Rugged Solar

General Plan Analysis Report

Prepared by: County Staff

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INTRODUCTION

San Diego County's General Plan is a complex, highly integrated document that serves as the blueprint for growth and development in the unincorporated County. It is based on a set of guiding principles and consists of the following elements: Land Use, Mobility, Conservation & Open Space, Housing, Safety and Noise. Each of these elements contains a set of goals and policies that must be adhered to by all discretionary development projects. In addition to the policy document, the County's General Plan also consists of a Land Use Distribution Map and Mobility Element Network Map. The land use map identifies the type and intensity of future uses on parcels of land throughout the County, whereas the mobility network delineates the road network that is required to accommodate these proposed uses. Finally, the County's General Plan also consists of several Community or Subregional Plans that are intended to provide more precise guidance regarding the character, land uses, and densities within each community planning area. All of these components make up the County's General Plan.

PROJECT DESCRIPTION

The project is a Major Use Permit for the construction and operation of a 80MW solar energy system on an approximately 765-acre site. The project site is located within the Boulevard Community Plan area within unincorporated San Diego County, north of Interstate 8 and west of McCain Valley Road.

Also included as part of the project would be a 1,000-volt DC underground collection system, a 34.5 kV overhead and underground collection system to link the CPV systems to the onsite substation, a 2-acre onsite private collector substation site including a 7,500 square foot O&M building, and a 69 kV undersling on the approved overhead transmission line for the Tule Wind project which would connect the onsite private collector substation to the Rebuilt Boulevard Substation.

The project site is accessed off of McCain Valley Road and Ribbonwood Road. Internal circulation would be provided by 24-foot graded and 12-foot improved (with an all weather surface) fire access roads and 20-foot wide service roads.

The site is subject to the Rural General Plan Regional Category and Rural Lands (RL-80) Land Use Designation. Zoning for the site is S92 (General Rural) and A72 (General Agricultural).

PROJECT OBJECTIVES

The Project would use Concentrated Photovoltaic (CPV) systems sited in an area with abundant solar energy to generate clean, renewable electricity. The applicant's objectives for the Project are as follows:

- 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, 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.
- Create utility-scale solar energy in-basin to improve reliability for the San Diego region by providing a source of local generation.
- Locate solar power plant facilities as near as possible to existing or planned electrical transmission facilities, including colocating with existing transmission facilities when feasible.

- Site solar power plant facilities in areas within the County of San Diego (County) that have excellent solar attributes, including but not limited to high direct normal irradiance (DNI), in order to maximize productivity.
- No net additional emission of GHGs, including GHG emissions from employee transportation, consistent with the methodology employed by the California Air Resources Board (CARB) pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code.
- Invest a minimum of $100 million of economic development to support the local economy through the creation of high-wage, highly skilled construction and permanent jobs that pay prevailing and living wages.
- Develop up to 168.5 MW of renewable solar energy systems that reduce consumption of non-renewable resources and reduce GHG and other long-term air pollutant emissions while minimizing impacts to natural resources.

CONSISTENCY WITH THE COUNTY'S GENERAL PLAN

Staff concluded that the proposed Rugged Solar development project is in compliance with the countywide policies identified the County's General Plan. This section identifies several General Plan policies that are applicable to the proposed development project and explains staffs' rationale for reaching a conclusion of compliance.

Policy LU-2.8 Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment, and/or are detrimental to human health and safety.

The project would be consistent with this policy. Implementation of mitigation measures discussed throughout the Soitec Solar Development EIR would reduce project-generated impacts to the extent feasible. As described in the Soitec Solar Development EIR (as well as in the Biological Technical Report prepared for this project), the implementation of mitigation will ensure that the removal of potential habitat on the project site would not result in significant impacts on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Similarly, implementation of mitigation will reduce project impacts to sensitive natural communities. As discussed in the Soitec Solar Development EIR and in the Cultural Resources Report, potential impacts to previously unknown cultural resources will be reduced to a less than significant level with the implementation of mitigation. Generally, wherever a potentially significant impact has been identified for the project, the Soitec Solar Development EIR discusses and requires implementation of relevant and appropriate mitigation by the project to minimize the identified impact to the extent feasible.

Policy LU-5.3: Rural Land Preservation. Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations.

The project would be consistent with this policy. The project site does not include any existing open space easements. While the project site does consist of rural lands and wetland habitats associated with Tule Creek, the project has been designed to avoid the wetland associated with Tule Creek and allow for continued wildlife movement through the site. While the project site

contains native habitat, preservation will occur on a nearby site which provides for the protection of native habitat and wildlife movement areas.

Groundwater recharge on the project site would not be significantly altered as the project site would consist of primarily permeable surfaces to allow for groundwater recharge as exists under the current conditions.

Policy LU-5.5: Projects that Impede Non-Motorized Travel. Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts to existing planned routes would occur, ensure that impacts are mitigated and acceptable alternative routes are implemented.

The project would be consistent with this policy. The project does not propose any features or improvements which would impede bicycle and pedestrian access.

Policy LU-6.1 Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.

The project would be consistent with this policy. No threatened or endangered species have been identified on the project site. The project has been designed to avoid onsite wetland areas associated with Tule Creek and allow for continued wildlife movement through the site. All project impacts to sensitive natural resources (biological and cultural resources) will be mitigated to below a level of significance. Refer also to the Biological Technical Report and Archeological Technical Report prepared for this project as well as the Soitec Solar Development EIR. Mitigation for habitat impacts will be located in areas that contribute significant resources to an integrated preserve system.

Policy LU-6.5 Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County's LID Handbook.

