

APPENDIX 9.1-6

Supplemental Paleontological Resources Analysis

TECHNICAL MEMORANDUM

To: Jacumba Solar LLC
From: Sarah Siren, Senior Paleontologist
Subject: Supplemental Paleontological Resources Analysis
Date: July 21, 2015

1.0 INTRODUCTION

This memorandum provides information regarding decommissioning impacts. During the public review comment period for the Draft EIR, public comments were received seeking clarification regarding secondary impacts that may occur from the implementation of the mitigation measure M-AE-3 to decommission the solar facility. I am providing the following analysis of that activity as an expert in my field. This analysis does not change the conclusions regarding the level of significance of the prior analysis of Paleontological Resources included in the Draft EIR. This memorandum analyzes the potential of implementing M-AE-3 to have a significant environmental impact related to paleontological resources, and concludes that it would be consistent with the conclusions of the Draft EIR prepared and circulated for the development of the Proposed Project.

2.0 REGULATORY SETTING

The regulatory setting remains as established in Section 2.6 of the Draft EIR.

3.0 ANALYSIS

Decommissioning Impacts

As stated in Chapter 1, Project Description of the Draft EIR, the expected lifespan of the Proposed Project is estimated to be at least 30 years. Mitigation measure M-AE-3 requires decommissioning of the solar facility to reduce aesthetics impacts.

Paleontological Resources

Project decommissioning could adversely affect paleontological resources through ground-disturbing activities, such as excavation and grading, which has the potential to damage or destroy known and unknown paleontological resources that may be present on or below the

ground surface, particularly in undeveloped areas. The impacts of undertaking the decommissioning mitigation to paleontological resources would be similar to those associated with construction and would involve potential discovery during ground disturbing activities. Based on published geological mapping and the County's *Guidelines for Determining Significance for Paleontological Resources*, approximately 34% of the development footprint is underlain by a geologic unit of high sensitivity. According to County guidelines, because the proposed excavation is equal to or greater than 2,500 cubic yards in an area of high paleontological sensitivity, the impact is **potentially significant (PR-1)** and services of a qualified Project Paleontologist and a Paleontological Resources Monitor are required. In actuality, the likelihood of impacting paleontological resources during decommissioning activities would be substantially reduced compared to construction as the activities during construction would have disturbed the ground and no additional disturbance footprint would be necessary for decommissioning. However, as a conservative approach to ensure decommissioning activities would be undertaken in accordance with County guidance, the mitigation measure identified for project construction in Section 2.6 Paleontological Resources of the Draft EIR (M-PR-1) would be required for decommissioning.

4.0 CONCLUSIONS

Decommissioning activities would be expected to result in substantially less disturbance than during construction. However, for the purposes of a conservative analysis, it was assumed that decommissioning would result in disturbance similar to those estimated for the Proposed Project construction activities. As with the construction, with implementation of M-PR-1 impacts from project decommissioning are considered **less than significant**. However, as with construction, there is still the potential for the discovery of unknown paleontological resources during earth moving activities and there is still the potential for significant impacts to paleontological resources, if discovered. This impact would be considered **potentially significant (PR-1)**, consistent with the construction impacts identified in the Draft EIR. As with the construction, with implementation of M-PR-1, impacts from project decommissioning would be reduced to **less than significant**.



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