

## CHAPTER 4.0 PROJECT ALTERNATIVES

California Environmental Quality Act (CEQA) Guidelines Section 15126.6(a) requires an Environmental Impact Report (EIR) to “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” This chapter discusses a range of alternatives to the proposed Starlight Solar Project (project), including modified locations, alternative designs, and a No Project Alternative.

### 4.1 Rationale for Alternatives Selection

An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives governed by the rule of reason that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible. The State CEQA Guidelines state that factors that may be considered when determining the feasibility of alternatives are “site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context) and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent)” (14 California Code of Regulations [CCR] 15126.6[f][1]).

Additionally, the No Project Alternative must be analyzed. The EIR must explain the rationale for selecting the alternatives to be discussed, identify those that were not carried forward because they were infeasible, and briefly explain why these were not carried forward. The “environmentally superior” alternative to the project must be identified and discussed (see Section 4.6, Environmentally Superior Alternative). If the environmentally superior alternative is the No Project Alternative, the EIR must identify an additional environmentally superior choice among the other alternatives.

#### 4.1.1 Project Objectives

In accordance with the State CEQA Guidelines, appropriate alternatives for EIR analysis are those that meet most of the basic project objectives and avoid or substantially lessen any of the significant environmental effects of the proposed project. Consequently, this section reviews the objectives that were identified for the proposed project and any significant unavoidable environmental effects.

The fundamental purpose of the project is to permit, construct, and operate utility-scale solar energy and battery storage as near as possible to existing infrastructure in eastern San Diego County. The Applicant’s specific objectives for the project are as follows:

1. Develop a solar energy project that maximizes energy generation and battery storage potential with a rated capacity of approximately 100 megawatts (MW) and an approximately 217-MW battery energy storage system (BESS) facility that can supply electricity to indirectly reduce the need to emit greenhouse gases (GHGs) caused by the generation of similar quantities of electricity from either existing or future nonrenewable sources to meet existing and future electricity demands, including during on-peak power periods.
2. Develop a renewable solar energy project that can meet the criteria to achieve the maximum state and federal solar investment tax credits, which are intended to decrease the cost of renewable energy generation and delivery, promote the diversity of energy supply, and decrease the dependence of the United States on foreign energy supplies.

3. Assist in achieving the state's Renewables Portfolio Standard (RPS), as mandated under the 100 Percent Clean Energy Act of 2018 (Senate Bill 100), by developing and constructing California RPS-qualified solar generation from eligible renewable energy resources by December 31, 2045.
4. Develop a utility-scale solar energy project that improves electrical reliability for the San Diego region by providing a source of local generation as near as possible to existing San Diego Gas and Electric (SDG&E) transmission infrastructure.
5. Provide a new source of energy storage that assists the state in achieving or exceeding its energy storage targets, consistent with the terms of Assembly Bill 2514, and its GHG reduction targets, consistent with Assembly Bill 32, Senate Bill 32, and Assembly Bill 1279.
6. Site a solar energy project in an area within San Diego County that has excellent solar attributes, including but not limited to high direct normal irradiance, in order to maximize productivity.
7. Develop a utility-scale solar energy facility within San Diego County that supports the economy by investing in the region and creating construction jobs.

### **4.1.2 Significant Impacts Resulting from the Proposed Project**

Alternatives to be considered under CEQA are those that would avoid or substantially lessen one or more of the significant environmental effects identified during evaluation of the proposed project. Many of the adverse environmental impacts described in Chapter 2.0, Significant Environmental Effects of the Proposed Project, were judged to be less than significant with the incorporation of identified mitigation. The environmental impacts described in Chapter 3.0, Environmental Effects Found Not to Be Significant, were judged to be less than significant without the incorporation of mitigation. Table 4-1 summarizes the impacts that would result from the proposed project.

The project would result in potentially significant and unavoidable adverse impacts to Aesthetics (Section 2.1) for which feasible mitigation measures would not reduce the impacts to below a level of significance. Implementation of feasible mitigation measures would reduce potentially significant impacts to the following resource topics to less than significant: Biological Resources (Section 2.2); Cultural Resources (Section 2.3); Hydrology and Water Quality (Section 2.4); Noise (Section 2.5); Tribal Cultural Resources (Section 2.6); and Wildfire (Section 2.7). Therefore, the analyzed alternatives were examined for their ability to reduce the project's significant environmental impacts, as listed above.

As discussed in Section 3.1, after further evaluation, potential impacts to the following resource topics were determined to be less than significant: Air Quality (Section 3.1.1); Energy (Section 3.1.2); Geologic Hazards, Soils, and Paleontological Resources (Section 3.1.3); Greenhouse Gas Emissions (Section 3.1.4); Hazards and Hazardous Materials (Section 3.1.5); Land Use and Planning (Section 3.1.6); Mineral Resources (Section 3.1.7); Public Services (Section 3.1.8); Transportation and Traffic (Section 3.1.9); and Utilities and Service Systems (Section 3.1.10). As discussed in Section 3.2, during the Initial Study process, potential impacts to Agriculture and Forestry Resources; Population and Housing; and Parks and Recreation were determined to be less than significant or have no impact. Therefore, the analysis of these resource topics is not discussed further in this alternatives analysis.

**Table 4-1. Summary of Impacts Resulting from the Proposed Project**

Environmental Resource	Significant and Unavoidable Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact
Aesthetics	X		
Agriculture and Forestry Resources*			X
Air Quality			X
Biological Resources		X	
Cultural Resources		X	
Energy			X
Geologic Hazards, Soils, and Paleontological Resources			X
Greenhouse Gas Emissions			X
Hazards and Hazardous Materials			X
Hydrology and Water Quality		X	
Land Use and Planning			X
Mineral Resources			X
Noise		X	
Population and Housing*			X
Public Services			X
Parks and Recreation*			X
Transportation			X
Tribal Cultural Resources		X	
Utilities and Service Systems			X
Wildfire		X	

\* Based on the evaluation in Section 3.2, Environmental Effects Found Not to be Significant as Part of the Initial Study, the County of San Diego determined that the project would not result in significant impacts related to Agricultural and Forestry Resources, Population and Housing, and Parks and Recreation.

## 4.2 Alternatives Considered but Rejected

State CEQA Guidelines Section 15126.6(c) recommends that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection.

According to the State CEQA Guidelines, among the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plan or regulatory limitations, jurisdictional boundaries, and whether the Applicant can reasonably acquire, control, or otherwise have access to the alternative site. Several alternatives for the project were rejected from further analysis consistent with Section 15126.6(c) of the State CEQA Guidelines, which state that “Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. A description of each alternative and the rationale for rejection is provided below.