The project would be consistent with this policy. Solar development has been determined to be a non-priority development project (PDP) by the County of San Diego and the local Regional Water Quality Control Board and therefore, the project is not subject to hydromodification requirements and Major SWMP requirements. The use of impermeable surfaces would be minimized to the extent practicable, however, concrete foundations for the substation components and O&M facility would include impervious surfaces and would effectively alter existing drainage patterns and could potentially result in an increase in erosion and siltation. Preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) would require Rugged Solar LLC to incorporate low-impact development features into the project design to ensure that existing drainage patterns are not significantly altered.

LU-6.6: Integration of Natural Features into Project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.

The project would be consistent with this policy. The project site includes coast live oak woodland and mixed oak woodland habitat which will be avoided by project design Existing rock formations on the site would also be avoided by project design.

Policy LU-6.9: Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.

The project would be consistent with this policy. Grading required for the installation CPV trackers would be consistent with the requirements of the County of San Diego Grading Ordinance. The majority of the site is gently to moderately sloping and the project does not propose grading that would create major landform modifications. During construction, the implementation of required erosion control plans, stormwater management plans, and best management practices (BMPs) would minimize potential erosion and sedimentation impacts to a less than significant level.

Policy LU-6.10: Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.

The project would be consistent with this policy. A Phase I and Limited Phase II Environmental Site Assessment were prepared for the Rugged solar farm and sampling results indicated that the on-site soils do not have concentrations of heavy metals (including arsenic and lead), dioxins, or furans that would pose a hazard and require remediation. The records search conducted as part of the Phase I did not indicate that off-site sources of hazardous materials exist that would impact the Rugged solar farm site.

Proposed development of the site does not interfere with implementation of emergency responses in the area. The Rugged solar farm is located over 8 miles from the Jacumba airport and would not result in a hazard for air traffic in the area. With the implementation of project design features and completion of a site-specific Fire Protection Plan, the project would be in compliance with applicable fire codes and would reduce potential impacts associated with wildfire hazards.

Policy LU-8.2: Groundwater Resources. Require development to identify adequate groundwater resources in groundwater-dependent areas, as follows:

- In areas dependent on currently identified groundwater overdrafted basins, prohibit new development from exacerbating overdraft conditions.
- Encourage programs to alleviate overdraft conditions in Boulevard.
- In areas without current overdraft groundwater conditions, prohibit new groundwater-dependent development where overdraft conditions are foreseeable.

The project would be consistent with this policy. The proposed project would use groundwater from onsite wells as well as offsite sources including the Jacumba Community Services District, Pine Valley Mutual Water Company and Padre Dam Municipal Water District. Groundwater Investigations were prepared for each of the water sources identified for use by the proposed project. The Soitec Solar Development EIR discusses potential impacts to groundwater resources in the project area as well as offsite sources and concludes that impacts would be less than significant with incorporation of mitigation. To ensure that County significance thresholds related to groundwater-dependent habitat are not exceeded, the applicant will implement a Groundwater Monitoring and Mitigation Plan.

Policy LU-8.3: Groundwater Dependent Habitat. Discourage development that would significantly draw down the groundwater table to the detriment of groundwater-dependent habitat, except in the Borrego Valley.

The project would be consistent with this policy. Please refer to Policy LU-8.2 consistency analysis, above. The project has incorporated mitigation measures to ensure that the use of groundwater from onsite wells will not result in a significant impact to groundwater-dependent habitat.

Policy LU-10.2: Development–Environmental Resource Relationship. Require development in semi-rural and rural areas to respect and conserve the unique natural features and rural character and avoid sensitive or intact environmental resources and hazard areas.

The project would be consistent with this policy. While the project site contains native habitat, no endangered species were identified on the project site. No highly sensitive or sensitive habitat lands as identified by the Resource Protection Ordinance were identified onsite which warrant avoidance measures. The project site contains a portion of Tule Creek which will be avoided by project design. The project includes a large offsite mitigation location which will mitigate all impacts to natural habitat to a less than significant level. The project site does not contain any unique natural features or hazard areas that require avoidance.

Policy LU-12.1: Concurrency of Infrastructure and Services with Development. Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing.

The project would be consistent with this policy. There are several fire stations that are owned and staffed by San Diego County Fire Authority, CalFire, San Diego Rural Fire Protection District, and U.S. Forest Service within the project area. Police protection in the project area is served by the San Diego County Sheriff's Department, California Highway Patrol, and U.S. Customs and Border Protection. The Mountain Empire Unified School District serves the project area, and includes six elementary schools, one senior high school, and three alternative education schools. Based on the existing services as well as the contribution of equipment and funds towards local fire and emergency response capabilities, the project would not result in the need for additional fire or emergency response facilities or services nor would it cause the need for expanded facilities.

Policy LU-12.2: Maintenance of Adequate Services. Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved Level of Service (LOS) but do not achieve a LOS of D or better.

The project would be consistent with this policy. Primary access to the proposed Rugged solar farm and O&M facility would be provided by I-8, McCain Valley Road and Ribbonwood Road. According to the Mountain Empire Mobility Element Network Map, Interstate 8, McCain Valley Road and Ribbonwood Road are classified as Mobility Element Roads which operate at an acceptable LOS. Therefore, improvements of these Mobility Element Roads is not required.

Policy LU-13.2: Commitment of Water Supply. Require new development to identify adequate water resources, in accordance with state law, to support the development prior to approval.

The project would be consistent with this policy. The project would use groundwater from an existing onsite wells as well as water provided by the Pine Valley Mutual Water Company, Jacumba Community Services District and the Padre Dam Municipal Water Company. Also see discussion in LU 8.2 above.

Policy M-3.3 Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes in conformance with State law, and local regulations.

The project would be consistent with this policy. The proposed project would include a primary access roads off of McCain Valley Road and Ribbonwood Road that would allow for fire and rescue apparatus access as well as enable operations and maintenance access to the internal project road network. In addition, fire access and service roads would be included within the site and would permit access between rows of CPV trackers. Fire roads will be designed to support the imposed loads of fire apparatus.

