

APPENDIX 9.1-4
Supplemental Environmental Analysis

TECHNICAL MEMORANDUM

To: Jacumba Solar LLC
From: Joe Monaco, Director of Environmental Services
Subject: Supplemental Environmental Analysis
Date: July 28, 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. The following analysis of that activity is provided by Dudek as experts in the preparation of environmental evaluation and recognized as such by the County. This analysis does not change the conclusions regarding the level of significance of the prior analysis in the Draft EIR. This memorandum analyzes the potential of implementing M-AE-3 to have a significant environmental impact related to the following environmental topics: Geology, Soils and Seismicity; Hydrology and Water Quality; Land Use and Planning; Public Services; Traffic and Transportation; and Utilities and Service Systems. This analysis 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 the respective topic subsections of Section 3 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.

Geology, Soils, and Seismicity

The decommissioning mitigation would remove development from the site and, as such, would not have the potential to result in impacts to or risk of impacts from seismic ground shaking, liquefaction, and/or expansive soils. Therefore, secondary impacts from decommissioning mitigation associated with geology and soils would be less than significant.

Hydrology and Water Quality

The decommissioning mitigation would remove development from the site; hydrology and water quality impacts from these activities would be similar to those identified in Section 3.1.4 Hydrology and Water Quality of the Draft EIR for construction activities. The requirements of a Construction SWPPP would be applied to decommissioning in accordance with County requirements such that storm water flows and soil erosion are managed. As described in M-AE-3, the decommissioning mitigation would be undertaken in accordance with a plan that would identify efforts such as recontouring and hydroseeding, which would maintain the drainage flow patterns and velocities into undisturbed drainages consistent with the existing and the developed conditions. The volume of water necessary for decommissioning activities is estimated to be approximately 10 acre feet, as identified in the Draft EIR Section 1.2.1, and would be provided by JCSD, or PDMWD, or a mix thereof as established for construction. This volume of water is substantially less than that needed for construction purposes. Therefore, secondary impacts from decommissioning mitigation would be less than significant for the same reasons as expressed for project construction in Section 3.1.4 of the Draft EIR.

Land Use and Planning

The decommissioning mitigation would not result in secondary impacts, as determined for construction activities, to land use and planning because the decommissioning mitigation simply returns the use to vacant land.

Public Services

The decommissioning mitigation would remove development from the site and as such would not have the potential to result in secondary impacts to public services. Potential impacts associated with ignition resulting in wildfire is addressed in the Hazards and Hazardous Materials analysis and mitigation including the need to incorporate decommissioning into the Construction FPP is identified (M-HZ-1). The potential impacts associated with EMS responses during decommissioning is too speculative to determine as the likelihood of multiple construction or decommissioning occurring at the same time as this project's decommissioning is not known. Nevertheless potential impacts are provided for in the mitigation measure M-HZ-2,

which as prescribed in Section 2.4 Hazards and Hazardous Materials of the Draft EIR is applicable to decommissioning as well as construction. All other public services would be impacted similarly as during construction by the presence of workers and equipment during the approximately six-month decommissioning period. Therefore, secondary impacts from decommissioning mitigation would be less than significant for the same reasons as expressed for project construction in Section 3.1.6 of the Draft EIR.

Traffic and Transportation

The secondary traffic and transportation impacts of undertaking the decommissioning mitigation would be similar to those associated with construction and would involve temporary impacts from worker vehicles, water trucks, and components removal. The number of trips associated with the decommissioning mitigation activities would be similar to those for construction though reduced. A traffic control plan would be required for decommissioning activities the same as required for construction activities, as would notification procedures per County requirements. The traffic control plan for decommissioning would ensure that truck movements and oversized truck travel is undertaken in a safe manner and that other roadway users are notified. Secondary traffic and transportation impacts would be temporary and less than significant for the same reasons as expressed for project construction in Section 3.1.7 Traffic and Transportation of the Draft EIR.

Utilities and Service Systems

The secondary utilities and service systems impacts of undertaking the decommissioning mitigation would be similar to those associated with construction and would involve temporary impacts from water required for activities including dust suppression. The amount of water associated with the decommissioning mitigation activities would be approximately 10 acre feet, reduced compared to that for construction and would be provided by either JCSD, or PDMWD, or a mix thereof. The components removed from the project site would be recycled to the extent practicable. Certain components such as battery and substation components are not readily recyclable at this time and would be disposed of at a regulated disposal facility, or recycled if appropriate at the time of decommissioning. Secondary impacts from decommissioning mitigation would be less than significant for the same reasons as expressed for project construction in Section 3.1.8 Utilities and Service Systems of the Draft EIR.

4.0 CONCLUSIONS

Decommissioning activities would be expected to result in substantially less disturbance than during construction, and decommissioning-related ground disturbing activities would occur in locations disturbed by project construction. Furthermore, the levels of equipment and activities

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necessary on site and water deliveries to the site would be greatly reduced under decommissioning compared to construction. The potential impacts from project decommissioning are considered **less than significant** for each of the topics evaluated herein, consistent with the construction impacts identified in the Draft EIR.



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