County of San Diego

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 505-6445 General ▪ (858) 694-2705 Codes
(858) 565-5920 Building Services
www.SDCPDS.org

DAHVIA LYNCH
DIRECTOR

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An Addendum to the Previously Certified Environmental Impact Report for the Soitec Solar Development Program

FOR PURPOSES OF CONSIDERATION OF RUGGED SOLAR PROJECT

PDS2017-MUP-12-007W1, PDS2017-MUP-12-007TE, PDS2017-ER-12-21-0005A

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth the criteria for determining what additional environmental documentation, if any, must be completed when a previously certified environmental impact report (EIR) covers the project for which a subsequent discretionary action (or actions) is required. The Rugged Solar Project is one of four individual solar energy projects analyzed in the Revised Final Soitec Solar Development Program EIR (Revised PEIR), which was certified by the County of San Diego Board of Supervisors on October 14, 2015. In this case, the County of San Diego (County) must assess whether the Revised PEIR for the Rugged Solar Project (Approved Rugged Project) adequately covers the impacts associated with the owner/applicant-initiated modification to Major Use Permit (MUP) 3300-12-007 (Proposed Project). This Environmental Review Update Checklist Form has been prepared in accordance with CEQA Guidelines Section 15164(e) to explain the rationale for determining whether any additional environmental documentation is needed for the subject discretionary actions.

1. Background on previously certified EIRs:

Revised Final Soitec Solar Development Program EIR (Revised PEIR)

On October 14, 2015, the County of San Diego Board of Supervisors adopted the Tailored Proposed Project and No LanEast and LanWest Alternative (Alternative 2A) as the "project," and certified the Revised Final Program Environmental Impact Report (Revised PEIR) (SCH NO. 2012-121-018) for the Soitec Solar Development Project (Soitec Project) (County of San Diego 2015a). The Soitec Project analyzed in the Revised PEIR encompassed approximately 1,490 acres within the Mountain Empire Subregional Plan area in unincorporated San Diego County (see Figure 1-1, Regional Location). The Soitec Project was composed of four individual solar farms. The Tierra del Sol Solar and Rugged Solar Projects were analyzed at a project level, and the LanEast Solar and LanWest Solar Projects were analyzed at a program level (see Figure 1-2, Soitec Solar Development (Approved 2015)). The four individual solar farms proposed to use concentrator photovoltaic (CPV) electric generation system technology on dual-axis trackers to produce solar energy at the utility-scale. Together, these four solar farms comprised the whole of the action as defined by CEQA, and were intended to produce up to 168.5 megawatts. However, the County Board of Supervisors approved Alternative 2A, which eliminated the LanEast and LanWest Solar Projects entirely, reduced the Tierra del Sol Solar Project by 99 trackers, and reduced the Rugged Solar Project by 177 trackers within the western subarea (Assessor's Parcel Number [APN] 611-060-04-00) near the Tule Creek corridor. Alternative 2A as approved by the County Board of Supervisors—composed of the Tierra del Sol Solar and Rugged Solar Projects—is referred to herein as the Approved Project.

Changes to the Rugged Solar Project (Proposed Project) are the only subject of this Addendum to the Revised PEIR. The Tierra del Sol Solar Project is not being brought forward at this time and is not owned by the Rugged Solar Project applicant.

The Revised PEIR evaluated potentially significant effects of the Soitec Project for the following environmental areas of potential concern: Aesthetics; Agricultural and Forestry Resources; Air Quality; Biological Resources; Cultural Resources; Geology, Soils, and Seismicity; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Noise; Paleontological Resources; Population and Housing; Public Services; Parks and Recreation; Transportation and Traffic; and Utilities and Service Systems.

Of these environmental subject areas, the Revised PEIR found that the Approved Project, consisting of just the Tierra del Sol Solar and Rugged Solar Projects, would result in less-than-significant impacts to Agricultural and Forestry Resources; Geology, Soils, and Seismicity; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Paleontological Resources; Public Services; Transportation and Traffic; Utilities and Service Systems; Parks and Recreation; Mineral Resources; and Population and Housing. The Revised PEIR further found that the Approved Project would cause significant impacts that could be mitigated to a level below significance to Biological Resources, Cultural and Paleontological Resources, and Noise. Finally, the Revised PEIR found that impacts to Aesthetics and Air Quality would remain significant and

unavoidable. The County Board of Supervisors made CEQA Findings and approved a Statement of Overriding Considerations when it certified the Revised PEIR and approved the Approved Project.

The Revised PEIR for the Approved Project is on file at the offices of the County Department of Planning & Development Services (PDS) and the County website at https://www.sandiegocounty.gov/content/sdc/pds/ceqa/Soitec-Solar-RFPEIR.html.

The Addendum to the Revised PEIR for the Proposed Project is also on file with PDS as Environmental Review Number PDS2017-ER-12-21-005A.

2. Lead agency name and address:

County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, California 92123

a. Contact: Regina Ochoa, Project Manager
b. Phone number: (619) 323-8090
c. Email: Regina.Ochoa@sdcounty.ca.gov

3. Project applicant's name and address:

Rugged Solar LLC
c/o J. Whalen Associates Inc.
2851 Camino del Rio S., Suite 200
San Diego, California 92108

a. Jean-Paul La Marche
b. Phone number: (858) 349-2666
c. Email: jean-paul.lamarche@cleanfocus.us

4. Summary of the activities authorized by present permit/entitlement application(s):

The Approved Project included refined versions of the Tierra del Sol Solar and Rugged Solar Projects, and the County Board of Supervisors issued MUPs for both projects. This application only concerns the Rugged Solar Project (herein referred to as the "Approved Rugged Project"). Accordingly, this summary only describes the activities allowed for the Approved Rugged Project, as analyzed in the Revised PEIR and certified by the County Board of Supervisors.

The Approved Rugged Project is approved for development of a utility-scale solar farm on 765 acres expected to produce up to 80 megawatts of alternating-current generating capacity from 3,261 CPV dual-axis trackers (reflecting the reduction of 120 trackers through application of PDF-AE-1 and M-AE-PP-1, and reduction of 177 trackers through the Board of Supervisors' selection of Alternative 2A) grouped into four subareas throughout the site. The Approved Rugged Project is approved to consist of the following components: A collection system to link trackers to the on-site substation and consisting of one, 1,000-volt direct-current underground conductor that would lead to two, 34.5-kilovolt underground and overhead alternating-current conductors, and a 2-acre on-site private collector substation site with a fenced pad area of approximately 6,000 square feet

and maximum height of 35 feet, including a 450-square-foot control house. A generation tie (gen-tie) line from the site is approved to connect to a co-located gen-tie line with the Tule Wind Energy Project. The co-located gen-tie line is approved to deliver power from the Approved Rugged Project's substation to the 69-kilovolt bus at San Diego Gas & Electric's Rebuilt Boulevard Substation (see Figure 1-3, Approved Rugged Project).

The Approved Rugged Project was anticipated to be monitored on site from the operations and maintenance (O&M) building, and off site through a supervisory control and data acquisition (SCADA) system. The O&M building was anticipated to be a 60-foot by 125-foot (7,500 square feet) facility that would be used for storage, employee operations, and maintenance of equipment. During construction, a temporary batch plant and rock-crushing facility is approved to be located on the Approved Rugged Project site. The temporary batch plant was approved to produce concrete for construction of the Tierra del Sol and Rugged Projects, and consisted of a 10,000-square-foot mixing plant, areas for sand and gravel stockpiles, an access road, and truck load out and truck turnaround areas.

Individual CPV trackers as approved under the Approved Rugged Project were anticipated to be installed by inserting the mast 20 feet deep and encasing it in concrete from the batch plant, vibrating the mast 20 feet into the ground, or attaching the mast to a concrete foundation. Components for the Approved Rugged Project are listed in Table 1.

Access to the Approved Rugged Project site was originally analyzed from Ribbonwood Road and McCain Valley Road via construction of a new road that was approved to connect the Approved Rugged Project's central subarea to McCain Valley Road off site. This road was subsequently constructed following approval of the Approved Rugged Project and is now a private road named Tule Mountain Road.

Table 1. Approved Rugged Project Components

Project Component	Component Description
System Technology	Dual-axis concentrator photovoltaic
Solar Energy Produced (megawatts)	80
Tracker Panel Height (feet)	Up to 30 feet
Installation Method	Concrete foundations; 20-foot mast depth; on-site concrete batch plant
Exterior Lighting	Project-wide
Project Site Acreage (acres)	765
Development Footprint (acres)	498.2
Grading Cut & Fill Quantities (cubic yards)	28,410
Substation Size (square feet)	6,000
Overhead Collection System	34.5 kilovolts; steel poles 50 to 75 feet in height
Operations and Maintenance Building (square feet)	7,500
Construction Water Use (acre feet)	59
Operational Water Use (acre feet/year)	8.7
Panel Washing Frequency	Every 6 weeks
Operational Day-to-Day Employees	20

5. Does the project for which a subsequent discretionary action is now proposed differ in any way from the previously approved project?

The proposed Rugged project, as modified through this MUP Modification application, is herein referred to as the "Proposed Project." The Proposed Project would be a solar farm on a total of 764 acres, which represents a reduction in total site acreage by 1 acre as compared to the Approved Rugged Project. Additionally, accounting for the changes made to the Approved Rugged Project, the Proposed Project is expected to reduce the development footprint from 498.2 acres to approximately 391.2 acres, an approximately 21% reduction.

The Proposed Project would produce up to 74 megawatts of solar energy from single-axis photovoltaic (PV) trackers and would not use the CPV dual-axis technology as originally contemplated for the Approved Rugged Project. Due to the Proposed Project's change in technology from CPV dual-axis trackers to PV single-axis trackers, the Proposed Project would require significantly less concrete because the single-axis trackers do not require concrete foundations for installation. Additionally, this change from CPV dual-axis to PV single-axis technology would reduce the height of the solar array and pole-mount structures from approximately 30 feet as originally proposed under the Approved Rugged Project to approximately 7 feet, with a maximum panel height of 12 feet, under the Proposed Project. Piles would be driven to a depth of approximately 7 feet below ground surface as opposed to the 20 feet required of the Approved Rugged Project.

Similar to the Approved Rugged Project, a temporary concrete batch plant is analyzed as part of the Proposed Project that would be located on site during construction within the Proposed Project footprint. However, the batch plant is not necessary for the Proposed Project due to implementation of single-axes PV trackers, which do not require the same deep concrete footings as the technology anticipated by the Approved Rugged Project. If the Tierra del Sol Project is not implemented on the same schedule as the Proposed Project, the batch plant location on the Rugged project site would not be available for a temporary batch plant. A concrete batch plant could be sited on the Tiera del Sol site should such a plant be required; however, because the Tiera del Sol Project anticipated the same technology that the Proposed Project is no longer pursuing, and because the timing of the Tiera del Sol construction is not within the control of the Rugged project proponent, and because the location of such a batch plant (if required) is not known at this time, it is too speculative to analyze its potential re-location. However, the re-location of a batch plant to the Tiera del Sol site would reduce the distance of travel between the batch plant and the final location, and would reasonably be expected to be constructed within the area anticipated for development by the Revised PEIR; therefore, impacts would be expected to be reduced if a batch plant is relocated to the Tiera del Sol site.

The Proposed Project would include a larger on-site collector substation that would increase the size of the substation from 6,000 square feet as analyzed under the Approved Rugged Project to 26,000 square feet (see Figure 1-4, Proposed Rugged Project). Components for the Proposed Project are listed in Table 2.

Upon completion, the Proposed Project would be remotely monitored through a SCADA system and would not have physical on-site monitoring as originally contemplated under the

Approved Rugged Project. Aside from maintenance and repairs, the Proposed Project would not generate any operational traffic. The Proposed Project would have a reduction to the O&M building from a 60-foot by 125-foot (7,500-square-foot building required for operation of the Approved Rugged Project) to a 60-foot by 105-foot (6,300-square-foot) warehouse building that would be used for storage of parts and equipment.

Table 2. Proposed Project Components

Project Component	Component Description
System Technology	Single-axis photovoltaic
Solar Energy Produced (megawatts)	74
Tracker Panel Height (feet)	7 average, up to 12
Installation Method	Pile-driving with isolated pre-drilling; 7-foot depth; on-site concrete batch plant
Exterior Lighting	Storage building and substation only
Project Site Acreage (acres)	764
Development Footprint (acres)	391.2
Grading Cut & Fill Quantities (cubic yards)	75,000
Substation Size (square feet)	26,000
Overhead Collection System	34.5 kilovolts; steel poles 50 feet in height
Operations and Maintenance Building (square feet)	6,300
Construction Water Use (acre feet)	36.5
Operational Water Use (acre feet/year)	1.41
Panel Washing Frequency	Once per year
Operational Day-to-Day Employees	0

The Tierra del Sol Solar and Rugged Solar Projects were both approved by the California Air Resources Board and certified as “environmental leadership” projects under Assembly Bill (AB) 900, the Jobs and Economic Improvement Through Environmental Leadership Act of 2011, by California Governor Edmund Gerald Brown Jr. AB 900, which took effect January 1, 2012, established specified, expedited procedures for the judicial review of EIRs and approvals granted for a leadership project related to the development of a range of projects, including clean renewable energy or clean energy manufacturing projects. Among other things, AB 900 projects are required to create high-wage, highly skilled jobs and not result in any net additional emissions of greenhouse gases (GHGs), including GHG emissions from operations. Accordingly, both the Tierra del Sol Solar and Rugged Solar Projects included the following attributes/economic benefits, some of which were included in the Project Objectives in the Revised PEIR (County of San Diego 2015a):

- A minimum capital investment of $100,000,000 in California upon completion of construction.

- Creation of high-wage, highly skilled jobs that pay prevailing wages[1] and living wages[2] and provide construction jobs and permanent jobs for Californians.
- Commitment to obtain voluntary carbon offsets or GHG credits from a qualified GHG emissions broker to offset total projected construction and operational GHG emissions.
- Agreement to comply with the California Rules of Court established for litigation challenging an EIR for an Environmental Leadership Project, including payment of judicial costs for hearing and deciding the case on an expedited basis.
- Agreement to pay the costs of preparing the administrative record for the project concurrent with review and consideration of the project, in a form and manner specified by the lead agency.

The Final Soitec Solar Development Project PEIR (Final PEIR) was originally certified by the Board of Supervisors on February 4, 2015 (County of San Diego 2015b), and a legal challenge was filed by Backcountry Against Dumps and Donna Tisdale against the County and Soitec. Litigation challenging the Final PEIR was entitled to litigation streamlining under AB 900. On July 8, 2015, San Diego Superior Court Judge Joel R. Wohlfeil issued his Minute Order and Ruling (Decision) on the Court's June 25, 2015 hearing. The Decision found that the Final PEIR violated CEQA because an optional energy storage system on approximately 7 acres of the Rugged Solar Project was added to the Final PEIR in an Additional Information Statement after the Draft PEIR had been circulated for public review. The Decision found no legal fault with any other aspect of the Final PEIR. On July 29, 2015, Judge Wohlfeil issued a Peremptory Writ of Mandate (Peremptory Writ) to the Board of Supervisors requiring that the County rescind and vacate its certification of the Final PEIR, associated Findings and Statement of Overriding Considerations, and land use approvals for the Tierra del Sol Solar and Rugged Solar Projects by November 2, 2015. Therefore, the Board of Supervisors rescinded and vacated its certification of the Final PEIR, associated Findings and Statement of Overriding Considerations, and land use approvals in accordance with the Peremptory Writ on October 14, 2015. On the same day, the Board of Supervisors adopted the Revised PEIR and granted the land use approvals for the Approved Rugged Project without the optional energy storage system.

In *Golden Door Properties, LLC v. County of San Diego*, the appellate court found that a mitigation measure that allowed project applicants to offset significant GHG emission impacts by purchasing carbon offsets did not comply with CEQA. (See *id.* (2020) 50 Cal. App. 5th 467.) It is important to clarify that the specific economic benefit to offset the Approved Rugged Project's construction and operational GHG emissions was not required to mitigate the Approved Rugged Project's GHG emissions because the Approved Rugged Project did not have a significant GHG impact. Instead, the Approved Rugged Project included this benefit

[1] A prevailing wage is defined as the hourly wage, usual benefits and overtime, paid to the majority of workers, laborers, and mechanics within a particular area. The Proposed Project would incorporate the latest Department of Industrial Relations wage determinations at the time that contracts go out for bid for construction of the Proposed Project.
[2] A living wage is defined as the minimum income necessary for a worker to meet basic needs for an extended period of time or for a lifetime. The County of San Diego has not adopted a living wage. However, should the County adopt a living wage going forward, the Proposed Project applicants commit to complying with any wage requirements contained therein.

as a condition of certification under AB 900. The Approved Rugged Project's AB 900 economic benefits were included in the MUP issued by the County Board of Supervisors.