Policy M-4.4 Accommodate Emergency Vehicles. Design and construct public and private roads to allow for necessary access for appropriately sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.

The project would be consistent with this policy. Please refer to Policy M-3.3 consistency analysis above.

Policy M-10.7 Parking Area Design for Stormwater Runoff. Require that parking areas be designed to reduce pollutant discharge and stormwater runoff through site design techniques such as permeable paving, landscaped infiltration areas, and unpaved but reinforced overflow parking areas that increase infiltration. Require parking areas located within or adjacent to preserve areas to also include native landscaping and shielded lighting.

The project would be consistent with this policy. Access roads and the parking area within the project site would consist of permeable material which will increase infiltration. The parking area is not located in or adjacent to a preserve area, but all required lighting will be appropriately shielded.

Policy COS-2.2 Habitat Protection through Site Design. Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.

The project would be consistent with this policy. The project has been designed to avoid the most biologically sensitive habitats onsite including wetlands associated with Tule Creek.

Policy COS-3.1 Wetland Protection. Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.

The project would be consistent with this policy. The project has been designed to avoid the onsite wetlands associated with Tule Creek.

Policy COS-3.2: Minimize Impacts of Development. Require development projects to:

- Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and
- Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species.

The project would be consistent with this policy. The project has been designed to avoid the onsite wetlands associated with Tule Creek. All project impacts to existing biological resources will be mitigated to a less than significant level.

Policy COS-4.1 Water Conservation. Require development to reduce the waste of potable water through use of efficient technologies and conservation efforts that minimize the County's dependence on imported water and conserve groundwater resources.

The project would be consistent with this policy. Construction and operation of the project would require the use of water; however, water usage will be limited to the extent practicable. During construction, the proposed project would use approximately 59 acre-feet of water and during operation, the project will use approximately 8.7 acre-feet of water. The water necessary for construction of the proposed project would be provided from numerous sources including onsite wells, the Jacumba Community Services District, the Pine Valley Mutual Water Company and the Padre Dam Municipal Water District to ensure no significant impacts result. Ongoing water use for the project will be minimized to the least amount necessary to wash the solar panels and sustain the onsite vegetative screening. The landscaping irrigation will consist of water-efficient drip irrigation and a solar irrigation clock to minimize water use for the proposed landscaping.

COS-4.2 Drought-Efficient Landscaping. Require efficient irrigation systems and in new development encourage the use of native plant species and non-invasive drought tolerant/low water use plants in landscaping.

The project would be consistent with this policy. The proposed project will include a landscape screening buffers along portions of the project site. The landscaping buffer includes plants which are on the County of San Diego (2004) "Suggested Plant List for a Defensible Space." To the extent possible, non-invasive, drought tolerant plants will be utilized which will thrive in the climate zone of the Boulevard area. The landscaping irrigation will consist of water-efficient drip irrigation and a solar irrigation clock to minimize water use for the proposed landscaping.

Policy COS-5.2 Impervious Surfaces. Require development to minimize the use of directly connected impervious surfaces and to retain stormwater run-off caused from the development footprint at or near the site of generation.

The project would be consistent with this policy. The only impervious surfaces on the proposed project site consist of concrete pad sites for substation equipment and the O&M facility; however the majority of the project site would remain pervious as under the existing conditions. See discussion in LU 6.5 above.

Policy COS-5.3 Downslope Protection. Require development to be appropriately sited and to incorporate measures to retain natural flow regimes, thereby protecting downslope areas from

erosion, capturing runoff to adequately allow for filtration and/or infiltration, and protecting downstream biological resources.

The project would be consistent with this policy. Installation of the solar trackers and associated facilities would cause a minimal increase in the amount of impervious surface area on the project site. As such the project is not anticipated to result in an increase in the rate or amount of surface water runoff rate or cause flooding in on site or off site areas. In addition, site drainage will be designed in accordance with County of San Diego standards to ensure that a substantial alteration of existing drainage patterns does not occur, and that the rate and/or runoff will be consistent with existing conditions.

Grading required for development of the project would be consistent with the County of San Diego Grading Ordinance which would be enforced via the required grading permit. Also, prior to construction, Rugged Solar Farm LLC would be required to implement a Storm Water Pollution Prevention Plan (SWPPP) that will include BMPs to minimize potential impacts regarding stormwater runoff.

Policy COS-5.5 Impacts of Development to Water Quality. Require development projects to avoid impacts to the water quality in local reservoirs, groundwater resources, and recharge areas, watersheds, and other local water sources.

The project would be consistent with this policy. Please refer to Policy COS-5.3 consistency analysis above. Potential impacts to groundwater resources and local water resources would be minimized through the implementation of mitigation as well as through the project SWPPP. Therefore with implementation of mitigation and the project SWPPP which includes BMPs to protect areas from stormwater runoff, erosion and sedimentation during construction, the project would be consistent with this policy.

Policy COS-7.1 Archaeological Protection. Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.

The project would be consistent with this policy. While the archaeological evaluation of the project site has identified archeological resources, no sites were determined to be potentially eligible for listing on the California Register of Historical Resources nor considered significant cultural resources under the standards of the County's Resource Protection Ordinance. In order to mitigate for potential impacts to undiscovered buried archaeological resources on the project site, a grading monitoring program and potential data recovery program will be implemented.

Policy COS-7.3 Archaeological Collections. Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner.

The project would be consistent with this policy. See response for Policy COS-7.1.

Policy COS-9.1 Preservation. Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes.

The project would be consistent with this policy. A review of the County's Paleontological Resources Maps indicates that the Rugged solar farm is located entirely on plutonic igneous

rock and has no potential for producing fossil remains. Therefore, impacts to paleontological resources as a result of the Rugged solar farm would be less than significant.

