicle mileage. Local government will have a part in implementing some of these strategies. The Scoping Plans also call for reductions in vehicle-associated GHG emissions through smart growth that will result in reductions in vehicle miles traveled (CARB 2008, 2014, 2017).

**Would the project:**

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

a) Neither the County of Imperial nor the ICAPCD has established significance thresholds for GHG emissions. In order to establish context in which to consider the GHG emissions created from the Proposed Project, this analysis reviewed guidelines used by other public agencies in California and found the most conservative GHG emissions threshold is detailed in *CEQA & Climate Change*, prepared by California Air Pollution Control Officers Association (CAPCOA, 2008), which recommends a threshold of 900 metric tons of CO<sub>2e</sub> (MtCO<sub>2e</sub>) per year from any project. It should also be noted that a direct comparison of construction GHG emissions with long-term thresholds would not be appropriate, since construction emissions are short-term in nature and would cease upon completion of construction. Other Air Districts, including the SCAQMD, recommend that GHG emissions from construction activities be amortized over 30 years, when construction emissions are compared to operational-related GHG emissions thresholds.

The CalEEMod model used to calculate the criteria pollutant emissions for the air quality analysis was also utilized to calculate the GHG emissions associated with construction of the proposed Project (see Appendix G). The CalEEMod model calculated GHG emissions generated from the construction of one of the six exploratory wells that would be constructed as part of the proposed project. Table 8 shows the estimated GHG emissions from each phase of construction of one well site and the total construction-related GHG emissions from all six exploratory well sites.

**Table 8: Construction-Related Greenhouse Gas Emissions from the Proposed Project**

| Activity  | Greenhouse Gas Emissions in metric tons/year |                 |                  |                  |
|---|--|-----------------|------------------|------------------|
|   | CO <sub>2</sub>                              | CH <sub>4</sub> | N <sub>2</sub> O | CO <sub>2e</sub> |
| Well Pad & Access Road Construction                         | 10.54  | 0.00            | 0.00             | 9.47             |
| Well Drilling   | 148.41                                       | 0.02            | 0.00             | 149.02           |
| Well Testing  | 2.51   | 0.00            | 0.00             | 2.52             |
| Well Clean-Up   | 3.28   | 0.00            | 0.00             | 3.31             |
| Total Construction Emissions for One Well Site              | 164.74                                       | 0.03            | 0.00             | 165.46           |
| Total Construction Emissions for Six Well Sites             | 988.46                                       | 0.18            | 0.00             | 992.77           |
| <b>Total Construction Emissions Amortized over 30 years</b> | <b>32.95</b>                                 | <b>0.01</b>     | <b>0.00</b>      | <b>33.09</b>     |
| <b>GHG Emissions Threshold of Significance<sup>1</sup></b>  |  |                 |                  | <b>900</b>       |
| Exceed Threshold?   |  |                 |                  | No               |

Notes:

<sup>1</sup> GHG emissions threshold from CAPCOA, 2008.

Source: CalEEMod Version 2016.3.2 (see Appendix B).

As shown in Table 8, the Proposed Project would generate 33.09 MtCO<sub>2e</sub> per year, which would not exceed the annual GHG emissions threshold of 900 MtCO<sub>2e</sub>. As such, it could be concluded that the Project's construction-related GHG contribution is not "cumulatively considerable" and is therefore less than significant under CEQA.

The Proposed Project consists of development of six exploratory geothermal wells, which would be tested after completion of the well drilling phase in order to determine the commercial potential of each well. If a well is judged to have commercial potential, well monitoring may be continued indefinitely until the applicant proceeds with the approval process to place the well into commercial service. Therefore,

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the operational GHG emissions would be limited to well monitoring activities that may be limited to weekly or monthly vehicle trips to the well sites to obtain pressure and temperature measurements. As such, only nominal GHG emissions would be created from the on-going operation of the proposed project and operations-related GHG emissions would be less than significant for the Proposed Project.

Therefore, implementation of the Proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.

- b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

b) The California State Legislature adopted AB 32 in 2006, that requires the State's GHG emissions by 2020 to meet the GHG emissions level created in 1990 and adopted AB 197 and SB 32 in 2016, that requires the State's GHG emissions to be 40 percent below 1990 levels by 2030.

Neither the County of Imperial nor the ICAPCD has adopted a climate action plan to reduce GHG emissions in the Proposed Project area. As such, the only applicable plans for reducing GHG emissions for the Proposed Project area are statewide plans that include AB 32, AB 197, and SB 32. As shown above in impact (a), the Proposed Project would generate 33.09 MTCO<sub>2e</sub> per year from construction of the Proposed Project and as discussed above in impact (a), only negligible GHG emissions would be created from operation of the Proposed Project. In addition, it should be noted that the Proposed Project has the potential to assist the State in meeting its GHG reduction goals provided in AB 32, AB 197, and SB 32, as the project consists of six exploratory geothermal wells that have the potential of creating a carbon-free electricity in the future, if any of the wells are found to be commercially viable.

Therefore, the Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs. A less than significant impact would occur.