It is unclear whether EIR Addendums are eligible for the judicial streamlining benefits of AB 900. Nevertheless, the Proposed Project is not seeking to amend those conditions in the Rugged MUP modification, and will maintain all of the AB 900 attributes/economic benefits outlined above. Like the Approved Rugged Project, the Proposed Project would not result in a significant GHG emissions impact, as described further in the Environmental Checklist, below. The Approved Rugged Project's commitment to offset its construction and operational GHG emissions will be incorporated into the Proposed Project's Conditions of Approval.

The Proposed Project would differ from the Approved Rugged Project in several ways that would reduce the environmental impacts associated with the Approved Rugged Project. The Proposed Project would use single-axis PV tracker technology with a maximum tracker panel height of 12 feet and an average height of 7 feet, whereas the Approved Rugged Project would have used dual-axis CPV tracker technology with a maximum tracker panel height of 30 feet. The change in height and scale of the solar technology would reduce the Proposed Project's aesthetic impacts, as described further in the Environmental Checklist, below. The Proposed Project would impact 391.2 acres, whereas the Approved Rugged Project would have impacted 498.2 acres. In terms of biological resources, the Proposed Project would impact 71.5 fewer acres of sensitive vegetation communities and rare plants, including fewer impacts to individual rare plants, and 2.91 fewer acres of wetlands and jurisdictional waters. Accordingly, the reduced height of the PV tracker panels, the switch to single-axis PV tracker technology, the elimination of project-wide exterior lighting, and the reduced footprint of the Proposed Project would reduce impacts to various environmental resource areas, as discussed in further detail in the Environmental Checklist, below.

The Proposed Project would require approximately 36.5 acre-feet (AF) of water to construct, whereas the Approved Rugged Project would have required approximately 59 acre-feet of water to construct. Additionally, due to the change to single-axis PV technology from dual-axis CPV technology, the Proposed Project would require panel washing only once a year whereas the Approved Rugged Project required panel washing every 6 weeks (i.e., approximately 8 to 9 times per year) because CPV panels are more sensitive to dust. The Proposed Project would be monitored remotely and, accordingly, would not require any on-site personnel or associated bathroom facilities, whereas the Approved Rugged Project required up to 20 on-site personnel, including associated bathroom facilities, for operational purposes. As a result, the Proposed Project would only require approximately 1.4 acre-feet of annual water use for operational purposes, whereas the Approved Rugged Project required approximately 8.7 acre-feet of annual water use. A comparison of the components for the Approved Rugged Project and the Proposed Project is provided in Table 3.

The reduction in both construction and operational water usage associated with the Proposed Project would reduce impacts to groundwater resources and utilities and service systems, which would remain less than significant, as described further in the Environmental Checklist, below.

Table 3. Comparison Summary of Proposed Project and Approved Rugged Project

Project Component	Approved Rugged Project	Proposed Project	Difference
System Technology	Dual-Axis CPV	Single-Axis PV	—
Solar Energy Produced (megawatts)	80	74	(6)
Tracker Panel Height (feet)	Up to 30	7 (average), up to 12	(18) to (23)
Installation Method	Concrete foundations; 20-foot mast depth; on-site concrete batch plant	Pile-driving with isolated pre-drilling 7-foot depth; on-site concrete batch plant	(13 feet pile depth)
Exterior Lighting	Project-Wide	Storage building and substation only	—
Project Site Acreage (acres)	765	764	(1)
Development Footprint (acres)	498.2	391.2	(107)
Grading Cut and Fill Quantities (cubic yards)	28,410	75,000	46,590
Substation Size (square feet)	6,000	26,000	20,000
Overhead Collection System	34.5 kV; steel poles 50 to 75 feet in height	34.5 kV; steel poles 50 feet in height	(0–25) feet in height
Operations and Maintenance Building (square feet)	7,500	6,300	(1,200)
Construction Water Use (acre feet)	59	36.5	(12.5)
Operational Water Use (acre/year)	8.7	1.41	(7.29)
Panel Washing Frequency	Every 6 weeks (nine washings per year)	Once per year	(8)
Operational day-to-day Employees	20	0	(20)

Notes: CPV = concentrator photovoltaic; PV = photovoltaic; kV = kilovolt
Off-site impacts for the Approved Rugged Project associated with access roads and off-site fuel modification zone areas are not included in the impact comparison because these would not be required by the Approved Rugged Project or Proposed Project. Furthermore, road improvement areas within and adjacent to the on-site portions of Tule Mountain Road were associated with the Tule Wind Energy Project and analyzed under CEQA document SCH# 2009121079.

The Approved Rugged Project included various Project Design Features (PDFs) to ensure that the project avoided effects related to Aesthetics/Visual Resources; Air Quality; Geology, Soils, and Seismicity; Hazards and Hazardous Materials; Noise; Public Safety; and Transportation and Traffic (see Table 4). The Proposed Project would implement all of the same PDFs listed in Table 4, except where noted in the table with underline/strike-through text. In addition to the PDFs listed in Table 4, all mitigation measures to be carried forward from the Approved Rugged Project to the Proposed Project are provided in full in Appendix A, Project Design Features and Mitigation Measures.

Table 4. Summary of Project Design Features

Subject Area	Design Feature or Construction Measure	
Aesthetics	PDF-AE-1	In the southernmost parcel of the Rugged site, ~~pull back project grading and remove trackers from the natural saddle that occurs on the southern parcel and would likely be visible to westbound Interstate 8 motorists. I~~in-place existing natural vegetation shall be protected to act as a low screen and provide topographic and vegetative continuity across the natural saddle area that occurs on the southern parcel while complying with the Fire Protection Plan. Additional shrub plantings (fire resistant and a maximum height 6 feet) shall also be included in the area to reinforce vegetation line across the saddle.
	PDF-AE-2	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. Fencing shall be of an appropriate design and color for the Proposed Project location.
	PDF-AE-3	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.
	PDF-AE-4	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.
	PDF-AE-5	Outdoor lighting at each solar farm site shall conform to County of San Diego Light Pollution Code Zone A standards for lamp type and shielding requirements. More specifically, Zone A standards shall be applicable for all Class I (i.e., lighting for assembly areas where color rendition is important) and Class II (i.e., lighting for general illumination and security) lighting at the solar farm site and all outdoor lighting fixtures shall be fully shielded and directed downward. Further, fully shielded motion sensor lighting shall be installed at the on-site private substation yard, next to the entrance door to the substation control house, and mounted atop entrance gates and shall be turned off when no one is on site. When possible, tracker washing shall occur during evening and morning hours to reduce occurrences of dark sky illumination. Regarding operation of security measures, motion sensor infrared cameras shall be installed at the project site to avoid illumination of the site and surrounding area during nighttime hours.
	~~PDF-AE-6~~	~~A Glare Study utilizing project-level information shall be prepared for the LanEast and LanWest solar farms and approved by the County Department of Planning and Development Services (PDS). The glare study shall consider potential effects to sensitive receptors in the area including residents, recreationists, and motorists on Interstate 8, Old Highway 80, and McCain Valley Road. If potential visual resource impacts associated with project-generated glare are identified, then measures such as landscape screening and/or increased setbacks shall be required to reduce impacts.~~
Air Quality	PDF-AQ-1	The following measures will be applied to the Proposed Project to minimize fugitive dust (PM_{10}) and to comply with County Code Section 87.428 (Grading Ordinance), the following will be implemented:

Table 4. Summary of Project Design Features

Subject Area	Design Feature or Construction Measure
	• The applicants will apply 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. These measures will be applied to all active construction areas, unpaved access roads, parking areas, and staging areas as necessary. • Sweepers and water trucks will be used to control dust and debris at public street access points. • Internal fire access roadways will be stabilized by paving, application of an aggregate base material (such as disintegrated granite), or chip sealing after rough grading. • Exposed stockpiles (e.g., dirt, sand) 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. Disturbed areas will be covered with a nontoxic soil binding agent (Such as EP&A's Envirotac II and Rhinosnot Dust Control, Erosion Control and Soil Stabilization).
	PDF-AQ-2 Project-related construction activities using 75-horsepower or greater diesel-powered equipment is powered with California Air Resources Board (CARB) certified Tier 4 Interim engines. Project grading and building plans shall include a note stating, "75-horsepower or greater diesel-powered equipment is required to be powered with CARB-certified Tier 4 Interim Engines."
Geology and Soils	**PDF-GE-1** Prior to the approval of any building plan and the issuance of any building permit, a geotechnical study must be prepared by a Registered Civil or Geotechnical Engineer, and submitted for approval by the PDS, Building Division. The report must specify foundation designs, which are adequate to preclude substantial damage to the proposed structures due to liquefaction. The applicant must prepare the report and submit it along with the submittal for the building plans. The PDS, Building Division shall review the geotechnical study for compliance with all applicable building codes and engineering standards, and shall ensure that liquefaction evaluation is adequate and that any recommendations to minimize effects of liquefaction, if any, are incorporated into the project design.

Table 4. Summary of Project Design Features

Subject Area	Design Feature or Construction Measure
Hazards and Hazardous Materials	**PDF-HZ-2** Pursuant to the San Diego County Consolidated Fire Code Section 4903 and OSHA Regulation 1926.24, Fire Protection and Prevention, the Proposed Project applicants shall prepare a Construction Fire Prevention Plan (CFPP), and have the CFPP reviewed and approved by SDCFA and CalFire a minimum of 45 days prior to issuance of the first construction permit, such as a grading permit. The CFPP will identify potential sources of ignition and fuel during construction and decommissioning, and will detail the specific fire-prevention measures that will be employed during construction and decommissioning. Appendix 3.1.4-7 provides a conceptual outline for preparation of the CFPP.
	PDF-HZ-3 Prior to approval of a Major Use Permit, a site-specific fire protection plan shall be prepared and approved by the SDCFA. The plan shall be prepared in accordance with San Diego County Consolidated Fire Code Section 4903 and the most current version of the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Wildland Fire and Fire Protection, and shall address Code requirements for access, fencing/gates/signs, defensible space, adequate water supply and emergency response.
Noise	**PDF-N-1** To ensure noise from tracker washing activities will comply with the County Noise Ordinance, the following operational procedures and equipment will be implemented as part of the project design: Wash Station Gasoline Engine Enclosure: The proposed IPC Eagle Wash Station has a reference noise level of 99 dBA, at 9 feet from the engine. The wash station incorporates a new generation Honda GX-160 gasoline powered engine. In the factory configuration, this engine is mounted to an open frame on the wash station. A number of manufacturers produce acoustic panels suitable for exterior use, fabricated with steel casing and foam insulation, which have a sound transmission class (STC) rating up to 40. Acoustic-rated louvers are also available to permit air circulation while dampening sound propagation; such louvers can achieve an STC rating up to approximately 25. A cubic enclosure constructed with solid panels on 5 sides, and an acoustic louver on the remaining face, would achieve a composite STC of 32. Such an enclosure would reduce the operational sound level of the wash station to 67 dBA at 9 feet. As a design feature, the applicant is proposing to employ a sound enclosure for the wash station engine to achieve a sound level of not greater than 67 dBA at 9 feet; as along as this maximum noise level is respected, other equipment may be substituted. North/South Panel Washing Operations: Because of the orientation of the trackers (long axis north–south), tracker washing would take place in a north–south direction, using the service roads oriented in this direction. Along the northern and southern property lines, washing of the closest tracker to the property line would require 10 minutes, after which the adjacent tracker (at the end of the next row over) would be washed for another 10 minutes, and then equipment would be moved down the row, away from the property line. The maximum amount of time within a critical 130 foot distance from the property line would therefore be 20 minutes in an hour.

Table 4. Summary of Project Design Features

Subject Area	Design Feature or Construction Measure	
		Wash Station Operations Setback Distance: Using simple distance attenuation formulas, it was determined that continuous operation of the wash station within 130 feet of a property line with adjacent residential use would exceed the applicable portion of the San Diego County Noise ordinance (Section 36.404 Sound Level Limits). For eastern and western property lines, the distance from tracker washing activity would remain constant, as the equipment moves parallel to the property line; therefore a design feature is to place the IPC Eagle Wash Station a minimum of 130 feet from the eastern and western property lines. This would equate to following the center-line of the service road on the interior side of the solar tracker row closest to the east and west property lines. The noise produced by the water spray nozzle itself was not calculated because the noise level is anticipated to be at least 10 dBA less than the enclosed engine, which would not affect the composite noise level from the wash station.
	PDF-N-2	As part of the project design and to ensure noise from pile driving activities will comply with the County Noise Ordinance, the project's construction schedule shall be phased so that geologic testing and any pre-drilling for tracker mast installation will be completed before any pile driving to install tracker masts occurs. This will be added as a condition to the MUP.
Public Services	PDF-PS-1	As a condition to providing service and pursuant to the Safety Element of the General Plan, the applicant(s) shall enter into a fire and emergency protection services agreement with the San Diego County Fire ~~Authority~~ Protection District prior to approval of a Major Use Permit Modification to make a fair share contribution to fund the provision of appropriate fire and emergency medical services, which includes but is not limited to: • An initial Paramedic and firefighting staffing and/or ~~startup~~ equipment, total cost of $~~360,000~~250,000; and • Annual funding for ~~one~~ Paramedic and firefighting staffing and/or equipment ~~staff firefighter~~, total annual cost of $~~73,000~~24,667, with an annual ~~5~~2% escalator.
Transportation	PDF-TR-1	**Prepare Traffic Control Plan.** Pursuant to the County of San Diego Code of Regulatory Ordinances, Sections 71.602, 71.603 and 71.605, the project applicant or construction contractor shall obtain a traffic control permit and prepare a traffic control plan for each project to ensure safe and efficient traffic flow in the area and on the project sites during construction activities. The traffic control plan shall specifically address construction traffic within the County's public rights-of-way satisfactory to the Department of Public Works at least forty-five days prior to construction. The traffic control plan shall contain project-specific measures to be implemented during construction for noticing, signage, policy guidelines, and the limitation of lane closures to off-peak hours (although it is noted that no requirement for roadway or lane closures has been identified). The traffic control plan shall include provisions for construction times, and control plans for allowance of bicyclists, pedestrians, and bus access throughout construction. The traffic control plan shall also include provisions to ensure emergency vehicle passage at all times.

Table 4. Summary of Project Design Features

Subject Area	Design Feature or Construction Measure
	The traffic control plan shall include a construction notification plan, which shall identify the procedures that would be used to inform property owners of the location and duration of construction, identify approvals that would be needed prior to posting or publication of construction notices, and include text of proposed public notices and advertisements. The construction notification plan would address at a minimum the two of the following components: • **Public notice mailer**. A public notice mailer would be prepared and mailed no fewer than 15 days prior to construction. The notice would identify construction activities that would restrict, block, remove parking, or require a detour to access existing residential properties, and would provide alternative access, if required. The notice would state the type of construction activities that would be conducted and the location and duration of construction, including all helicopter activities. The project applicant or construction contractor would mail the notice to all residents or property owners within 1,000 feet of project components. If construction delays of more than 7 days occur, an additional notice would be prepared and distributed. • **Public liaison person and toll-free information hotline**. The project applicant or construction contractor would identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person would be included in notices distributed to the public. The project applicants would also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls would be addressed in the construction notification plan. To facilitate access to properties that might be obstructed by construction activities, the project applicant or construction contractor would notify property owners and tenants at least 24 hours in advance of construction activities and would provide alternative access if required.

A comparison of construction schedules between the Approved Rugged Project and Proposed Project are provided in Tables 5A and 5B. Construction schedules and equipment would vary between the two projects due to changes in project proponents and updated construction methods and technologies.[3] Overall, both the Approved Rugged Project and Proposed Project would have

[3] For a summary of equipment in the Approved Rugged Project, refer to the Revised PEIR Appendix 2.2-1. For a summary of equipment for the proposed project, please refer to Appendix C1, Air Quality Assessment.

similar construction schedules, with a duration of approximately 1 year. Construction schedules and equipment vary between the Approved Rugged Project and Proposed Project due to changes in project proponents, construction methods, and technology.

