CHAPTER 8.0 OTHER CEQA CONSIDERATIONS

This chapter summarizes the information presented in Chapters 1.0, 2.0, and 3.0 of this Environmental Impact Report (EIR) to address the broader questions posed by the California Environmental Quality Act (CEQA) Guidelines, Section 15126.2. These include significant effects that cannot be mitigated to less than significant levels, significant irreversible environmental changes, and growth-inducing impacts. In addition, Appendix F of the CEQA Guidelines identifies that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy, as applicable, in order to assure energy implications are considered in project decisions. Energy consumption is addressed below under Section 8.2.

8.1 Significant Environmental Effects of the Proposed Project That Cannot Be Mitigated to Less Than Significant

Table S-1 of this EIR summarizes the results of the environmental analysis completed for the Proposed Project in Chapter 2.0. Mitigation measures have been identified to reduce environmental impacts associated with aesthetics, biology, cultural resources, hazards and hazardous materials, noise, and paleontological resources and are included in Table S-1. These mitigation measures would reduce potentially significant impacts to less than significant level for all impacts except for aesthetics. Additional mitigation measures were considered in attempting to reduce impacts to below a level of significance, but these measures were determined to be infeasible. A detailed analysis of significant environmental effects, mitigation measures and infeasible mitigation measures is discussed in Chapter 2.0 of this EIR.

The following are significant environmental effects of the Proposed Project that cannot be mitigated to less than significant:

- Aesthetics
    - Visual Character or Quality: (AE- 1 and cumulative AE-3)

8.2 Significant Irreversible Environmental Changes

Irreversible long-term environmental changes associated with the Proposed Project would include those potential significant impacts described in Chapters 2.1 through 2.6, as well as environmental effects analyzed in Chapter 3.1 of this EIR. Construction of the Proposed Project would require fossil fuels, a nonrenewable resource, to power construction vehicles. In exchange for using nonrenewable and non-retrievable resources, the project would provide a source of clean, renewable energy. Over the operational life of the Proposed Project, it would contribute incrementally to the reduction in demand for fossil fuel based electricity generation. Therefore,

the incremental reduction in fossil fuels would be a beneficial effect of the commitment of nonrenewable resources.

Temporary and long-term commitment of water resources would occur as a result of the construction, operation, and maintenance of new operations. Adoption of the Proposed Project would change the visual landscape and character of the site and would affect candidate, sensitive, and/or special-status species, sensitive natural communities, and wildlife access and movement. However, all impacts to biological resources will be mitigated to a less than significant level. Decommissioning and deconstructing the project would restore the visual character and biological resources of the area upon completion.

8.3 Growth-Inducing Effects

The CEQA Guidelines (Section 15126.2(d)) identify a project to be growth-inducing if it fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Sections 1.8 and 3.2.3 of this EIR specifically addresses whether the Proposed Project would induce growth and/or impact populations and housing in the area. The following summarizes this discussion.

The Proposed Project does not propose any residential use, included but not limited to a residential subdivision, mobile home park, or construction for a single-family residence that would cause an increase in population. The Proposed Project also does not include a recreational component, such as a hotel, resort, campground, or other facility that would attract or accommodate an increase in visitors to the area that would indirectly cause temporary increases in population.

During construction, the Proposed Project would temporarily add up to approximately 200 workers to the region. Few of these workers, if any, would relocate to the area with their families and are not expected to induce substantial population growth in the Mountain Empire and Boulevard area. Once construction is complete, the Proposed Project would not require any permanent on-site workers.