## **4.2.1 Wind Energy Alternative**

### **4.2.1.1 Description and Setting**

The Wind Energy Alternative would construct a 100-MW wind energy generation on the project site in place of the solar energy facility. Thus, this alternative would install utility-scale wind turbines rather than solar arrays. Similar to the proposed project, the Wind Energy Alternative would also include supporting infrastructure improvements such as transmission lines, an on-site collector substation, a supervisory control and data acquisition (SCADA) system to provide critical operating information (e.g., power production, equipment status and alarms, and meteorological information), a BESS, vehicle access, and water tanks.

The County of San Diego (County) developed a Wind Resource Map (County of San Diego 2013) as a part of the Wind Energy Zoning Ordinance Amendment and General Plan Amendment to the Mountain Empire Subregional Plan (Boulevard Chapter) and Borrego Springs Community Plan to Allow Wind Energy Development, POD 10-007 (Wind Energy Ordinance). The proposed project site is located within a viable wind energy generation location; the mapped wind power resource potential ranges from “good” to “excellent”.

### **4.2.1.2 Ability to Avoid or Reduce Environmental Impacts**

Land based utility-scale wind turbines often reach heights upwards of 300 feet above ground level (U.S. Department of Energy 2024). Wind turbines would typically be located on topographically elevated areas that are visible from a distance. The wind turbines would also require increased safety and nighttime lighting and could create potential glare impacts. Considering the potential turbine height and lighting requirements would increase visibility of the project, it is anticipated that the Wind Energy Alternative would increase the severity of the project’s significant and unavoidable aesthetic impacts. A wind energy project may require less ground disturbance than the proposed project, which would reduce the cultural resource and tribal cultural resource (TCR) impacts, which are less-than-significant impacts with mitigation. However, it could result in additional biological resource impacts due to avian and bat collisions and mortality, as well as wildlife avoidance of the project area due to increased noise during operations. Additionally, depending on the location of the turbines, the Wind Energy Alternative could result in increased noise impacts to off-site sensitive receptors (i.e., residences) during operations as compared to the proposed project.

### **4.2.1.3 Ability to Meet Project Objectives**

The Wind Energy Alternative would meet some of the project objectives since it would create utility-scale renewable energy facilities and directly assist in achieving or exceeding the state’s RPS and GHG reduction objectives or the state’s renewable energy storage target (Objective 3 and Objective 5). However, this alternative would not provide additional energy through a solar energy project (Objective 1) or meet the criteria to achieve the maximum state and federal solar investment tax credits (Objective 2). While it would provide electric reliability for the San Diego region through a local source of generation and would support the economy, it would not do so through solar energy (Objective 4 and Objective 7). In addition, this alternative would not provide a solar project in an area with excellent solar attributes (Objective 6).

### **4.2.1.4 Conclusion**

The Wind Energy Alternative would be unlikely to lessen or avoid the significant impacts from the proposed project and would not meet most of the project objectives. In addition, the Wind Energy Alternative may

increase the severity of the project's significant and unavoidable visual impacts, as well as increase impacts to biological resources during operations. Therefore, it was eliminated from further consideration in this EIR.

## **4.2.2 Alternate Site Location Alternative**

Section 15126.6(f)(2) of the State CEQA Guidelines addresses alternative locations for a project. The key question and first step in the analysis is whether any of the significant effects of the proposed project would be avoided or substantially lessened by developing the proposed project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Further, State CEQA Guidelines Section 15126.6(f)(1) lists several factors that may be considered when addressing feasibility of alternatives (any alternative, not just alternative locations) and states that "No one of these factors establishes a fixed limit on the scope of reasonable alternatives." In addition, an alternative site need not be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a project proponent.

### **4.2.2.1 Description and Setting**

The Alternate Site Location Alternative would consist of placing a 100-MW solar energy generation and storage facility with supporting infrastructure in another location within unincorporated San Diego County. The alternate location would be the parcels identified for the proposed project's biological resources conservation easement (Assessor's Parcel Nos. 659-130-03, 659-140-01, and 659-140-02), which are shown on Figure 1-3 in Chapter 1.0, Project Description, Location, and Environmental Setting. These parcels are within Empire Ranch and are owned by the Applicant. An approximately 3.5-mile overhead/underground generation-tie (gen-tie) line would connect the on-site project collector substation to the SDG&E Boulevard substation. The Alternate Site Location Alternative would be approximately 0.58 mile south of the proposed project site and adjacent to the U.S.–Mexico border.

### **4.2.2.2 Ability to Meet Project Objectives**

The Alternate Site Location Alternative would meet most of the project objectives since it would create a solar energy project with a capacity of up to approximately 100 MW and an approximately 217-MW BESS facility (Objective 1) and meet the criteria to achieve the maximum state and federal solar investment tax credits (Objective 2). It would also assist in achieving the state's RPS and GHG reduction objectives (Objective 3), provide a new source of energy storage (Objective 5), and support the economy (Objective 7). However, the generation facility would not be located as near as possible to SDG&E infrastructure (Objective 4).

### **4.2.2.3 Ability to Avoid or Reduce Environmental Impacts**

The approximately 3.5-mile-long gen-tie line to connect the solar facility to the SDG&E Boulevard substation would require significantly more construction activities, ground disturbance, earthwork, and operational activities (maintenance for a longer gen-tie line) than the proposed project. It would significantly reduce or eliminate impacts to aesthetics since it would be set further back from public views from Old Highway 80 and Interstate 8 (I-8), and from private views from existing residences in Boulevard. However, the Alternate Site Location Alternative would result in environmental impacts that would be more significant than the proposed project to biological resources, cultural resources, hydrology, transportation, and TCRs due to increased area of ground disturbance associated with a longer off-site gen-tie line.

#### **4.2.2.4 Conclusion**

Although the Alternate Site Location Alternative would meet most of the project objectives and lessen the significant aesthetics impacts from the proposed project, it would increase the severity of significant impacts in other environmental issue areas. Therefore, it was eliminated from further consideration in this EIR.

### **4.3 No Project/No Build Alternative**

#### **4.3.1 Description and Setting**

The No Project/No Build Alternative would not implement the project. No project-related construction or ground disturbance activities would occur, and there would be no changes to the existing land use types or operational characteristics of the project site. None of the direct and cumulative impacts associated with the construction, operation, maintenance, and future decommissioning of the project to any of the resources identified and discussed in Chapter 2.0 would occur. The property could also be developed as a by-right residential project in accordance with the Rural Lands 80 (RL-80) General Plan land use designation and zoning of General Rural (S92), which allow for one dwelling unit per 80 acres.