As explained in the Environmental Checklist, below, none of the proposed changes associated with the Proposed Project would require major revisions to the Revised PEIR due to new significant effects or the substantial increase in the severity of previously identified significant effects. There are no substantial changes with respect to the circumstances under which the Proposed Project would be undertaken that would require major revisions to the Revised PEIR due to new significant effects or the substantial increase in the severity of previously identified significant effects. Likewise, there is no new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Revised PEIR was certified that shows that the Proposed Project would result in new significant effects or substantially more severe effects than those analyzed in the Revised PEIR.

Table 5A. Approved Rugged Project Construction Schedule

Project Activity/Equipment	Start	End	Duration (days)
Mobilization	7/1/2014	7/8/2014	7
Clear and Grub	7/10/2014	9/18/2014	60
Grading/Road Construction	9/20/2014	9/29/14	9
Underground Electric	10/2/2014	1/26/2015	100
Substation Construction	7/17/2014	8/26/2014	35
O&M Building	11/28/2014	2/5/2015	60
Tracker Installation	8/27/2014	4/16/2015	200
Punch List and Cleanup	4/22/2015	6/30/2015	60

Source: Revised Final Program Environmental Impact Report (SCH NO. 2012-121-018) for the Soitec Solar Development Project – Appendix 2.2-2 (Approved Rugged Project);
Note: O&M = Operations and Maintenance

Table 5B. Proposed Project Construction Schedule

Project Activity/Equipment	Start	End	Duration (days)
Mobilization			
Clear and Grub	1/16/2022	1/31/2022	15
Grading/Road Construction	2/01/2022	3/31/2022	30
Solar Array Installation	4/01/2022 (Including O&M)	9/30/2022 (Including O&M)	182
Offsite Gen-Tie Connection	10/01/2022	12/31/2022	91
Site Entrance Paving & Internal Access Finish Work	10/01/2022	12/30/2022	90
Painting O&M Building	10/01/2022	10/14/2022	13

Appendix C1 Air Quality Assessment (Proposed Project);
Note: O&M = Operations and Maintenance

6. Subject areas determined to have new or substantially more severe significant environmental effects compared to those identified in the previous Negative Declaration (ND) or EIR. The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

☒	NONE				
☐	Aesthetics	☐	Agriculture and Forest Resources	☐	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Energy
☐	Geology and Soils	☐	Greenhouse Gas Emissions	☐	Hazards and Hazardous Materials
☐	Hydrology and Water Quality	☐	Land Use and Planning	☐	Mineral Resources
☐	Noise	☐	Population and Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities and Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

DETERMINATION:

On the basis of this analysis, Planning & Development Services has determined that:

☒ No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR or MND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified EIR is adequate upon completion of an ADDENDUM.

☐ No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR or ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, because the project is a residential project in conformance with, and pursuant to, a Specific Plan with an EIR completed after January 1, 1980, the project is exempt pursuant to CEQA Guidelines Section 15182.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However all new significant environmental effects or a substantial increase in severity of previously identified significant effects are clearly avoidable through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT ND is required.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND or EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.

Regina Ochoa — 4/21/22

Signature — Date

Regina Ochoa — Planning Manager

Printed Name — Title

INTRODUCTION

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted Negative Declaration (ND) or a previously certified Environmental Impact Report (EIR) for the project.

CEQA Guidelines, Section 15162(a) and 15163 state that when an EIR has been certified or a ND has been adopted for a project, no Subsequent or Supplemental EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;
    b. Significant effects previously examined will be substantially more severe than shown in the previously certified EIR;
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines, Section 15164(a) states that the lead agency or responsible agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent EIR have occurred.

If the factors listed in CEQA Guidelines Sections 15162, 15163, or 15164 have not occurred or are not met, no changes to the previously certified EIR or previously adopted ND are necessary.

The following responses detail any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that may cause one or more effects to environmental resources. The responses support the "Determination," above, as to the type of environmental documentation required, if any.

Environmental Review Checklist Update

I. **AESTHETICS:** Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to aesthetic resources including: scenic vistas; scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; existing visual character or quality of the site and its surroundings; or day or nighttime views in the area?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would result in significant and unavoidable aesthetic impacts. The Revised PEIR determined that the Approved Rugged Project would conflict with the existing visual character or quality of the surrounding area (**AE-R-1**) and would create daytime glare that would impact local residences (**AE-R-2**) and motorists (**AE-R-3**). Despite the implementation of **M-AE-PP-1** and **PDF-AE-1** through **PDF-AE-5**, the Revised PEIR determined that impacts **AE-R-1**, **AE-R-2**, and **AE-R-3** would remain significant and unavoidable (County of San Diego 2015a). It was also determined that impacts to scenic vistas would be less than significant.

A Visual Resources Analysis (Appendix B1) and Glare Study (Appendix B2) were prepared to analyze the potential aesthetics impacts of the Proposed Project as compared to the Approved Rugged Project. The Proposed Project and the Approved Rugged Project would both have significant and unavoidable impacts on visual impacts related to conflicts with existing visual character or quality, but the Proposed Project would have less of an impact compared to the Approved Rugged Project due to the reduced bulk and scale of the single-axis PV trackers as compared to the CPV trackers, and the smaller developed area footprint. The average height of the Proposed Project trackers would be 7 feet, and would not exceed 12 feet in height. In comparison, the Approved Rugged Project CPV tracker panel height is approved to be a maximum of 30 feet tall. The development area footprint of the Proposed Project would occupy 391.2 acres, which is less than the 498.2-acre footprint that is approved under the Approved Rugged Project (representing a reduction of approximately 21%). The Proposed Project would introduce panels within an area of the site wherein panels were excluded in the Approved Rugged Project (see changes to PDF-AE-1), and this change would be most evident as viewed from an approximately 1-mile-long segment of westbound Interstate 8 starting at the McCain Valley Road overpass. Although the Proposed Project trackers would be partially visible in a topographical saddle to the northwest (as viewed from westbound Interstate 8), both the distance between motorists and the panels (ranging from 1.2 miles to 0.5 miles, depending on the specific location on westbound Interstate 8) and the relatively low vertical profile of trackers would allow for the trackers to blend in with the surrounding landscape. In addition, and assuming a prevailing travel speed of 60 miles per hour, tracker edges detectable in the topographical saddle would be present in views from westbound Interstate 8 for approximately 60 seconds. Therefore, the addition of these trackers in the area where

CPV trackers were previously excluded would result in a less-than-significant impact on available views from the nearby segment of westbound Interstate 8. In addition, due to the reduced vertical scale of Proposed Project trackers and the reduced development area footprint of the Proposed Project, the Proposed Project would result in reduced visual impacts as experienced from other public roads that are part of the Proposed Project viewshed, including Ribbonwood Road and McCain Valley Road.

The Proposed Project would reduce impacts related to lighting and glare compared to the Approved Rugged Project, and would result in less-than-significant impacts. With respect to glare, the Proposed Project would eliminate glare received by adjacent residences and would eliminate glare received by passing motorists on McCain Valley Road and Ribbonwood Road. Whereas the panels in the Approved Rugged Project consisted of large (up to 30 feet high) CPVs made out of clear glass Fresnel lenses, a tracker technology that is designed to concentrate incoming light on a PV cell, the PV panels of the Proposed Project are relatively low profile (maximum 12 feet tall) and are designed to efficiently absorb all incoming light (and not reflect). The Approved Rugged Project is approved to allow project-wide exterior lighting, whereas the Proposed Project would include only exterior lighting for the storage building and substation. Accordingly, the Proposed Project would no longer cause impacts **AE-R-2** or **AE-R-3** found by the Revised PEIR to be significant and unavoidable impacts of the Approved Rugged Project. The Proposed Project would cause temporary glare (September through March) in the "yellow" category (potential to cause temporary after-image) for motorists traveling east and west on Tule Mountain Road. However, Tule Mountain Road is a private, gated roadway (locked gates are installed near the west and east terminus of the roadway) and would not be open for public use. This road was established for construction of the Tule Wind Project (specifically, for delivery of large wind turbine blades), and as such, existing use is assumed to be extremely limited. Moreover, future potential use of the road would be limited to construction and operations personnel associated with the Rugged Project. Accordingly, this private road is not evaluated for significance under CEQA. In the future, if Tule Mountain Road were to be dedicated for public use, local residents would not be anticipated to use the roadway for daily or semi-regular travel. Neither Ribbonwood Road nor McCain Valley Road (north/south roadways that connect to Tule Mountain Road) are Circulation Element roadways that experience a high level of daily traffic, and there are a limited number of residences off McCain Valley Road (approximately 4) that would benefit from an east/west roadway with direct access to Ribbonwood Road, which offers direct access to Interstate 8 (potentially resulting in slightly reduced travel time).

Consistency with goals, standards, or policies related to visual resources as given in the County General Plan, Mountain Empire Subregional Plan, or Boulevard Community Plan would be less than significant under both the Approved Rugged Project and Proposed Project.

The Proposed Project's overall visual impact on motorists would be reduced due to the Proposed Project's reduced visibility from roadways. The Proposed Project would continue to implement Mitigation Measure **M-AE-PP-1**, which requires installation of landscape screens for visually impacted roadways and motorists who travel those roadways. The mitigation measure has been modified under the Proposed Project to specify that landscape screening is only required along McCain Valley Road, whereas the mitigation measure under the

Approved Rugged Project required screening along Tierra Del Sol Road that is no longer needed because the Tierra del Sol Project is not proceeding at this time (and is not owned by the Proposed Project applicant). A summary of each mitigation measure and PDF pertaining to aesthetics as provided in the Revised PEIR for the Approved Rugged Project is provided in Table 6, and complete mitigation and PDF details are provided in Appendix A.

Table 6. Revised PEIR Mitigation Measures and Project Design Features – Aesthetics

Mitigation Measure/ PDF No.	Mitigation Measure/PDF Summary
M-AE-PP-1	Installation of landscape screens of McCain Valley Road for motorists.
PDF-AE-1	Existing natural vegetation shall be protected to act as a low screen and provide topographic and vegetative continuity across the natural saddle area that occurs on the southern parcel of the Rugged site.
PDF-AE-2	Visible staging material and equipment storage areas shall be visually screened using temporary screening fencing.
PDF-AE-3	The O&M building shall be painted/finished with muted-earth toned colors and materials, coatings, or paints having little or no reflectivity shall be used whenever possible.
PDF-AE-4	Weathered steel shall be used for gen-tie monopoles.
PDF-AE-5	Outdoor lighting shall conform to County of San Diego Light Pollution Code Zone A standards for lamp type and shielding requirements.

PEIR = Program Environmental Impact Report; PDF = Project Design Feature; O&M = Operations and Maintenance

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to aesthetics, and would eliminate two significant and unavoidable impacts associated with the Approved Rugged Project (**AE-R-2** and **AE-R-3**). There are no changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to aesthetics and visual resources.

II. AGRICULTURAL RESOURCES: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to agriculture or forestry resources including: conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, conflicts with existing zoning for agricultural use or Williamson Act contract, or conversion of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would not convert an important County agricultural resource to nonagricultural use (County of San Diego 2015a). This was determined using the County Local Agricultural Resource Assessment Model, and

impacts were determined to be less than significant. The Approved Rugged Project site contains land that previously supported grazing activities but is not considered an important County agricultural resource. Additionally, it was determined that indirect impacts to agricultural resources would be less than significant. The project site would not result in a concentration of people within 1 mile of an agricultural operation or land use contract, and would not conflict with a Williamson Act contract.

Both the Proposed Project and the Approved Rugged Project would have less-than-significant impacts to agricultural resources.

The development footprint of the Proposed Project would occupy approximately 107 fewer acres of land than the development footprint that is approved under Approved Rugged Project, which represents a reduction in approximately 21%. The Proposed Project would not convert an important County agricultural resource to nonagricultural use. The Proposed Project site contains land that previously supported grazing activities but is not considered an important County agricultural resource. Indirect impacts to agricultural resources would remain less than significant under the Proposed Project.

The Proposed Project and the Approved Rugged Project would have the same less-than-significant impacts to agricultural resources.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to agricultural resources. There are no changes in circumstances under which the project is undertaken and/or “new information of substantial importance” that would cause one or more effects to agricultural resources.

III. AIR QUALITY: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or “new information of substantial importance” that cause one or more effects to air quality including: conflicts with or obstruction of implementation of the San Diego Regional Air Quality Strategy or applicable portions of the State Implementation Plan (SIP); violation of any air quality standard or substantial contribution to an existing or projected air quality violation; a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; exposure of sensitive receptors to substantial pollutant concentrations; or creation of objectionable odors affecting a substantial number of people?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would be consistent with regional or other state or federal air quality standards, would not impact sensitive receptors, and would not create significant odor (County of San Diego 2015a). The Approved Rugged Project would implement **PDF-AQ-1**, and **M-AQ-PP-1** and **M-AQ-PP-2** during construction

activities, and would reduce oxides of nitrogen (NO_x) and particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}) emissions to below a level of significance. Due to overlapping construction of the Tierra del Sol Solar and Rugged Solar Projects, however, short-term construction emissions related to NO_x would be above significance thresholds for a short time for both projects. Accordingly, the Revised PEIR found a significant and unavoidable impact (**AQ-PP-1**) due to the overlapping construction of the Tierra del Sol Solar and Rugged Solar Projects. As concluded in the Revised PEIR, impacts to air quality would be significant and unavoidable. However, as indicated in Tables 7 and 8, below, construction and operation for solely the Rugged Solar component of the Approved Rugged Project would have emission levels that fall under all applicable screening thresholds.

Air quality impacts from the Proposed Project were analyzed in the Air Quality Assessment (Appendix C1). The Proposed Project would be consistent with the Regional Air Quality Strategy, similar to the Approved Rugged Project, because it would generate less average daily traffic than the underlying RL-80 land use that was incorporated into the Regional Air Quality Strategy, and would not result in the development of any residential or commercial uses that would result in population or permanent employment increase beyond what is approved in the General Plan or previously certified in the Revised PEIR. Specifically, the Proposed Project would result in similar levels of construction employment, but would reduce the number of permanent, on-site employees from 20 employees to zero employees.

As concluded in the Air Quality Assessment for the Proposed Project (Appendix C1), the Proposed Project's construction criteria air pollutants would not exceed County screening level thresholds. Compared to the Approved Rugged Project, construction emissions would be reduced, and all emissions levels would still fall below screening level thresholds, as shown in Table 7.

Table 7: Estimated Daily Maximum Construction Emissions (pounds per day)

	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions (Approved Rugged Project)	*17.94*	*248.95*	*127.07*	*0.46*	*98.53*	*26.64*
Maximum Daily Emissions (Proposed Project)	*16.01*	*26.88*	*97.49*	*0.24*	*4.18*	*1.27*
Pollutant Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Sources: Revised Final Program Environmental Impact Report (SCH NO. 2012-121-018) for the Soitec Solar Development Project (Page 2.2-86) (Approved Rugged Project); Appendix C1 Air Quality Assessment (Proposed Project)
VOC = volatile organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = suspended particulate matter; $PM_{2.5}$ = fine particulate matter

Table 8: Estimated Daily Maximum Operational Emissions (pounds per day)

	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions (Approved Rugged Project)	*1.71*	*25.84*	*11.84*	*0.03*	*1.09*	*0.75*
Maximum Daily Emissions (Proposed Project)	*0.18*	*0.15*	*0.57*	*0.002*	*0.22*	*0.06*
Pollutant Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Sources: Revised Final Program Environmental Impact Report (SCH NO. 2012-121-018) for the Soitec Solar Development Project (Page 2.2-86) (Approved Rugged Project); Appendix C1 Air Quality Assessment (Proposed Project)
VOC = volatile organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = suspended particulate matter; $PM_{2.5}$ = fine particulate matter

A Construction Health Risk Assessment was also prepared for the Proposed Project (an attachment to Appendix C1). Based on the analysis in the Air Quality Assessment, the Proposed Project would implement Best Available Control Technology for Toxics, including using Tier 4 construction equipment. As a result, construction would not cause health risks from air quality construction emissions.