**IX. HAZARDS AND HAZARDOUS MATERIALS *Would the project:***

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

a) Material that is to be transported, stored, or disposed of during project construction and operation has the potential to contain hazardous materials and could present a hazard to construction workers, the public, or the environment if improperly managed. Vehicles and equipment used for construction would contain or require the temporary, short-term use of potentially hazardous substances, such as fuels, lubricating oils, and hydraulic fluid. Hazardous substances would be stored in transportable containment trailers at locations within the construction staging area to minimize potential for accidental releases and/or spills. No other hazardous or potentially hazardous materials will be brought into the Proposed Project area. Further, the Proposed Project would be required to comply with all applicable rules and regulations involving hazardous materials, including the State of California CCR Title 23 Health and Safety Regulations, the California Division of Occupational Safety and Health (Cal/OSHA) requirements, the Hazardous Waste Control Act, the California Accidental Release Prevention (CalARP) Program, and the California Health and Safety Code. Compliance with these measures would reduce any potential risk or impact associated with the transport, use, or disposal of hazardous materials. This impact is less than significant.

- b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

b) As noted above, the Proposed Project would include the storage of hazardous materials within the Proposed Project area; however, hazardous substances would be stored in transportable containment trailers at locations within the construction staging area to minimize potential for accidental releases and/or spills. No other hazardous or potentially hazardous materials will be brought into the Proposed Project area. Further, the Proposed Project would be required to comply with all applicable rules and regulations involving hazardous materials, including the State of California CCR Title 23 Health and Safety Regulations, the California Division of Occupational Safety and Health (Cal/OSHA) requirements, the Hazardous Waste Control Act, the California Accidental Release Prevention (CalARP) Program, and the California Health and Safety Code. Compliance with these measures would reduce any potential risk or impact associated with the release of hazardous materials into the environment. This impact is less than significant.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

c) The nearest school to the Proposed Project area is West Shores High School, approximately 3 miles to the northeast. The Proposed

|   | Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI)                      |
|---|--------------------------------------|--|-------------------------------------|-------------------------------------|
| Project would not result in a release of hazardous emissions, hazardous or acutely hazardous materials, or substances within one-quarter mile of an existing or proposed school. No impact would occur.   |                                      |  |                                     |                                     |
| 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?<br>d) A review of federal and state standard and supplemental databases indicated that the Proposed Project area is not located within any identified hazardous material site pursuant to Government Code Section 65962.5. No hazardous materials sites are located within 0.25 mile of the Proposed Project area (DTSC 2109; SWRCB 2019). The Proposed Project would not create a significant hazard to the public or environment. No impacts would occur.   | <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?<br>e) The Proposed Project is located within two miles of the Salton City Airport; however, implementation of the Proposed Project would not result in people permanently residing or working in the area. Following construction, no permanent workers would be located on-site and work in the area would be restricted to maintenance activities at well sites that are determined to have a viable geothermal resource; the Proposed Project does not involve housing. As such, the project will not result in exposure to a safety hazard or excessive noise from proximity to the Salton City Airport. No impact would occur. | <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?<br>f) The construction of the Proposed Project would not involve blocking or restricting any access routes. The Proposed Project would not interfere with emergency response plans or operations near the Proposed Project area. No impacts are expected.   | <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?<br>g) The potential for a wildfire in the unincorporated areas of the County is generally low (County of Imperial 1997) and the Proposed Project area is not located within a fire hazard severity zone (CalFire 2007). The Proposed Project would not introduce features that directly or indirectly increase the risk of wildfire throughout the Proposed Project area. No impact would occur.  | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

X. **HYDROLOGY AND WATER QUALITY** *Would the project:*

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?<br>a) No known or reasonably expected surface water quality issues are anticipated to result from implementation of the Proposed Project; however, because ground disturbing activities will occur in an area greater than one acre, a SWPPP will be developed that implements BMPs (as previously discussed) that sufficiently control degradation of water quality on-site and adjacent to a drill pad or access road. In addition, the SWPPP will be implemented such that stormwater discharges would not adversely impact human health or the environment, nor contribute to any exceedances of any applicable water quality standard contained in the Basin Plan (Lahontan Regional Water Quality Control Board). This impact is less than significant. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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?<br>b) Construction of the Proposed Project would require the use of water; however, the use of water would be temporary in nature (30 days per proposed well site) and operation of the geothermal wells would not require ongoing use of a substantial amount of water. Therefore, the Proposed Project would result in less than significant impacts associated with groundwater depletion.  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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:   |                          |                          |                                     |                          |

|   | Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI)                      |
|---|--------------------------------------|--|-------------------------------------|-------------------------------------|
| (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 checked="" type="checkbox"/>                            | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <p>c) As previously discussed, the construction of the Proposed Project would result in ground disturbing activities in an area greater than one acre; therefore, a SWPPP would be required. The SWPPP would be developed to identify BMPs that sufficiently avoid any on-site or off-site erosion and runoff from areas proposed for ground disturbance. Operation of the Proposed Project would not have an impact of a stormwater drainage system as the Proposed Project would not result in an increase in the amount of runoff from any proposed well site. Impacts would, therefore, be less than significant.</p> <p>It should be noted that proposed well sites 18-32, and 47-32 would require access roads that are located within a 100-year Federal Emergency Management Administration (FEMA) floodplain. Prior to construction, a Waters of the US determination would be required to determine the appropriate permitting requirements. It is possible that the Proposed Project would require compliance with Section 401 and 404 of the Clean Water Act (CWA) and Fish and Game Code 1600. If it is determined the Proposed Project would result in impacts to jurisdictional waters, the appropriate permits will be secured prior to impacts to the waters. This impact is less than significant.</p> <p>Due to potential impacts associated with construction of the access roads for proposed well pads 47-32 and 18-32, the Proposed Project would implement Mitigation Measures MM-BIO-10 to reduce impacts associated with state or federally protected wetlands.</p> |                                      |  |                                     |                                     |
| 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"/> |
| <p>d) The Proposed Project area is not located in an area at risk of tsunami or seiche (County of Imperial 1997). No impact would occur.</p>  |                                      |  |                                     |                                     |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?   | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <p>e) As discussed above in Section, the Proposed Project would be compliant with all city, state, and federal regulations, including compliance with the NPDES permits with the implementation of BMPs; compliance with the referenced regulations would reduce any potential impact associated with a water quality control plan to a less than significant. Additionally, as discussed above, implementation of the Proposed Project would not require significant water supplies. No impact would occur.</p>  |                                      |  |                                     |                                     |