#### **4.3.2 Comparison of the Effects of the No Project/No Build Alternative to the Proposed Project**

##### **4.3.2.1 Aesthetics**

Under the No Project/No Build Alternative, the visual conditions of the project site would be retained in their current state. As such, the No Project/No Build Alternative would avoid the project's impacts to aesthetics. This includes avoidance of the significant and unavoidable visual character and quality impacts related to the change in the established rural, vegetated landscape, and unencumbered character of the project site (**Impacts AE-1 and AE-2**). The No Project/No Build Alternative scenario would also avoid the panoramic view impacts of the project (**Impact AE-3**), including impacts to scenic views from State Route (SR) 94, I-8, and local recreational areas. The No Project/No Build Alternative scenario would also avoid the cumulative impacts of the project (**Impacts AE-CU-1 through AE-CU-3**). Refer to EIR Section 2.1, Aesthetics, for additional details regarding aesthetic impacts of the project. While the proposed project would include project design features **PDF-AE-1** through **PDF-AE-4** to alleviate adverse effects to visual quality, valued visual character, and panoramic views, these impacts would be significant. Overall, the No Project/No Build Alternative would avoid all significant and unavoidable aesthetic impacts of the project.

In summary, if no development were to occur under the No Project/No Build Alternative, then all aesthetic impacts identified for the project would be avoided. Therefore, impacts of the No Project/No Build Alternative related to aesthetics would be *decreased* in comparison to the proposed project.

##### **4.3.2.2 Biological Resources**

The existing site conditions would remain under the No Project/No Build Alternative, including existing biological resources. As such, no impacts to biological resources would occur under this alternative.

Therefore, impacts of the No Project/No Build Alternative related to biological resources would be *decreased* in comparison to the proposed project.

### **4.3.2.3 Cultural Resources**

The No Project/No Build Alternative would not disturb the known and undiscovered archaeological resources on the project site. The No Project/No Build Alternative would not implement the project, and no construction activities, including grading or other earthwork activities, associated with these improvements would occur. This includes avoidance of **Impact CR-1** related to impacts to known archaeological resources, **Impact CR-2** related to undiscovered cultural resources within the potential impact area, and **Impact CR-3** related to the potential impacts to undiscovered human remains during construction. The project would mitigate these impacts to below a level of significance through implementation of **M-CR-1** to **M-CR-3**, which require a cultural open space easement, archaeological and Native American monitoring, and a cultural resources Treatment Agreement and Preservation Plan. While these impacts would be reduced to less-than-significant impacts by proposed mitigation under the project, the No Project/No Build Alternative would avoid impacts to cultural resources since no change to the resources would occur.

Therefore, impacts of the No Project/No Build Alternative related to cultural resources would be *decreased* in comparison to the proposed project.

### **4.3.2.4 Hydrology and Water Quality**

Under the No Project/No Build Alternative, the project site would remain in its current condition and the project would not be built or operated. Under this alternative, no construction activities, including grading or other earthwork activities, associated with these improvements would occur. Thus, the No Project/No Build Alternative would avoid the project's significant hydrology and water quality impacts associated with potential alteration of drainage patterns and flood hazards due to the perimeter fence during construction and operation of the project (**Impact HY-1**). While the project would mitigate this impact to below a level of significance via **M-HY-1**, the No Project/No Build Alternative would avoid impacts to hydrology and drainage patterns since no change to the resources would occur.

Therefore, impacts of the No Project/No Build Alternative related to hydrology and water quality would be *decreased* in comparison to the proposed project.

### **4.3.2.5 Noise**

Under the No Project/No Build Alternative, the project site would remain in its current condition and the project would not be built or operated. Under this alternative, no construction activities, including blasting, would occur. As such, there would be no potential for ground-borne vibration-related impacts to occur. Additionally, this alternative would not result in impacts to noise-sensitive land uses (**Impact N-1**) and would not result in any impacts related to airborne noise during construction or operation (**Impact N-2**). This alternative would also not result in any ground-borne vibration impacts. While the project would mitigate these impacts to below a level of significance via **M-N-1** and **M-N-2**, the No Project/No Build Alternative would entirely avoid noise-related impacts since no noise-generating activities would occur.

Therefore, impacts of the No Project/No Build Alternative related to noise would be *decreased* in comparison to the project.

### **4.3.2.6 Tribal Cultural Resources**

The No Project/No Build Alternative would not implement the project and no construction activities, including grading or other earthwork activities, associated with these improvements would occur. No TCRs have been identified within the project site. However, previously undocumented TCRs could be identified

and impacted during project implementation (**Impact TCR-1**). Under the No Project/No Build Alternative, the potential to uncover previously undocumented TCRs would not occur. While these impacts would be reduced to below a level of significance with implementation of **M-CR-2** and **M-CR-3**, the No Project/No Build Alternative would completely avoid impacts to TCRs identified for the project.

Therefore, impacts of the No Project/No Build Alternative related to TCRs would be *decreased* in comparison to the proposed project.

#### 4.3.2.7 Wildfire

Under the No Project/No Build Alternative, the existing conditions of the project site would be retained in their current state, and no activities associated with construction or operation of the proposed project would occur. As such, the No Project/No Build Alternative would not introduce new potential sources of wildfire ignition at the project site and would avoid significant impacts related to exacerbated wildfire risk and infrastructure (**Impacts WF-1** and **WF-2**). While the project would mitigate these impacts to below a level of significance via **M-WF-1** through **M-WF-6**, the No Project/No Build Alternative would entirely avoid impacts related to wildfire since no change to the project site would occur.

Therefore, impacts of the No Project/No Build Alternative related to wildfire would be *decreased* in comparison to the proposed project.

### 4.3.3 Relationship to Project Objectives

The No Project/No Build Alternative would meet none of the project objectives. Table 4-2 outlines this alternative's ability to attain the basic project objectives outlined above and in Chapter 1.0, Project Description, Location, and Environmental Setting.

**Table 4-2. Attainment of Project Objectives—No Project/No Build Alternative**

Project Objective	Does the Alternative Attain the Project Objective?
Develop a solar energy project that maximizes energy generation and battery storage potential with a rated capacity of approximately 100 MW and an approximately 217-MW BESS facility that can supply electricity to indirectly reduce the need to emit GHGs caused by the generation of similar quantities of electricity from either existing or future nonrenewable sources to meet existing and future electricity demands, including during on-peak power periods.	<b>No.</b> This alternative would not construct or operate the project and therefore would not generate electricity.
Develop a renewable solar energy project that can meet the criteria to achieve the maximum state and federal solar investment tax credits, which are intended to decrease the cost of renewable energy generation and delivery, promote the diversity of energy supply, and decrease the dependence of the United States on foreign energy supplies.	<b>No.</b> This alternative would not construct or operate the project and therefore would not meet the criteria to achieve the maximum state and federal solar investment tax credits.
Assist in achieving the state's RPS, as mandated under the 100 Percent Clean Energy Act of 2018 (Senate Bill 100), by developing and constructing California RPS-qualified solar generation from eligible renewable energy resources by December 31, 2045.	<b>No.</b> This alternative would not construct or operate the project and therefore would not generate electricity. The project would not assist in achieving the state's RPS.
Develop a utility-scale solar energy project that improves electrical reliability for the San Diego region by providing a source of local generation as near as possible to existing SDG&E transmission infrastructure.	<b>No.</b> This alternative would not construct or operate the project and therefore would not improve electrical reliability for the San Diego region.