Operational emissions would be reduced compared to the Approved Rugged Project and would remain less than screening level thresholds, as shown in Table 8. As concluded in the Air Quality Assessment for the Proposed Project (Appendix C1), impacts to air quality associated with the Proposed Project would be less than significant. (See also the Greenhouse Gas Screening Letter in Appendix C2). The Proposed Project would maintain **PDF-AQ-1**, **M-AQ-PP-1**, and **M-AQ-PP-2** as prescribed in the Revised PEIR. **PDF-AQ-1** requires the project proponents to implement fugitive dust control measures, and **M-AQ-PP-1** and **M-AQ-PP-2** require the Proposed Project to regulate types of construction machinery and to implement a construction worker ridership program to reduce impacts related to NO_x and PM_{10} emissions. The Proposed Project would also maintain **PDF-AQ-2**, which is recommended in the Air Quality Assessment (Appendix C1). **PDF-AQ-2** requires the Proposed Project to use Tier 4 construction equipment for all 75 horsepower or greater diesel-powered equipment; this PDF would further reduce emission rates (see Table 7). A summary of each mitigation measure and PDF pertaining to air quality as provided in the Revised PEIR for the Approved Rugged Project is provided in Table 9, and complete mitigation and PDF details are provided in Appendix A.

Table 9. Revised PEIR Mitigation Measures and Project Design Features – Air Quality

Mitigation Measure/PDF No.	Mitigation Measure/PDF Summary
M-AQ-PP-1	Regulate types of construction machinery to reduce impacts related to NO_x emissions.
M-AQ-PP-2	Implement construction worker ridership program to reduce impacts related to NO_x and PM_{10} emissions.
PDF-AQ-1	Implement fugitive dust control measures to reduce PM_{10} emissions.
PDF-AQ-2	Require Tier 4 construction equipment for all 75 horsepower or greater diesel-powered equipment.

PEIR = Program Environmental Impact Report; PDF = Project Design Feature; NO_x = oxides of nitrogen; PM_{10} = suspended particulate matter

As noted in the Air Quality Assessment (Appendix C1) and Revised PEIR (County of San Diego 2015a), cumulative construction impacts could occur if construction activities for adjacent/nearby projects occur simultaneously. The Tierra del Sol Solar Project is not anticipated to be constructed concurrently with the Proposed Project; therefore, there would be no construction overlap between the two projects as anticipated in the Revised PEIR. Therefore, the Proposed Project's impact to short-term construction emissions would be reduced, and combined daily construction emissions would not exceed the threshold during peak construction periods; impact **AQ-PP-1** (short-term construction emissions of PM_{10} and NO_x) would be reduced as compared to the Approved Rugged Project.

However, because the Tierra del Sol MUP is still valid, it could conceivably still occur during construction of the Proposed Project. In that case, as contemplated by the Revised PEIR, these combined cumulative impacts could be significant when construction emissions occur simultaneously and produce localized levels in excess of County standards, and impact **AQ-PP-1** (short-term construction emissions of PM_{10} and NOx) would still occur. However, potential cumulative impacts under the Proposed Project would not pose impacts to air quality greater than those analyzed under the Revised PEIR because, as described above, the Proposed Project would result in a reduction in construction emissions as compared to the Approved Rugged Project. Furthermore, potential simultaneous construction from the Tierra del Sol Major Project would be subject to the same mitigation measures and PDFs as prescribed in the Revised PEIR.

The Proposed Project would not create significant odors. Impacts related to odors were determined to be less than significant for the Approved Rugged Project. Specific to the Approved Rugged Project, the Revised PEIR determined that potential sources that would emit odors during construction included equipment exhaust and the on-site batch plant. The Revised PEIR stated that odors from equipment exhaust would be localized and generally confined to the immediate area surrounding the Rugged site, including the batch plant. The Revised PEIR stated that the Approved Rugged Project would use typical construction techniques, and that odors would be temporary and typical of most construction sites. Therefore, it was determined that the Approved Rugged Project would not contain any major sources of odor and would not be located in an area with existing odors. As for operational emissions, the Revised PEIR stated that land uses and industrial operations typically associated with odor complaints include agricultural uses, wastewater treatment plants, food

processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Because the Approved Rugged Project is not associated with the aforementioned land uses, it would not be expected to generate objectionable odors off site, nor would significant odors be generated during operation and maintenance of the facility. The Proposed Project would have a similar odor profile as the Approved Rugged Project; however, construction odor impacts would be reduced due to the reduced scale of the project, and operational odor impacts would also be reduced because the number of on-site employees would be reduced from 20 to zero, thus avoiding any potential for vehicle trips and other odor-causing activities. Similar maintenance activities would occur under the Proposed Project as the Approved Rugged Project; however, these activities would be temporary, only occurring once annually.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant air quality impacts. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more air quality impacts.

IV. BIOLOGICAL RESOURCES: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to biological resources including: adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; adverse effects to federally protected wetlands as defined by Section 404 of the Clean Water Act; interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would result in potentially significant direct impacts to special-status species from County List A (**BI-R-2**), special-status species from County List B (**BI-R-3**), suitable habitat for San Diego ringneck snake (*Diadophis punctatus similis*) and rosy boa (*Charina trivirgata*) (**BI-R-9**), golden eagle (*Aquila chrysaetos*) and raptor foraging habitat (**BI-R-10**), viability of a core wildlife area (**BI-R-11**), special-status upland vegetation communities on site and in the proposed off-site access roads (**BI-R-19**), 0.3 acres of wetlands, and 3.6 acres of tamarisk scrub (**BI-R-21**), groundwater-dependent vegetation (**BI-R-24**), Resource Protection Ordinance wetland and wetland buffers (**BI-R-27**), foraging and breeding habitat (**BI-R-29**), shallow-rooted vegetation due to well drawdown (**BI-R-30**), movement of small and mid-sized wildlife (**BI-R-31**), and smaller wildlife being able to navigate the project site due to removal of habitat (**BI-R-32**) (County of San Diego 2015a). It was also determined that the Approved Rugged Project would result in direct, short-term,

construction-related potentially significant impacts to County List A and B species (**BI-R-1**), County Group I (**BI-R-4**), active nest or young of nesting special-status wildlife species (**BI-R-5)**, loss of suitable nesting/ foraging habitat for avian species (**BI-R-6**), loss of individual special-status snakes from County Group II (**BI-R-7**), any active nests or young of nesting special-status bird species from County Group II (**BI-R-8**), special-status vegetation communities on site and in the proposed off-site access roads (**BI-R-18**), jurisdictional wetlands and waters on site (**BI-R-20**), foraging and breeding habitat on site (**BI-R-28**), and migratory birds and active migratory bird nests and/or eggs protected under the Migratory Bird Treaty Act (**BI-R-33**) (County of San Diego 2015a). All potential significant impacts to biological resources would be mitigated to less than significant with incorporation of Mitigation Measures **M-BI-PP-1** through **M-BI-PP-15** and **M-BI-R-1**. A summary of each mitigation measure pertaining to biological resources as provided in the Revised PEIR for the Approved Rugged Project is provided in Table 10, and complete mitigation details are provided in Appendix A.

Table 10. Revised PEIR Mitigation Measures – Biological Resources

Mitigation Measure No.	Mitigation Measure Summary
M-BI-PP-1	Preservation of off-site open space for impacts to upland scrub and chaparral communities, and habitat for special-status plant and wildlife species.
M-BI-PP-2	Biological monitoring during ground disturbance.
M-BI-PP-3	Preparation of construction Stormwater Pollution Prevention Plan.
M-BI-PP-4	Preparation of biological monitoring report following ground disturbance activities.
M-BI-PP-5	Preparation of Fugitive Dust Control Plan.
M-BI-PP-6	Landscaping plant palette to be reviewed and approved by Project Biologist.
M-BI-PP-7	O&M personnel prohibited from harming, harassing or feeding wildlife; travelling outside of the project footprint, bringing pets onsite, or littering.
M-BI-PP-8	All measures from project Fire Protection Plan shall be implemented.
M-BI-PP-9	Weed control treatments and associated requirements.
M-BI-PP-10	Implementation of Nesting Bird Management, Monitoring, and Reporting Plan; and conduct preconstruction nesting bird surveys.
M-BI-PP-11	Cover and/or provide escape routes for wildlife and conduct daily monitoring.
M-BI-PP-12	Minimize nighttime construction lighting.
M-BI-PP-13	Design all transmission and distribution towers and lines in accordance with Avian Power Line Interaction Committee (APLIC) standards.
M-BI-PP-14	Obtain Clean Water Act, Section 401/404 permits issued by the California Regional Water Quality Control Board and the U.S. Army Corps of Engineers for impacts to waters of the United States and state, and a Section 1602 Streambed Alteration Agreement issued by the California Department of Fish and Wildlife. If permits and agreement are not required, provide evidence from the respective resource agency that a permit or agreement is not required.
M-BI-PP-15	Implement the Groundwater Monitoring and Mitigation Plan to prevent impacts to oak woodland.

Mitigation Measures M-BI-R-1 from the Approved Rugged Project has been replaced by the revised measure M-BI-PP-14., which has been expanded to specify mitigation requirements for impacts to regulated waters and wetlands.
PEIR = Program Environmental Impact Report; O&M = operations and maintenance; CDFW = California Department of Fish and Wildlife

The Approved Rugged Project would result in potentially significant, permanent, indirect impacts to County List A and B plant species (**BI-R-13**), special-status wildlife species and electrocution/collisions by listed bird or bat species (**BI-R-15**), nesting success of tree-nesting raptors (**BI-R-17)**, jurisdictional wetlands and waters (**BI-R-23**), and special-status upland vegetation communities (**BI-R-26**). Additionally, the Approved Rugged Project would result in indirect, short-term, construction-related potentially significant impacts to County List A and B plant species (**BI-R-12**), special-status wildlife species (**BI-R-14**), nesting success of tree-nesting raptors (**BI-R-16**), jurisdictional wetlands and waters on site (**BI-R-22**), and special-status upland vegetation communities (**BI-R-25**). With implementation of Mitigation Measures **M-BI-PP-1** through **M-BI-PP-15**, and **M-BI-R-1**, as summarized in Table 10 and provided in Appendix A, the Proposed Project would have less-than-significant impacts on biological resources.

A Biological Technical Report (Appendix D) was prepared to analyze the Proposed Project's impacts on biological resources. It is noted that the report prescribes different numbering conventions for impacts as compared to the Revised PEIR for the Approved Rugged Project. The summary below parenthetically notes impact numbers for the Proposed Project followed by the Approved Rugged Project. Impacts associated with the Approved Rugged Project are noted with a "BI-R" prefix.

Similar to the Approved Rugged Project, the Biological Technical Report for the Proposed Project (Appendix D) determined that the Proposed Project would have potentially significant permanent direct impacts related to special-status plant species (**Impact SP-2 [Proposed Project]; Impact BI-R-2 and BI-R-2 [Approved Rugged Project]**), habitat for special- status wildlife species (**Impact W-3 and W-6; Impact BI-R-6 and BI-R-9**), foraging habitat (**Impact W-7; Impact BI-R-10**), loss of suitable nesting habitat (**Impact W-11; Impact BI-R-17**), sensitive vegetation communities (**Impact V-2; Impact BI-R-19**), oak root protection zone (**Impact V-3**), jurisdictional aquatic resources (**Impact V-5; Impact BI-R-21 and BI-R-27**), and wildlife movement (**WM-2 and WM-4; Impact BI-R-29, BI-R-31, and BI-R-32)**. The Proposed Project would have potentially significant temporary direct impacts related to special-status plant species (**Impact SP-1; Impact BI-R-1**), special-status wildlife species (**Impact W-1, W-2, W-4, W-5; Impact BI-R-4, BI-R-5, BI-R-7, and BI-R-8**), sensitive upland vegetation communities and oak root protection zone (**Impact V-1; Impact BI-R-18**), jurisdictional aquatic resources (**Impact V-4; Impact BI-R-20**), wildlife movement (**Impact WM-1; Impact BI-R-28**), and migratory birds and active migratory bird nests protected under the Migratory Bird Treaty Act (**Impact P-1; Impact BI-R-33**). Additionally, the Proposed Project would have potentially significant permanent indirect impacts related to special-status plant species (**Impact SP-4; Impact BI-R-13**), special-status wildlife species (**Impact W-9; Impact BI-R-15**), jurisdictional aquatic resources (**Impact V-7; Impact BI-R-23**), the groundwater table (**Impact V-8; Impact BI-R-24**), sensitive upland vegetation communities (**Impact V-10; Impact BI-R-26**), and wildlife movement (**WM-3; Impact BI-R-30**). Finally, the Proposed Project would have potentially significant temporary indirect impacts related to special-status plant species (**Impact SP-3; Impact BI-R-12**), special-status wildlife species (**Impact W-8; Impact BI-R-14**), tree nesting raptors (**Impact W-10; Impact BI-R-16**),

jurisdictional aquatic resources (**Impact V-6; Impact BI-R-22**), the groundwater table (**Impact V-8; Impact BI-R-24**), sensitive upland vegetation communities and oak root protection zone (**Impact V-9; Impact BI-R-25**), and wildlife movement (**WM-3; Impact BI-R-30)**. As concluded in the Biological Technical Report (Appendix D), with implementation of **M-BI-PP-1** through **M-BI-PP-15**, biological resource impacts associated with the Proposed Project would be reduced to less than significant.

The Proposed Project would reduce the total project footprint from approximately 498.2 acres resulting from the Approved Rugged Project to approximately 391.2 acres. Despite the reduction in the project footprint, the Proposed Project would have similar potentially significant impacts that would need to be reduced through implementation of **M-BI-PP-1** through **M-BI-PP-15** so that impacts would be less than significant. Specifically, the Proposed Project would impact 71.5 acres less to on-site sensitive upland habitat as compared to the Approved Rugged Project (Table 11). Only two sensitive upland vegetation communities would have minor increases in impacts under the Proposed Project: granitic chamise chaparral and coast live oak woodland; however, the same mitigation would apply, and impacts would be reduced to less than significant, similar to the Approved Rugged Project.

Off-site impacts for the Approved Rugged Project associated with access roads and off-site fuel modification zone areas are not included in the impact comparison because these would not be required by either project. Additionally, the road improvement areas within and adjacent to the on-site portions of Tule Mountain Road were associated with the Tule Wind Energy Project. Therefore, it is assumed that with implementation of the Tule Wind Energy Project, the impacts along Tule Mountain Road would no longer occur under the Approved Rugged Project, and thus, would no longer occur under the Proposed Project.

Table 11. On-Site Upland Vegetation Communities Impacts for the Proposed Project Compared to the Approved Rugged Project

Habitat Types/Vegetation Communities	Approved Rugged Project Total Impacts (Grading and Fuel Modification Zone) (Acres)[1]	Proposed Project Impacts (Grading and Fuel Modification Zone) (Acres)	Acreage Difference between Approved Rugged Project and Proposed Project
Upland Scrub and Chaparral			
Big Sagebrush Scrub[2]	62.0	49.68	12.3
Big Sagebrush Scrub (Disturbed)[2]	2.9	0.67	2.2
Montane Buckwheat Scrub[2]	65.6	57.83	7.7
Montane Buckwheat Scrub (Disturbed)[2]	7.2	6.78	0.5
Granitic Chamise Chaparral[2]	89.6	95.19	−5.16
Granitic Northern Mixed Chaparral[2]	—	—	—
Red Shank Chaparral[2]	35.6	32.78	2.8
Scrub Oak Chaparral[2]	60.1	57.96	2.1

Table 11. On-Site Upland Vegetation Communities Impacts for the Proposed Project Compared to the Approved Rugged Project

Habitat Types/Vegetation Communities	Approved Rugged Project Total Impacts (Grading and Fuel Modification Zone) (Acres)[1]	Proposed Project Impacts (Grading and Fuel Modification Zone) (Acres)	Acreage Difference between Approved Rugged Project and Proposed Project
Scrub Oak Chaparral (Disturbed)[2]	0.5	—	0.5
Semi-Desert Chaparral[2]	50.7	45.07	5.6
Semi-Desert Chaparral – Rock[2]	0.7	0.11	0.6
Semi-Desert Chaparral (Disturbed)[2]	0.3	0.02	0.2
Subtotal	*375.1*	*346.07*	*29.0*
Upland Woodland and Savannah			
Coast Live Oak Woodland[2]	0.03	0.54	−0.50
Mixed Oak Woodland[2]	0.03	—	0.03
Subtotal	*0.06*	*0.54*	*−0.47*
Non-Native Communities			
Non-Native Grassland[2]	64.9	21.93	43.0
Non-Native Grassland: Broadleaf-Dominated[2]	N/A	—	—
Subtotal	*64.9*	*21.93*	*43.0*
Impact Total	***440.1***	***368.53***	***71.5***
Oak Root Zone[2]	**4.4**	**2.24**	**2.2**
Urban/Developed	58.1	22.67	**35.43**
TOTAL	**498.2**	**391.2**	**107.0**

Notes: Acreages may not sum due to rounding.
N/A = this vegetation community was not mapped during this analysis year.
1 The impact totals for the Approved Rugged Project are based on Table 4-7 in the Revised PEIR.
2 Considered special status by the County of San Diego (2010).