XI. **LAND USE AND PLANNING** *Would the project:*

- a) Physically divide an established community?
- a) The Proposed Project includes the drilling, testing, and monitoring of the proposed geothermal resource wells. The Proposed Project would not physically divide an established community, as there are no proposed facilities that would prohibit travel throughout the Proposed Project area. Components of the Proposed Project would not physically divide, or block residents from accessing public areas or facilities. Land use designations within the Proposed Project area would remain the same. No impact would occur.
- 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?
- b) The Proposed Project area is located within the Truckhaven Geothermal Leasing Area of Imperial County (County of Imperial 2015); the land uses associated with the Proposed Project are allowable under the Imperial County Renewable Energy and Transmission Element (2015). The Proposed Project is not in conflict with the County adopted land-use plans or policies. It is consistent with the County's General Plan, the Renewable Energy and Transmission Element Update, and the applicable sections of the Imperial County Land Use Ordinance (Title 9); therefore, no impact would occur.

| Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI) |
|--------------------------------------|--|-------------------------------------|----------------|
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XII. **MINERAL RESOURCES** *Would the project:*

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <p>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?</p> <p><b>a)</b> A number of mineral resources in Imperial County are currently being extracted, including gold, gypsum, sand, gravel, lime, clay, stone, kyanite, limestone, sericite, mica, tuff, salt, potash, and manganese. Several issues influence the extraction of mineral deposits in Imperial County, including the location of geologic deposition, the potential for impacts to the environment, and land use conflicts. As a result, the extraction of mineral resources is limited to a relatively small number of sites throughout the County. 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 Proposed Project area. No impacts would occur.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>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?</p> <p><b>b)</b> As noted above, 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 Proposed Project area. No impacts would occur.</p>  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XIII. **NOISE**

This section describes the existing noise setting and potential noise and vibration effects from project implementation on the site and its surrounding area. Construction noise modeling was performed through use of the Roadway Construction Noise Model (RCNM) Version 1.1. The model output is provided in Appendix H.

**Environmental Setting**

The proposed wells sites are located on the southwest side of Salton City, which is an unincorporated area located in the western portion of Imperial County. The primary sources of noise within the study area consists of vehicle noise on State Route 86 and the local roads, aircraft noise from Salton Sea Airport, and from off-road equipment operating at the Salton City Landfill. It should be noted that due to the distances these sources are located from the proposed well sites, these noise sources only provide nominal increases to the very low ambient noise levels at the proposed well sites.

**County of Imperial Noise Standards**

The General Plan Noise Element (County of Imperial, 2015) provides the applicable noise standards for the Proposed project. The Noise Element limits the noise level from any noise generating property to 50 dBA between 7 a.m. and 10 p.m. and to 45 dBA between 10 p.m. and 7 a.m. at the property line of the nearest home. The Noise Element exempts construction noise from these standards, provided construction activities occur between 7 a.m. and 7 p.m. Monday thru Friday and between 9 a.m. and 5 p.m. on Saturday and construction noise does not exceed 75 dBA Leq averaged over 8 hours.

**Would the project result in:**

- |   |                          |                                     |                          |                          |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <p>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?</p> <p><b>a)</b> The Proposed Project would consist of development of six exploratory geothermal wells. Both construction and operation of the Proposed Project would have the potential to generate noise in excess of standards and have been analyzed separately below.</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

**Construction-Related Noise**

Construction activities for the Proposed Project are anticipated to begin in early 2020 and each well would take approximately two months to complete, or approximately one year for all six wells as it is anticipated that after a well is completed the crew would move to the next well location, so no concurrent well construction activities are anticipated. The anticipated construction phases for each well location would include: 1) Well pad and access road construction; 2) Well drilling; 3) Well testing; and 4) Well clean-up.

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

The General Plan Noise Element exempts construction activities from the applicable noise standards, provided that construction activities are limited to between 7 a.m. and 7 p.m. Monday thru Friday and between 9 a.m. and 5 p.m. on Saturday and do not exceed 75 dBA Leq at the nearby homes. The well pad and access road construction, well testing, and well clean-up activities will adhere to these time limits, as such the construction noise level threshold for these activities is 75 dBA Leq at the property lines of the nearest homes. However, the well drilling phase of construction is required to operate 24-hours per day in order to minimize a risk of cave-in of the borehole. As such, the noise level threshold for the well drilling phase of construction is 45 dBA at the property line of the nearest home, which is based on the most restrictive nighttime residential noise standard.