Project Objective	Does the Alternative Attain the Project Objective?
Provide a new source of energy storage that assists the state in achieving or exceeding its energy storage targets, consistent with the terms of Assembly Bill 2514, and its greenhouse gas reduction targets, consistent with Assembly Bill 32, Senate Bill 32, and Assembly Bill 1279.	<b>No.</b> This alternative would not construct or operate the project and therefore would not provide a new source of energy storage.
Site a solar energy project in an area within San Diego County that has excellent solar attributes, including but not limited to high direct normal irradiance, in order to maximize productivity.	<b>No.</b> This alternative would not construct or operate the project and therefore would not maximize productivity.
Develop a utility-scale solar energy facility within San Diego County that supports the economy by investing in the region and creating construction jobs.	<b>No.</b> This alternative would not construct or operate the project and therefore would not support the economy.

## 4.4 Visual Buffer Alternative

### 4.4.1 Description and Setting

As shown in Figure 4-1, the Visual Buffer Alternative would remove approximately 50 acres of solar arrays from the northernmost portion of the project site within Area A-2. The 50 acres of solar arrays would be relocated off-site to the south of Area A-1, directly west of Tule Jim Lane. This relocation would move arrays south of the ridgeline that runs west to east and bisects Areas A-2 and A-1. This ridgeline is depicted in Section 2.1 Aesthetics, Figure 2.1-3. The project site slopes upward in elevation by an average of 8% from the northern project boundary on Jewel Valley Way to the ridgeline. Under the Visual Buffer Alternative, the fencing, landscaping, and solar arrays would be set back at least 800 feet from Jewel Valley Way to the north. The relocation would provide a visual and topographical buffer between the proposed project and SR 94, Jewel Valley Road, and the private properties.

The Visual Buffer Alternative would include similar numbers of photovoltaic (PV) modules as the proposed project and generate the same amount of electricity. The BESS, switchyard, gen-tie line, and other project components would be the same as the proposed project. To facilitate the installation of equipment foundations, the rocky topography of the relocated area would require an increase in blasting activities, grading, and surface clearing. Therefore, the length of construction may be slightly increased under this alternative, but the daily construction would likely remain the same as the proposed project.

### 4.4.2 Comparison of the Effects of the Visual Buffer Alternative to the Proposed Project

#### 4.4.2.1 *Aesthetics*

The Visual Buffer Alternative would relocate 50 acres of solar arrays from the northern boundary of the project site to below Area A-1, west of Tule Jim Road. Under the Visual Buffer Alternative, the fencing, landscaping, and solar arrays would be set back at least 800 feet from Jewel Valley Way to the north. The 800-foot buffer area would remain in its existing condition. Thus, the foreground view would remain undisturbed, and this would provide a visual buffer between the community of Boulevard and the solar facility.

This relocation would reduce visual impacts from Key Observation Point (KOP) 2, which depicts the view from I-8 westbound facing southwest (see Section 2.1, Figure 2.1-3). The ridgeline bisecting Areas A-1 and A-2 is visible in this figure. As shown in the simulation of the proposed project, travelers along this route

would have slightly elevated views of the northern portions of the project with views of the solar arrays, on-site collector substation, SCADA, BESS, and portions of the aboveground gen-tie. With the removal of these solar arrays in the north under the Visual Buffer Alternative, the scale of the project would decrease in visibility from I-8.

This relocation would also reduce visual impacts from KOP 3, which depicts the views from I-8 eastbound facing southeast (see Section 2.1, Figure 2.1-4). As shown in the simulation of the proposed project, northern portions of Area A-2 along Jewel Valley Road and Jewel Valley Way are visible. Similarly, with the removal of these solar arrays in the north under the Visual Buffer Alternative, the scale of the project would decrease in visibility from I-8.

The Visual Buffer Alternative would result in increased visual impacts from KOP 7, which depicts the view from Jewel Valley Road facing north (see Section 2.1, Figure 2.1-7). Under the proposed project, the solar arrays are visible on a hillside approximately 0.5 mile to the north. However, the Visual Buffer Alternative would relocate solar panels directly adjacent to the public road, increasing visual contrast.

With the relocation of the solar arrays, visibility of the project from the north would be largely blocked from certain mid- and long-range public views. This would lessen the visual inconsistency with the existing rural and open space land-use density, architecture, vegetative patterns, and natural forms that currently define landscape quality and character with the site and surroundings. Although the surrounding topography and viewing distance would limit visibility from some viewpoints, the vast scale and overall visual exposure of the project would still be evident from many public viewpoints and would still alter the scenic quality of the landscape. Therefore, while **Impacts AE-1** and **AE-2** would be substantially decreased in severity under the Visual Buffer Alternative, they would remain significant and unavoidable.

KOP 8 represents travel viewers along SR 94. This section of the highway is an Eligible State Scenic Highway, with slightly raised views of the northernmost portion of the project site (see Section 2.1, Figure 2.1-8). The relocation of the solar arrays to the south on the opposite side of the ridgeline would result in the ridgeline largely blocking views of the solar arrays from SR 94. Given the reduction of impacts to the views from I-8 (described above) and SR 94 (both Eligible State Scenic Highways), the significant and unavoidable project impacts to a scenic vista would be reduced to less than significant with the Visual Buffer Alternative (**Impact AE-3**).

The Visual Buffer Alternative would not avoid or substantially lessen the cumulative impacts of the project (**Impacts AE-CU-1** through **AE-CU-3**) due to the vast scale and overall visual exposure of the project. While project design features **PDF-AE-1** through **PDF-AE-4** would alleviate adverse effects to visual quality and valued visual character, these impacts would remain significant and unavoidable .

Therefore, impacts of the Visual Buffer Alternative related to aesthetics would be *decreased* in comparison to the proposed project.

#### **4.4.2.2 Biological Resources**

The Visual Buffer Alternative would relocate 50 acres of solar arrays from the northern boundary of the project site to below Area A-1, west of Tule Jim Road. The current area contains redshank chaparral, granitic chamise chaparral, and riparian habitat. The relocation area contains Coast live oak woodlands, redshank chaparral, and granitic chamise chaparral.

Biological resource impacts of the Visual Buffer Alternative would be similar to the proposed project, including impacts to special-status plants (**Impacts BI-SP-1** to **BI-SP-4**), special-status wildlife (**Impacts BI-W-1** to **BI-W-7**), nesting birds and bats (**Impacts BI-W-1** to **BI-W-4**), wildlife movement (**Impacts BI-WLC-1** to **WLC-3**), core wildlife area (**Impact BI-W-8**), riparian habitat and sensitive

vegetation communities (**Impacts BI-V-1 to BI-V-4**), and jurisdictional resources (**Impacts BI- JR-1 to BI-JR-4**).

