

### Global Response GR-6

#### Alternatives

A number of commenters stated that the Draft EIR should consider additional alternatives to the JVR Energy Park Project (Proposed Project) and suggested alternatives that would purportedly reduce the Proposed Project's significant and unavoidable impacts to aesthetic and visual resources.

#### Reasonable Range of Alternatives

The California Environmental Quality Act (CEQA) requires a Draft EIR to describe “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” (CEQA Guidelines, § 15126.6(a).) The Draft EIR satisfied this requirement in Chapter 4, Project Alternatives.

Chapter 4, Project Alternatives, considered but rejected the Energy Efficiency Ordinance Alternative, the Distributed Generation and Storage Policy Alternative, the Wind Energy Alternative, Alternative Locations, the ECO Substation Connection Alternative, and the Community Buffer with Southwest Expansion Alternative. Chapter 4 concluded that these alternatives did not feasibly attain most of the basic objectives of the Proposed Project and/or would not avoid or substantially lessen any of the significant effects of the Proposed Project. Please refer to Section 4.2 of Chapter 4, Alternatives, for a complete discussion of the alternatives considered but rejected in the Draft EIR.

Commenters on the Draft EIR expressed concern about the location of the Proposed Project and questioned why it is not located somewhere else in the County or in Imperial County. As explained in the Draft EIR, “[t]he Applicant and County have explored a number of alternative locations throughout San Diego County and have screened these locations for their capability to meet the Project objectives, including the presence of excellent solar attributes. There are no other known readily available parcels of undeveloped land of similar size in the eastern portion of the County that could accommodate development of the Proposed Project that have not already been considered and rejected for development of a similar solar project, provide adequate site accessibility, and/or could be acquired by the Applicant within a reasonable period of time. Ultimately, the Applicant does not own or have the ability to easily acquire other sites in the San Diego region in order to provide an Alternative Location project.” Further, the County does not have jurisdictional control over alternative locations in Imperial County. Accordingly, alternative

locations within Imperial County cannot feasibly be implemented by the County. (CEQA Guidelines, § 15126.6(f)(1).)

Additionally, Chapter 4 Project Alternatives fully analyzed three alternatives to the Proposed Project. The Draft EIR analyzed two scenarios under the “no project” alternative in accordance with CEQA Guidelines section 15126.6(e)(2). The No Development No Project Alternative analyzed the existing conditions at the time the Notice of Preparation for the Draft EIR was published and compared that scenario to the significant environmental effects caused by the Proposed Project. The Buildout No Project Alternative analyzed the multi-use development of the Project site in accordance with the Project site’s General Plan and Zoning designations. Using past applications to develop the Project site with a specific plan, the Buildout No Project Alternative assumed the Project site would be developed with 1,110 residential units, commercial, recreation, and supporting infrastructure uses. Please refer to Section 4.3 of Chapter 4, Project Alternatives, for a complete discussion of the no project alternative scenarios.

Further, the Draft EIR analyzed two alternatives aimed at substantially lessening the Proposed Project’s significant environmental effects—the Proposed Project’s significant and unavoidable impacts to aesthetic and visual resources, and mitigation measure **M-BI-3**’s significant and unavoidable impact to mineral resources. These include the Community Buffer Alternative and the Reduced Project Alternative.

The Community Buffer Alternative includes a 300-foot buffer adjacent to private properties north of Old Highway 80 in the Jacumba Hot Springs community. This alternative would provide a visual buffer between the Proposed Project and these private properties and would substantially lessen the Proposed Project’s significant and unavoidable impacts to aesthetic and visual resources, as discussed in Section 4.4.3 of the Draft EIR.

In response to comments on the Draft EIR, the Community Buffer Alternative was revised in the Final EIR to include increased setbacks along Old Highway 80 and adjacent to Jacumba Community Park. As stated in the Final EIR, these increased setbacks would substantially reduce impacts to visual character and quality of the Jacumba community.

A comparison of views from the Jacumba community to the Proposed Project and to the Community Buffer Alternative is shown in Figure GR-6-1. As shown therein, for the Proposed Project viewers from the community would be approximately 75 feet away from the Proposed Project’s nearest solar arrays with an 8.8-degree angle of obstruction. This results in noticeable blocking of views across the Project site such that the hill and valley terrain of the surrounding area are blocked from view. Under the Community Buffer Alternative, viewers would be approximately 330 feet away from the Proposed Project’s nearest solar arrays (300 feet to the fence line). At this distance, the obstruction of the viewshed would be reduced to approximately 2.1

degrees. Accordingly, the Community Buffer Alternative would result in a 77% reduction in viewshed obstruction from the Jacumba community. As such, the EIR concludes that the Community Buffer Alternative would substantially lessen **Impact AE-1** (Existing Visual Character and/or Quality) and **Impact AE-2** (Valued Visual Character of Community) as well as the related cumulative impacts—**Impacts AE-CU-1** (Cumulative Visual Character and/or Quality) and **AE-CU-2** (Cumulative Valued Visual Character of Community), but not to less than significant. Further, the Community Buffer Alternative would also reduce the total mitigation requirement for habitat, meaning less biological open space easements would be required under mitigation measure **M-BI-3**. This reduction would lessen the mitigation measure's impact on mineral resources, but not to less than significant. The Community Buffer Alternative would reduce the Proposed Project's potentially significant impacts to additional resource areas as discussed further in Section 4.4 of Chapter 4, Alternatives. Further, the EIR concludes that the Community Buffer Alternative would generally meet all of the Proposed Project's objectives, although to a lesser extent than the Proposed Project.

The Draft EIR also analyzed the Reduced Project Alternative, which would eliminate development of the Project site north of the San Diego Gas & Electric easement. The alternative would substantially lessen **Impacts AE-3** (views from I-8), **AE-6** (views from State Park lands), **AE-7** (views from Round Mountain), **AE-8** (views from Round Mountain), and **AE-9** (views from Table Mountain), however, the impacts would remain significant. The alternative would also lessen **Impacts AE-1** (Existing Visual Character and/or Quality) and **AE-2** (Valued Visual Character of Community) as well as the related cumulative **Impacts AE-CU-1** (Cumulative Visual Character and/or Quality) and **AE-CU-2** (Cumulative Valued Visual Character of Community), but not to less than significant. The Reduced Project Alternative would reduce the development footprint to 484 acres, meaning the total mitigation requirement for habitat would also be reduced. This reduction would lessen the significant and unavoidable impact on mineral resources caused by mitigation measure **M-BI-3**, but not to a less than significant level. The Reduced Project Alternative would lessen the Proposed Project's potentially significant impacts to additional resource areas as discussed further in Section 4.5 of Chapter 4, Project Alternatives. Further, the Draft EIR concludes that the Reduced Project Alternative would generally meet all of the Proposed Project's objectives, although to a lesser extent than the Proposed Project.

Finally, Section 4.7 of Chapter 4, Project Alternatives, concludes that the No Development No Project Alternative is the environmentally superior alternative, and identifies the Reduced Project Alternative as the environmentally superior alternative amongst the remaining alternatives analyzed in the Draft EIR.

### Analysis of Alternatives Proposed in Public Comments

CEQA does not require “analysis of every imaginable alternative . . . the key issue is whether the [alternatives] discussion fosters informed decision making and informed public participation.” (*Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 348 [internal emphasis and citations omitted]; CEQA Guidelines, § 15126.6(a).) The Draft EIR satisfied this standard by analyzing a reasonable range of alternatives to reduce the Proposed Project’s significant and unavoidable impacts to aesthetic and visual resources from different viewpoints (i.e., from the Jacumba community and from I-8 and recreational lands), and mitigation measure **M-BI-3**’s significant and unavoidable impact to mineral resources. The alternatives analyzed demonstrate that modifying the Proposed Project’s site plan can reduce significant and unavoidable impacts to certain views from panoramic vistas and scenic viewpoints around the Project site. However, any development of the Project site would result in a significant and unavoidable impact to aesthetic and visual resources. Accordingly, the Draft EIR need not analyze every possible alternative to the Proposed Project that may result in a reduced impact to a particular view. (*Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 713-14.)