Policy COS-9.2 Impacts of Development. Require development to minimize impacts to unique geological features from human related destruction, damage, or loss.

The project would be consistent with this policy. There are no identified unique geologic features located on the project site. Additionally, large rock outcroppings that are located on-site have been avoided because they are not developable.

Policy COS-11.1: Protection of Scenic Resources. Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.

The project would be consistent within this policy. The project site is located approximately 2 miles north of Interstate 8 (a County designated scenic highway). Due to topography and intervening landforms, the project would be visible from the interstate by passing motorists for short intervals of time. The project site does not contain regionally significant scenic vistas and would not result in significant impacts on scenic highways or corridors.

Policy COS-11.3: Development Siting and Design. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:

- Creative site planning
- Integration of natural features into the project
- Appropriate scale, materials, and design to complement the surrounding natural landscape
- Minimal disturbance of topography
- Clustering of development so as to preserve a balance of open space vistas, natural features, and community character.
- Creation of contiguous open space networks

The project would be consistent with this policy. While the proposed project will introduce new visual features into the existing visual environment, several design features have been identified in the Soitec Solar Development EIR which minimize the visual impacts to the extent feasible. These measures include: staging material and equipment storage areas, including storage sites for excavated materials, visible from nearby roads, residences, and recreational areas shall be visually screened using temporary screening fencing; the O&M building shall be painted/finished with muted-earth toned colors; materials, coatings, or paints having little or no reflectivity shall be used whenever possible; new overhead conductors shall be non-specular in design to reduce conductor visibility, glare, and visual contrast; weathered or cor-ten steel shall be used for gen-tie monopoles to reduce the potential for color contrast between structures and existing vegetation and terrain. Also see discussion in COS-11.above.

COS-13.1 Restrict Light and Glare. Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.

The project would be consistent with this policy. Nighttime lighting during operations would be restricted to minimal maintenance and security lighting and all project lighting would comply with the County of San Diego Light Pollution Code. In addition, proposed security lighting at the

project site will be directed downward and shielded to minimize instances of light spillover and potential lighting impacts to adjacent properties and/or the night sky. Five residences are located within one mile of the Rugged solar farm. During operation of the Rugged solar farm, the residences within 1 mile would not receive glare as a result of distance and/or terrain obstruction. The intensity of glare produced by the CPV trackers would be less than that of metal, glass, and water and the generated reflection values are not considered hazardous to vision.

Policy COS-14.7: Alternative Energy Sources for Development Projects. Encourage development projects that use energy recovery, photovoltaic, and wind energy.

The project would be consistent with this policy. The proposed project consists of a concentrated photovoltaic energy collection system.

COS-14.8 Minimize Air Pollution. Minimize land use conflicts that expose people to significant amounts of air pollutants.

The project would be consistent with this policy. Potential air quality impacts associated with ground disturbing activities during construction would be short term. The project would result in negligible operational emissions and the project includes constructing a renewable energy, resource would result in an overall net reduction in air emissions when compared to energy generated from a non-renewable energy source.

Policy COS-14.9: Significant Producers of Air Pollutants. Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design.

The project would be consistent with this policy. Potential air quality impacts associated with ground disturbing activities during construction would be short term. The proposed project is a renewable energy project, and therefore, by its nature would comply with this policy.

Policy COS-14.10: Low-Emission Construction Vehicles and Equipment. Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.

The project would be consistent with this policy. The project would be constructed by private developers and would be encouraged by the County to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.

Policy COS-14.11 Native Vegetation. Require development to minimize the vegetation management of native vegetation while ensuring sufficient clearing is provided for fire control.

The project would be consistent with this policy. To comply with the fire code clearing and grubbing of the site would occur prior to construction. In addition, fire buffers ranging from 30' to 50' would be incorporated into the layout of the proposed project and ongoing maintenance activities would include weed whipping and general maintenance of areas under solar facilities. The project would also be subject to state, county, and federal laws, ordinances, rules, and regulations pertaining to the prevention and suppression of fires, including County DPLU Fire Prevention in Project Design Standards, County of San Diego Consolidated Fire Code, State Fire Regulations, International Fire Code (IFC) and the California Fire Code

(CFC). The San Diego County Fire Authority would provide fire protection through contracts with the San Diego County Rural Fire Protection District (SDRFPD).

Policy COS-15.6: Design and Construction Methods. Require development design and construction methods to minimize impacts to air quality.

The project would be consistent with this policy. Construction of the proposed project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, dust emissions, and combustion pollutants from on-site construction equipment and off-site trucks hauling construction materials including water to the site. The project will include the following measures to minimize air quality impacts during construction: application of water three times per day or as necessary depending on weather conditions to suppress fugitive dust during grubbing, clearing, grading, trenching, and soil compaction and/or apply a nontoxic soil binding agent to help with soil stabilization during construction, sweepers and water trucks will be used to control dust and debris at public street access points, internal construction roadways will be stabilized by paving, chip sealing or nontoxic soil binders after rough grading, exposed stockpiles will be covered and/or watered or stabilized with nontoxic soil binders, tarps, fencing or other suppression methods as needed to control emissions, traffic speeds on unpaved roads will be limited to 15 miles per hour (mph), all haul and dump trucks entering or leaving the site with soil or fill material will maintain at least 2 feet of freeboard, or cover loads of all haul and dump trucks securely, and disturbed areas will be reseeded with either a native plant hydroseed mix as soon as possible after disturbance, or covered with a nontoxic soil binding agent.

Policy COS-17.2 Construction and Demolition Waste. Require recycling, reduction and reuse of construction and demolition debris.

The project would be consistent with this policy. Recycling, reduction and reuse of construction and demolition debris will be required during construction. In compliance with County of San Diego Construction Demolition and Debris Management Plan requirements and in accordance with County Ordinance 68.508-68.518, recycling will be conducted during construction activities.