The Visual Buffer Alternative would implement mitigation measures **M-BI-1 to M-BI-11** that include biological monitoring; habitat preservation; construction-related indirect or temporary avoidance measures; resource management plan; nesting bird and bat surveys; bat roost avoidance; prevention of invasive plant species; operations and maintenance guidelines; and noise reduction measures to reduce impacts to below a level of significance.

Overall, the impacts of the Visual Buffer Alternative related to biological resources would be *similar* in comparison to the proposed project.

#### **4.4.2.3 Cultural Resources**

The Visual Buffer Alternative would relocate 50 acres of solar arrays from the northern boundary of the project site to below Area A-1, west of Tule Jim Road. The alternative would result in an adjustment in the location of disturbance to the south but would not reduce the overall project footprint. This alternative would still include grading, excavation, and other earthwork activities throughout most of the project site. The existence of the steeper hills and topography at the Visual Buffer Alternative site would require more blasting, grading, and contouring than the proposed project.

The proposed open space easement within Area A-2 in the array area proposed for relocation would remain undisturbed under the Visual Buffer Alternative. The Visual Buffer Alternative would avoid impacts to two isolates (P-37-033309 and P-37-033279), which are not significant. However, as documented in Appendix E.1, Cultural Resources Survey and Inventory, the area south of Area A-1, to which the arrays would be relocated, has not been surveyed, as it is located off-site. However, this off-site area is located near to the existing on-site airstrip and riparian area, where several cultural resources have been identified. Therefore, since the Visual Buffer Alternative would require more blasting, grading, and contouring than the proposed project due to steeper hills and topography at the site, cultural resource impacts are expected to be increased in severity as compared to the proposed project.

The Visual Buffer Alternative's impacts to known archaeological resources (**Impact CR-1**), undiscovered cultural resources (**Impact CR-2**), and undiscovered human remains (**Impact CR-3**) would be potentially significant. Like the proposed project, the Visual Buffer Alternative would mitigate these impacts to below a level of significance through the implementation of **M-CR-1 to M-CR-3**, which require a Cultural Open Space Easement, archaeological and Native American monitoring, and a Cultural Resources Treatment Agreement and Preservation Plan.

Overall impacts to cultural resources would remain less than significant with mitigation but would increase in severity with the Visual Buffer Alternative due to the increase in required earthwork. Therefore, impacts of the Visual Buffer Alternative related to cultural resources would be *increased* in comparison to the proposed project.

#### **4.4.2.4 Hydrology and Water Quality**

The Visual Buffer Alternative would include grading, excavation, and other earthwork activities throughout most of the project site. However, the topography of the proposed relocation, south of Area A-1 and west of Tule Jim Lane, is highly variable and contains sizable elevation changes. The existence of the steeper hills and topography would require more blasting, grading, and contouring than the proposed project. Therefore, hydrology and water quality impacts of the Visual Buffer Alternative are expected to be increased in severity as compared to the proposed project.

Given the additional earthwork, it is anticipated that the Visual Buffer Alternative would increase impacts related to hydrology associated with potential alteration of drainage patterns and diversion of flow (**Impact HY-1**). However, similar to the proposed project, this impact would be reduced to below a level of significance with implementation of mitigation measure **M-HY-1** that requires hydrologic and hydraulic analyses, stormwater design, and perimeter fencing design that avoids the blockage and/or redirection of storm flows.

Overall impacts to hydrology and water quality would remain less than significant with mitigation but would increase in severity due to the increase in required earthwork. Therefore, impacts of the Visual Buffer Alternative related to hydrology and water quality would be *increased* in comparison to the proposed project.

#### **4.4.2.5 Noise**

The Visual Buffer Alternative would include grading, excavation, and other earthwork activities throughout most of the project site. However, the topography of the proposed relocation, south of Area A-1 and west of Tule Jim Lane, is highly variable and contains sizable elevation changes. The existence of the steeper hills and topography would require more blasting, grading, and contouring than the proposed project.

The Visual Buffer Alternative would move solar arrays away from the noise-sensitive land uses to the northwest of the project site; however, the proposed area for relocation would be closer to noise-sensitive land uses to the southeast of the project site. As such, it is anticipated that the Visual Buffer Alternative would have similar operational impacts to noise-sensitive land uses as a result of stationary equipment compared to the proposed project (**Impact N-1**). However, given the additional required earthwork, it is anticipated that the Visual Buffer Alternative would increase construction impacts related to airborne noise (**Impact N-2**). Like the proposed project, the operational and construction period impacts would be mitigated to less than significant through the implementation of mitigation measures **M-N-1** and **M-N-2**.

Operational noise impacts of the Visual Buffer Alternative would remain less than significant with mitigation and would be similar to the proposed project. Construction noise-related impacts of the Visual Buffer Alternative would remain less than significant with mitigation, but would increase in severity. Therefore, overall, the impacts of the Visual Buffer Alternative related to noise would be *increased* in comparison to the proposed project.

#### **4.4.2.6 Tribal Cultural Resources**

The Visual Buffer Alternative would result in an adjustment in the location of disturbance to the south but would not reduce the overall project footprint. This alternative would still include grading, excavation, and other earthwork activities throughout most of the project site, and to a greater extent than the proposed project due to steeper hills and topography. No TCRs have been identified within the proposed project site. However, previously undocumented TCRs could be identified and impacted during project implementation (**Impact TCR-1**). Under the Visual Buffer Alternative, the potential to uncover previously undocumented TCRs would still occur. However, similar to the proposed project, this impact would be reduced to below a level of significance with implementation of mitigation measure **M-CR-2** (Treatment Agreement and Preservation Plan) and **M-CR-3** (Archaeological and Native American Monitoring).

Therefore, impacts of the Visual Buffer Alternative related to tribal cultural resources would be *similar* in comparison to the proposed project.

#### 4.4.2.7 Wildfire

The Visual Buffer Alternative would relocate 50 acres of solar arrays from the northern boundary of the project site to below Area A-1, west of Tule Jim Road. The alternative would result in an adjustment in the location of disturbance to the south but would not reduce the overall project footprint.

As the construction and operation activities associated with the Visual Buffer Alternative would be relatively unchanged compared to the proposed project, wildfire risk at the project site would be unchanged. Like the proposed project, the Visual Buffer Alternative would introduce new potential sources of wildfire ignition at the project site, which would result in impacts related to exacerbated wildfire risk and infrastructure (**Impacts WF-1** through **WF-2**). Both the Visual Buffer Alternative and the proposed project would mitigate these impacts to below a level of significance via **M-WF-1** through **M-WF-6**.

Overall, impacts of the Visual Buffer Alternative related to wildfire would be *similar* in comparison to the proposed project.

#### 4.4.3 Relationship to Project Objectives

The Visual Buffer Alternative would meet six of the project objectives. Table 4-3 outlines this alternative's ability to attain the basic project objectives outlined above and in Chapter 1.0, Project Description, Location, and Environmental Setting.