While the Draft EIR analyzed a reasonable range of alternatives and satisfied the requirements of CEQA, commenters proposed three additional alternatives: Reduced Project-Northern Focus Alternative; Jacumba Community Alternative; and the Reduced Panel Height Alternative. These additional alternatives are discussed further below.

### Reduced Project – Northern Focus Alternative

The Reduced Project – Northern Focus Alternative would eliminate the solar facility development south of the SDG&E easement with the exception of the substation and switchyard. This alternative would have a reduced impact area relative to the Proposed Project. As shown in Figure GR-6-2, Reduced Project Alternative – Northern Focus Site Plan, this alternative would reduce the project footprint to 152 acres, which is a reduction of 474 acres (76%) compared to the Proposed Project. For the purposes of evaluating the Reduced Project – Northern Focus Alternative, the decreased development footprint is also assumed to reduce the number of PV modules installed by approximately 76%. The amount of modules is subject to change based upon final engineering design. This reduction in PV modules would reduce the amount of energy generated by this alternative to approximately 22 megawatts (MW) AC, which is a reduction of 68 MW relative to the Proposed Project. In order to convey the energy to the substation and switchyard, a transmission line would be proposed along the switchyard access road and then north along Carrizo Gorge Road. The switchyard and substation would be the same as the Proposed Project. The length of construction would be reduced under this Alternative, but the daily construction would remain the same as the Proposed Project.



### **Project Objectives and Feasibility**

An EIR is not required to consider alternatives that fail to feasibly meet most of the project's basic objectives or are infeasible. (CEQA Guidelines, § 15126.6(a).) "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

The Reduced Project – Northern Focus Alternative would generally meet all project objectives, although not to the degree that the Proposed Project would. Although potentially feasible, the Reduced Project – Northern Focus Alternative would result in approximately 76% less renewable energy generation and, therefore, it would not achieve Proposed Project objectives 1, 2, 3, 5 or 7 to the same extent of the Proposed Project.

### **Analysis of Reduced Project – Northern Focus Alternative Environmental Effects**

The purpose of an EIR's alternatives discussion is to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any of the significant effects of the project (CEQA Guidelines Section 15126.6(a), (b)). The Proposed Project would result in potentially significant and unavoidable adverse impacts for which feasible mitigation measures would not reduce the impacts to below a level of significance for aesthetics (Section 2.1 of the EIR). In addition, habitat preservation (biological open easement) required by mitigation measure **M-BI-3** would have a significant and unavoidable impact to mineral resources (Section 2.8 of the EIR).

The analysis of the alternative below focuses on aesthetics and mineral resources. However, please refer to Table GR-6-1, which compares the Reduced Project – Northern Focus Alternative's potential impacts to all resource areas to those of the Proposed Project.

### **Aesthetics**

#### **Visual Character and/or Quality**

The Proposed Project would result in **Impact AE-1** (impact to Jacumba existing visual character and/or quality) and **Impact AE-2** (impact to visual character of Jacumba Hot Springs). The Reduced Project – Northern Focus Alternative would reduce the Project area by 76%. While this is a substantial reduction, this alternative would continue to include a 152-acre solar energy project in an area with a rural community character and open space quality. The change of 152 acres from open land to dark colored solar PV panels in a visually prominent area at the primary entrance to the community would remain significant from a community character and quality standpoint. Thus, **Impacts AE-1** and **AE-2** would be substantially lessened under the Reduced Project – Northern Focus Alternative, but not to below a level of significance since the impacts to visual character change would still occur on the remaining portion of the site.

### Focal or Panoramic Vistas

The Reduced Project – Northern Focus Alternative would result in significant impacts to focal or panoramic vistas (**Impacts AE-3 to AE-9**). Each of these impacts are discussed below.

The visual impact of converting 152 acres of open area into a solar energy development in the northern area of the Project site would be substantial from the I-8 vantage point considering the visual prominence of the change. As shown in Figure GR-6-3, Reduced Project Alternative - Northern Focus Alternative Key View 1, the change from open space to dark colored rows of panels would be highly prominent in the view from the I-8 Key View 1. Thus, the Reduced Project – Northern Focus Alternative would result in significant **Impact AE-3** (I-8) similar to the Proposed Project.

Considering the Reduced Project – Northern Focus Alternative would eliminate all panels and associated improvements to the south of the SDG&E transmission corridor, the views from vantage points that only include the southern area of the site would not be impacted under this alternative. This includes Key View 3 and 5 from Old Highway 80, Key View 4 from Jacumba Community Park, Key View 6 from the Jacumba Community, and Key View 7 from the southern portion of the State Parks land to the west. Thus, the Reduced Project – Northern Focus Alternative would avoid the significant **Impacts AE-4** (Old Highway 80) and **AE-5** (Jacumba Community Park) of the Proposed Project.

While the area of solar panels would be reduced, the long-distance views from State Park lands to the west, Round Mountain, Airport Mesa and Table Mountain areas would continue to have a highly visible and prominent change from converting 152 acres of open land to dark solar panels. (See Figures GR-6-4 and GR-6-5.) Thus, the Reduced Project Alternative - Northern Focus Alternative would have significant view **Impacts AE-6** (State Park Lands to the west), **AE-7** (Round Mountain), **AE-8** (Airport Mesa) and **AE-9** (Table Mountain), and this suggested alternative would not avoid view Impacts **AE-6 to AE-9** of the Proposed Project.

While not a significant impact of the Project, Key View 2 was examined given the potential for the transmission line included in this alternative to result in a new significant impact. Given that Key View 2 only includes the northern portion of the Project site and the Reduced Project – Northern Focus Alternative retains the development in that area, the Reduced Project – Northern Focus Alternative would have a similar view impact from solar panels at this location.

In addition, this alternative includes additional transmission lines visible from the Key View 2 vantage point which are not included in the Proposed Project. The proposed transmission line poles included in this alternative would be of lower height and less prominent than the existing lattice tower transmission lines in the area. Considering this, the additional transmission lines

included in this alternative would not affect the overall view impact significance. The Reduced Project – Northern Focus Alternative Key View 2 impacts would be greater than the Proposed Project but would continue to be less than significant.

### Cumulative Impacts

The Proposed Project results in cumulative **Impact AE-CU-1** on valued visual character or image of neighborhoods, communities, or localized areas. In addition, the Proposed Project results in cumulative **Impact AE-CU-2** to panoramic vista available from I-8 and from elevated vantage points in the Airport Mesa and Table Mountain Recreational Management Zones. The Reduced Project – Northern Focus Alternative would have a lessened impact considering the reduction of the development to 152 acres, but the 152-acre solar energy development as well as the cumulative projects would significantly impact the cumulative viewshed rural character and values of the Proposed Project vicinity. Thus, the Reduced Project – Northern Focus Alternative does not avoid **Impacts AE-CU-1** or **AE-CU-2**.

### Aesthetics Impacts Conclusion

Overall, the Reduced Project – Northern Focus Alternative would avoid **Impacts AE-4** (Old Highway 80) and **AE-5** (Jacumba Community Park). However, the Reduced Project–Northern Focus Alternative would result in significant **Impacts AE-1 to AE-3, AE-6 to AE-9, AE-CU-1 and AE-CU-2**. Indeed, any substantial development of the Project site with a solar energy project would have a significant and unavoidable impact to aesthetic and visual resources, which is consistent with the analysis of the other reduced footprint alternatives—the Reduced Project Alternative and the Community Buffer Alternative.

### **Mineral Resources**

Implementation of mitigation measure **M-BI-3** through preservation of on-site habitat (biological open space easement) would result in significant and unavoidable impacts to mineral resources (**Impact MR-1**) for the Proposed Project. The preservation of habitat on-site would result in the permanent loss of mineral resources valued at over \$12,500,000. The Reduced Project – Northern Focus Alternative would result in a reduced impact to sensitive vegetation communities and would therefore require less acreage to be conserved within a biological open space easement. The following table shows the acreages of vegetation communities that would be required to mitigate the Reduced Project – Northern Focus Alternative’s impacts.