Policy COS-18.1: Alternate Energy Systems Design. Work with San Diego Gas and Electric and non-utility developers to facilitate the development of alternative energy systems that are located and designed to maintain the character of their setting.

The project would be consistent with this policy. The County has worked with the applicant to design the project to maintain the character of the setting to the maximum extent possible.

Policy S-3.1 Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.

The project would be consistent with this policy. Clearing and grubbing of the site would occur prior to construction and fire buffers ranging from 30’ to 50’ would be incorporated into the layout of the proposed project. Ongoing maintenance activities would include weed whipping and general maintenance of areas under CPV trackers so as to minimize fire probability and risk. A Fire Protection Plan has been approved by the County Fire Marshal and the project is also subject to state, county, and federal laws, ordinances, rules, and regulations pertaining to

the prevention and suppression of fires and would be required to comply with all applicable regulations.

Policy S-3.3 Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.

The project would be consistent with this policy. Please refer to Policy S-3.1 Defensible Development above. The likelihood of wildfire would be minimized by clearing and grubbing the site and by incorporating fire buffers into the layout of the proposed project. The sole building located on site, the operations and maintenance annex, would likely consist of a pre-fabricated building which would have a low risk of catching fire. In addition, a project Fire Protection Plan has been approved by the County Fire Marshal.

Policy S-3.6 Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.

The project would be consistent with this policy. A Fire Protection Plan has been prepared for the proposed project and includes fire prevention measures to reduce the risk of structural and human loss due to wildfire. These measures include, but are not limited to: constructing all on-site facilities of non-combustible or ignition-resistant materials in accordance with County Building Code, having multiple water storage tanks with fire department connections available within the site, identifying roads and structures to comply with County Consolidated Fire Code, Section 505, having an illuminated sign at the project entrances that clearly indicates inverter and electrical grid layout, trackers "safe" mode switch location, and entire site de-energizing disconnect switch identification and location, clearing of all existing native vegetation to a height no taller than 6 inches and removal of all dead, dying, and dried (low fuel moisture) vegetation, 24-hour surveillance at the facility and having a minimum 50-foot fuel treatment perimeter area and perimeter fire apparatus access road.

Policy S-3.7: Fire Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire threat areas

The project would be consistent with this policy. As detailed in the Fire Protection Plan prepared for the project, the project will be required to construct all on-site facilities of non-combustible or ignition-resistant materials in accordance with County Building Code**.**

Policy S-6.1: Water Supply. Ensure that water supply systems for development are adequate to combat structural and wildland fires.

The project would be consistent with this policy. As detailed in the Fire Protection Plan prepared for the project, the project will be required to have multiple water storage tanks with fire department connections available within the site.

Policy S-6.3: Funding Fire Protection Services. Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.

The project would be consistent with this policy. To ensure that the proposed project would not impact fire and emergency response capabilities in the area, the each project will be required to contribute the following equipment and funds towards local fire and emergency response capabilities: one Type VI Fire Engine, annual funding towards one Type VI Fire Engine Replacement, annual funding towards one Type VI Fire Engine Maintenance Vehicle, annual funding for one Paramedic staff, and annual funding of the San Diego County Fire Authority Defensible Space Grant Program.

Policy S-7.1 Development Location. Locate development in areas where the risk to people or resources is minimized. In accordance with the California Department of Conservation Special Publication 42, require development be located a minimum of 50 feet from active or potentially active faults, unless an alternative setback distance is approved based on geologic analysis and feasible engineering design measures adequate to demonstrate that the fault rupture hazard would be avoided.

The project would be consistent with the policy. Although operations and maintenance of the project would require approximately 20 full-time employees that would work out of the O&M annex, the project site is located more than 13 miles from the nearest active fault (the Coyote Mountain Segment of the Elsinore Fault).

Policy S-9.2: Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

The project would be consistent with this policy. The project site does not contain any designated floodplains and therefore would not result in the need for flood control facilities.

Policy S-10.4 Stormwater Management. Require development to incorporate low impact design, hydromodification management, and other measures to minimize stormwater impacts on drainage and flood control facilities.

The project would be consistent with this policy. Grading required at the project site would proceed in accordance with the County of San Diego Grading Ordinance which would be enforced through the grading permit. In addition, prior to construction the project applicant would be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) that would include Best Management Practices (BMPs) to protect storm water runoff during ground disturbing activities. Also, see response for Policy LU-6.5.

Policy S-10.5 Development Site Improvements. Require development to provide necessary on- and off-site improvements to stormwater runoff and drainage facilities.

The project would be consistent with this policy. Refer to Policy S-10.4 Stormwater Management and LU-6.5.

Policy S-11.5 Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.

The project would be consistent with this policy. The project is largely an unmanned facility (employees would operate out of the O&M annex building). The limited on-site human activity would be negligible because the operations and maintenance building has been located towards the interior of the project. Additionally, while there are agricultural operations are located in the Rugged area, most operations consist of miscellaneous grazing and are not anticipated to use pesticides or other hazardous materials commonly used in agricultural row or crop production. The transport, use, and storage of hazardous materials on the project site during construction and operations would be subject to local, state and federal laws regulations and compliance with relevant laws and regulations would minimize the potential for upset conditions/impacts.

Policy N-1.1: Noise Compatibility Guidelines. Use the Noise Compatibility Guidelines (Table N-1) and the Noise Standards (Table N-2) as a guide in determining the acceptability of exterior and interior noise for proposed land uses.

The project would be consistent with this policy. With the incorporation of mitigation as discussed in the Soitec Solar Development EIR and Rugged Acoustical Assessment Report, to be implemented during both construction and operation of the project, the proposed project will not result in significant noise impacts.