**Table 4-3. Attainment of Project Objectives—Visual Buffer Alternative**

Project Objective	Does the Alternative Attain the Project Objective?
Develop a solar energy project that maximizes energy generation and battery storage potential with a rated capacity of approximately 100 MW and an approximately 217-MW BESS facility that can supply electricity to indirectly reduce the need to emit GHGs caused by the generation of similar quantities of electricity from either existing or future nonrenewable sources to meet existing and future electricity demands, including during on-peak power periods.	<b>Yes.</b> This alternative would construct and operate the project with a rated capacity of up to approximately 100 MW and an approximately 217-MW BESS.
Develop a renewable solar energy project that can meet the criteria to achieve the maximum state and federal solar investment tax credits, which are intended to decrease the cost of renewable energy generation and delivery, promote the diversity of energy supply, and decrease the dependence of the United States on foreign energy supplies.	<b>Yes.</b> This alternative would meet the criteria to achieve the maximum state and federal solar investment tax credits.
Assist in achieving the state's RPS, as mandated under the 100 Percent Clean Energy Act of 2018 (Senate Bill 100), by developing and constructing California RPS-qualified solar generation from eligible renewable energy resources by December 31, 2045.	<b>Yes.</b> This alternative would assist in achieving the state's RPS.
Develop a utility-scale solar energy project that improves electrical reliability for the San Diego region by providing a source of local generation as near as possible to existing SDG&E transmission infrastructure.	<b>Partially.</b> This alternative would construct and operate the project, but it would not locate the facilities as near as possible to SDG&E transmission infrastructure, reducing efficiency.
Provide a new source of energy storage that assists the state in achieving or exceeding its energy storage targets, consistent with the terms of Assembly Bill 2514, and its greenhouse gas reduction targets, consistent with Assembly Bill 32, Senate Bill 32, and Assembly Bill 1279.	<b>Yes.</b> This alternative would construct and operate the project and provide a new source of energy storage.

Project Objective	Does the Alternative Attain the Project Objective?
Site a solar energy project in an area within San Diego County that has excellent solar attributes, including but not limited to high direct normal irradiance, in order to maximize productivity.	<b>Yes.</b> This alternative would construct and operate the project in an area that has excellent solar attributes.
Develop a utility-scale solar energy facility within San Diego County that supports the economy by investing in the region and creating construction jobs.	<b>Yes.</b> This alternative would construct and operate the project within San Diego County that supports the economy.

## 4.5 Reduced Development Alternative

### 4.5.1 Description and Setting

Under the Reduced Development Alternative, as shown in Figure 4-2, the development footprint would be 538 acres, a reduction of 50 acres from the proposed project. This alternative would remove approximately 50 acres of solar arrays and infrastructure in the northern portion of the project (Areas A-1 and A-2). This reduction in development footprint would remove solar arrays from the northern side of the ridgeline and provide a visual buffer between the proposed solar facility, Old Highway 80, I-8, and the private properties, as well as a noise buffer from residential uses during construction and operations.

This reduction in PV modules would reduce the amount of energy generated by this alternative. The Reduced Development Alternative would generate 90 MW compared to the proposed project's generation of 100 MW, which is a reduction of 10 MW. The capacity of the BESS, including the number of battery containers, would also likely be reduced under this alternative. The switchyard, on-site collector substation, gen-tie line, and other project components would be the same as the proposed project. The overall length of construction would be reduced under this alternative, but the daily construction activities would remain the same as the proposed project.

### 4.5.2 Comparison of the Effects of the Reduced Development Alternative to the Proposed Project

#### 4.5.2.1 *Aesthetics*

The Reduced Development Alternative would remove 50 acres of solar arrays from the northern boundary of the project site. Under this alternative, the fencing, landscaping, and solar arrays would be set back at least 800 feet from Jewel Valley Way to the north. The 800-foot buffer area would remain in its existing condition. Thus, the foreground view would remain undisturbed, and this would provide a visual buffer between the Boulevard community and the project.

This removal would reduce visual impacts from KOP 2, which depicts the view from I-8 westbound facing southwest (see Section 2.1, Figure 2.1-3). The ridgeline bisecting Areas A-1 and A-2 is visible in this figure. As shown in the simulation of the proposed project, travelers along this route would have slightly elevated views of the northern portions of the project with views of the solar arrays, on-site collector substation, SCADA, BESS, and portions of the aboveground gen-tie. With the removal of these solar arrays in the north under the Reduced Development Alternative, the scale of the project would decrease in visibility from I-8.

This removal would also reduce visual impacts from KOP 3, which depicts the views from I-8 eastbound facing southeast (see Section 2.1, Figure 2.1-4). As shown in the simulation of the proposed project, northern portions of Area A-2 along Jewel Valley Road and Jewel Valley Way are visible. Similarly, with

the removal of these solar arrays in the north under the Reduced Development Alternative, the scale of the project would decrease in visibility from I-8.

With the removal of the solar arrays, visibility of the project from the north would be largely blocked from certain mid- and long-range public views. This would lessen the visual inconsistency with the existing rural and open space land-use density, architecture, vegetative patterns, and natural forms that currently define landscape quality and character with the site and surroundings. Although the surrounding topography and viewing distance would limit visibility from some viewpoints, the vast scale and overall visual exposure of the project would still be evident from many public viewpoints and would fundamentally alter the scenic quality of the landscape. Therefore, while **Impacts AE-1** and **AE-2** would be decreased in severity under the Reduced Development Alternative as compared to the project, they would remain significant and unavoidable.

KOP 8 represents the travel route motorists and viewers would experience along SR 94. This section of the highway is an Eligible State Scenic Highway, with slightly raised views of the northernmost portion of the project site (see Section 2.1, Figure 2.1-8). Relocating the solar arrays to the south on the opposite side of the ridgeline would largely block views of the arrays from SR 94. Given the reduction of impacts to views from I-8 (described above) and SR 94 (both Eligible State Scenic Highways), the significant and unavoidable project impacts to a scenic vista would be reduced to less than significant with the Reduced Development Alternative (**Impact AE-3**).

The Reduced Development Alternative would not avoid or substantially lessen the cumulative impacts of the project (**Impacts AE-CU-1** through **AE-CU-4**). While project design features **PDF-AE-1** through **PDF-AE-4** would alleviate adverse effects to visual character and quality and panoramic view impacts, these impacts would be significant and unavoidable.

Overall, impacts of the Reduced Development Alternative related to aesthetics would be *decreased* in comparison to the proposed project.

#### **4.5.2.2 Biological Resources**

Under the Reduced Development Alternative, the impact area would be reduced by 50 acres in the northern portion of the project site (Areas A-1 and A-2). This reduction in the development footprint would result in the preservation of existing habitat and vegetation communities in the northern portion of the site, maintaining its current biological function.