As shown in Figure 2.8-1 in the EIR, mineral resources (e.g., alluvium) underlie 188 acres of the Project site outside of the Proposed Project’s MUP boundary. Accordingly, in its analysis of the Reduced Project Alternative and Community Buffer Alternative, the Draft EIR conservatively assumed that any reduction in open space easement requirements would directly correlate to a

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reduction in impact to mineral resources—in other words, the open space easements over the mineral resources would be reduced, while the open space easements overlying the non-mineral resource areas would remain intact. However, the Draft EIR notes that this would likely not be the case as the valley portion of the Project site (e.g., Boundary creek as it flows towards and under I-8) where the mineral resources are located contains significant biological value and acts as a critical wildlife corridor.

| <b>Vegetation Community/Land Cover</b>  | <b>Ratio</b> | <b>Permanent Direct Impacts (Acres)</b> | <b>Required Mitigation (Acres)</b> |
|---|--------------|---|------------------------------------|
| Desert saltbush scrub                   | 2:1          | 31.99                                   | 63.98                              |
| Desert sink scrub                       | 3:1          | --                                      | --                                 |
| Mesquite bosque                         | 3:1          | --                                      | --                                 |
| Sonoran mixed woody scrub               | 1:1          | --                                      | --                                 |
| Sonoran mixed woody and succulent scrub | 1:1          | 47.12                                   | 47.12                              |
| Fallow agriculture                      | 0.5:1        | 55.65                                   | 27.83                              |
| Disturbed habitat                       | N/A          | 11.53                                   | --                                 |
| Urban/developed                         | N/A          | 5.84                                    | --                                 |
| Unvegetated Streambed                   | 1:1          | 0.02                                    | 0.02                               |
| <b>Total</b>                            | <b>—</b>     | <b>152.15</b>                           | <b>138.95</b>                      |

Given that assumption, for the analysis of the Reduced Project – Northern Focus Alternative, potential open space easements to reduce the Northern Focus Alternative’s biological impacts were considered which avoid impacts to mineral resources. To avoid the mineral resource area, the open space easements could be piecemealed throughout the site using two of the following three options: (1) preservation of 35.41 acres of mesquite bosque scrub along the western edge of the Project site adjacent to State Park lands; (2) preservation of approximately 83.70 acres of Sonoran mixed wood and succulent scrub along with 1.86 acres of disturbed habitat, 1.53 acres of Sonoran mixed woody scrub, desert saltbush scrub and 0.49 acre of unvegetated stream channel—the area would occur north of the proposed alternative between the development and I-8; and, (3) preservation of 90.13 acres of Sonoran mixed wood and succulent scrub, 0.45 acre of tamarisk scrub, and 0.03 acre of desert saltbrush scrub located along the eastern edge of the MUP boundary. Although these areas would meet the vegetation requirements for mitigation, the open space easements would not satisfy the guidelines for designing open space easements stated in the County’s Guidelines for Determining Significance, Biological Resources. For one, this patchwork of open space easements

would not preserve the wildlife movement corridor which occurs along Boundary Creek to west of the Northern Focus Alternative, permitting wildlife movement north and south of I-8 and from the western boundary of the site to the eastern boundary. Further, the open space easements would not protect the critical riparian habitat along the creek and would not preserve land in large blocks of habitat. The areas between the biological open space areas would be left as potential development/mining and, if developed, would fragment the preserved habitat rendering them ineffective. Indeed, the shape of these potential open space easements would not create the maximum amount of open space with the lowest amount of interface between development and preserved areas and would not create the maximum amount of habitat connectivity between on and off-site areas. For similar reasons, fragmenting the open space easements would conflict with the Restated and Amended Planning Agreement for the North and East County MSCP. Land 3/4 mile to the west of the Project site is identified as a Focused Conservation Area with BLM and State Parks land directly to the west of the Project site. By preserving land in one block of open space easements, the open space easements would act as an extension of this Focused Conservation Area and conserved land, while fragmenting the easements would risk future development in sensitive biological areas. Accordingly, the County would likely reject these open space easements as mitigation for the Reduced Project – Northern Focus Alternative’s biological resources impacts.

However, a block of habitat could be considered that would satisfy the Northern Focus Alternative’s biological mitigation requirements and minimize impacts to mineral resources as shown in Figure GR-6-6. This block of habitat would preserve 138.95 acres of habitat along the western edge of the Project site. This would build upon the existing preserved lands to the west of the Proposed Project and would not result in the preservation of fragmented habitat. This would also aid in the preservation of the wildlife corridor which runs north to south on the west side of the Proposed Project. However, this biological open space easement (See Figure GR-6-6) would result in impacts to 68.3 acres of mineral resources.

As such under the Northern Focus Alternative, a total of 68.3 acres of significant mineral resources would no longer be able to be mined. This represents an approximate loss of 6,545,326 tons of potential sand and aggregate, which would amount to \$78,543,900 and greatly exceed the County’s minimum value threshold of \$12,500,000. In other words, the Reduced Project– Northern Focus Alternative would require habitat mitigation (**M-BI-3**) that would cause a significant and unavoidable impact to mineral resources, although this impact would be less than the Proposed Project.

### **Other Environmental Impacts**

The Reduced Project – Northern Focus Alternative would lessen impacts to other resource areas as a result of the reduced scale of the Project. However, the Reduced Project – Northern Focus Alternative may also cause an additional impact to jurisdictional waters (unvegetated streambed)

as a result of the transmission line from the solar arrays to the Switchyard Facilities. (See Revised Table GR-6-1 for a comparison of the Northern Focus Alternative's impacts on all resource areas.)

### **Reduced Project – Northern Focus Alternative Conclusion**

In conclusion, the Reduced Project – Northern Focus Alternative would lessen impacts to aesthetic and visual resources as compared to the Proposed Project but impacts to visual character and quality and panoramic views would remain significant and unavoidable. Similarly, the Reduced Project – Northern Focus Alternative would require less biological open space easement area for habitat preservation, which in turn would reduce the impact of mitigation measure **M-BI-3** to mineral resources, but not to a less than significant level. The Northern Focus Alternative would generally meet all project objectives, although it would result in approximately 76% less renewable energy generation and, therefore, it would not achieve Proposed Project objectives 1, 2, 3, 5 or 7 to the same extent of the Proposed Project.

Additionally, the Reduced Project – Northern Focus Alternative is not considerably different than the Reduced Project Alternative analyzed in the Draft EIR. The Reduced Project – Northern Focus Alternative prioritizes reducing impacts to views from Old Highway 80 and the Jacumba community, while the Reduced Project Alternative prioritizes reducing impacts to views from I-8, public lands, and the northern portion of the Project site. Accordingly, the Reduced Project – Northern Focus Alternative would not offer significant environmental advantages over the alternatives analyzed in the Draft EIR. However, given the Reduced Project – Northern Focus Alternative reduces the size of the solar development to 152 acres and reduces impacts to views from Old Highway 80 and the Jacumba community to less than significant, the Reduced Project – Northern Focus Alternative would be the environmentally superior alternative. (*South County Citizens for Smart Growth v. County of Nevada* (2013) 221 Cal.App.4th 316, 330; *Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 547.)

### **Jacumba Community Alternative**

The Jacumba Community Alternative would reduce the project area relative to the Proposed Project. As shown in Figure GR-6-7, the Jacumba Community Alternative would include a reduced project area, buffers from the community, and a trail. This alternative would eliminate development from the former Mountain Meadows Dairy area and the area south of Old Highway 80. It is noted, however, that, aside from impacts to aesthetic and visual resources, the Proposed Project would not result in any significant and unavoidable impacts related to its development in the vicinity of the Jacumba Airport or at the location of the former Mountain Meadows Dairy. This alternative would also require the water main realignment identified for the Proposed Project.

The Jacumba Community Alternative would extend the buffer to 200 feet along the north side of the highway, increase the buffer adjacent to the mobile home park to 200 feet, and include a 100-foot buffer from the remaining Jacumba Hot Springs community. This alternative would also include a trail along the eastern, southern and western perimeter of the solar development. Further, this alternative would not include the battery energy storage system. It would also not include the Switchyard Facilities, and instead would underground a gen-tie line to the SDG&E ECO substation. (The commenter that proposed this alternative also proposed eliminating the substation, but that is not technologically possible.)