As discussed in Section 1.1, Project Objectives, the Proposed Project would assist in achieving the state's Renewable Portfolio Standard (RPS) and greenhouse gas emissions (GHG) reduction objectives by developing and constructing California RPS-qualified solar generation, approved under Senate Bill (SB) X1 2. As such, the Proposed Project would not directly induce growth related to provision of additional electric power. Rather, energy demand, as determined by the California Public Utilities Commission (CPUC), with input from the California Energy Commission, drives generation procurement; procurement does not drive an increase in either utility customers or energy consumption. Furthermore, implementation of the

Proposed Project would not permit San Diego Gas & Electric (SDG&E) or any other investor-owned utility, to expand its service territory. For these reasons, and as further described in Sections 1.8 and 3.2.3 of this EIR, the Proposed Project would not directly or indirectly induce substantial population growth.

8.4 Energy Conservation

As described in Chapter 1.0 of this EIR the Proposed Project would generate electricity from a renewable energy supply (solar) in a location suitable for collection of solar energy and adjacent to an existing substation (ECO Substation), minimizing the distance of a connection line. The project also includes storage of energy to assist with a more stabilized distribution of the energy generated. The project objectives include assisting in directly achieving or exceeding the state's Renewable Portfolio Standard (RPS) and GHG emissions reduction objectives by developing and constructing California RPS-qualified solar generation, approved under Senate Bill (SB) X1 2, which established renewable energy targets of 20% total electricity sold to retail customers by the end of 2013, 25% by the end of 2016, and 33% of total electricity sold to retail customers by 2020.

Based on CEQA Guidelines Appendix F, Energy Conservation, of the State CEQA Guidelines, in order to ensure energy implications are considered in project decisions, CEQA identifies that EIRs include a discussion of the potential impacts of proposed projects, with particular emphasis on avoiding or reducing wasteful, unnecessary, or inefficient use of energy resources as applicable. Environmental effects may include the Project's energy requirements and its energy use efficiencies by amount and fuel type during construction, operation and decommissioning; the effects of the Project on local and regional energy supplies; the effects of the Project on peak and base period demands for electricity and other forms of energy; the degree to which the Project complies with existing energy standards; the effects of the Project on energy resources; and the Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives, if applicable. Because the Proposed Project is a renewable energy project the environmental effects associated with the generation of energy by the project are evaluated as environmental effects of the Proposed Project in Section 2 and 3 of this EIR. Furthermore, with the inclusion of the battery energy storage component the facility would deliver generated electricity to the broader grid beyond peak generation periods and enable effective management by the utilities. Consideration of Project related energy conservation focuses on whether unnecessary or wasteful energy use would occur during construction and decommissioning activities and operation and maintenance.

The Proposed Project would require construction, operation and maintenance, and decommissioning all of which would involve use of combustion engines for workers travelling to and from the site and equipment on the site. As described in Section 1, the

Proposed Project would involve up to 200 workers during construction and decommissioning phases. The workers would arrive at the beginning of the work day and depart at the end, no unnecessary or wasting of fuel would result from construction and decommissioning workers travelling to and from the site. Similarly delivery vehicles (materials, components, and water) would be transported directly to the site and the associated vehicles would return directly to their originating facility. Additional heavy machinery and generators would be required on-site to install and then dismantle the facility. Machinery would be of the most efficient available and operated only when necessary as a component of cost effective project delivery including minimizing idling time, either by shutting equipment off when not in use or reducing the time of idling to five minutes at a maximum. All machinery would be in compliance with applicable San Diego APCD rules. Construction would be accomplished over an approximately 6-month period and decommissioning would be achieved in a similar time frame. As Project construction and decommissioning activities represent a necessary, short-term expenditure of non-renewable energy in order to achieve a new source of renewable solar energy that would generate electricity for approximately 30 years, the associated energy use is not considered wasteful.

Project operation would not include any on-site workers except for maintenance inspections and repairs if necessary. The elimination of manually operated on site systems avoids unnecessary or wasteful uses of fuel to travel frequently to and from the site. On-site systems would be powered during the day with a feed from the facility, thereby using renewable energy. A nominal minimal amount of backfeed power would be required to keep essential equipment operational during the night. The power necessary during the night would be a very small fraction of the power generated, necessary, and not considered wasteful.