As summarized in Tables 12 and 13, the Proposed Project would overall have less impacts to rare plant species and jurisdictional aquatic resources than the Approved Rugged Project.

Table 12. On-Site Rare Plant Impacts for the Proposed Project Compared to the Approved Rugged Project

County List	Species	Approved Rugged Project Impacts (Individuals)[1]	Proposed Project Impacts (Individuals)
A	Jacumba milkvetch	226 to 2,020	1,210
	Tecate tarplant	1 to 10	—
B	Sticky geraea	177 to 850	544
	Desert beauty	956 to 4,770	203
D	Peninsular spineflower	—	190
	Desert larkspur	98 to 450	772

Table 12. On-Site Rare Plant Impacts for the Proposed Project Compared to the Approved Rugged Project

County List	Species	Approved Rugged Project Impacts (Individuals)[1]	Proposed Project Impacts (Individuals)
	Pride of California	7 to 70	3
	Payson's jewel flower	—	—
	Low bush monkeyflower	—	—

Notes: Totals may not sum due to rounding.

1 The impact totals for the Approved Rugged Project are based on Tables 4-4 and 4-6 in the Revised PEIR (County of San Diego 2015a).

Table 13. On-Site Wetlands/Jurisdictional Waters Impacts for the Proposed Project Compared to the Approved Rugged Project

Vegetation Community/ Waters Type	Impacts		
	Jurisdiction	*Approved Rugged Project Impact (Acres)[1]*	*Proposed Project Impact (Acres)*
Wetlands/Riparian Habitat			
Alkali Meadow	ACOE/RWQCB/CDFW/County	0.1	0.05
Disturbed Alkali Meadow	ACOE/RWQCB/CDFW/County	0.2	0.16
Tamarisk Scrub	ACOE/RWQCB/CDFW/County	—	—
	Subtotal	*0.3*	*0.21*
Disturbed Alkali Meadow	CDFW/County	—	—
Disturbed Mulefat Scrub	CDFW/County	—	—
Tamarisk Scrub	CDFW/County	—	—
	Subtotal	---	---
Tamarisk Scrub	CDFW-Only	3.6	0.76
	Wetlands/Riparian Subtotal	*3.9*	*0.97*
Non-Wetland Waters/Streambed			
Non-Vegetated Channel	ACOE/RWQCB/CDFW	—	0.01
	Non-Wetland Waters/Streambed Subtotal	—	*0.01*
	Jurisdictional Total	**3.9**	**0.99**

Note: Totals may not sum due to rounding.

ACOE = U.S. Army Corps of Engineers; RWQCB = Regional Water Quality Control Board; CDFW = California Department of Fish and Wildlife; County = County of San Diego

1 The impact totals for the Approved Rugged Project are based on Table 4-7 in the Revised PEIR.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to biology and biological resources. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to biology and biological resources.

V. CULTURAL RESOURCES: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to cultural resources including: causing a change in the significance of a historical or archaeological resource as defined in State CEQA Guidelines Section 15064.5; destroying a unique paleontological resource or site or unique geologic feature; and/or disturbing any human remains, including those interred outside of formal cemeteries?

YES	NO
☐	☒

The Revised PEIR determined that impacts to cultural resources discovered (CR-R-1) would be potentially significant and impacts to discovery of unknown human remains would be less than significant. With implementation of **M-CR-PP-1**, impacts to potential new cultural resources would be less than significant (County of San Diego 2015a).

A Cultural Resources Addendum Report was prepared for the Proposed Project (Appendix E). The Cultural Resources Addendum Report determined that there are no significant or Resource Protection Ordinance sites that intersect the site. Under the County Guidelines, all archaeological sites are considered "important" (County of San Diego 2007a). The importance of the site can be mitigated by the curation of artifacts recovered through implementation of **M-CR-PP-1**, which would also require monitoring during construction. Under this mitigation measure, impacts would be reduced to less than significant under both the Approved Rugged Project and Proposed Project. Any potentially significant impacts to other sites under the Approved Rugged Project have been reduced to less than significant due to avoidance achieved through project design.

The Proposed Project would have similar types of potential impacts to cultural resources as the Approved Rugged Project because they are sited in the same area. However, because the Proposed Project would have a smaller development footprint by approximately 21%, it would result in reduced overall ground disturbance and extent of possible cultural resources impacts as compared to the Approved Rugged Project.

Similar to the Approved Rugged Project, the Proposed Project would result in less-than-significant impacts to cultural resources through implementation of **M-CR-PP-1**. This mitigation measure was required under the Approved Rugged Project to mitigate potential impacts in the event of the discovery of unknown archaeological or cultural deposits; the measure requires grading monitoring, coordination with Native American monitors, archaeological reporting, and submittal of a final monitoring report to the South Coastal Information Center. This mitigation measure would address potential impacts to undiscovered buried archaeological or cultural resources; the mitigation measure would reduce the potential impact to less than significant because it establishes procedures to record, report, and treat undiscovered archaeological or cultural resources.

The Proposed Project would also implement Mitigation Measures **M-CR-PP-2** and **M-CR-PP-3**, similar to the Approved Rugged Project. **M-CR-PP-2** requires the installation of temporary

construction fencing around known archaeological sites prior to the start of ground-disturbing activities, and **M-CR-PP-3** requires implementation of an Archaeological Treatment Plan in the event that known previously recorded cultural resources cannot be avoided. As determined for the Approved Rugged Project, these mitigation measures would reduce potential impacts to known cultural resources to less than significant because they provide specific provisions to proactively avoid and/or treat known resources. A summary of each mitigation measure pertaining to cultural resources as provided in the Revised PEIR for the Approved Rugged Project is provided in Table 14, and complete mitigation details are provided in Appendix A.

Table 14. Revised PEIR Mitigation Measures – Cultural Resources

Mitigation Measure No.	Mitigation Measure Summary
M-CR-PP-1	Monitoring of grading activities, coordination with Native American Monitors, archaeological reporting, and submittal of a final monitoring report to the South Coastal Information Center.
M-CR-PP-2	Installation of temporary construction fencing around known archaeological sites prior to the start of ground-disturbing activities.
M-CR-PP-3	Implementation of an Archaeological Treatment Plan in the event that known previously recorded cultural resources cannot be avoided.

PEIR = Program Environmental Impact Report

With implementation of Mitigation Measures **M-CR-PP-1**, **M-CR-PP-2**, and **M-CR-P-3**, the Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to cultural resources. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to cultural resources.

VI. ENERGY: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to energy including: resulting in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, and/or conflicts with or obstruct a state or local plan for renewable energy or energy efficiency?

YES	NO
☐	☒

The Revised PEIR analyzed energy impacts related to the Approved Rugged Project in the context of assessing significant irreversible environmental changes (County of San Diego 2015a, Section 8.2). The Revised PEIR explained that although the project would require the use of fossil fuels, a non-renewable resource, to power construction vehicles for the site, in return, the project would create a source of clean, renewable energy, which, over the operational life of the project, would contribute incrementally to the reduction in demand for

fossil-fuel-based electricity generation. Therefore, the incremental reduction in fossil fuels would be a beneficial effect of the commitment of nonrenewable resources.

The Proposed Project would require the use of fossil fuels, a non-renewable resource, to power construction vehicles and equipment for the site. However, the Proposed Project would require less non-renewable resources for construction as compared to the Approved Rugged Project because its development footprint is smaller by approximately 21%; no permanent, on-site employees would be traveling to and from the site daily (i.e., reduced petroleum consumption); and the PV trackers would require less-intensive installation and maintenance. For these reasons, the Proposed Project would result in less construction activities and equipment, and subsequently require less non-renewable energy than the Approved Rugged Project. Moreover, the Proposed Project would employ construction equipment equipped with Tier 4 engines,[4] which would operate more efficiently than older construction equipment fleets containing less-efficient engine types, thus reducing non-renewable energy consumption during construction.

Like the Approved Rugged Project, however, the Proposed Project would create a source of clean, renewable energy that would contribute incrementally to the reduction in demand for fossil-fuel-based electricity generation and bring a beneficial effect of the commitment of nonrenewable resources.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant energy impacts. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more energy impacts.

VII. GEOLOGY AND SOILS: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from geology and soils including: exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; being located on expansive soil creating substantial risks to life or property; and/or having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would not result in significant impacts related to geology and soils (County of San Diego 2015a). The Approved

[4] Tier 4 diesel engines significantly reduce emissions of particulate matter (PM) and oxides of nitrogen (NOx). These engines are more fuel efficient than traditional construction diesel engines.

Rugged Project is not located within a fault rupture hazard zone, and there is no evidence that the project site is located near an active fault. The Approved Rugged Project would have no impact related to exposure of people or structures to adverse effects from a known fault-rupture hazard zone. Potential adverse effects from strong seismic ground shaking, landslides and slope instabilities, liquefaction, and expansive soils would be less than significant with implementation of **PDF-GE-1**, which would require a geotechnical study to be performed on the project site and compliance with the California Building Code and the County Grading Ordinance. The Approved Rugged Project would have less-than-significant impacts to adequate soils for septic systems because the project would have to obtain an Onsite Wastewater Treatment Systems permit, which would involve demonstrating the location and design is appropriate for the site.

Similar to the Approved Rugged Project, the Proposed Project would not be located within a fault rupture hazard zone or near a known active fault; would not expose people or structures to a known hazard zone; and would not result in potential adverse effects from strong seismic ground shaking, landslides and slope instabilities, liquefaction, or expansive soils. The Proposed Project would also implement **PDF-GE-1**. A summary of this PDF pertaining to geology and soils as provided in the Revised PEIR for the Approved Rugged Project is provided in Table 15, and the complete PDF is provided in Appendix A.

Table 15. Revised PEIR PDF – Geology and Soils

PDF No.	PDF Summary
PDF-GE-1	Require a geotechnical study to be performed on the project site and compliance with the California Building Code (CBC) and the County grading ordinance.

PEIR = Program Environmental Impact Report; PDF = Project Design Feature

Compared to the Approved Rugged Project, the Proposed Project would have reduced impacts related to soils for septic systems because the Proposed Project would be operated remotely and, therefore, would not include any on-site restroom facilities or require on-site wastewater treatment.

The Proposed Project would have the same impact conclusions as the Approved Rugged Project. Both projects would result in less-than-significant impacts related to geology and soils.

The Proposed Project does not propose any changes that would cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to geologic resources. There are no changes in circumstances under which the project is undertaken and/or “new information of substantial importance” that would cause one or more effects to geologic resources.

VIII. GREENHOUSE GAS EMISSIONS: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more new significant effects or a substantial increase in the severity of previously identified significant effects associated with greenhouse gas emissions or compliance with applicable plans, policies or regulations adopted for the purpose of reducing greenhouse gas emissions?

YES	NO
☐	☒

The Revised PEIR determined that the total operational carbon dioxide equivalent (CO_2e) emissions associated with the Approved Rugged Project, including amortized construction-related emissions—which were calculated at 135 metric tons (MT) of CO_2e per year—would be approximately 722 MT CO_2e per year, which is less than the screening criteria of 900 MT CO_2e used to evaluate GHG impacts (County of San Diego 2015a).

Further, implementation of the Approved Rugged Project would result in net carbon savings of 106,268 MT CO_2e per year after offsetting the project's annual GHG emissions. The Approved Rugged Project was required to offset all construction and operation emissions as a condition of AB 900 by purchasing carbon offsets. The Approved Rugged Project helped attain the state's and County's goals in GHG reductions by creating a source of renewable energy that would be used instead of energy from fossil fuels. All impacts associated with GHG emissions for the Approved Rugged Project were determined to be less than significant.

A GHG Screening Analysis (Appendix C2) was prepared for the Proposed Project to analyze the GHG impacts of operation and construction. The Proposed Project's annual emissions, including operations and amortized construction emissions, would be 556 MT CO_2e per year; therefore, emissions would be less than 900 MT CO_2e per year, and would be less than significant. Additionally, according to the Revised PEIR, the Approved Rugged Project's annual operational emissions were estimated to be 722 MT CO_2e per year (County of San Diego 2015a). Therefore, the annual emissions from the Proposed Project would be 166 MT CO_2e less than the Approved Rugged Project; therefore, impacts of the Proposed Project would be reduced compared to the Approved Rugged Project. Furthermore, with the offset of emissions resulting from the Proposed Project, emissions from construction and operations would be counteracted and would create a 73,603 MT CO_2e net reduction in emissions, as calculated in Appendix C2. This net reduction is because a greater percentage of the energy used in San Diego County would come from renewable energy sources and would therefore reduce GHG emissions with implementation of the Proposed Project. All impacts associated with GHG emissions for the Proposed Project were determined to be less than significant.

Similar to the findings in the Revised PEIR for the Approved Rugged Project, the Proposed Project would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Specifically, like the Approved Rugged Project, the Proposed Project would provide a potential reduction in GHG emissions each year of operation if the electricity generated by the solar farm were to be used instead of electricity generated by fossil-fuel sources. Therefore, because the Proposed Project would assist in the

attainment of the state's and County's renewable energy goals by using a renewable source of energy that could displace electricity generated by fossil-fuel-fired power plants, the Proposed Project would comply with the goals and objectives of the state. The Proposed Project would further state-wide and County-wide efforts to reduce reliance on fossil fuels, and would not preclude the attainment of long-term emissions reductions goals. Therefore, impacts would be less than significant.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant GHG emissions impacts. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more GHG emissions impacts.

IX. HAZARDS AND HAZARDOUS MATERIALS: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials including: creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes; creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment; location within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport; within the vicinity of a private airstrip resulting in a safety hazard for people residing or working in the project area; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would comply with all applicable hazardous substance regulations, would not expose persons to hazardous materials, would not emit hazardous emissions within 0.25 miles of an existing or proposed school or day care facility, would comply with applicable fire codes, and would not interfere with emergency response and emergency evacuation planning (County of San Diego 2015a). Additionally, the Approved Rugged Project would implement **PDF-HZ-2** and **PDF-HZ-3** , which would require preparation of a Construction Fire Protection Plan and a site-specific Fire Protection Plan; **PDF TR-1**, which would ensure safe and efficient traffic flow in the area and on site during construction to ensure safe access for emergency responders; and **PDF-PS-1**, which would contribute funding toward local fire and emergency response. These PDFs would

reduce impacts related to hazards to less than significant. It was also determined that there would be no impact on airports or air traffic in the area.

The Proposed Project would result in less-than-significant impacts to hazards. Similar to the Approved Rugged Project, the Proposed Project would comply with all applicable hazardous substance regulations, would not expose persons to hazardous materials, would not emit hazardous emissions within 0.25 miles of an existing or proposed school or day care facility, would comply with applicable fire codes, and would not interfere with emergency response or emergency evacuation planning. As noted in the Revised PEIR for the Approved Rugged Project (County of San Diego 2015a), the Proposed Project would also maintain and implement a site-specific Hazardous Materials Business Plan to manage the risk of accidental release of hazardous material and use of hazardous materials on the project site. The Proposed Project would not use regulated substances subject to California Accidental Release Prevention Program requirements. The nearest school to the project site is Clover Flat Elementary School, approximately 1.5 miles southwest of the Proposed Project; therefore, the Proposed Project would not expose a school or daycare to hazardous materials or substances.

The Revised PEIR determined that the Approved Rugged Project would not expose people or structures to significant risk of loss, injury, or death involving wildfires, and would not result in service level decline through implementation of **PDF-PS-1**, which would require the applicant to enter into a Fire and Emergency Protection Services Agreement. The Approved Rugged Project would provide adequate emergency access and sufficient water supplies to service the project from existing entitlements. The Revised PEIR determined that the Approved Rugged Project would result in less-than-significant impacts for wildfire (County of San Diego 2015a).

A Fire Protection Technical Memorandum was also prepared which compared the Approved Rugged Project with the Proposed Project (Appendix F1). As compared to the Approved Rugged Project, the Fire Protection Technical Memorandum determined the Proposed Project would reduce potential wildfire risk by reducing the number and degree of ignition sources that would be introduced to the site. The overall development footprint of the Proposed Project would be reduced by 107 acres, representing an approximately 21% smaller footprint compared to the Approved Rugged Project, and thus resulting in fewer potential ignition sources. Additionally, changes to the Proposed Project include a less-complicated solar tracker system, significantly less on-site maintenance activities, and reduction of the on-site daily worker population from 20 with the Approved Rugged Project to zero with the Proposed Project. The Fire Protection Technical Memorandum determined that the potential emergency services impacts on fire response resources from the Proposed Project do not rise to a level of significance given the current response resources in the project area, and anticipates a reduction in demand for emergency services from the Proposed Project compared to the Approved Rugged Project because the Proposed Project would not require full-time staffing whereas the Approved Rugged Project would have had employees on the project site daily.