As described in the ECO Substation Connection Alternative, the underground line would be 2.5-miles long and extend from the Proposed Project site to the ECO substation. The line would include a 100-foot-wide right of way, which would total approximately 30 acres. The impact area is assumed to include a 15-foot-wide access/maintenance unpaved roadway plus a 24-foot-wide temporary impact area for trenching and line installation. Thus, a 2.5-mile line would result in approximately 4.5 acres of permanent impacts and 14.5 acres of temporary impacts. As additional access roadways may be required along with a staging area, this may potentially underestimate the area that would be impacted by the 2.5-mile line.

Overall, the Jacumba Community Alternative solar facility, water main realignment and underground gen-tie connection would impact a total of 476 acres. This represents a reduction of 150 acres (approximately 24%) compared to the revised Proposed Project. It is noted that an additional 11 acres of right-of-way would be needed along the ECO gen-tie connection line, but the area would not be impacted. The solar facility development footprint would be reduced from 623 to 454 acres, which would reduce the Major Use Permit area by 27%. The decreased solar facility development footprint under this alternative would reduce the number of PV modules that could be installed, although the number of modules is subject to change based upon final engineering design. This reduction in PV modules would reduce the amount of energy generated by this alternative to approximately 66 MW, which is a reduction of approximately 24 MW (27%) relative to the Proposed Project. The length of time of construction would be reduced under this alternative.

### **Project Objectives and Feasibility**

An EIR is not required to consider alternatives that fail to feasibly meet most of the project's basic objectives or are infeasible. (CEQA Guidelines, § 15126.6(a).) "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

The Jacumba Community Alternative would generally meet project objectives 3, 6, and 7, but would not meet project objectives 1, 2, 4, or 5. Objectives 1 and 5 would not be met because this

alternative would not include energy storage. Objective 2 would not be met because undergrounding the gen-tie line to the ECO Substation would require a permitting process at the California Public Utilities Commission (CPUC) that would extend beyond the end of 2022, thereby preventing the Proposed Project from achieving the maximum federal solar Investment Tax Credit (ITC). The ITC declines from 26% to 22% as of January 1, 2023. Placing the gen-tie in the SDG&E easement would also require the Section 851 permitting process before the CPUC, which SDG&E states will take no less than 12 months and often takes over 24 months. (SDG&E, Changing Regulatory Landscape, CPUC Section 851 & Tribal Land Policy, at p. 10 (Jul. 24, 2020).) Further, this application period cannot begin until all project plans are final and transaction documents have been negotiated. Finally, whether the CPUC would approve the Section 851 application is not preordained. Objective 4 would not be met by extending a transmission line 2.5 miles to the ECO Substation and, therefore, not locating the project near SDG&E facilities to reduce transmission infrastructure needs. The Jacumba Community Alternative would result in approximately 27% less renewable energy generation and, therefore, it would not achieve Proposed Project objectives 3, 6 or 7 to the same extent as the Proposed Project.

Further, it is unknown if there is capacity at the ECO substation to accommodate the energy generated by the Jacumba Community Alternative or if use of the substation by the Proposed Project applicant would be approved by SDG&E. SDG&E also has an easement over this area for an existing overhead transmission line to the ECO substation line, and it is unknown if the Project Applicant would be permitted to complete improvements within the easement. Accordingly, the Jacumba Community Alternative may be technically and legally infeasible.

Despite the conclusions reached above, however, as a matter of public disclosure, the environmental effects of the Jacumba Community Alternative have been compared to the Proposed Project, below.

### **Analysis of Alternative Environmental Effects**

The purpose of an EIR's alternatives discussion is to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any of the significant effects of the project (CEQA Guidelines Section 15126.6(a), (b)). The Proposed Project would result in potentially significant and unavoidable adverse impacts for which feasible mitigation measures would not reduce the impacts to below a level of significance for aesthetics (Section 2.1 in the EIR). In addition, habitat preservation (biological open space easement) required by mitigation measure **M-BI-3** would result significant and unavoidable impact to mineral resources (Section 2.8 of the EIR).

The analysis below focuses on aesthetics and mineral resources. However, please refer to Table GR-6-1, which compares the Jacumba Community Alternative's potential impacts to all resource areas to those of the Proposed Project.



### Aesthetics

#### Visual Character and/or Quality

The Proposed Project would result in **Impact AE-1** (impact to Jacumba existing visual character and/or quality) and **Impact AE-2** (impact to visual character of Jacumba Hot Springs). The Jacumba Community Alternative would reduce the solar facility development area by 27% but would continue to include a solar energy facility of a significant size in an area with a rural community character and open space quality. The visual change from open land to dark colored solar PV panels in a visually prominent area would remain significant from a community character and quality standpoint. In addition, this alternative would include temporary visual changes during the trenching and installation of the 2.5-mile underground ECO gen-tie connection line as well as the associated 2.5-mile permanent access roadway for the ECO connection. Given the temporary nature of the construction activities and that the dirt access road would not be visually prominent from public locations, the change in visual impact severity related to these features would not be substantial. **Impacts AE-1** and **AE-2** would be lessened under the Jacumba Community Alternative, but not to below a level of significance since the development would conflict with the visual character of the area.

#### Focal or Panoramic Vistas

The Proposed Project would result in significant view impacts **AE-3** to **AE-9**. Each of these impacts are discussed below.

The visual impact from the I-8 vantage point would be significant considering the Jacumba Community Alternative does not propose any additional setbacks as compared to the Proposed Project. While the additional ECO connection construction activities and permanent dirt access roadway would result in visual changes as viewed from I-8, these changes would not be substantial considering the temporary nature of the construction activities, existence of other dirt roads in the area, and the road would not be visually prominent from this key view. Thus, this alternative would result in significant **Impact AE-3** (I-8) similar to the Proposed Project.

While impacts would be substantially lessened due to the reduced development footprint and buffers in the southern area of the site, the impacts to northward views from vantage points in the southern portion of the Project site would remain significant. The additional ECO gen-tie connection would also not be highly visible from these vantage points. This includes Key View 3 and 5 from Old Highway 80, Key View 4 from Jacumba Community Park, Key View 6 from the Jacumba Community, and Key View 7 from the southern portion of the State Parks land to the west. Thus, **Impact AE-4** (Old Highway 80) and **Impact AE-5** (Jacumba Community Park) would remain significant similar to the Proposed Project.

The area of solar panels would be reduced and, as such, impacts to the long-distance views from State Park lands to the west, Round Mountain, Airport Mesa and Table Mountain area would be less than the Proposed Project's impacts to these views. However, given this alternative would develop a utility-scale solar project, impacts to these views would remain significant and unavoidable. The ECO gen-tie improvements would not be highly visible. Thus, the Jacumba Community Alternative would have significant view **Impacts AE-6** (State Park lands to the west), **AE-7** (Round Mountain), **AE-8** (Airport Mesa) and **AE-9** (Table Mountain) less than Proposed Project, but impacts would remain significant and unavoidable.

While not a significant impact of the Proposed Project, Key View 2 was examined given the comment regarding eliminating the transmission line reducing the view impact at this location. Given that Key View 2 only includes the northern portion of the Project site and the Jacumba Community Alternative retains solar facility development in that area, the Jacumba Community Alternative would have a similar visual impact at this location. The ECO line gen-tie would include a dirt roadway in this area, but the visual change would be less than significant considering the temporary nature of the construction activities, existence of other dirt roads in the area, and the road would not be visually prominent. Overall, the view impact at Key View 2 would be less than significant, similar to the Proposed Project.

### Cumulative Impacts

The Proposed Project results in cumulative **Impact AE-CU-1** on valued visual character. In addition, the Proposed Project results in cumulative **Impact AE-CU-2** to panoramic vistas available from I-8 and from elevated vantage points in the Airport Mesa and Table Mountain Recreational Management Zones. The Jacumba Community Alternative would reduce the solar facility development footprint and provide buffers, but the solar energy development would significantly contribute to the cumulative impact on rural character and valued visual character. The Jacumba Community Alternative long-distance view impact would be less than the Proposed Project, including the cumulative impacts to views from I-8 and from the Airport Mesa and Table Mountain Recreational Management Zones. Nonetheless, the Jacumba Community Alternative does not avoid **Impacts AE-CU-1** or **AE-CU-2**.