Policy N-1.2: Noise Management Strategies. Require the following strategies as higher priorities than construction of conventional noise barriers where noise abatement is necessary:

- Avoid placement of noise sensitive uses within noisy areas
- Increase setbacks between noise generators and noise sensitive uses
- Orient buildings such that the noise sensitive portions of a project are shielded from noise sources
- Use sound-attenuating architectural design and building features
- Employ technologies when appropriate that reduce noise generation (i.e. alternative pavement materials on roadways)

The project would be consistent with this policy. Noise generating equipment on the project site has been located and buffered so as to not result in significant noise impacts. To ensure noise from inverters would comply with the County Noise Ordinance, the following would be implemented: locate non-enclosed inverters a minimum of 800 feet or greater from the nearest property line, or enclose inverters within 800 feet of property lines in cement blocks or other type of structure capable of achieving a minimum 10 dB attenuation, direct all switch station doorways and exterior ventilation ducts away from adjacent property lines, prior to the approval of building plans, a noise analysis shall be prepared that demonstrates that the inverters comply with the County Noise Ordinance, the O&M building at the Rugged solar farm shall be located no closer than 1,250 feet from the property line.

Policy N-2.1 Development Impacts to Noise Sensitive Land Uses. Require an acoustical study to identify inappropriate noise level where development may directly result in any existing or future noise sensitive land uses being subject to noise levels equal to or greater than 60 CNEL and require mitigation for sensitive uses in compliance with the noise standards listed in Table N-2.

The project would be consistent with this policy. An Acoustical Assessment Report was prepared for the proposed project. As discussed in Policy N-1.2, the project will require mitigation to ensure compliance with established noise standards.

Policy N-3.1: Groundborne Vibration. Use the Federal Transit Administration and Federal Railroad Administration guidelines, where appropriate, to limit the extent of exposure that sensitive uses may have to groundborne vibration from trains, construction equipment, and other sources.

The project would be consistent with this policy. No operational components of the Rugged solar farm include significant groundborne noise or vibration sources, and no significant vibrations sources currently exist, or are planned, in the area. Construction activities, including equipment use and pile driving for the proposed project would not exceed the Federal Transit Administration guidelines.

Policy N-4.1: Traffic Noise. Require that projects proposing General Plan amendments that increase the average daily traffic beyond what is anticipated in this General Plan do not increase cumulative traffic noise to off-site noise sensitive land uses beyond acceptable levels.

The project would be consistent with this policy. The proposed project will not result in an increase in the average daily traffic beyond what is anticipated in the General Plan and therefore will not result in an increase cumulative traffic noise to off-site noise sensitive land uses beyond acceptable levels.

Policy N-6.2 Recurring Intermittent Noise. Minimize impacts from noise in areas where recurring intermittent noise may not exceed the noise standards listed in Table N-2.

The project would be consistent with this policy. Recurring intermittent noise (such as noise generated during maintenance activities including panel washing) would be relatively low and would not exceed the noise standards for adjacent land uses.

Policy N-6.4 Hours of Construction. Require development to limit the hours of operation as appropriate for non-emergency construction and maintenance.

The project would be consistent with this policy. Construction and maintenance of the proposed project will conform to the hours of operation for such activities as specified by the County Noise Ordinance. If work is required outside of regularly permitted hours then the project applicant will go through the appropriate County process to ensure County approval of activities.

LAND USE DISTRIBUTION MAP AMENDMENTS

The project does not require any changes to the Land Use Distribution Map. The project site has been given an RL-80 designation, with S-92 and A-72 Zoning. Major Impact Utility Uses are allowed in these zones with approval of a Major Use Permit.

ROAD NETWORK AMENDMENTS

The project does not require any changes to the Mobility Element roadway classifications. The current Mobility Element classifications can accommodate the proposed project.

MOUNTAIN EMPIRE SUBREGIONAL PLAN

Staff concluded that the proposed Rugged Solar development project is in compliance with the policies identified the Mountain Empire Subregional Plan. This section identifies several Mountain Empire Subregional Plan policies that are applicable to the proposed development project and explains staffs' rationale for reaching a conclusion of compliance.

Land Use (Policy and Recommendation 1). The landforms of the Subregion are an important environmental resource that should be respected in new development. Hillside grading shall be minimized and designed to blend in with the existing natural contours.

The project would be consistent with this policy. An existing north-south ridgeline is located in the western extent of the project site. As proposed limited grading is anticipated to be required and therefore, project components would largely be located on the existing natural contours of the site.

Land Use (Policy and Recommendation 2). Create a buffer area of one hundred and fifty (150) feet in width along the international boundary line inclusive of the existing sixty-foot (60') Public Reserve owned by the Federal Government.

The project would be consistent with this policy. The project site is not located adjacent to the Public Reserve line.

Land Use (Policy and Recommendation 3). Apply a ninety (90') foot setback within which no new permanent building may be built northerly of the existing sixty (60') foot Public Reserve line. Where such ninety (90') foot setback can be shown to adversely impact a property, owner may apply for a waiver from complying with the setback as provided for Section 7060 of The Zoning Ordinance.

The project would be consistent with this policy. The project site is not located adjacent to the Public Reserve line.

Land Use (Policy and Recommendation 4). Ensure that all development be planned in a manner that provides adequate public facilities prior to or concurrent with need.

The project would be consistent with this policy. There are several fire stations that are owned and staffed by San Diego County Fire Authority, CalFire, San Diego Rural Fire Protection District, and U.S. Forest Service within the project area. Police protection in the project area is served by the San Diego County Sheriff's Department, California Highway Patrol, and U.S. Customs and Border Protection. The Mountain Empire Unified School District serves the project area, and includes six elementary schools, one senior high school, and three alternative education schools. Based on the existing services as well as the contribution of equipment and funds towards local fire and emergency response capabilities, the project would not result in the need for additional fire or emergency response facilities or services nor would it cause the need for expanded facilities.