Each of these changes would result in a reduced potential demand for emergency response resources. The original assessment for the Approved Rugged Project indicated that solar projects had a very low fire ignition occurrence rate. The assessment indicated that from a fire

perspective, the potential risk was low, and emergency response was within the General Plan Safety Element requirements. The Proposed Project would further reduce the potential for a fire ignition by reducing the overall area that supports the solar tracker array and by replacing the dual-axis CPV trackers with a simpler, single-axis PV tracker that has been in use on numerous other utility-scale solar projects.

The Proposed Project's trackers are anticipated to require significantly reduced maintenance and cleaning, resulting in a substantial reduction in the potential for maintenance worker–related fire starts while on site or traveling to and from the site. Likewise, on-site, daily personnel reductions from 20 to zero would negate the previously identified potential risk from this population for accidental ignitions.

Furthermore, the San Diego County Fire Protection District and the California Department of Forestry and Fire Protection (CAL FIRE) have invested in the area since the Approved Rugged Project to enhance the response capabilities throughout the region. These investments include a new fire station on Ribbonwood Road with advanced life support capabilities, and the conversion of volunteer-reliant stations to career stations.

A Fire Protection Plan Addendum was prepared for the Proposed Project that analyzed fire risks (Appendix F2). The Fire Protection Plan Addendum identifies measures and best practices to reduce the potential for wildfire ignition and minimize the potential effects of a wildfire on the project site. The Proposed Project would comply with the requirements and recommendations of the Fire Protection Plan Addendum.

The Proposed Project would also implement **PDF-HZ-2**, **PDF-HZ-3**, and **PDF-TR-1**. **PDF-HZ-2** would require preparation and implementation of a Construction Fire Prevention Plan that would be reviewed and approved by the San Diego County Fire Authority (SDCFA) and CAL FIRE before issuance of a construction permit; the Construction Fire Prevention Plan would identify potential sources of ignition and detail specific fire-prevention measures to prevent ignition during construction. **PDF-HZ-3** would require that the Proposed Project proponents prepare a site-specific Fire Protection Plan that addresses all code requirements for access, fencing/gates/signs, defensible space, water supply, and emergency response. **PDF-TR-1** would ensure safe and efficient traffic flow in the project area and on the project site during construction activities. These PDFs would reduce impacts related to hazards to a less-than-significant level. The Revised PEIR also determined that the Approved Rugged Project would have no impact on airports or air traffic in the area (County of San Diego 2015a).

A summary of each PDF pertaining to hazards and hazardous materials as provided in the Revised PEIR for the Approved Rugged Project is provided in Table 16, and PDF details are provided in Appendix A. A summary of transportation (PDF-TR-1) and public service (PDF-PS-1) impacts are provided in their respective sections below.

Table 16. Revised PEIR PDFs – Hazards and Hazardous Materials

PDF No.	PDF Summary
PDF-HZ-2	Prepare and implement a Construction Fire Prevention Plan subject to review and approval by SDCFA and CAL FIRE. The Plan would identify potential sources of ignition and detail prevention measures.
PDF-HZ-3	Prepare a site-specific fire protection plan addressing Code requirements.

PEIR = Program Environmental Impact Report; PDF = Project Design Feature; SDCFA = San Diego County Fire Authority

In terms of medical emergencies, Proposed Project demand reductions and recent response capabilities improvements in the Proposed Project area combine to address medical response concerns. For example, the reduction of maintenance/cleaning activities, along with the reduction of on-site daily workers from 20 to zero with the Proposed Project, would result in significant reductions in the potential for medical emergencies. It was originally estimated that the 20 on-site personnel anticipated under the Approved Rugged Project would generate up to 1.6 calls per year, using County baseline statistics for calls per-capita (County of San Diego 2015a). This is a relatively low number of calls, but was determined at the time to contribute to the increase in medical calls in the area based on the cumulative project evaluation. The Proposed Project's reduction to no on-site workers on a daily basis further reduces the call volume that would be anticipated from the Proposed Project. The potential for an emergency medical call would be limited to an accident during the daylight hours on the one day per year that the tracker panels are anticipated to be washed and on the estimated 10 to 20 days per year that maintenance personnel would be on site. Based on the relative lack of on-site personnel, it is estimated that the medical calls from the site would be near zero calls per year.

In summary, both the Proposed Project and the Approved Rugged Project would result in similar, less-than-significant impacts to hazards. The Proposed Project would reduce impacts related to wildfire risk and emergency medical demand compared to the Approved Rugged Project. Both projects would implement **PDF-HZ-2, PDF-HZ-3, and PDF TR-2**, and **PDF-PS-1** to reduce impacts to less than significant.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to hazards and hazardous materials, and wildfire risk. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to hazards and hazardous materials, or wildfire risk.

X. HYDROLOGY AND WATER QUALITY: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to hydrology and water quality including: violation of any waste discharge requirements; an increase in any listed pollutant to an impaired water body listed under section 303(d) of the Clean Water Act; cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses; substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion, siltation or flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; provide substantial additional sources of polluted runoff; place housing or other structures which would impede or redirect flood flows within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps; expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and/or inundation by seiche, tsunami, or mudflow?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would not result in significant increases in water surface elevations within Tule Creek, would not substantially alter the drainage pattern of the site or increase velocities and peak flow rates, would not create flood hazards to persons or property, would not exceed the significance threshold for impacts to water quality, and would not significantly impact groundwater resources. Therefore, impacts related to hydrology and water quality would be less than significant (County of San Diego 2015a).

A Preliminary CEQA Drainage Study (Appendix G1) and Storm Water Quality Management Plan (Appendix G2) were prepared to analyze the Proposed Project's impacts on the hydrology of the area. The Proposed Project would not cause significant impacts related to alteration of existing drainages, increases in water surface elevations, increases in peak flow/runoff velocities leaving the site, increases to the 100-year limits of inundation, or increases to flooding hazards. The Drainage Study involved hydrologic and hydraulic software modeling of the project site and Proposed Project development.

The Drainage Study determined that the Proposed Project would not alter existing drainage patterns across the site because existing contours would be softened to reduce the potential for rill erosion without diverting flow. The study also concluded that the Proposed Project would not increase runoff velocities or peak flow rates leaving the site, cause flooding downstream, or hydraulicly impact downstream stormwater infrastructure. Furthermore, the Proposed Project would not increase water surface elevation in a watercourse across the site

or downstream of the site, and Proposed Project improvements would not alter existing hydrologic or hydraulic properties of the site (Appendix G1).

The Proposed Project would demand less water for both the construction and operation phases as compared to the Approved Rugged Project due, in part, to its smaller development footprint and less-frequent operational activities (such as panel washing). The Proposed Project would use less water by 12.5 acre-feet for construction and 7.29 acre-feet per year for operations. The Proposed Project would use groundwater for construction and for operations such as annual washing of the panels, and no potable water is anticipated because the project would be unmanned. A Groundwater Resources Investigation Report was performed to analyze the Proposed Project's impact on groundwater resources. The Groundwater Resources Investigation Report (Appendix H1) determined that the Proposed Project would have a less-than-significant impact to groundwater storage and water quality. According to the report, the production capacity of the wells is sufficient to meet the Proposed Project's long-term operation and maintenance requirements (i.e., panel washing and landscape irrigation). The analysis in the report revealed that water quality for Well 8 has elevated concentration levels of uranium. However, because operation of the Proposed Project would not involve the human consumption from Well 8, the report does not recommend treatment of this water for non-potable use. Potable water would be required during construction for construction personnel that would be either trucked in or obtained from another potable source.

The Revised PEIR also concluded that implementation of a Groundwater Monitoring and Mitigation Plan (GMMP) would ensure that any unanticipated impacts to groundwater storage, well interference, and/or groundwater-dependent habitat are detected and reversed through curtailment or cessation of pumping. Implementation of the GMMP is required for the Proposed Project under Mitigation Measure **M-BI-PP-15**. A GMMP has been prepared for the Proposed Project (Appendix H2).

The Approved Rugged Project and the Proposed Project would have similar hydrological impacts. Both the Approved Rugged Project and the Proposed Project would have less-than-significant impacts related to the hydrology of the project area and water quality.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to hydrology and water quality. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to hydrology and water quality.

XI. LAND USE AND PLANNING: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to land use and planning including: physically dividing an established community; and/or conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would not physically divide an established community or conflict with applicable land use plans, policies, or regulations. It was determined that impacts related to land use and planning would be less than significant for the Approved Rugged Project (County of San Diego 2015a).

The Proposed Project would not physically divide an established community and would not conflict with applicable land use plans, policies, or regulations. It was determined that impacts related to land use and planning would be less than significant for the Proposed Project.

In addition, the Proposed Project would implement **PDF-TR-1** and **PDF-AQ-1** to further minimize temporary conflicts between adjacent land uses and construction activities**. PDF-TR-1** would require the preparation and implementation of a Traffic Control Plan and notification of property owners in the project vicinity. This PDF would ensure safe and timely movement of construction and residential traffic through the project area, and ensure that local residents are aware of construction activities. **PDF-AQ-1** would require dust control measures be implemented for the Proposed Project that would reduce potential effects related to dust generation and alleviate land use impacts related to dust.

With implementation of these measures, the Proposed Project and the Approved Rugged Project would have similar, less-than-significant land use and planning impacts.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to land use and planning. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to land use and planning.

XII. MINERAL RESOURCES: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to mineral resources including: the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would have a less-than-significant impact on the loss of availability of known mineral resources (County of San Diego 2015a).

The Proposed Project would have a less-than-significant impact on the loss of availability of known mineral resources because it would not preclude the potential extraction of aggregate mineral resources following the decommissioning phase of the project. Furthermore, the project site would likely be unsuitable for mining operation because of the presence of Tule Creek, which is environmentally sensitive, and the presence of noise-sensitive land uses adjacent to the site.

The Proposed Project and the Approved Rugged Project would have the same impact conclusions related to mineral resources. Both projects would result in less-than-significant impacts.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to mineral resources. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to mineral resources.

XIII. NOISE: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from noise including: exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels; a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; for projects located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or for projects within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would result in potentially significant impacts related to operational noise related to inverter noise (**M-N-R-1**) but less-than-significant impacts related to panel washing with the application of **PDF-N-1**, and less-than-significant impacts related to construction noise, vibration, and corona noise with the implementation of **PDF-N-2**. Mitigation Measure **M-N-R-1** would locate non-enclosed inverters a minimum of 800 feet from the nearest property line, direct all switch station doorways and exterior ventilation ducts away from adjacent property lines, require preparation of a noise analysis to demonstrate compliance with the County Noise Ordinance, and locate the O&M building no closer than 1,250 feet from the property line. With this mitigation, noise impacts would be reduced less than significant (County of San Diego 2015a).

A Noise Assessment (Appendix I) was prepared to analyze the potential noise impacts of the Proposed Project. Operational noise from the Proposed Project was determined to be less than significant with the inclusion of mitigation (**M-N-R-1**). The assessment concluded that, based on the empirical data, manufacture specifications, and the distances to the property lines, noise levels from operation of the Proposed Project, including transformers, inverters, and the PV trackers and substation, were found to meet the most restrictive nighttime property line standard of 45 A-weighted decibels (dBA) at the nearest property lines. Additionally, all daytime activities (e.g., panel washing) are expected to meet the daytime property line standard of 50 dBA at the nearest property lines.

It was also determined in the Noise Assessment that construction noise impacts of the Proposed Project would be less than significant. The assessment concluded that grading activities could result in an anticipated worst-case 8-hour average combined noise level of 74.5 dBA at the property line; no blasting or rock crushing is anticipated during grading operations. Solar panel installation could result in a noise level of 74.9 dBA or less based on equipment separation at a distance of 275 feet. Given these projections and the proposed spatial separation of the equipment over the large site area, the noise levels of the grading and panel installation are anticipated to comply with the County of San Diego's 75 dBA standard at all Proposed Project property lines (Appendix I).

The Approved Rugged Project and the Proposed Project would have similar noise impacts. Both the Approved Rugged Project and the Proposed Project would require non-enclosed inverters to be, at a minimum, 800 feet or greater from the nearest property line; all switch station doorways and exterior ventilation ducts to be directed away from adjacent property lines; preparation of a noise analysis to demonstrate compliance with the County Noise Ordinance; and the O&M building to be located no closer than 1,250 feet from the property line (**M-N-R-1**). Further, panel washing activities would comply with **PDF-N-1,** which establishes operational procedures and equipment. Specifically, **PDF-N-1** requires that the Approved Rugged and Proposed Projects install and use a wash station enclosure; this enclosure would reduce operational sound levels of the gasoline-engine wash station. **PDF-N-1** also requires a time limit of 20 minutes per 1 hour within a 130-foot distance from northern and southern property lines; the washing station would also be required to be placed a minimum 130 feet from eastern and western property lines. Construction noise impacts from both the Approved Rugged Project and Proposed Project would be less than significant with implementation of **PDF-N-2**. Specifically, **PDF-N-2** requires that construction activities be phased so that geologic testing and any pre-drilling activities for trackers be completed before any pile-driving for tracker installation occurs. A summary of each mitigation measure and PDF pertaining to noise as provided in the Revised PEIR for the Approved Rugged Project is provided in Table 17, and complete mitigation PDF details are provided in Appendix A.

Table 17. Revised PEIR Mitigation Measures and PDFs – Noise

Mitigation Measure/PDF No.	Mitigation Measure/PDF Summary
M-N-R-1	Locate non-enclosed Inverters at a minimum of 800 feet or greater from the nearest property line, direct all switch station doorways and exterior ventilation ducts away

	from adjacent property lines, prepare a noise analysis to demonstrate compliance with the County Noise Ordinance.
PDF-N-1	Compliance with County Noise Ordinance for panel washing activities and procedures.
PDF-N-2	Require construction activities be phased so that geologic testing and any pre-drilling activities for trackers be completed before any piled driving for tracker installation occurs.

PEIR = Program Environmental Impact Report; PDF = Project Design Feature

The Approved Rugged Project and Proposed Project would have similar, less-than-significant impacts related to groundborne vibration. Neither project would include operation components that would be sources of substantial vibration. Furthermore, no significant vibration sources currently exist, or are planned, in the project area. Construction activities for the Approved Rugged Project and Proposed Project would produce vibrations. The nearest property line to proposed construction areas would be 100 feet. At this distance, project-generated construction noise would be 70.4 dBA L_{eq} and 77.1 dBA L_{max} (with the exception of pile drivers). Therefore, noise generated by construction activities would be less than the County standard of 75 dBA L_{eq} 8-hour average at the nearest property line, and a less–than-significant impact would occur during standard construction activities.

Impact pile-driving for the installation of solar trackers is anticipated to cause the highest level of vibration. However, the Revised PEIR determined that the Approved Rugged Project's pile-driving activities would not exceed thresholds of significance based on its distance from residences; the nearest residence to these activities would be 250 feet from property lines (County of San Diego 2015a). The Proposed Project's construction activities and noise impacts would be similar compared to the Approved Rugged Project.

For these reasons, the Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant noise impacts. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more noise impacts.

XIV. PALEONTOLOGICAL RESOURCES: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to paleontological resources including project-related grading or excavation that will disturb the substratum or parent material below the major soil horizons in any paleontologically sensitive area of the County, as shown on the County's Paleontological Resources Potential and Sensitivity Map that is included in the County Guidelines (County of San Diego 2009)?

YES	NO
☐	☒

The Revised PEIR determined that impacts from the Approved Rugged Project to paleontological resources would be less than significant. According to the County's Paleontological Resources Map, the Approved Rugged Project is located on plutonic igneous rock, which is not considered paleontologically sensitive and would therefore have no potential

for producing fossil remains (County of San Diego 2007b). The Approved Rugged Project would have less-than-significant impacts related to paleontological resources (County of San Diego 2015a).

Because the Proposed Project is located on the same plutonic igneous rock as the Approved Rugged Project, it would have the same less-than-significant impact conclusion as the Approved Rugged Project related to paleontological resources.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to paleontological resources. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to paleontological resources.