### Aesthetics Conclusion

Overall, the Jacumba Community Alternative would reduce some impacts, but all aesthetic impacts would remain significant and unavoidable. As summarized in the EIR, the Reduced Project Alternative and Community Buffer Alternative would also reduce the severity of aesthetic impacts. In other words, any substantial development of the Project site with a solar energy project would have a significant and unavoidable impact to aesthetics and visual resources, which is

consistent with the analysis of the other reduced footprint alternatives analyzed in the EIR—the Reduced Project Alternative and the Community Buffer Alternative.

### Mineral Resources

Implementation of mitigation measure **M-BI-3** through preservation of on-site habitat (biological open space easement) would result in significant and unavoidable impacts to mineral resources (**Impact MR-1**) for the Proposed Project. The preservation of habitat on-site would result in a permanent loss of mineral resources valued at over \$12,500,000. As with the Reduced Project Alternative and Community Buffer Alternative analyzed in the EIR, the suggested Jacumba Community Alternative would have a reduced development footprint and thus the acreage of habitat required to be preserved would be reduced.

Specifically, the Jacumba Community Alternative would result in impacts to 37.71 acre of desert saltbrush scrub, 81.95 acre of Sonoran mixed woody and succulent scrub, 0.74 acre of tamarisk scrub, 320.31 acre of fallow agriculture, 6.13 acres of peninsular juniper woodland and scrub, and 0.13 acre of streambed that would result in the mitigation easement need of 75.42 acre of desert saltbrush scrub, 81.95 acre of Sonoran mixed woody and succulent scrub, 2.21 acre of tamarisk scrub, 160.16 acre of fallow agriculture, 12.26 acres of peninsular juniper woodland and scrub, and 0.13 acre of streambed. Overall, this totals 332.12 acres of required habitat preservation. For purposes of this analysis, it is conservatively assumed that a biological open space easement would not be implemented within the valley/Boundary Creek portion of the Project site that overlies mineral resources (i.e., it is assumed that this alternative would reduce the impacts to mineral resources to the maximum extent possible). However, as discussed above, this portion of the Project site provides a wildlife corridor and contains high value biological resources. In addition, approximately 10 acres of additional habitat preservation would be necessary for the ECO line connection. As such under the Jacumba Community Alternative, a total of 342.12 acres of biological open space easement would be required, and 83.67 acres of significant mineral resources would no longer be able to be mined. This represents an approximate loss of 8,018,262.83 tons of potential sand and aggregate, which would amount to \$96,219,161.60 and would greatly exceed the County's minimum value threshold of \$12,500,000. In other words, the Jacumba Community Alternative would require habitat preservation in accordance with mitigation measure **M-BI-3** that would cause a significant and unavoidable impact to mineral resources, although this impact would be less than the Proposed Project.

### Other Environmental Impacts

The Jacumba Community Alternative would reduce the on-site impacts by reducing the development footprint by approximately 150 acres as compared to the Proposed Project. This in turn would reduce impacts to air quality; biological resources; greenhouse gas emissions; cultural

resources; geology, soils, and seismicity; hazards and hazardous materials; paleontological resources; and tribal cultural resources. While these impacts on-site would be reduced under this alternative, the off-site ECO gen-tie connection line improvements in this alternative would result in additional impacts to drainages, and sensitive habitat such as Sonoran mixed woody succulent scrub, shadescale scrub and Peninsular juniper woodland and scrub. Further, sensitive plants are located within the area (sticky geraea, slender-leaved ipomopsis, scarlet gilia, oceanblue larkspur and Palmer's grapplinghook) (CPUC 2011), as well as cultural, tribal cultural and paleontological resources in the vicinity of the gen-tie connection line. However, the alternative would eliminate any potential impact to bats associated with the abandoned buildings on site that would remain in place. Overall, the Jacumba Community Alternative would substantially reduce impacts due to this alternative's reduced development footprint, but the Jacumba Community Alternative would result in additional off-site impacts to biological, cultural, tribal cultural and paleontological resources as a result of the gen-tie line connection.

### **Jacumba Community Alternative Conclusion**

In conclusion, the Jacumba Community Alternative would lessen impacts to aesthetic and visual resources, but significant and unavoidable impacts to visual character and quality and panoramic vistas would remain. Further, the Jacumba Community Alternative would not significantly reduce impacts to mineral resources. The Jacumba Community Alternative would also substantially reduce impacts as a result of the reduced on-site development footprint, but would result in additional off-site biological, cultural, tribal cultural and paleontological resources impacts as a result of the gen-tie line connection. (See Table GR-6-1 for a comparison of the Jacumba Community Alternative's impacts on all resource areas.) While the Jacumba Community Alternative would generally meet a portion of objectives 3, 6, and 7, although not to the degree that the Proposed Project would, it would not meet project objectives 1 or 5 by removing energy storage from the project description, objective 2 by impairing the Proposed Project's ability to achieve the maximum ITC, and objective 4 by extending the gen-tie 2.5 miles to the ECO substation and, therefore, not locating the Project near SDG&E facilities to reduce transmission infrastructure needs.

Further, with the exception of the gen-tie line, the Jacumba Community Alternative is not considerably different than the Reduced Project Alternative analyzed in the Draft EIR. The Jacumba Community Alternative prioritizes reducing impacts to views from Old Highway 80 and the Jacumba community, while the Reduced Project Alternative prioritizes reducing views from I-8 and the northern portion of the Project site. Accordingly, the Jacumba Community Alternative would not offer significant environmental advantages over the alternatives analyzed in the Draft EIR. (*South County Citizens for Smart Growth v. County of Nevada* (2013) 221 Cal.App.4th 316, 330; *Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 547.) In addition, the Proposed

Project was revised after public review of the Draft EIR in response to comments, and the Proposed Project now includes increased setbacks along Old Highway 80 and the Jacumba Community.

### **Reduced PV Panel Height Alternative**

The Reduced PV Panel Height Alternative would reduce the maximum height of the PV panels to 7 feet above ground surface, instead of 12 feet as specified for the Proposed Project. This would substantially increase the visual screening of the PV panels.

### **Feasibility and Project Objectives**

An EIR is not required to consider alternatives which are infeasible. (CEQA Guidelines, § 15126.6(a).) “Feasible” is defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” The Reduced PV Panel Height Alternative would be considered technologically infeasible because of the technical restraints posed by the Project site and the PV panel technology commercially available. Among other things, the racking systems support many panels together in a straight line across hundreds of feet to track the sun throughout the day. These racking systems allow the panels to be supported in a straight line despite minor (12 inches) deviations in ground level and explain why certain PV panels may be higher in height than otherwise expected at a given location. The racking systems have a minimum mechanical height of 4.6 feet when the PV panel is flat and 7.5 feet when the panel is in full-tilt position. Further, the racking system must ensure that panels and other electrical equipment that cannot satisfy required waterproof ratings are elevated to provide at least 12 inches of freeboard as a factor of safety above the calculated Base Flood Elevation in order to comply with the San Diego County Flood Damage Prevention ordinance and guidance from FEMA. A height of 7 feet would not allow for sufficient elevation of the panels above a 100-year flood.

Finally, available utility-scale panels range from 6.5 feet to 7.9 feet long, and the Proposed Project is expected to use a 7.5-foot panel as the shortest panels are facing obsolescence (see Appendix U in the Final EIR). Given these environmental conditions and technical constraints, it is not technologically feasible to limit the PV panels to 7 feet in height. However, please note that 12 feet represents the maximum height of a PV panel above graded ground surface in full tilt position and that same tracker would be 9 feet tall in the flat position. Similarly, where site conditions permit (no undulation, little flood depth), PV panels may be as short as 7.5 feet in the full tilt position and 4.6 feet in the flat position. Accordingly, the Reduced PV Panel Height Alternative is technologically infeasible as the alternative could not be accomplished in a successful manner.