The alternative would avoid direct impacts to biological resources within the 50-acre area through reduced ground disturbance, vegetation removal, and habitat modification. This represents an approximate 8.5% reduction in the overall impact area compared to the proposed project. Areas A-1 and A-2 contain similar biological resources to the rest of the project site, including potential habitat for special-status species.

However, construction activities under this alternative could still result in significant indirect impacts to biological resources, including the following:

- Special-status plants and their habitat (**Impacts BI-SP-1 to BI-SP-4**)
- Special-status wildlife species (**Impacts BI-W-1 to BI-W-7**)
- Nesting birds and bats (**Impacts BI-W-1 to BI-W-4**)
- Wildlife movement corridors (**Impacts BI-WLC-1 to BI-WLC-3**)
- Core wildlife areas (**Impact BI-W-8**)

- Riparian habitat and sensitive vegetation communities (**Impacts BI-V-1 to BI-V-4**)
- Jurisdictional resources (Impacts **BI-JR-1 to BI-JR-4**)

These indirect impacts, though reduced in severity due to the smaller development footprint, could still result in significant effects on biological resources, primarily through habitat fragmentation, disturbance from construction activities (such as noise or vibration), and disruptions to wildlife movement and nesting behaviors. The alternative would implement the same mitigation measures as the proposed project (**M-BI-1 to M-BI-11**) to reduce impacts to below a level of significance.

While the overall intensity of direct impacts would be reduced under this alternative, the indirect impacts would remain significant but mitigable. Implementation of the required mitigation measures would reduce all biological resource impacts to below a level of significance, consistent with the proposed project.

Therefore, the impacts of the Reduced Development Alternative related to biological resources would be *decreased* in comparison to the proposed project.

#### **4.5.2.3 Cultural Resources**

Under the Reduced Development Alternative, the impact area would be reduced by 50 acres in the northern portion of the project site. The proposed open space easement in the array area proposed for relocation would remain undisturbed. The Reduced Development Alternative would avoid impacts to two isolates (P-37-033309 and P-37-033279), which are not significant. Given this alternative would reduce impacts by 50 acres, or 8.5% relative to the project, the potential impacts to undiscovered cultural resources would be reduced. Thus, the Reduced Project Alternative's impacts to known archaeological resources (**Impact CR-1**), undiscovered cultural resources (**Impact CR-2**), and undiscovered human remains (**Impact CR-3**) would be less than the project. However, these impacts would remain potentially significant. The Reduced Development Alternative would mitigate these impacts to below a level of significance through implementation of **M-CR-1 to M-CR-3**, which require a cultural open space easement, archaeological and Native American monitoring, and a cultural resources Treatment Agreement and Preservation Plan.

Therefore, impacts of the Reduced Development Alternative related to cultural resources would be *similar* in comparison to the proposed project.

#### **4.5.2.4 Hydrology and Water Quality**

The Reduced Development Alternative would include grading, excavation, and other earthwork activities throughout the reduced project development footprint, resulting in a reduction of 50 acres of grading. Similar to the proposed project, the Reduced Development Alternative would result in significant hydrology and water quality impacts associated with potential alteration of drainage patterns and flood hazards due to the perimeter fence during construction and operation of the project (**Impact HY-1**). As for the project, the impact would be reduced to a less-than-significant level through implementation of mitigation measure **M-HY-1**, which requires hydrologic and hydraulic analyses, stormwater design, and perimeter fencing design that avoids the blockage and/or redirection of storm flows.

Overall impacts of the Reduced Development Alternative to hydrology and water quality would be decreased in severity as compared to the project but would remain less than significant with mitigation. Therefore, impacts of the Reduced Development Alternative related to hydrology and water quality would be *similar* in comparison to the proposed project.



#### **4.5.2.5 Noise**

The Reduced Development Alternative would include grading, excavation, and other earthwork activities throughout the reduced project development footprint, resulting in a reduction of 50 acres of grading. Removing 50 acres from the development footprint would reduce the overall length of construction activities. However, daily construction activities would be similar for the Reduced Development Alternative and the proposed project. As such, it is anticipated that the Reduced Development Alternative would have similar impacts related to noise-sensitive land uses compared to the proposed project (**Impact N-1** and **Impact N-2**), albeit slightly reduced due to a shortened construction timeline. Like the proposed project, these impacts would be mitigated to less than significant through the implementation of mitigation measures **M-N-1** and **M-N-2**.

Overall noise-related impacts would remain less than significant with mitigation but would decrease in severity. Therefore, the impacts of the Reduced Development Alternative related to noise would be *similar* in comparison to the proposed project.

#### **4.5.2.6 Tribal Cultural Resources**

The Reduced Development Alternative would reduce the overall project footprint and potential construction-related impacts on TCRs may be less than those for the proposed project. However, the alternative would still include grading, excavation, and other earthwork activities throughout most of the project site. No TCRs have been identified within the project site. However, previously undocumented TCRs could be identified and impacted during project implementation (**Impact TCR-1**). Under the Reduced Development Alternative, the potential to uncover previously undocumented TCRs would still occur. However, similar to the proposed project, this impact would be reduced to below a level of significance with implementation of mitigation measure **M-CR-2** (Treatment Agreement and Preservation Plan) and **M-CR-3** (Archaeological and Native American Monitoring).

Therefore, impacts of the Visual Buffer Alternative related to tribal cultural resources would be *similar* in comparison to the proposed project.

#### **4.5.2.7 Wildfire**

Under the Reduced Development Alternative, the impact area would be reduced by 50 acres in the northern portion of the project site. As the construction and operation activities associated with the Reduced Development Alternative would be relatively unchanged compared to the proposed project, wildfire risk at the project site would be unchanged. Like the proposed project, the Reduced Development Alternative would introduce new potential sources of wildfire ignition at the project site, which would result in impacts related to exacerbated wildfire risk and infrastructure (**Impacts WF-1** through **WF-2**). Both the Reduced Development Alternative and the proposed project would mitigate these impacts to below a level of significance via **M-WF-1** through **M-WF-6**.

Therefore, impacts of the Reduced Development Alternative related to wildfire would be *similar* in comparison to the proposed project.

### **4.5.3 Relationship to Project Objectives**

The Reduced Development Alternative would meet five of the project objectives. Table 4-4 outlines this alternative's ability to attain the basic project objectives outlined above and in Chapter 1.0, Project Description, Location, and Environmental Setting.