Energy Conservation (Policy and Recommendation 8.1). New development should utilize alternative energy technologies, especially active and passive solar energy systems.

The project would be consistent with this policy. The proposed project is a solar facility and therefore, by its nature complies with this policy.

Public Facilities and Services (Policy and Recommendation 5.4). Uses proposed for the property adjacent to substations or transmission line rights-of-ways should be reviewed for possible impacts to the power facilities and vice versa.

The project would be consistent with this policy. The existing Sunrise Powerlink is located near the project site and adjacent to the Tule gen-tie onto which the project will co-locate. The proposed project would be compatible with the existing transmission facilities and vice versa.

Environmental Resources (Policy and Recommendation 1). All development shall demonstrate a diligent effort to retain as many native oak trees as possible.

The project would be consistent with this policy. The project has been designed to avoid all coast live oak woodland and mixed oak woodland habitat onsite.

Environmental Resources (Policy and Recommendation 3). Floodways should be maintained in their natural state unless findings can be made that a threat to public safety exists.

The project would be consistent with this policy. The project site does not contain any mapped floodways and therefore, will comply with this policy.

Environmental Resources (Policy and Recommendation 4). The dark night sky is a significant resource for the Subregion and appropriate steps shall be taken to preserve it.

The project would be consistent with this policy. Nighttime lighting during operations would be restricted to ongoing maintenance and security lighting and all project lighting would comply with the County Lighting Ordinance. In addition, proposed security lighting at the solar facility will be directed downward and shielded to minimize light spillover and potential lighting impacts to adjacent properties and/or the night sky. Therefore, since lighting would be limited to the minimum number necessary to ensure security of the facility and because lighting would be shielded, the project would be consistent with this policy.

Environmental Resources (Policy and Recommendation 5). Development shall not adversely affect the habitat of sensitive plant and wildlife species or those areas of significant scenic value.

The project would be consistent with this policy. While the project site contains native habitat, no endangered species were identified on the project site. No highly sensitive or sensitive habitat lands as identified by the Resource Protection Ordinance were identified onsite which warrant avoidance measures. The project site contains a portion of Tule Creek which will be avoided by project design. The project includes a large offsite mitigation location which will mitigate all impacts to natural habitat to a less than significant level. The project site does not contain any unique natural features or hazard areas that require avoidance.

BOULEVARD COMMUNITY PLAN

Staff concluded that the proposed Rugged Solar development project is in compliance with the policies identified the Boulevard Community Plan. This section identifies several Boulevard Community Plan policies that are applicable to the proposed development project and explains staffs' rationale for reaching a conclusion of compliance.

Policy LU 1.1.1. Prohibit higher density, clustered subdivisions, or industrial-scale projects or facilities that induce growth and detract from or degrade the limited groundwater resources,

water and air water quality, visual and natural resources, abundant wildlife, and historic rural character of the Boulevard area. Renewable energy projects, such as solar and wind projects, are not “industrial-scale projects or facilities” for purposes of this Community Plan.

The project would be consistent with this policy. The proposed project is a solar project and therefore is not considered an“industrial-scale projects or facilities” as defined by the Boulevard Community Plan.

Policy LU 1.1.2 Encourage development to protect the quality and quantity of ground and surface water resources, air quality, dark skies, visual resources, and low ambient noise levels, as well as retain and protect the existing natural and historic features characteristic of the community’s landscape and natural environment.

The project would be consistent with this policy. A Groundwater Resources Investigation Report**,** Air Quality Technical Report, Visual Resources Report and Acoustical Assessment Report were completed for the proposed project. These studies analyzed the project for compliance with all applicable Federal, State and Local regulations and ordinances. The project has been designed to protect the quality and quantity of ground and surface water resources, air quality, dark skies, visual resources, and low ambient noise levels, as well as retain and protect the existing natural and historic features characteristic of the community’s landscape and natural environment to the maximum extent possible.

Policy LU 1.1.3. Encourage development to respectfully incorporate existing topography and landforms, watersheds, riparian areas, oaks, and other native vegetation and wildlife, ridgelines, historic and cultural resources, views, and sustainability design factors.

The project would be consistent with this policy: An existing north-south ridgeline is located in the western extent of the project site. Limited grading for the panel foundations and access roads is anticipated. The existing topography and landforms of the site would not be substantially manipulated. The project site does not contain any ridgelines or historic and cultural resources. The project has been designed to avoid onsite riparian areas and oak woodlands.

Policy LU 1.1.6 Require landscaping in new development to emphasize the use of xeriscape design with native, drought-tolerant, and fire-resistant plants to conserve water resources and help prevent the spread of fire.

The project would be consistent with this policy. The proposed project will include a landscape screening buffer along visually prominent areas of the project site. The landscaping buffer includes plants which are on the County of San Diego (2004) “Suggested Plant List for a Defensible Space.” To the extent possible, non-invasive, drought tolerant plants will be utilized which will thrive in the climate zone of the Boulevard area. The landscaping irrigation will consist of water-efficient drip irrigation and a solar irrigation clock to minimize water use for the proposed landscaping.

Policy LU 1.2.1 Encourage and promote local and onsite energy conservation, residential scale renewable energy production, and zero waste recycling goals that will help eliminate the need for industrial projects and facilities.

The project would be consistent with this policy. The proposed project would not hinder the development of onsite energy conservation, residential scale renewable energy production, and zero waste recycling goals.

Policy LU 1.2.2 Require development, including regional infrastructure and public facilities, to comply and maintain a rural bulk and scale in accordance with Boulevard's community character. Renewable energy projects, such as wind and solar projects, are not "regional infrastructure or public facilities" for purposes of this policy.