XV. POPULATION AND HOUSING: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to population and housing including displacing substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would not result in a direct impact to population and housing, and therefore impacts would be less than significant. The Approved Rugged Project construction personnel were not expected to relocate to the area. Additionally, after the Approved Rugged Project would have been constructed, it was anticipated to require up to 20 employees, which could increase the regional population, but this additional population would not represent a substantial increase across the region. Therefore, impacts to population and housing would be less than significant under the Approved Rugged Project (County of San Diego 2015a).

Compared to the Approved Rugged Project, the Proposed Project would represent reduced impacts to population and housing. The Proposed Project is anticipated to require fewer construction personnel because the project development area is smaller by 21%. Furthermore, the Proposed Project would be operated remotely and would not require day-to-day operational personnel; therefore, impacts to population and housing would be less than the Approved Rugged Project.

The Proposed Project and the Approved Rugged Project would have the same impact conclusions related to population and housing. Both projects would result in less-than-significant impacts.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to population and housing. There are no changes in circumstances under which the project is undertaken and/or

"new information of substantial importance" that would cause one or more effects to population and housing.

XVI. PUBLIC SERVICES: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would have a less-than-significant impact on public services with the inclusion of **PDF-PS-1**, which would help fund a paramedic unit; **PDF-TR-1**, requiring a Traffic Control Plan and construction notification procedures that would ensure safe and efficient traffic flow; and **PDF-HZ-2**, which would require the preparation of a Construction Fire Protection Plan to reduce the need for additional fire prevention services. Impacts would be less than significant (County of San Diego 2015a).

The Proposed Project would include implementation of **PDF-PS-1**, a Fire and Emergency Services Agreement; **PDF-TR-1**, which would require a Traffic Control Plan and construction notification procedures to ensure safe and efficient traffic flow; and **PDF-HZ-2**, which would require the preparation of a Construction Fire Protection Plan to reduce the need for additional fire prevention services. Impacts would be less than significant. A summary of the PDF pertaining to public services as provided in the Revised PEIR for the Approved Rugged Project is provided in Table 18, and the PDF is specifically detailed in Appendix A.

Table 18. Revised PEIR PDF– Public Services

PDF No.	PDF Summary
PDF-PS-1	Applicant shall enter into a fire and emergency services agreement with SDCFA prior to approval of the Major Use Permit Modification to make a fair share contribution to fund the provision of appropriate fire and emergency medical services.

PEIR = Program Environmental Impact Report; PDF = Project Design Feature; SDCFA = San Diego County Fire Authority

The Approved Rugged Project and Proposed Project would temporarily increase the number of workers in the region for construction. The increase in workers in the area is not expected to substantially increase the demand for police services, schools, parks, or other public facilities such that new or expanded facilities or staff would be required. The Approved Rugged Project is approved to include 20 employees for day-to-day operations; similar to the construction phase of the Approved Rugged Project, this increase was determined to pose a less-than-significant impact to the public services and facilities mentioned above. The Approved Rugged Project and the Proposed Project would result in less-than-significant

impacts. The Proposed Project is anticipated to require fewer construction personnel because the project development area is smaller by 21%. Furthermore, The Proposed Project would include no operational day-to-day employees; therefore, its impact to public services would be reduced as compared to Approved Rugged Project (which is approved to have 20 operational employees).

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to public services. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to public services.

XVII. RECREATION: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would not result in an impact to recreational resources, and therefore would be less than significant (County of San Diego 2015a).

The Approved Rugged Project and Proposed Project would temporarily increase the number of workers in the region for construction. The increase in workers in the area is not expected to substantially increase the demand for recreational facilities. The Approved Rugged Project is approved to include 20 employees for day-to-day operations; similar to the construction phase of the Approved Rugged Project, this increase was determined to pose a less-than-significant impact to recreation. The Approved Rugged Project and the Proposed Project would result in less-than-significant impacts.

The Proposed Project is anticipated to require fewer construction personnel because the project development area is smaller by 21%. Furthermore, the Proposed Project would include no operational day-to-day employees; therefore, its impact to recreation would be reduced as compared to Approved Rugged Project (which is approved to have 20 operational employees).

The Proposed Project and the Approved Rugged Project would result in less-than-significant impacts.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to recreation. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to recreation.

XVIII. TRANSPORTATION: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to transportation/traffic including: an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system; exceedance, either individually or cumulatively, of a level of service standard established by the county congestion management agency for designated roads or highways; a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; substantial increase in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); inadequate emergency access; inadequate parking capacity; and/or a conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project's transportation-related impacts would be less than significant (County of San Diego 2015a). The Approved Rugged Project would not increase hazards due to design features, or impact operational traffic or unsignalized intersections. Impacts associated with construction traffic, including 160 daily trips (or up to 200 daily trips during the 9-month period when construction traffic generation would be greatest), on Mobility Element and non-Mobility Element roads would be reduced through the implementation of **M-AQ-PP-2**, a construction worker rideshare program. Implementation of **PDF-TR-1**, which would require creation of a Traffic Control Plan and Construction Notification Plan, would reduce construction impacts to unsignalized intersections to less than significant. A summary the PDF pertaining to transportation as provided in the Revised PEIR for the Approved Rugged Project is provided in Table 19, and complete PDF details are provided in Appendix A.

Table 19. Revised PEIR PDF – Transportation

PDF No.	PDF Summary
PDF-TR-1	Prepare and implement a traffic control and construction notification plan. The plan shall identify the procedures that would be used to inform property owners of the location and duration of construction.

PEIR = Program Environmental Impact Report; PDF = Project Design Feature

Subsequent to the certification of the Revised PEIR, the CEQA Guidelines were updated to focus the transportation analysis on vehicle miles traveled (VMT) rather than level of service (LOS). Because the Approved Rugged Project was analyzed using LOS guidelines, and because the Proposed Project is being evaluated under this Addendum to the Revised PEIR, the Transportation Screening Analysis (Appendix J) conducted to analyze transportation impacts associated with the Proposed Project used LOS.

As concluded in the Transportation Screening Analysis, impacts from the Proposed Project on unsignalized intersections from construction would remain less than significant with implementation of **PDF-TR-1** and **M-AQ-PP-2**. Construction traffic associated with the Proposed Project would generate approximately 160 daily trips over the 12-month construction period, and a maximum of 197 daily trips during the 6-month peak construction traffic period. These daily trip estimates are similar to those analyzed under the Approved Rugged Project (160 daily trips over the 12-month period and 200 daily trips during the 6-month period). Traffic Control Plans would be required as a condition of approval for the Proposed Project, which would manage the construction trips, including worker trips and deliveries, throughout the construction process, and would keep impacts to less than significant. Operations and maintenance impacts associated with the Proposed Project would be minimal and less than significant because Proposed Project facilities would be operated remotely and would only generate operational traffic in the case of routine maintenance and repairs.

Despite the construction trips generated by the Proposed Project, the surrounding roadway segments and intersections, which are currently operating at an LOS B or better, are not expected to operate below LOS D, according to the Transportation Screening Analysis (Appendix J).

Operations and maintenance impacts associated with the Proposed Project would be less than the Approved Rugged Project because the Proposed Project facilities would be operated remotely and would only generate operational traffic in the case of routine maintenance or repairs; in comparison, the Approved Rugged Project is approved to be staffed with up to 20 day-to-day employees (equaling 40 daily trips). Therefore, the Proposed Project would have less-than-significant impacts related to traffic because the Proposed Project would only generate traffic in the event of infrequent maintenance (such as yearly panel washing) or repair work, and would not generate daily trip traffic from employees.

The Proposed Project is not subject to VMT standards or thresholds because the Revised PEIR was certified before CEQA Guidelines were changed in 2020 to require VMT analysis. However, for informational purposes, the Proposed Project's Transportation Screening Analysis determined the Proposed Project to have less-than-significant impacts related to VMT because the Proposed Project would only generate traffic in the event of maintenance or repair work, and would not be expected to generate a significant number of trips on the days employees would be required to be on site, such as for yearly panel washing. Specifically, projects generating fewer than 110 average daily trips are exempt from preparing VMT analyses because they are presumed to have a less-than-significant impact due to the de-minimis number of trips (Appendix J).

For these reasons, both the Approved Rugged Project and Proposed Project would have a less-than-significant impact on construction and operational traffic.

The Proposed Project does not propose any changes that would cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to transportation/traffic. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to transportation/traffic.

XIX. TRIBAL CULTURAL RESOURCES: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to tribal cultural resources including: causing a change in the significance of a tribal cultural resource as defined in Public Resource Code §21074?

YES	NO
☐	☒

"Tribal Cultural Resources" was not an environmental impact area considered by the Revised PEIR because it was certified before AB 52, which defined "tribal cultural resources" as a CEQA impact area, took effect (see California Public Resources Code Section 21084.2). The County published the Notice of Preparation of an EIR for the Soitec Project prior to July 1, 2015.

Although the Revised PEIR did not specifically evaluate potential impacts related to tribal cultural resources pursuant to the process set forth by AB 52, the potential to impact tribal cultural resources was a known issue at the time that the Final PEIR and Revised PEIR were certified. Accordingly, tribal cultural resources do not qualify as "new information" under CEQA Guidelines Section 15162(a)(3) because they were known issues at the time the County certified both the Final PEIR and Revised PEIR. Furthermore, as described in more detail below, the Revised PEIR analyzed the potential to impact cultural resources, including Native American resources, and concluded that the Approved Rugged Project would have a less-than-significant impact with implementation of mitigation.

The Revised PEIR analyzed impacts from the Approved Rugged Project to cultural resources and participated in Native American consultation. No information was obtained through consultation and monitoring during fieldwork that found that any of the evaluated sites were culturally significant. No traditional cultural properties are known to exist within the project site. Impacts related to Native American resources would be less than significant. In addition, the Approved Rugged Project would implement **M-CR-PP-1**, which would mitigate any accidental discovery of Native American resources to below a level of significance (County of San Diego 2015a).

The Proposed Project would have the same less-than-significant impact conclusion as the Approved Rugged Project relating to tribal cultural resources. The Cultural Resources Addendum Report (Appendix E) for the Proposed Project concluded that the findings and recommendations per the cultural resource inventory conducted for the Approved Rugged Project in 2013 are accurate and pertinent to the Proposed Project. Therefore, the Proposed Project maintains the recommendation that Native American monitors be present during construction in case of inadvertent discoveries per **M-CR-PP-1**.

The Proposed Project would have similar types of potential impacts to cultural resources as the Approved Rugged Project because they are sited in the same area and would implement the same mitigation measure (**M-CR-PP-1**). However, because the Proposed Project would have a smaller development footprint by approximately 21%, it would therefore result in reduced ground disturbance and extent of possible tribal cultural resources impacts compared to the Approved Rugged Project.

For these reasons, the Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to tribal cultural resources. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to tribal cultural resources.

XX. UTILITIES AND SERVICE SYSTEMS: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to utilities and service systems including: exceedance of wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or wastewater treatment facilities, new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; require new or expanded entitlements to water supplies or new water resources to serve the project; result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and/or noncompliance with federal, state, and local statutes and regulations related to solid waste?

YES	NO
☐	☒

The Revised PEIR determined that the Approved Rugged Project would not result in an impact to utilities, and therefore impacts would be less than significant. It was determined that the Approved Rugged Project has viable sources of water to supply its construction and operational needs through the Padre Dam Municipal Water District and Jacumba Community Services District. Between these two water sources, the Revised PEIR concluded that the Approved Rugged Project would have a 14-acre surplus of water that would be available to support its construction phase (County of San Diego 2015a). According to the Groundwater Resources Investigation Report prepared for the Approved Rugged Project, the production capacity of the wells are sufficient to meet the project's long-term operation and maintenance requirements (i.e., panel washing, potable supply, and landscape irrigation). The Revised PEIR concluded that implementation of a GMMP would ensure that any unanticipated impacts to groundwater storage, well interference, and/or groundwater-dependent habitat are detected and reversed through curtailment or cessation of pumping (County of San Diego 2015a).

Implementation of the GMMP is required for the Proposed Project under Mitigation Measure **M-BI-PP-15**. An update to the Groundwater Resources Investigation Report (Appendix H1) originally prepared for the Approved Rugged Project was conducted for the Proposed Project to provide updated evaluations on groundwater resources based on revisions to the project description and more recent groundwater production level data. The report concluded that there is sufficient long-term availability of groundwater to supply the Proposed Project. The report also stated that implementation of an updated GMMP would reduce potential impacts to groundwater-dependent habitat related to potential water table decline to less than

significant. The report includes a water quality analysis of wells to inform the Proposed Project. The analysis identified water quality for Well 8 has elevated concentration levels of uranium. However, because operation of the Proposed Project would not involve potable water or human consumption from Well 8, the report does not recommend treatment of this water for non-potable use (Appendix H1). Potable water would be required during construction for construction personnel that would be either trucked in or obtained from another potable source.

Furthermore, the applicant for the Proposed Project submitted a Project Facility Water Availability form, which was approved by the County on October 23, 2020. This form indicated that the Proposed Project is not located within the County District's Sphere of Influence boundary.

For wastewater treatment, the Approved Rugged Project is approved to install and operate a septic system that would treat wastewater from the O&M building. The Revised PEIR determined that installation, operation, and decommissioning of this septic system would not violate any wastewater requirements of the applicable Regional Water Quality Control Board, and therefore impacts would be less than significant (County of San Diego 2015a). In comparison, the Proposed Project would have reduced impacts related to septic systems because the Proposed Project would be operated remotely and, therefore, would not include any on-site restroom facilities or require on-site wastewater treatment.

The Approved Rugged Project would send solid waste to local landfills during construction, operation, and decommissioning. The Revised PEIR determined that this stream of solid waste is not anticipated to be substantial, and impacts to local solid waste collection, transfer, and disposal capacities would be less than significant (County of San Diego 2015a). The Proposed Project would generate similar or reduced amounts of solid waste during construction and operation because the development footprint is smaller by 21% and therefore would generate less construction waste. In addition, the Proposed Project would be primarily operated remotely compared to the Approved Rugged Project, which is approved to be staffed by up to 20 full-time employees who would generate solid waste. For these reasons, the Proposed Project would have a reduced impact on utilities compared to the Approved Rugged Project. Both the Proposed Project and the Approved Rugged Project would result in less-than-significant impacts to utilities.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to utilities and service systems. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to utilities and service systems.

XXI. WILDFIRE: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would result in an increased risk of wildfire to persons or property.

YES	NO
☐	☒

"Wildfire" was not an environmental impact area considered by the Revised PEIR because it was certified before the CEQA Guidelines were updated in January 2019 to include wildfires as an environmental topic. The County published the Notice of Preparation of an EIR for the Soitec Project prior to July 1, 2015.

Although the Revised PEIR did not specifically evaluate potential impacts related to wildfire, the potential to impact wildfire was a known issue at the time that the Final PEIR and Revised PEIR were certified. Accordingly, wildfire impacts and the corresponding analysis do not qualify as "new information" under CEQA Guidelines Section 15162(a)(3) because it was a known issue at the time the County certified both the Final PEIR and Revised PEIR. Furthermore, as described in more detail below, the Revised PEIR analyzed the potential to impact wildfires, as part the analysis of Hazards and Hazardous Materials, and concluded that the Approved Rugged Project would have a less-than-significant impact with implementation of **PDF-PS-1** (County of San Diego 2015a). See Section IV, Hazards and Hazardous Materials, for additional analysis.

The Proposed Project would not cause any new significant environmental effects or a substantial increase in the severity of previously identified significant effects to wildfire. There are no changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that would cause one or more effects to wildfire.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in any mandatory finding of significance listed below?

Does the project degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

YES	NO
☐	☒

Does the project degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the

number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As described throughout this Addendum, there are no changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that would result in any of the mandatory findings of significance.

In general, the Proposed Project would result in an overall reduction in permanent ground disturbance, total project infrastructure unit counts and heights, construction equipment and associated activities, and operational and maintenance activities, thereby reducing impacts to the environment compared to the Approved Rugged Project. The Proposed Project would reduce the total project footprint from approximately 498.1 acres resulting from the Approved Rugged Project to approximately 391.2 acres. Specifically, the Proposed Project would impact 71.5 acres less to on-site sensitive upland habitat compared to the Approved Rugged Project. Only two sensitive upland vegetation communities would have greater impacts under the Proposed Project: granitic chamise chaparral and coast live oak woodland. Additionally, the Proposed Project would overall have less impacts to rare plant species and jurisdictional aquatic resources than the Approved Rugged Project. Despite the reduction in the project footprint, the Proposed Project would have similar potentially significant impacts, and thus would require implementation of **M-BI-PP-1** through **M-BI-PP-15**, as provided under the Approved Rugged Project, to reduce impacts to a level that is less than significant.