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**Table GR-6-1**  
**Summary of Alternatives to the Proposed Project**

| Issue Areas   | Proposed Project | EIR Alternatives |                       |                  |                             | Community Recommended            |                               |
|---|------------------|------------------|-----------------------|------------------|-----------------------------|----------------------------------|-------------------------------|
|   |                  | No Project       |                       | Community Buffer | Reduced Project Alternative | Reduced Project – Northern Focus | Jacumba Community Alternative |
|   |                  | No Development   | Development Per Plans |                  |                             |                                  |                               |
| <b>Impact AE-1:</b> Impact to Jacumba existing visual character and/or quality  | SU               | ▼                | =                     | ▼                | ▼                           | ▼ (SU)                           | ▼ (SU)                        |
| <b>Impact AE-2:</b> Impact to visual character of Jacumba Hot Springs   | SU               | ▼                | ▼                     | ▼                | ▼                           | ▼ (SU)                           | ▼ (SU)                        |
| <b>Impact AE-3:</b> I-8 Long distance view changes to this eligible state scenic highway viewpoint due to proposed project                | SU               | ▼                | ▼                     | =                | ▼                           | =                                | =                             |
| <b>Impact AE-4:</b> Old Highway 80 – Long distance view blockage and character change from this County scenic highway system viewpoint    | SU               | ▼                | ▲                     | =                | =                           | ▼ (LS)                           | ▼ (SU)                        |
| <b>Impact AE-5:</b> Jacumba Community Park – Long distance view blockage and character change from this County Park                       | SU               | ▼                | ▲                     | =                | =                           | ▼ (LS)                           | ▼ (SU)                        |
| <b>Impact AE-6:</b> Anza-Borrego Desert State Park Lands and Carrizo Gorge Wilderness - Long distance view changes from State Parks lands | SU               | ▼                | ▼                     | =                | ▼                           | ▼ (SU)                           | ▼ (SU)                        |
| <b>Impact AE-7:</b> Round Mountain – Character change and view interruption from this recreational resource viewpoint                     | SU               | ▼                | ▼                     | =                | ▼                           | ▼ (SU)                           | ▼ (SU)                        |
| <b>Impact AE-8:</b> Airport Mesa - Long distance view changes at this recreational resource viewpoint due to proposed solar               | SU               | ▼                | ▼                     | =                | ▼                           | ▼ (SU)                           | ▼ (SU)                        |
| <b>Impact AE-9:</b> Table Mountain area – Long distance view changes at this recreational resource viewpoint due to proposed solar        | SU               | ▼                | ▼                     | =                | ▼                           | ▼ (SU)                           | ▼ (SU)                        |

**Table GR-6-1**  
**Summary of Alternatives to the Proposed Project**

| Issue Areas  | Proposed Project | EIR Alternatives |                       |                  |                             | Community Recommended            |                               |
|--|------------------|------------------|-----------------------|------------------|-----------------------------|----------------------------------|-------------------------------|
|  |                  | No Project       |                       | Community Buffer | Reduced Project Alternative | Reduced Project – Northern Focus | Jacumba Community Alternative |
|  |                  | No Development   | Development Per Plans |                  |                             |                                  |                               |
| <b>Impact AE-10:</b> Glare impact to roadways from proposed project  | LS               | ▼                | ▲                     | =                | ▼                           | ▼                                | ▼                             |
| <b>Impact AE-CU-1: Cumulative</b> Impact on valued visual character or image of neighborhoods, communities, or localized areas.  | SU               | ▼                | =                     | ▼                | ▼                           | ▼ (SU)                           | ▼ (SU)                        |
| <b>Impact AE-CU-2:</b> Cumulative impacts to panoramic vista available from elevated vantage point in the Airport Mesa and Table Mountain Recreational Management Zones. | SU               | ▼                | ▼                     | =                | ▼                           | ▼ (SU)                           | ▼ (SU)                        |
| <b>Impact AQ-1:</b> Construction-related cancer risk from diesel exhaust   | SM               | ▼                | ▲                     | ▼                | ▼                           | ▼ (LS)                           | ▼ (SM)                        |
| <b>Impact AQ-CUM-1:</b> Construction-related emissions of No <sub>x</sub> , PM <sub>10</sub> and PM <sub>2.5</sub>   | SM               | ▼                | ▲                     | =                | =                           | =                                | =                             |
| <b>Impact BI-SP-1:</b> Temporary direct impact to special-status plants  | SM               | ▼                | ▲                     | =                | =                           | = (SM)                           | = (SM)                        |
| <b>Impact BI-SP-2:</b> Permanent direct impact to special-status plants  | SM               | ▼                | ▲                     | =                | ▼                           | = (SM)                           | = (SM)                        |
| <b>Impact BI-SP-3:</b> Construction-related temporary indirect impacts to special-status plants  | SM               | ▼                | ▲                     | =                | =                           | = (SM)                           | = (SM)                        |
| <b>Impact BI-SP-4:</b> Operational permanent indirect impacts to special-status plants   | SM               | ▼                | ▲                     | =                | =                           | = (SM)                           | = (SM)                        |
| <b>Impact BI-W-1:</b> Temporary direct impact to special-status wildlife   | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact BI-W-2:</b> Permanent direct impact to special-status wildlife (including  | SM               | ▼                | ▲                     | ▼                | ▼                           | ▼ (SM)                           | = (SM)                        |



**Table GR-6-1**  
**Summary of Alternatives to the Proposed Project**

| Issue Areas   | Proposed Project | EIR Alternatives |                       |                  |                             | Community Recommended            |                               |
|---|------------------|------------------|-----------------------|------------------|-----------------------------|----------------------------------|-------------------------------|
|   |                  | No Project       |                       | Community Buffer | Reduced Project Alternative | Reduced Project – Northern Focus | Jacumba Community Alternative |
|   |                  | No Development   | Development Per Plans |                  |                             |                                  |                               |
| tricolored blackbird, burrowing owl and raptor foraging habitat)  |                  |                  |                       |                  |                             |                                  |                               |
| <b>Impact BI-W-3:</b> Permanent direct impact to special-status wildlife (sensitive bird nesting)                                   | SM               | ▼                | ▲                     | =                | =                           | =                                | =                             |
| <b>Impact BI-W-4:</b> Permanent direct impact to Special-status wildlife (bats)   | SM               | ▼                | ▲                     | =                | =                           | ▼ (LS)                           | ▼ (LS)                        |
| <b>Impact BI-W-5:</b> Construction-related temporary indirect impacts to special-status wildlife (including sensitive bird nesting) | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact BI-W-6:</b> Operational permanent indirect impacts to special-status wildlife   | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact BI-WLC-1:</b> Temporary direct impact to wildlife movement  | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact BI-WLC-2:</b> Permanent direct impact to wildlife movement (Core wildlife area)   | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact BI-WLC-3:</b> Temporary indirect impact to wildlife movement  | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact BI-V-1:</b> Temporary direct riparian habitat or sensitive vegetation communities   | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact BI-V-2:</b> Permanent direct riparian habitat or sensitive vegetation communities   | SM               | ▼                | ▲                     | ▼                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact BI-V-3:</b> Temporary Indirect Impacts to Riparian Habitat or Sensitive Vegetation Communities                            | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |

**Table GR-6-1**  
**Summary of Alternatives to the Proposed Project**

| Issue Areas  | Proposed Project | EIR Alternatives |                       |                  |                             | Community Recommended            |                               |
|--|------------------|------------------|-----------------------|------------------|-----------------------------|----------------------------------|-------------------------------|
|  |                  | No Project       |                       | Community Buffer | Reduced Project Alternative | Reduced Project – Northern Focus | Jacumba Community Alternative |
|  |                  | No Development   | Development Per Plans |                  |                             |                                  |                               |
| <b>Impact BI-V-4:</b> Permanent indirect riparian habitat or sensitive vegetation communities  | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact BI-JAR-1:</b> Temporary direct Jurisdictional resources  | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | ▲ (SM)                        |
| <b>Impact BI-JAR-2:</b> Temporary indirect Jurisdictional resources  | SM               | =                | ▲                     | =                | ▼                           | ▼ (SM)                           | ▲ (SM)                        |
| <b>Impact BI-JAR-3:</b> Permanent indirect impact to jurisdictional resources  | SM               | ▲                | ▲                     | =                | ▼                           | ▼ (SM)                           | ▲ (SM)                        |
| <b>Impact CR-1:</b> Construction and Decommissioning-related impacts to undiscovered cultural resources on-site or known cultural resources within 50 feet of the Project ADI        | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact CUL-2:</b> Construction-related impacts to undiscovered human remains  | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact GEO-1:</b> Ground failure due to liquefaction, seismically induced settlements, and/or lateral ground spread that could result in the collapse of a structure              | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact GEO-2:</b> Expansive soils have potential to impact development  | SM               | ▼                | ▲                     | =                | ▼                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact HAZ-1:</b> Operational-related impacts that could exacerbate wildfire risks and thereby expose project occupants to risk of loss, injury or death involving wildland fires | SM               | ▼                | ▲                     | =                | =                           | ▼ (SM)                           | = (SM)                        |

**Table GR-6-1**  
**Summary of Alternatives to the Proposed Project**

| Issue Areas   | Proposed Project | EIR Alternatives |                       |                  |                             | Community Recommended            |                               |
|---|------------------|------------------|-----------------------|------------------|-----------------------------|----------------------------------|-------------------------------|
|   |                  | No Project       |                       | Community Buffer | Reduced Project Alternative | Reduced Project – Northern Focus | Jacumba Community Alternative |
|   |                  | No Development   | Development Per Plans |                  |                             |                                  |                               |
| <b>Impact HAZ-2:</b> Construction-related impacts exposing project occupants to potential risk of loss, injury or death involving wildland fires  | SM               | ▼                | ▲                     | =                | =                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact HAZ-CU-1:</b> Cumulative impacts to interference with emergency response  | SM               | ▼                | ▲                     | =                | =                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact HAZ-CU-2:</b> Cumulative impacts to Wildland Fire Hazards   | SM               | ▼                | ▲                     | =                | =                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact HYD-1:</b> Impacts resulting from implementation of the Proposed Project associated with potential alteration of drainage patterns and flood hazards due to the perimeter fence, during construction and operation  | SM               | ▼                | ▲                     | =                | =                           | ▼ (SM)                           | = (SM)                        |
| <b>Impact MR-1:</b> MM BI-3, Habitat Preservation, will cause a potentially significant impact with respect to the permanent loss of availability of a known mineral resource that is minable, processable, and marketable under the technologic and economic conditions that exist at present or which can be estimated to exist in the next 50 years and is valued at more than \$12,500,000. | SU               | ▼                | ▲                     | ▼                | ▼                           | ▼ (SM)                           | ▼ (SM)                        |
| <b>Impact NOI-1:</b> Operational stationary equipment noise   | SM               | ▼                | ▲                     | ▼                | =                           | = (SM)                           | = (SM)                        |
| <b>Impact NOI-2:</b> Operational Mobile Equipment noise   | SM               | ▼                | ▲                     | ▼                | =                           | = (SM)                           | = (SM)                        |
| <b>Impact NOI-3:</b> Construction-related noise   | SM               | ▼                | ▲                     | ▼                | =                           | = (SM)                           | = (SM)                        |

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Existing View East from Undeveloped Brawley Avenue Property



Proposed Project Simulation: Visual Simulation of the Proposed Project

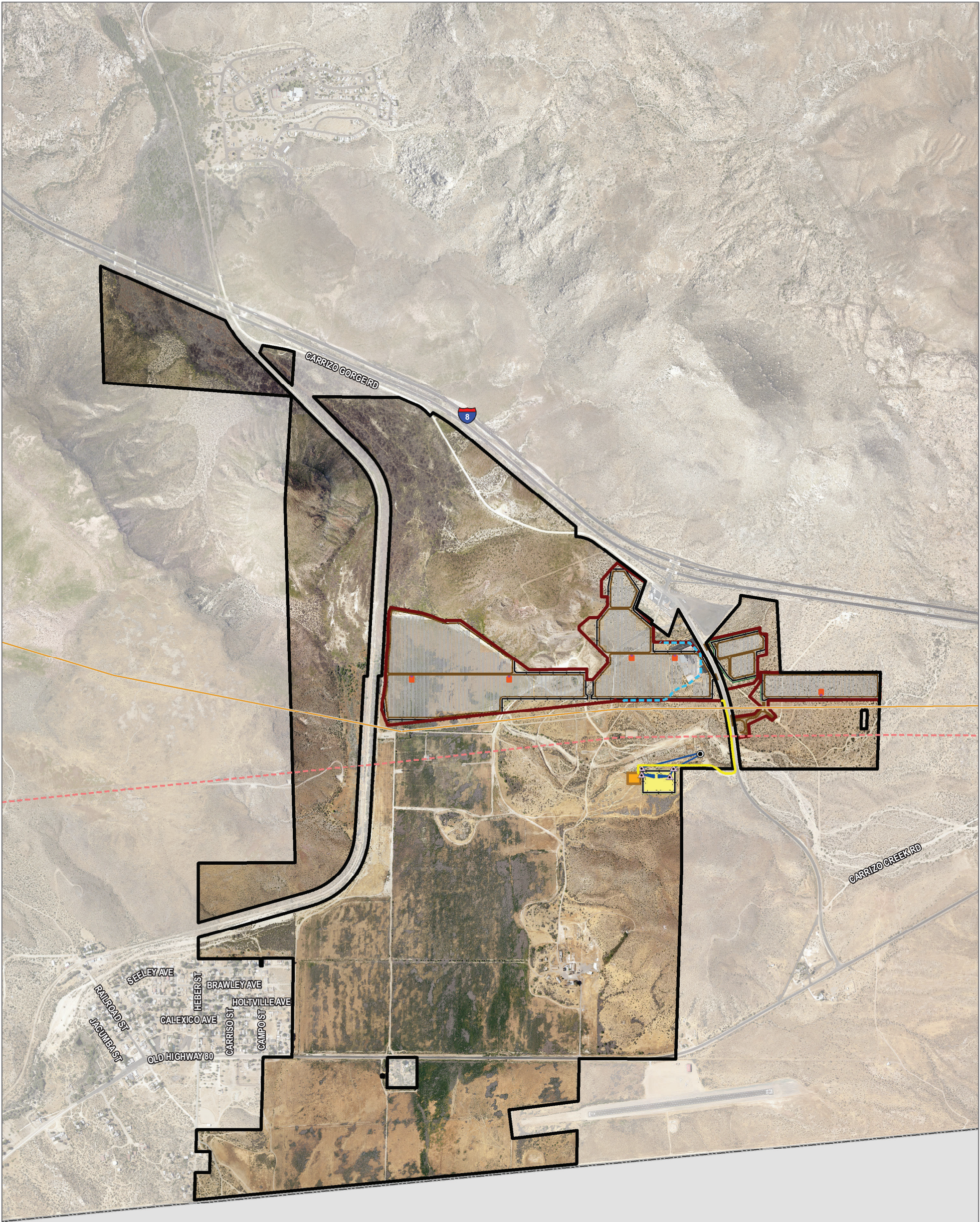


Alternative Simulation: Visual Simulation of the Community Buffer Alternative



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|   |                                       |
|---|---------------------------------------|
| Project Boundary                          | Utility Connection                    |
| MUP Boundary (Northern Development Focus) | Monopole with six arms (115')         |
| Transmission Line Corridor (24-Foot Wide) | Monopole with no arms (75'-90')       |
| <b>Project Components</b>                 | Access Roads                          |
| Solar Panels                              | Landscape Buffer                      |
| Battery Storage Container                 | Waterline                             |
| Inverter/Transformer Pad                  | Fence                                 |
| Substation                                | <b>Existing Infrastructure</b>        |
| Switchyard                                | Sunrise Powerlink Transmission Line   |
|   | Southwest Powerlink Transmission Line |