The project would be consistent with this policy. The proposed project is a solar project and therefore is not considered an"industrial-scale projects or facilities" as defined by the Boulevard Community Plan.

Policy LU 3.1.1. Encourage development to preserve dark skies with reduced lighting and increased shielding requirements.

The project would be consistent with this policy. Nighttime lighting during operations would be restricted to ongoing maintenance and security lighting and all project lighting would comply with the County Lighting Ordinance. In addition, proposed security lighting at the solar facility will be directed downward and shielded to minimize light spillover and potential lighting impacts to adjacent properties and/or the night sky. Therefore, since lighting would be limited to the minimum number necessary to ensure security of the facility and because lighting would be shielded, the project would be consistent with this policy.

Policy LU 3.2.1. Require development to minimize impacts to the native and riparian habitat.

The project would be consistent with this policy. While the project site contains native habitat, no endangered species were identified on the project site. No highly sensitive or sensitive habitat lands as identified by the Resource Protection Ordinance were identified onsite which warrant avoidance measures. The project site contains a portion of Tule Creek which will be avoided by project design. The project includes a large offsite mitigation location which will mitigate all impacts to natural habitat to a less than significant level. The project site does not contain any unique natural features or hazard areas that require avoidance.

Policy LU 3.3.1. Encourage the designation, protection, and long-term management of historic sites in the Boulevard area.

The project would be consistent with this policy. While the archaeological evaluation of the project site has identified archeological resources, no sites were determined to be potentially eligible for listing on the California Register of Historical Resources nor considered significant cultural resources under the standards of the County's Resource Protection Ordinance. Therefore, because the project site does not contain historic sites, the project complies with this policy.

Policy LU 6.1.1. Require commercial, industrial development and large scale energy generation projects to mitigate adverse impacts to the rural community character, charm, quiet ambiance and life-style, or the natural resources, wildlife, and dark skies of Boulevard, if feasible, in accordance with the California Environmental Quality Act.

The project would be consistent with this policy. As presented in the Soitec Solar Development EIR, project impacts, where feasible, would be mitigated to a less than significant level. Therefore, as impacts would be mitigated, the project would be consistent with this policy.

Policy LU 6.1.2. Encourage commercial, industrial development and large scale energy generation projects to create and maintain adequate buffers between residential areas and incompatible activities that create heavy traffic, noise, infrasonic vibrations, lighting, odors, dust and unsightly views and impacts to groundwater quality and quantity.

The project would be consistent with this policy. Residential uses exist in the vicinity of he project site. The project has been designed to incorporate fire clearing requirements and perimeter access roads along the project boundaries in order to provide a buffer between the trackers and the residential uses. Measures have been incorporated into the project as demonstrated in the Soitec Solar Development EIR and project technical studies to reduce potential impacts from noise, infrasonic vibrations, lighting dust and unsightly views and impacts to groundwater quality and quantity.

Policy LU 6.1.3. Encourage commercial, industrial development and large scale energy generation projects to provide buffers from public roads, adjacent and surrounding properties and residences, recreational areas, and trails.

The project would be consistent with this policy. Please refer to Policy LU 6.1.3 consistency analysis above.

Policy CM 8.1.1. Prohibit development and the exportation or sale of groundwater that would adversely impact the ground and surface water resources.

The project would be consistent with this policy. The total water demand for the project construction is expected to be approximately 59 acre-feet over a 1-year period. Of the total construction water demand, 44 acre-feet is anticipated to be supplied from the on-site supply well with up to 16 acre-feet supplied from off-site sources. Annual project operating demand, post-construction, would be approximately 8.7 acre-feet/year. A Groundwater Resources Investigation Report was prepared which demonstrated that the County significance thresholds for groundwater storage and well interference would not be met or exceeded, either during construction or during operation and maintenance. The project does not propose the exportation or sale of groundwater from the site.

Policy CM 8.3.1 Require that the source and quality of water that is imported into the area via tanker trucks or other means, for use on major construction projects, will be verified and validated to avoid contamination of local surface and groundwater resources.

The project would consistent with this policy. Groundwater Resources Investigation Reports were completed for offsite water sources including the Jacumba Community Services District and Pine Valley Mutual Water Company.

Policy CM 8.5.1. Prohibit development from altering natural drainage patterns.

The project would consistent with this policy. A Preliminary Hydrology and Drainage Study was prepared for the proposed project. The study confirms that existing drainage patterns and

peak flow rates would generally be maintained. The project would not substantially affect hydrology and drainage patterns due to the limited alteration of topography and small amount of new impervious surface. According to the preliminary drainage design, the additional increase in runoff is to be detained within an infiltration trench and allowed to infiltrate into the soil.

Policy CM 8.6.1. Encourage the use of existing right-of-way when construction of new transmission lines is required, where technically and economically feasible. Additionally, encourage existing right-of-way over new right-of-way alignments for construction of new transmission lines when existing right-of-way is insufficient.

The project would be consistent with this policy. Power from project would be delivered to the Rebuilt Boulevard Substation via the Tule Wind Energy project (MUP 3300-09-019) gen-tie alignment as adopted by the Board of Supervisors on August 8, 2012. The gen-tie for the Tule Wind Energy project includes a 69 kV undersling line, which will be used to service the Rugged solar farm. The Tule gen-tie will run south along the east side of McCain Valley Road and SDG&E's Sunrise Powerlink and across I-8, after which it will cross McCain Valley Road and run parallel to Old Highway 80 along the north side until it crosses Old Highway 80 at the proposed new SDG&E Boulevard East Substation. The collocation of these gen-ties has been utilized to minimize impacts resulting from the necessary transmission facilities.

Policy CM 8.6.2 Encourage the use of solar and residential scale wind turbines.

The project would be consistent with this policy. The proposed project would not hinder the development of solar and residential scale wind turbines.