Additionally, there are no significant or Resource Protection Ordinance sites that intersect the project site. Similar to the Approved Rugged Project, the Proposed Project would result in less-than-significant impacts to cultural resources through implementation of **M-CR-PP-1**. This mitigation measure was required under the Approved Rugged Project to mitigate potential impacts in the event of the discovery of unknown archaeological or cultural deposits; the measure requires grading monitoring, coordination with Native American monitors, archaeological reporting, and submittal of a final monitoring report to the South Coastal Information Center. This mitigation measure would address potential impacts to undiscovered buried archaeological and cultural resources; the mitigation measure would reduce the potential impact to less than significant because it establishes procedures to record, report, and treat undiscovered archaeological and cultural resources.

The Proposed Project would also implement **M-CR-PP-2** and **M-CR-PP-3**, similar to the Approved Rugged Project. **M-CR-PP-2** requires installation of temporary construction fencing around known archaeological sites prior to the start of ground-disturbing activities, and **M-CR-PP-3** requires implementation of an Archaeological Treatment Plan in the event that known previously recorded cultural resources cannot be avoided. As determined for the Approved Rugged Project, these mitigation measures would reduce potential impacts to known cultural resources to less than significant because they provide specific provisions to proactively avoid and/or treat known resources.

Therefore, the Proposed Project, as compared to the Approved Rugged Project, would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or

endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Cumulative impacts were previously evaluated for the Approved Rugged Project, as presented in the analyses of each resource topic contemplated in the Revised PEIR (County of San Diego 2015a). Significant and unavoidable cumulative impacts were identified for the Approved Rugged Project, including those related to aesthetics—specifically views from Interstate 8 and Old Highway 80 (**AE-CUM-PP-1**), and alteration of a visual landscape (**AE-CUM-PP-2**)—and air quality—specifically short-term construction emissions (NO_x) (**AQ-CUM-1**). In general, the Proposed Project would result in an overall reduction in permanent ground disturbance, total project infrastructure unit counts and heights, construction equipment and associated activities, and operational and maintenance activities. As such, cumulative impacts would be reduced compared to the Approved Rugged Project.

Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

The Proposed Project would not have environmental effects that will cause substantial adverse effects on human beings. Refer to Section III, Air Quality (sensitive receptors); Section VII, Geology and Soils (rupture or faults); Section IX, Hazards and Hazardous Materials (wildfire hazard and emergency evacuations); and Section XVI, Public Services (fire protection and law enforcement services).

As described in this Addendum, there are no changes in the Proposed Project, no changes in circumstances under which the Proposed Project is undertaken, and no "new information of substantial importance" that results in any of the mandatory findings of significance.

REFERENCES

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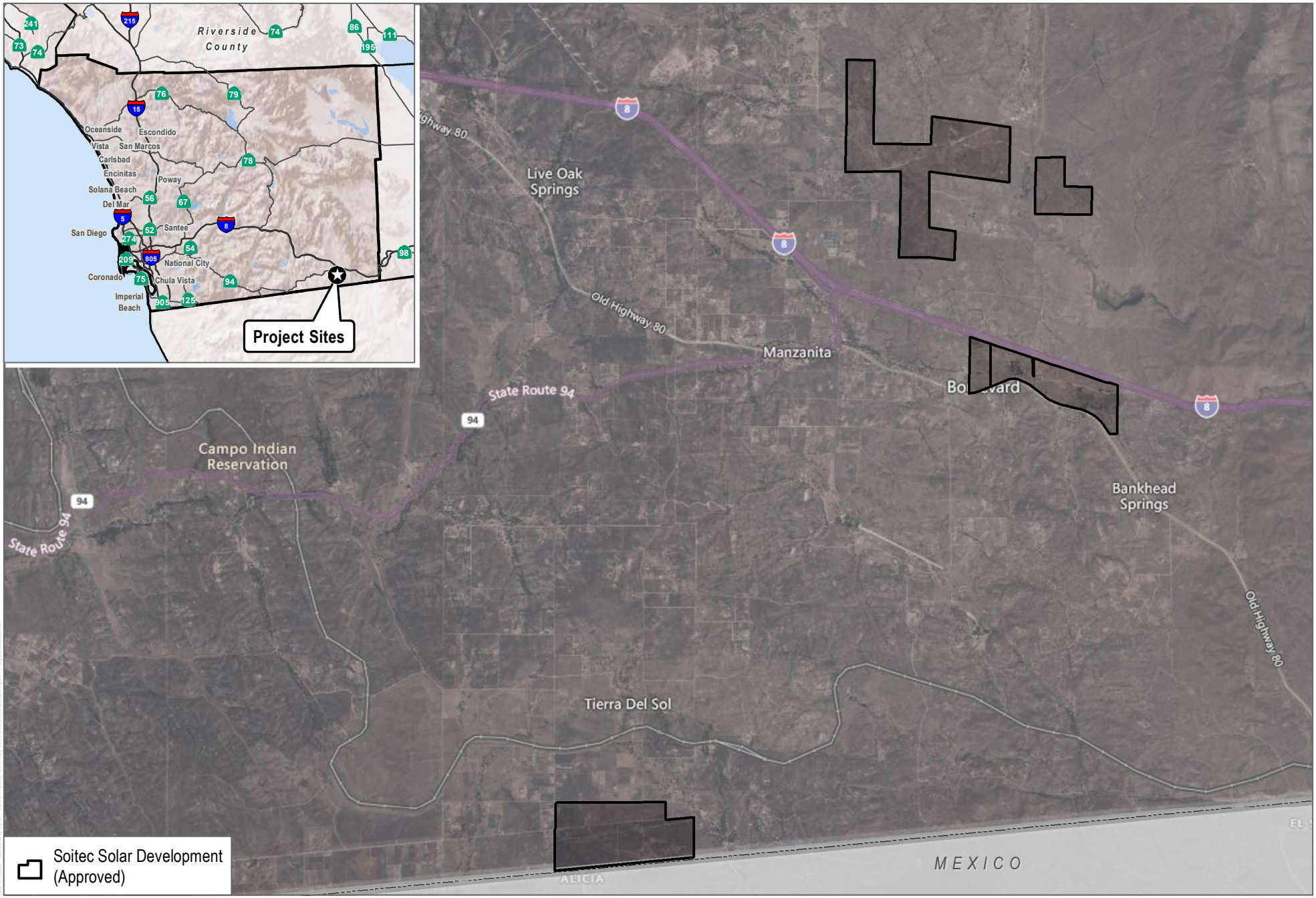

SOURCE: Michael Baker 2019; SANGIS 2020, 2021

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FIGURE 1-1

Regional Location

Addendum to Final Revised Program EIR for the Soitec Solar Development Program

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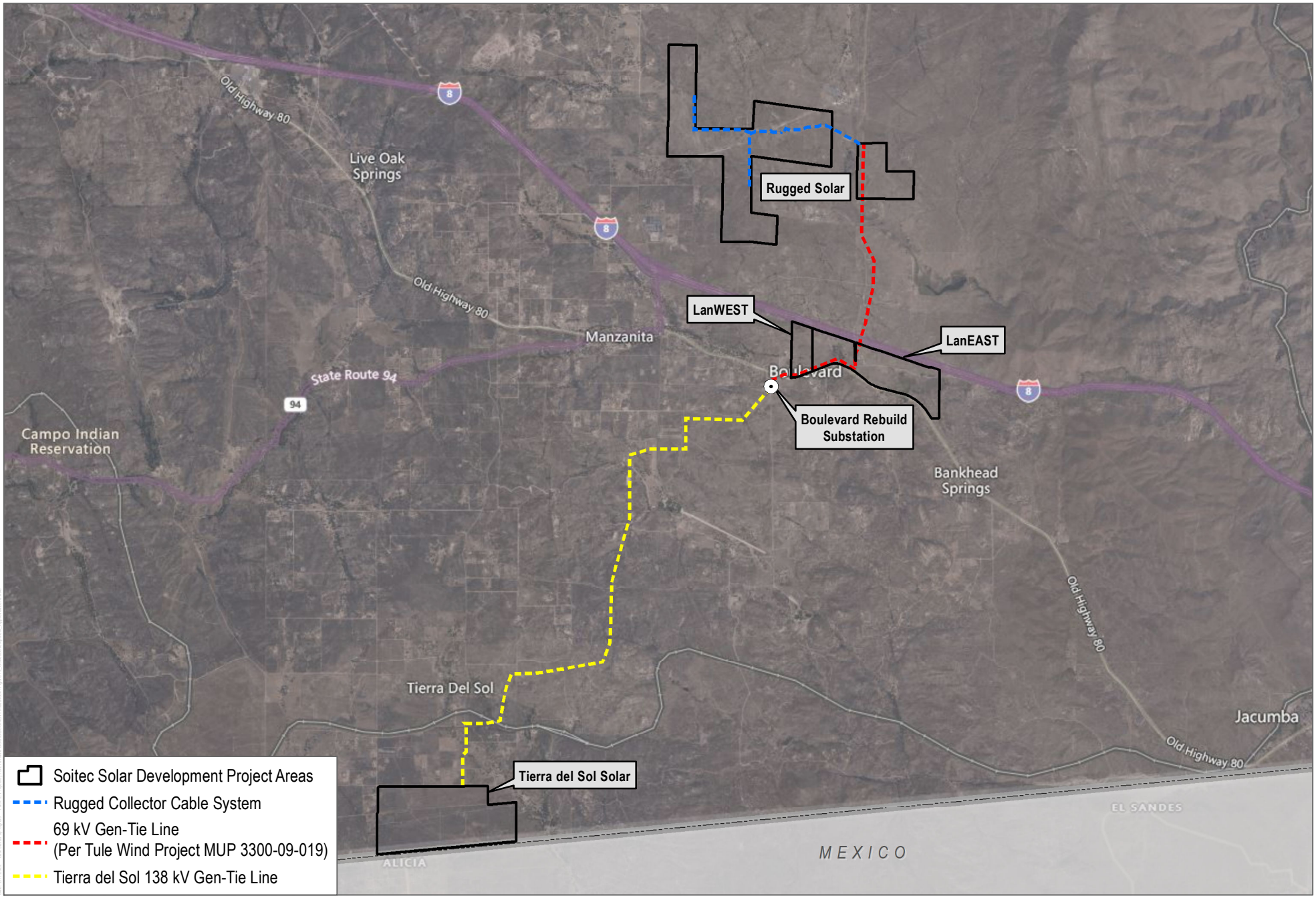

SOURCE: Michael Baker 2019; SANGIS 2020, 2021

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FIGURE 1-2

Soitec Solar Development (Approved 2015)

Addendum to Final Revised Program EIR for the Soitec Solar Development Program

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Rugged Solar Farm Project Boundary
SDG&E Construction Yard
Existing Tule Gen-Tie
Overhead Collector Cable System
Permanent
Tule Project Impact

SOURCE: Michael Baker; SANGIS 2020

DUDEK

0 500 1,000 Feet

FIGURE 1-3

Approved Rugged Project

Addendum to Final Revised Program EIR for the Soitec Solar Development Program

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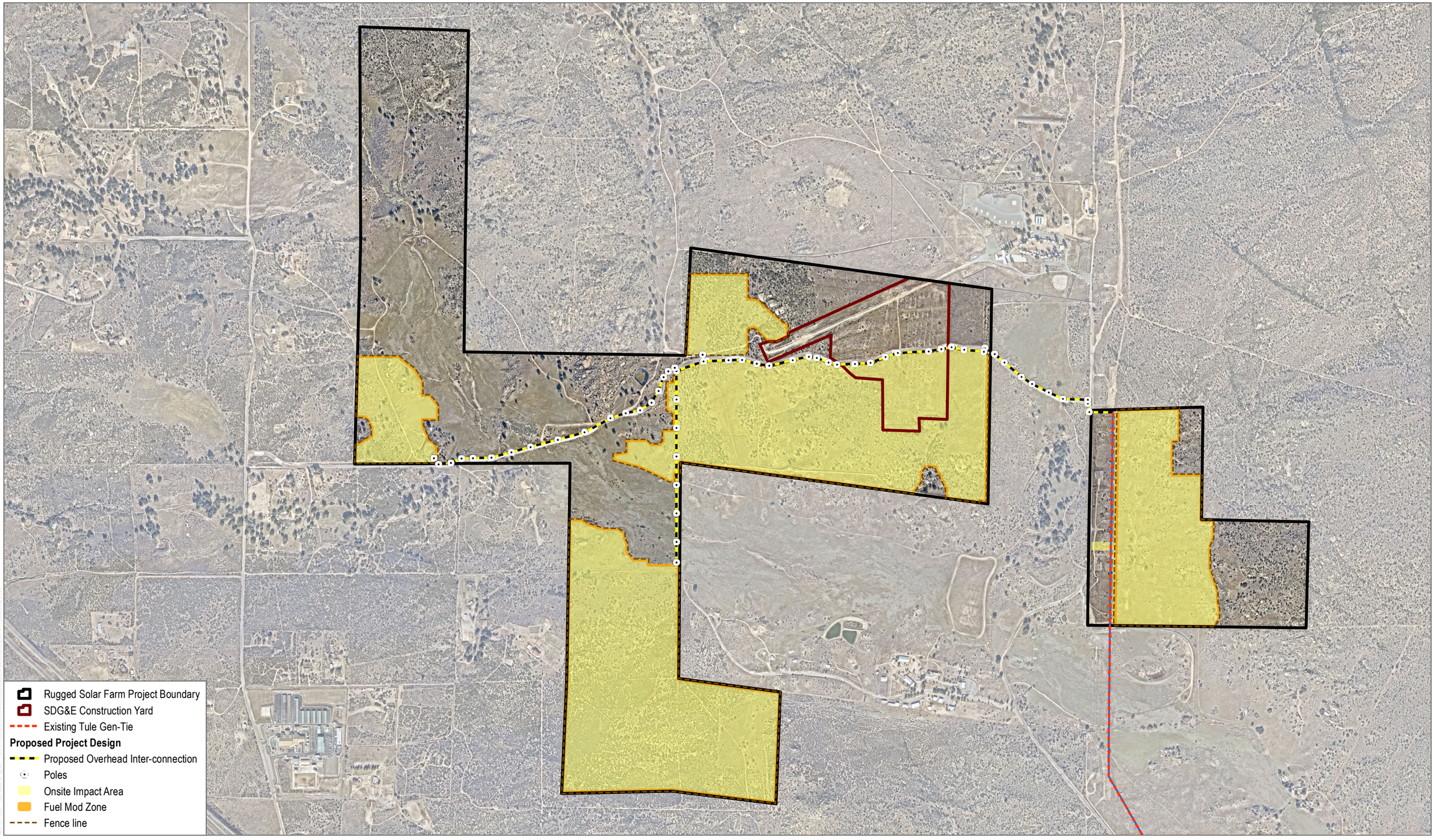

SOURCE: Michael Baker; SANGIS 2020

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0 500 1,000 Feet

FIGURE 1-4

Proposed Rugged Project

Addendum to Final Revised Program EIR for the Soitec Solar Development Program

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Appendix A

Project Design Features and Mitigation Measures

Appendix B1

Visual Impact Analysis

Appendix B2

Glare Study

Appendix C1

Air Quality Assessment

Appendix C2

Greenhouse Gas Screening Letter

Appendix D

Biological Resources Report

Appendix E

Cultural Resources Addendum Report

Appendix F1

Fire Protection Technical Memorandum

Appendix F2

Fire Protection Plan Letter Update

Appendix G1

Preliminary CEQA Drainage Study

Appendix G2

SWQMP

Appendix H1

Groundwater Resources Investigation Report

Appendix H2

GMMP

Appendix I

Noise Assessment

Appendix J

Transportation Screening Analysis

Appendix A

Project Design Features and Mitigation Measures

Appendix B1

Visual Impact Analysis

Appendix B2

Glare Study

Appendix C1

Air Quality Assessment

Appendix C2

Greenhouse Gas Screening Letter

Appendix D

Biological Resources Report

Appendix E

Cultural Resources Addendum Report

Appendix F1

Fire Protection Technical Memorandum

Appendix F2

Fire Protection Plan Letter Update

Appendix G1

Preliminary CEQA Drainage Study

Appendix G2

SWQMP

Appendix H1

Groundwater Resources Investigation Report

Appendix H2

GMMP

Appendix I

Noise Assessment

Appendix J

Transportation Screening Analysis