The Federal Highway Administration (FHWA) compiled noise level data regarding the noise generating characteristics of several different types of construction equipment used during the Central Artery/Tunnel project in Boston. Table 9 below provides a list of the construction equipment measured, along with the associated measured noise emissions and measured percentage of typical equipment use per day. From this acquired data, FHWA developed the Roadway Construction Noise Model (RCNM). The RCNM, which uses the Spec 721.560 L<sub>max</sub> at 50 feet, has been used to calculate the construction equipment noise emissions (see Appendix H).

**Table 9: Construction Equipment Emissions and Usage Factors**

| Equipment             | Acoustical Use Factor <sup>1</sup> (Percent) | Spec 721.560 L <sub>max</sub> @ 50 Feet <sup>2</sup> (dBA, slow <sup>3</sup> ) | Actual Measured L <sub>max</sub> @ 50 feet <sup>4</sup> (dBA, slow) |
|-----------------------|--|--|---|
| Auger Drill Rig       | 20   | 85   | N/A   |
| Backhoe               | 40   | 80   | 78  |
| Compressor (air)      | 40   | 80   | 78  |
| Concrete Mixer Truck  | 40   | 85   | 79  |
| Concrete Pump         | 20   | 82   | 81  |
| Concrete Saw          | 20   | 90   | 90  |
| Crane                 | 16   | 85   | 81  |
| Dozer                 | 40   | 85   | 82  |
| Dump Truck            | 40   | 84   | 76  |
| Excavator             | 40   | 85   | 81  |
| Flatbed Truck         | 40   | 84   | 74  |
| Front End Loader      | 40   | 80   | 79  |
| Generator             | 50   | 82   | 81  |
| Gradall (Forklift)    | 40   | 85   | 83  |
| Mounted Impact Hammer | 20   | 90   | 90  |
| Paver                 | 50   | 85   | 77  |
| Roller                | 20   | 85   | 80  |
| Tractor               | 40   | 84   | N/A   |
| Welder/Torch          | 40   | 73   | 74  |

- <sup>1</sup> Acoustical use factor is the percentage of time each piece of equipment is operational during a typical workday.
  - <sup>2</sup> Spec 721.560 is the equipment noise level utilized by the Roadway Construction Noise Model program.
  - <sup>3</sup> The "slow" response averages sound levels over 1-second increments. A "fast" response averages sound levels over 0.125-second increments.
  - <sup>4</sup> Actual Measured is the average noise level measured of each piece of equipment during the Central Artery/Tunnel project in Boston, Massachusetts primarily during the 1990s.
- Source: Federal Highway Administration, 2006.

The anticipated areas of construction and construction equipment that will be utilized during development of each area were obtained from the Project applicant. For each proposed well pad area, all equipment was placed at the shortest distance of the proposed well pad area to the nearest home. The results are shown below in Table 10.

**Table 10: Proposed Project Construction Noise Levels at Nearby Homes Prior to Mitigation**

| Sensitive Receptor Location | Construction Noise Level during: (dBA L <sub>eq</sub> ) |
|-----------------------------|---|
|-----------------------------|---|

|   |                             | Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI) |
|---|-----------------------------|--------------------------------------|--|-------------------------------------|----------------|
|   | Distance to Receptor (mile) | Well Pad & Access Road Construction  | Well Drilling  | Well Testing                        | Well Cleanup   |
|   | Nearest Home to Well 32-5   | 53                                   | 53   | 51                                  | 53             |
|   | Nearest Home to Well 47-5   | 51                                   | 51   | 51                                  | 51             |
|   | Nearest Home to Well 18-32  | 52                                   | 52   | 52                                  | 52             |
|   | Nearest Home to Well 47-32  | 58                                   | 58   | 56                                  | 56             |
|   | Nearest Home to Well 14-4   | 55                                   | 55   | 55                                  | 55             |
|   | Nearest Home to Well 17-4   | 49                                   | 49   | 49                                  | 49             |
| <b>Construction Noise Threshold<sup>1</sup></b> |                             | <b>75</b>                            | <b>45</b>  | <b>75</b>                           | <b>75</b>      |
| Exceed Threshold?                               |                             | No                                   | Yes  | No                                  | No             |

Notes:

<sup>1</sup> Construction Noise Thresholds from the General Plan Noise Element (County of Imperial, 2015).

Source: RCNM Version 1.1 (see Appendix C).

Table 9 shows that construction noise created during well pad and access road construction, well testing, and well cleanup and abandonment would be below the County's 75 dBA noise standard that is applicable when construction activities are exempt from the County's residential noise standards. Table 10 also shows that well drilling activities that would occur 24-hours per day until completion of the well, would exceed the County's residential nighttime noise standard of 45 dBA at the nearest home to each of the six proposed well sites. This would be considered a significant impact.

The mitigation measure MM-NOI-1 is proposed that would require the implementation of various sound control measures during well drilling phase of construction that are anticipated to reduce nighttime noise levels by up to 15 dB.

The well drilling phase of construction has been recalculated based on implementation of MM-NOI-1 and the results are shown in Table 11. As shown in Table 11 with implementation of MM-NOI-1, the well drilling noise levels would be lowered to within the County's residential nighttime noise standard of 45 dBA at the nearest home to each of the six proposed well sites. Impacts would be less than significant with implementation of MM NOI-1.