MEXICO

SOURCE: Kimley-Horn 2020; SANGIS 2017, 2021



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Existing View South from Eastbound I-8 at Carrizo Gorge Road Offramp



Visual Simulation of the Alternative Project



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Existing View West from Airport Mesa



Visual Simulation of the Alternative Project



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Existing View Southwest from mesa landform south of Table Mountain

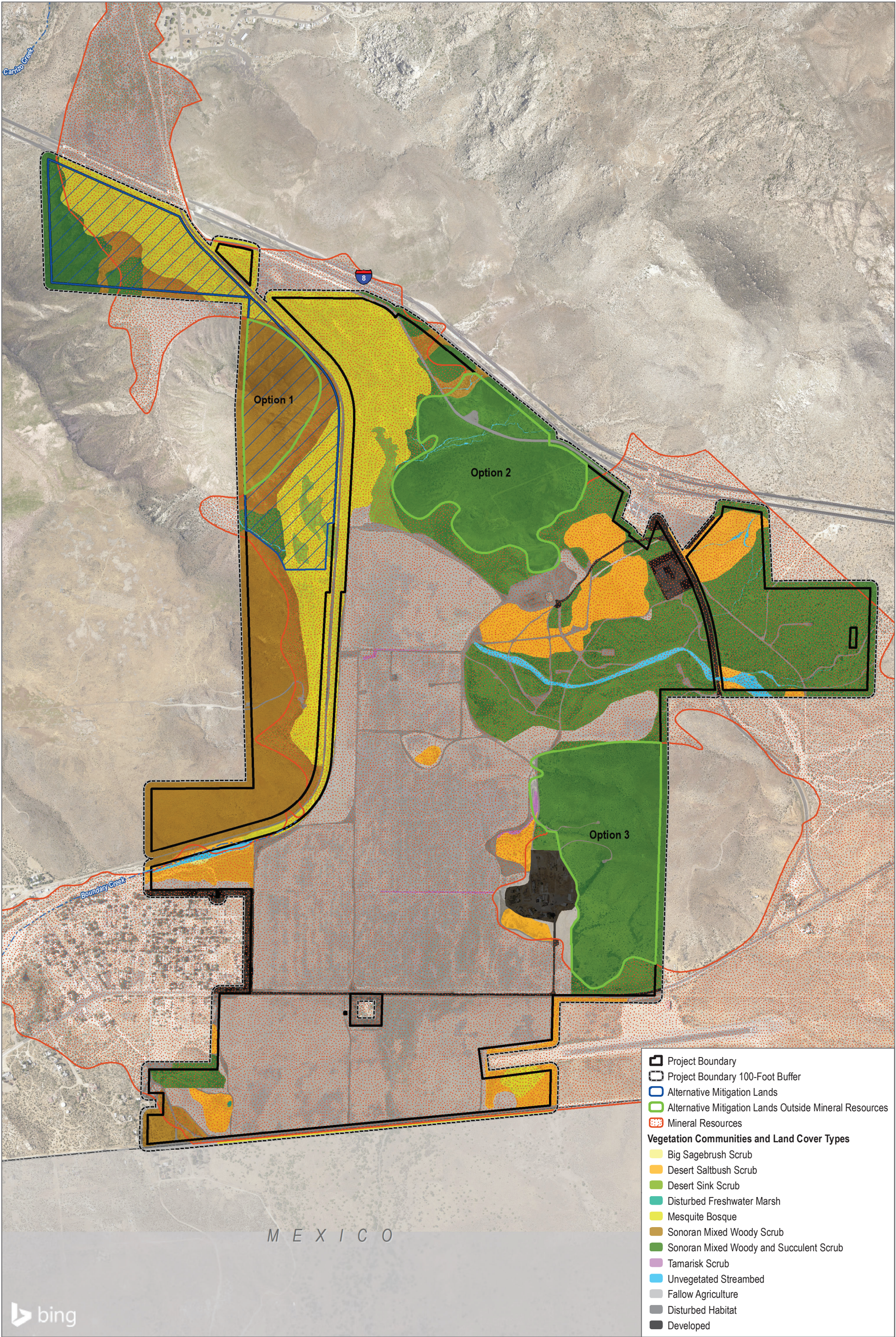


Visual Simulation of the Alternative Project



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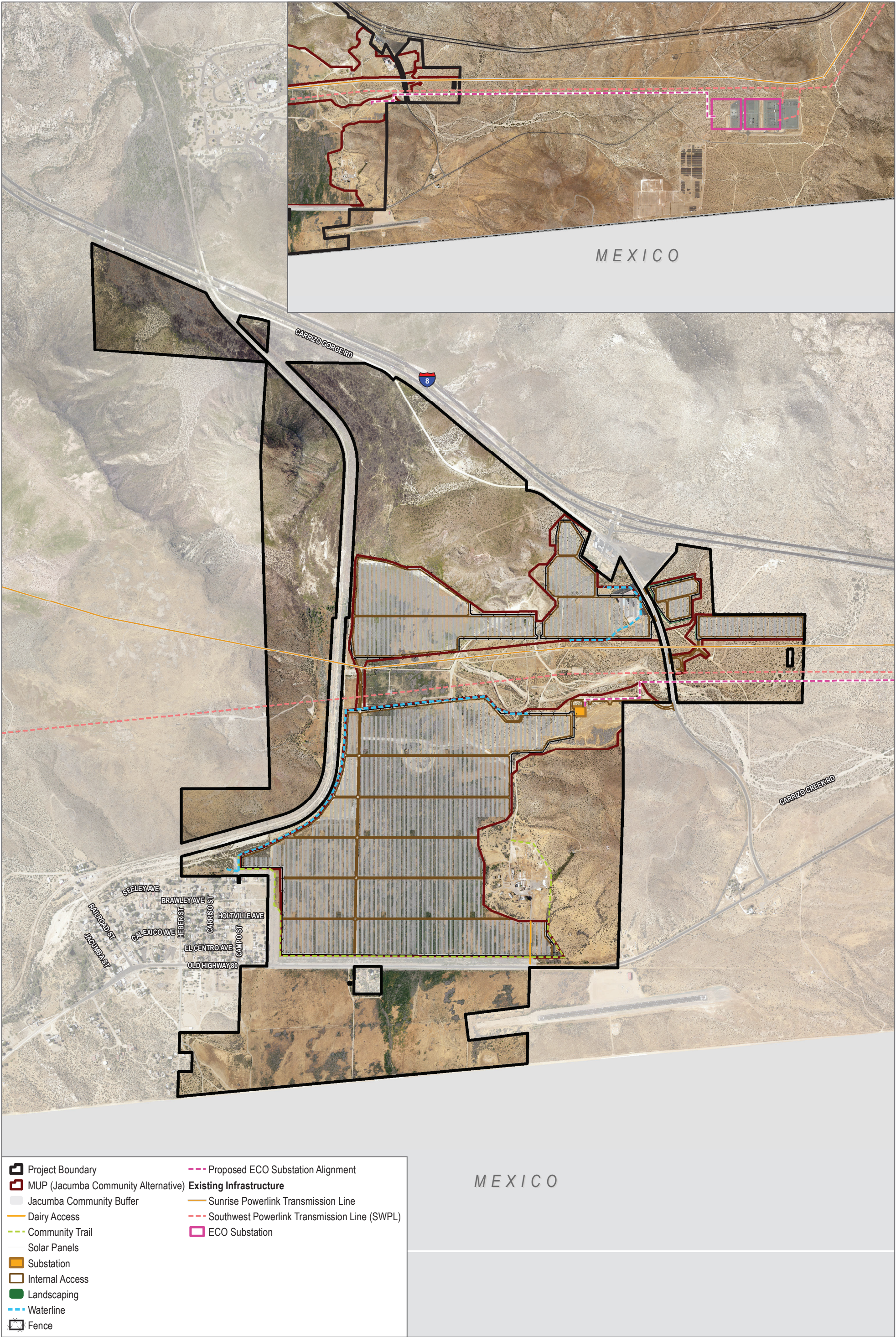


SOURCE: Leighton 2021; SANGIS 2017, 2021



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SOURCE: Kimley-Horn 2020; SANGIS 2017, 2021



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