**Table 11: Mitigated Proposed Project Construction Noise Levels at Nearby Homes**

| Sensitive Receptor Location                     | Distance to Receptor (mile) | Construction Noise Level during: (dBA L <sub>eq</sub> ) |                            |              |              |
|---|-----------------------------|---|----------------------------|--------------|--------------|
|   |                             | Well Pad & Access Road Construction                     | Well Drilling <sup>1</sup> | Well Testing | Well Cleanup |
| Nearest Home to Well 32-5                       | 0.34                        | 53  | 38                         | 51           | 53           |
| Nearest Home to Well 47-5                       | 0.44                        | 51  | 36                         | 51           | 51           |
| Nearest Home to Well 18-32                      | 0.4                         | 52  | 37                         | 52           | 52           |
| Nearest Home to Well 47-32                      | 0.2                         | 58  | 43                         | 56           | 56           |
| Nearest Home to Well 14-4                       | 0.28                        | 55  | 40                         | 55           | 55           |
| Nearest Home to Well 17-4                       | 0.58                        | 49  | 34                         | 49           | 49           |
| <b>Construction Noise Threshold<sup>2</sup></b> |                             | <b>75</b>   | <b>45</b>                  | <b>75</b>    | <b>75</b>    |
| Exceed Threshold?                               |                             | No  | No                         | No           | No           |

Notes:

<sup>1</sup> Well Drilling noise levels includes implementation of MM NOI-1.

<sup>2</sup> Construction Noise Thresholds from the General Plan Noise Element (County of Imperial, 2015).

Source: RCNM Version 1.1 (see Appendix C).

### Operation-Related Noise

The Proposed Project consists of development of six exploratory geothermal wells, which would be tested after completion of the well drilling phase in order to determine the commercial potential of each well. If a well is judged to have commercial potential, well monitoring may be continued indefinitely until the applicant proceeds with the approval process to place the well into commercial service. Therefore,

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

the operational emissions would be limited to well monitoring activities that may be limited to weekly or monthly vehicle trips to the well sites to obtain pressure and temperature measurements. As such, only nominal operational noise levels would be created from the on-going operation of the Proposed Project and operations-related noise would be less than significant for the Proposed Project.

Accordingly, with implementation of MM-NOI-1, the Proposed Project would not expose persons to noise levels in excess of standards established by Imperial County.

**MM-NOI-1:** The project applicant shall require the well drilling contractor to implement the following noise reduction measures:

- All construction equipment shall use noise-reduction features (e.g., mufflers and engine shrouds that are no less effective than those originally installed by the manufacturer;
- All non-essential well drilling equipment and truck deliveries shall be limited to operating during the allowable construction times of between 7 a.m. and 7 p.m. Monday thru Friday and between 9 a.m. and 5 p.m. on Saturday;
- The portable office and any storage containers used during the well drilling phase shall be placed between the drilling equipment and nearest home, in order to effectively act as a sound wall and provide attenuation to the nearest home.

b) Generation of excessive groundborne vibration or groundborne noise levels?

b) Construction activities would require the operation of off-road equipment and trucks that are known sources of vibration. Construction activities may occur as near as 0.2 mile (1,060 feet) from the home located in the proximity of proposed Exploratory Well 47-32.

A vibration monitoring study was prepared for the proposed project by Southwest Geophysics, Inc., January 17, 2018. However, it should be noted that the vibration study was limited to calculating the vibration propagation rates of the existing geological conditions of the project study area and does not provide any information about the proposed project vibration levels at the nearby sensitive homes, however the average attenuation rate of 1.28 calculated by the vibration study has been utilized to calculate the vibration levels at the nearby homes.

Since neither the County's General Plan nor the Municipal Code provide any thresholds related to vibration, Caltrans guidance has been utilized, which defines the threshold of perception from transient sources at 0.25 inch-per-second peak particle velocity (PPV). Table 12 shows the typical PPV produced from some common construction equipment.

**Table 12: Typical Construction Equipment Vibration Emissions**

| Equipment               | Peak Particle Velocity in inches per second at 25 feet | Vibration Level (L <sub>v</sub> ) at 25 feet |
|-------------------------|--|--|
| Pile Driver (impact)    | 0.644  | 104  |
| Pile Driver (sonic)     | 0.170  | 93   |
| Clam Shovel Drop        | 0.202  | 94   |
| Hydromill               |  |  |
| - in soil               | 0.008  | 66   |
| - in rock               | 0.017  | 75   |
| Vibratory Roller        | 0.210  | 94   |
| Hoe Ram                 | 0.089  | 87   |
| Large Bulldozer         | 0.089  | 87   |
| Caisson Drill           | 0.089  | 87   |
| Loaded truck (off road) | 0.076  | 86   |
| Jackhammer              | 0.035  | 79   |
| Small Bulldozer         | 0.003  | 58   |

Source: Federal Transit Administration 2006.

From the list of equipment shown in Table 2, a large bulldozer with a vibration level of 0.089 inch-per-second PPV would be the source of the highest vibration levels of all equipment utilized during construction activities for the Proposed Project. Based on typical propagation rates this would result in a vibration level of 0.001 inch-per-second PPV at the nearest home to construction activities. The construction-related vibration levels would be within the 0.25 inch-per-second PPV threshold detailed above. Construction-related vibration impacts would be less than significant.

The on-going operation of the Proposed Project would not result in the creation of any known vibration sources. Therefore, a less than

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

significant vibration impact is anticipated from the operation of the Proposed Project.

Accordingly, the Proposed Project would not expose persons to excessive groundborne vibration or groundborne noise levels.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- |                          |                          |                                     |                          |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

c) The proposed well sites are located as near as 400 feet from the runway for Salton Sea Airport. It should be noted that Noise Element of the General Plan (Imperial County, 2015) states that current airport activity at Salton Sea Airport is negligible and due to the low levels of activity, the County did not prepare noise contours for Salton Sea Airport. Therefore, it is likely that Salton Sea Airport does not have activity to create 65 dBA CNEL noise contours. It should also be noted that the Proposed Project would consist of the development of six exploratory wells, where the operation of the proposed wells would be limited to well monitoring activities that may be limited to weekly or monthly vehicle trips to the well sites to obtain pressure and temperature measurements. The Proposed Project would consist of a very limited increase in people working in the project area and the only source of airport noise is Salton Sea Airport that produces noise levels below County noise standards. As such, airport and airstrip noise impacts to the Proposed Project would be less than significant.

**XIV. POPULATION AND HOUSING** *Would the project:*

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?
- |                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

a) The Proposed Project would not induce unplanned population growth or displace existing people or housing. The Proposed Project consists of the installation of production wells within the LACSD water service boundaries. There are no residential units on the proposed well sites that would require relocation and access roads associated with the Proposed Project would be used only for accessing the proposed well sites. There are no proposed development of new roads or infrastructure that would introduce new populations to the Proposed Project areas. No impact would occur.

- 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"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

b) The Proposed Project does not include any activities that would displace people or housing within the Proposed Project area. No impact would occur.

**XV. PUBLIC SERVICES**

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- 1) Fire Protection?

1) The Proposed Project would not result in substantial adverse physical impacts to fire protection. The Proposed Project would not involve the modification of any fire protection services or their facilities. The Proposed Project would not invite new populations to the proposed well locations that would result in the permanent, and increased need of fire protection services. No impact would occur.

- 2) Police Protection?

2) The Proposed Project would not result in substantial adverse physical impacts to police protection. The Proposed Project would not involve the modification of any police protection services or their facilities. The Proposed Project would not invite new populations to the proposed well locations that would result in the permanent, and increased need of police protection services. No impact would occur.

- 3) Schools?

|  | Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI)                      |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| 3) The Proposed Project would not result in substantial adverse physical impacts to school facilities. The Proposed Project would not involve the modification of any schools or their facilities. The Proposed Project would not invite new populations to the proposed well locations that would result in the permanent, and increased need for schools. No impact would occur. |                                      |  |                                     |                                     |
| 4) Parks?  | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 4) The Proposed Project would not result in substantial adverse physical impacts to parks. The Proposed Project would not involve the modification of any parks or their facilities. The Proposed Project would not invite new populations to the proposed well locations that would result in the permanent, and increased need for parks. No impact would occur.                 |                                      |  |                                     |                                     |
| 5) Other Public Facilities?  | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 5) The Proposed Project would not result in substantial adverse physical impacts to public facilities. The Proposed Project would not involve the modification of any public facilities. The Proposed Project would not invite new populations to the proposed well locations that would result in the permanent, and increased need of public facilities. No impact would occur.  |                                      |  |                                     |                                     |

**XVI. RECREATION**

- a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- a) Implementation of the Proposed Project would not increase the use of existing neighborhood parks, campgrounds, trails, or other recreational facilities and would not include the construction or expansion of new recreational facilities. The Proposed Project would not induce new populations that would result in the substantial physical deterioration of recreational facilities or require new facilities. No impact would occur.
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?
- b) Implementation of 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 result in the substantial physical deterioration of recreational facilities or require new facilities. No impact would occur.

**XVII. TRANSPORTATION** *Would the project:*

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- a) Primary highway access to the Project vicinity is provided by State Highway 86, a four-lane highway running north-south through Imperial County on the west side of the Salton Sea. Immediate access to the Proposed Project area and some of the proposed well sites is from State Highway 86 to Airpark Drive. Access to the rest of the proposed well sites is from State Highway 86 to County Dump Road. Both Airpark Drive and County Dump Road are two-lane roads with very low traffic volume. Because the Proposed Project is short-term and temporary, and the traffic volumes generated by construction and well drilling so minor, the potential for the Proposed Project to cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system is negligible. This impact is less than significant.
- b) Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)?
- b) As noted above, any increase in traffic would be short-term and temporary, and the traffic volumes generated by construction and well drilling so minor, the potential for the Proposed Project to cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system is negligible. Additionally, operation of the Proposed Project would not increase vehicle miles travelled (VMT) as only routine maintenance activities would be required during operation. This impact is less than significant.
- c) Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- c) The Proposed Project does not include any alteration to the existing public road network. The access roads associated with the Proposed Project would be designed to accommodate trucks delivering heavy drill equipment to each proposed well site. The access

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

roads would not be open to the public and would only be maintained as long as their proposed well site is being constructed or in use. Once a proposed well site is retired or abandoned, the access road would be return to the existing condition. This impact is less than significant.

- d) Result in inadequate emergency access?
- d) The construction of the Proposed Project would not involve blocking or restricting any access routes. The Proposed Project would not interfere with emergency response plans or operations near the Proposed Project area. No impacts would occur.

**XVIII. TRIBAL CULTURAL RESOURCES**

- a) 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) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or
  - (ii) 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

a) As discussed in Section V, the records search identified 219 archaeological sites and 183 historic-era isolates within one-half mile of the Proposed Project area. In 2017, POWER recorded 12 sites and 12 isolates during the 2017 field season as part of the Proposed Project. Seven of these sites are in the Proposed Project area. Because the Proponents' geophysical contractor and POWER archaeological staff were tasked with moving Proposed Project features away from historic sites listed by the SCIC, no cultural resources are located within a feature of the Proposed Project.

The archaeological sites previously recorded in and within one-half mile from the Proposed Project site consist mainly of artifact scatters, although sites bearing stacked rock features and what appears to be habitation foundations are plentiful near large washes, especially the wash banks just west of State Route 86. No sites have been recorded on the floor of any wash, although a few isolates are known. Sites bearing the remnants of prehistoric fish traps or weir foundations, which in this area take the form of V-or J-shaped single-coursed cobble alignments (Dice et al. 2018) are also recorded in the Proposed Project area. Many of these can be seen on high-resolution aerial photographs. Historic trash and metal debris do occur near older roads, including dummy bombs and rounds that may have been dropped by World War II training planes between approximately 1940 and 1943 within the Proposed Project area. Trash litters both sides of the State Route 86 right-of-way and some of this is mixed with debris that may be more than 50 years old.

Attempts were made before any fieldwork began to move projected location of project features into locations where no sites had been previously located. Nonetheless, the inventory encountered 175 archaeological resources and 91 isolated artifacts. Proposed Project features have been moved to positions that would avoid the recorded site boundaries; however, construction of the access road associated with proposed well site 87-6 has the potential to impact a historic resource. Implementation of MM-CUL-1 would reduce the impact to less than significant.

Additionally, the County sent formal AB 52 consultation letters to Torres - Martinez Tribes and Quechan Tribes on August 7th, 2019 and no formal consultation has been requested.

**XIX. UTILITIES AND SERVICE SYSTEMS *Would the project:***

|  | Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI)                      |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| <p>a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?</p> <p>a) The Proposed Project area and location of proposed well sites do not currently contain any public utilities or services. The Proposed Project would not require the construction of any water, wastewater, stormwater, or energy facilities to accommodate the demands of the Proposed Project. Water use associated with the Proposed Project would be limited to the construction phase, and no infrastructure would be required to provide water to the Proposed Project area; water for dust control and drilling would be purchased from the Coachella Water District via a nearby fire hydrant. The Proposed Project would not generate wastewater that would need to be treated by a wastewater treatment facility. Storm water control would be implemented for each well pad and access road. Due to the lack of public utilities and services available within the Proposed Project area, and the lack of need to provide expanded services to accommodate the Proposed Project. These impacts are less than significant.</p> | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <p>b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years?</p> <p>b) As noted above, the Proposed Project would not require a significant amount of water. Water use associated with the Proposed Project would be limited to drilling and dust control measures. Water for dust control and drilling would be purchased from the Coachella Water District via a nearby fire hydrant. Operation of the Proposed Project would not require significant amount of water and would be limited to general maintenance activities. This impact is less than significant.</p>  | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <p>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?</p> <p>c) As noted above, 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 site once construction is complete. No impact would occur.</p>   | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <p>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?</p> <p>d) Solid wastes generated by the Proposed Project would be handled in conformance with all applicable statutes and regulations. The potential for the small amount of waste generated by the Project to exceed the available landfill disposal capacity is negligible.</p> <p>Small amounts drilling mud and cuttings would be generated from drilling operations associated with the Proposed Project. These wastes would be temporarily stored in the on-site containment basin or tanks. The solid contents remaining in each containment basin, typically consisting of non-hazardous, non-toxic drilling mud and rock cuttings, will be tested as required by the CRWQCB. The solids will be removed and disposed of in a waste disposal facility authorized by the CRWQCB to receive and dispose of these materials. If allowed they may be used as daily cover at the nearby landfill. This impact is less than significant.</p>  | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <p>e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</p> <p>e) As noted above, the Proposed Project would comply with all applicable statutes and regulations related to solid waste. Solid waste generated from the Proposed Project is expected to be minimal. This impact is less than significant.</p>  | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**XX. WILDFIRE**

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

|  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <p>a) Substantially impair an adopted emergency response plan or emergency evacuation plan?</p> <p>a) As noted above in Section IX, the Proposed Project area is not located within a fire hazard severity zone (CalFire 2007). As previously noted, construction of the Proposed Project would not involve blocking or restricting any emergency access routes. The Proposed Project would not interfere with emergency response plans or operations near the Proposed Project area. No impact would occur.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

|  | Potentially Significant Impact (PSI) | Potentially Significant Unless Mitigation Incorporated (PSUMI) | Less Than Significant Impact (LTSI) | No Impact (NI)                      |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| 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"/> |
| b) The Proposed Project would not involve development of structures of infrastructure that would introduce new populations to the Proposed Project area that could result in impacts involving wildfires. The proposed project would comply to the goals and policies identified in the County of Imperial General Plan Seismic and Public Safety Element to provide adequate safety measures to protect residents within the Proposed Project area. No impact would occur |                                      |  |                                     |                                     |
| 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 type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) As noted above, the Proposed Project would not involve development of structures of infrastructure that would introduce new populations to the Proposed Project area that could result in impacts involving wildfires. No impact would occur  |                                      |  |                                     |                                     |
| 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"/> |
| d) As noted above, the Proposed Project would not involve development of structures of infrastructure that would introduce new populations to the Proposed Project area that could result in impacts involving wildfires. No impact would occur  |                                      |  |                                     |                                     |

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

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

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

**SECTION 3**  
**III. MANDATORY FINDINGS OF SIGNIFICANCE**

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

- a) Does the project have the potential to 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, eliminate tribal cultural resources or eliminate important examples of the major periods of California history or prehistory?
- a) As identified in Section IV of this IS, the Proposed Project has the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, and/or reduce the number or restrict the range of a rare or endangered plant or animal. However, the Proposed Project would implement MM-BIO-1 through MM-BIO-10 to reduce any potentially significant impacts to biological resources. Additionally, the Proposed Project was determined to result in potentially significant impacts associated with California history or prehistory. Implementation of MM-CUL-1 through MM-CUL-4 would reduce these impacts to less than significant. Therefore, the Proposed Project would result in less than significant impacts with mitigation incorporated.
- 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.)
- b) Implementation of the Proposed Project would not result in a cumulative impact. All potentially significant impacts can be reduced to less than significant via the implementation of mitigation measures. The cumulative impacts associated with the Proposed Project are less than significant.
- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?
- c) As noted above, all environmental impacts associated with implementation of the Proposed Project can be reduce to less than significant via implementation of mitigation measures. The Proposed Project would not result in significant impacts on human beings. This impact is less than significant
- c) As noted above, all environmental impacts associated with implementation of the Proposed Project can be reduce to less than significant via implementation of mitigation measures. The Proposed Project would not result in significant impacts on human beings. This impact is less than significant.

#### **IV. PERSONS AND ORGANIZATIONS CONSULTED**

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

##### **A. COUNTY OF IMPERIAL**

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- David Black, Project Planner
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office

##### **B. OTHER AGENCIES/ORGANIZATIONS**

- **Bureau of Land Management**
- **California State Parks**
- **California State Lands Commission**
- **California Department of Conservation**

## V. REFERENCES

- Applied Earthworks, Inc.  
2017 Paleontological Resource Assessment and Survey for the Ormat Nevada, Inc. Truckhaven 3D Seismic Project, Imperial County, California
- Association of Environmental Professionals (AEP)  
2016 Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California. Available online at: [https://www.califaep.org/images/climate-change/AEP-2016\\_Final\\_White\\_Paper.pdf](https://www.califaep.org/images/climate-change/AEP-2016_Final_White_Paper.pdf).
- California Air Pollution Control Officers Association (CAPCOA)  
2008 Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act, on October 24, 2008.
- California Department of Conservation  
2019 California Important Farmland Finder. Available Online at: <https://maps.conservation.ca.gov/DLRP/CIFF/>
- 2016 Imperial County Williamson Act FY 2016/2017. Available Online at: [file:///C:/Users/tstrand/Downloads/Imperial\\_16\\_17\\_WA%20\(1\).pdf](file:///C:/Users/tstrand/Downloads/Imperial_16_17_WA%20(1).pdf)
- California Department of Forestry and Fire Protection  
2007 Fire Hazard Severity Zones in SRA. Available Online at: [https://osfm.fire.ca.gov/media/6680/fhszs\\_map13.pdf](https://osfm.fire.ca.gov/media/6680/fhszs_map13.pdf)
- County of Imperial  
2016 County of Imperial General Plan EIR. Available Online at: <http://www.icpds.com/?pid=571>
- 2105 County of Imperial Renewable Energy and Transmission Element. Available Online at: <http://www.icpds.com/CMS/Media/Renewable-Energy-and-Transmission-Element-2015.pdf>
- 1997 County of Imperial General Plan Seismic and Public Safety Element. Available Online at: <http://www.icpds.com/CMS/Media/Seismic-and-Public-Safety-Element.pdf>
- Department of Toxic Substances Control (DTSC)  
2019 EnviStor Database. Available Online at: <http://www.envirostor.dtsc.ca.gov/public/>
- State Water Resources Control Board (SWRCB)  
2017 GeoTracker Database. Available online at: <https://geotracker.waterboards.ca.gov/>

**VI. FINDINGS**

**This is to advise that the County of Imperial, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environmental and is proposing this Negative Declaration based upon the following findings:**

The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

The Initial Study identifies potentially significant effects but:

- (1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.
- (2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.
- (3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A NEGATIVE DECLARATION will be prepared.

**If adopted, the Negative Declaration means that an Environmental Impact Report will not be required. Reasons to support this finding are included in the attached Initial Study. The project file and all related documents are available for review at the County of Imperial, Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 (442) 265-1736.**

**NOTICE**

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**The public is invited to comment on the proposed Negative Declaration during the review period.**

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Date of Determination                      Jim Minnick, Director of Planning & Development Services

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*The Applicant hereby acknowledges and accepts the results of the Environmental Evaluation Committee (EEC) and hereby agrees to implement all Mitigation Measures, if applicable, as outlined in the MMRP.*

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Applicant Signature

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Date