**Table 4-4. Attainment of Project Objectives—Reduced Development Alternative**

Project Objective	Does the Alternative Attain the Project Objective?
Develop a solar energy project that maximizes energy generation and battery storage potential with a rated capacity of approximately 100 MW and an approximately 217-MW BESS facility that can supply electricity to indirectly reduce the need to emit GHGs caused by the generation of similar quantities of electricity from either existing or future nonrenewable sources to meet existing and future electricity demands, including during on-peak power periods.	<b>No.</b> This alternative would construct and operate a solar energy project and BESS facility with a rated capacity of approximately 90 MW. Therefore, the alternative would not maximize the potential solar generation and energy storage capacity of the site to same degree as the proposed project.
Develop a renewable solar energy project that can meet the criteria to achieve the maximum state and federal solar investment tax credits, which are intended to decrease the cost of renewable energy generation and delivery, promote the diversity of energy supply, and decrease the dependence of the United States on foreign energy supplies.	<b>Yes.</b> This alternative would meet the criteria to achieve the maximum state and federal solar investment tax credits.
Assist in achieving the state's RPS, as mandated under the 100 Percent Clean Energy Act of 2018 (Senate Bill 100), by developing and constructing California RPS-qualified solar generation from eligible renewable energy resources by December 31, 2045.	<b>Yes.</b> This alternative would assist in achieving the state's RPS.
Develop a utility-scale solar energy project that improves electrical reliability for the San Diego region by providing a source of local generation as near as possible to existing SDG&E transmission infrastructure.	<b>Partially.</b> This alternative construct and operate the project but it would not locate the facilities as near as possible to SDG&E transmission infrastructure.
Provide a new source of energy storage that assists the state in achieving or exceeding its energy storage targets, consistent with the terms of Assembly Bill 2514, and its greenhouse gas reduction targets, consistent with Assembly Bill 32, Senate Bill 32, and Assembly Bill 1279.	<b>Yes.</b> This alternative would construct and operate the project and provide a new source of energy storage.
Site a solar energy project in an area within San Diego County that has excellent solar attributes, including but not limited to high direct normal irradiance, in order to maximize productivity.	<b>Yes.</b> This alternative would construct and operate the project in an area that would maximize productivity.
Develop a utility-scale solar energy facility within San Diego County that supports the economy by investing in the region and creating construction jobs.	<b>Yes.</b> This alternative would construct and operate the project within San Diego County that supports the economy.

## 4.6 Environmentally Superior Alternative

The State CEQA Guidelines require an analysis of alternatives to identify an Environmentally Superior Alternative among the alternatives evaluated in the EIR. The Environmentally Superior Alternative is the alternative that would minimize adverse impacts on the environment. Based on the evaluation of the alternatives in this chapter and the comparison of impacts, as summarized in Table 4-5, both the Visual Buffer Alternative and the Reduced Development Alternative would minimize the project's adverse impacts on the environment in a similar manner; however, the Reduced Development Alternative reduces the project's adverse impacts to a further degree than the Visual Buffer Alternative. As directed by the State CEQA Guidelines Section 15126.6(e)(2):

If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Therefore, the Reduced Development Alternative would be the Environmentally Superior Alternative, because it would be the built alternative that minimizes the project's adverse impacts on the environment.

**Table 4-5. Comparison of Impact Conclusions Among Alternatives**

Issue Area	No Project/ No Build Alternative	Visual Buffer Alternative	Reduced Development Alternative
Aesthetics	Decreased	Decreased: Impact AE-3 would be reduced to less than significant	Decreased: Impact AE-3 would be reduced to less than significant
Biological Resources	Decreased	Similar	Similar: Impacts would remain less than significant with mitigation, but the severity of impacts would be decreased
Cultural Resources	Decreased	Similar: Impacts would remain less than significant with mitigation, but the severity of impacts would be increased	Similar: Impacts would remain less than significant with mitigation, but the severity of impacts would be decreased
Hydrology and Water Quality	Decreased	Similar: Impacts would remain less than significant with mitigation, but the severity of impacts would be increased	Similar: Impacts would remain less than significant with mitigation, but the severity of impacts would be decreased
Noise	Decreased	Similar: Impacts would remain less than significant with mitigation, but the severity of impacts would be increased	Similar: Impacts would remain less than significant with mitigation, but the severity of impacts would be decreased
Tribal Cultural Resources	Decreased	Similar	Similar
Wildfire	Decreased	Similar	Similar
Meets Project Objectives?	No; none of the project objectives (Objectives 1 through 7) would be met	Partially; one objective (Objective 4) would be partially met, and six objectives (Objective 1 through 3 and 5 through 7) would be met	Partially; one objective (Objective 1) would not be met, one objective (Objective 4) would be partially met, and five objectives (Objective 2, 3, and 5 through 7) would be met

The Visual Buffer Alternative would meet six of the project objectives and partially meet one of the project objectives. Compared to the proposed project, the Visual Buffer Alternative would decrease aesthetics impacts. Although impacts to visual quality and valued visual character by the Visual Buffer Alternative and proposed project would be significant and unavoidable (**Impact AE-1** and **Impact AE-2**), impacts to scenic vistas by the Visual Buffer Alternative would be reduced to less than significant after mitigation (**Impact AE-3**). As stated previously, the relocation of the solar arrays would limit visibility of the project from the north from certain mid- and long-range public views. However, given the variable topography in the proposed relocation area, the Visual Buffer Alternative would result in increased earthwork and grading. Although this increased earthwork and grading could increase the severity of impacts to cultural resources, hydrology and drainage patterns, and noise-sensitive land uses from construction noise, impacts would be less than significant with mitigation with the Visual Buffer Alternative, as for the proposed project.

Compared to the project, the Reduced Development Alternative would have decreased impacts to aesthetics and would have decreased impacts to biological resources, cultural resources, hydrology and drainage patterns, and construction noise due to decreased earthwork and grading activities. However, mitigation would still be required of the Reduced Development to reduce these impacts to less than significant, as for the proposed project. While the Reduced Development Alternative would meet five of the stated project objectives, it would not meet the objective (Objective 1) of the project to maximize the solar energy generation of the project site, and it would only partially meet the objective (Objective 4) to provide a utility-scale solar energy project that improves electrical reliability for the San Diego region by providing a source of local generation as near as possible to existing SDG&E transmission infrastructure.

While the Reduced Development Alternative would decrease impacts to visual quality and valued visual character to a further degree than the Visual Buffer Alternative, neither alternative would entirely avoid the significant and unavoidable impact or reduce it to a less-than-significant level. The Visual Buffer Alternative would meet or partially meet the stated project objectives, but it would increase the severity of impacts to cultural resources, hydrology and drainage patterns, and construction noise; however, these impacts would be less than significant with mitigation. On the other hand, the Reduced Development Alternative would decrease the severity of impacts to biological resources, cultural resources, hydrology and drainage patterns, and construction noise, but these impacts would be less than significant with mitigation, and the Reduced Development Alternative would not meet the objective (Objective 1) of the project to maximize the solar energy generation of the project site.

Based strictly on an analysis of the relative environmental impacts, the Reduced Development Alternative is considered the Environmentally Superior Alternative. The County will consider the whole of the record when considering the project including, but not limited to, public comment and testimony. The County may select the project as proposed, an alternative, or a specified combination of particular elements identified in the alternatives, as the approved project. In all scenarios, the Mitigation Monitoring and Reporting Program (MMRP) would be applied to the approved project.

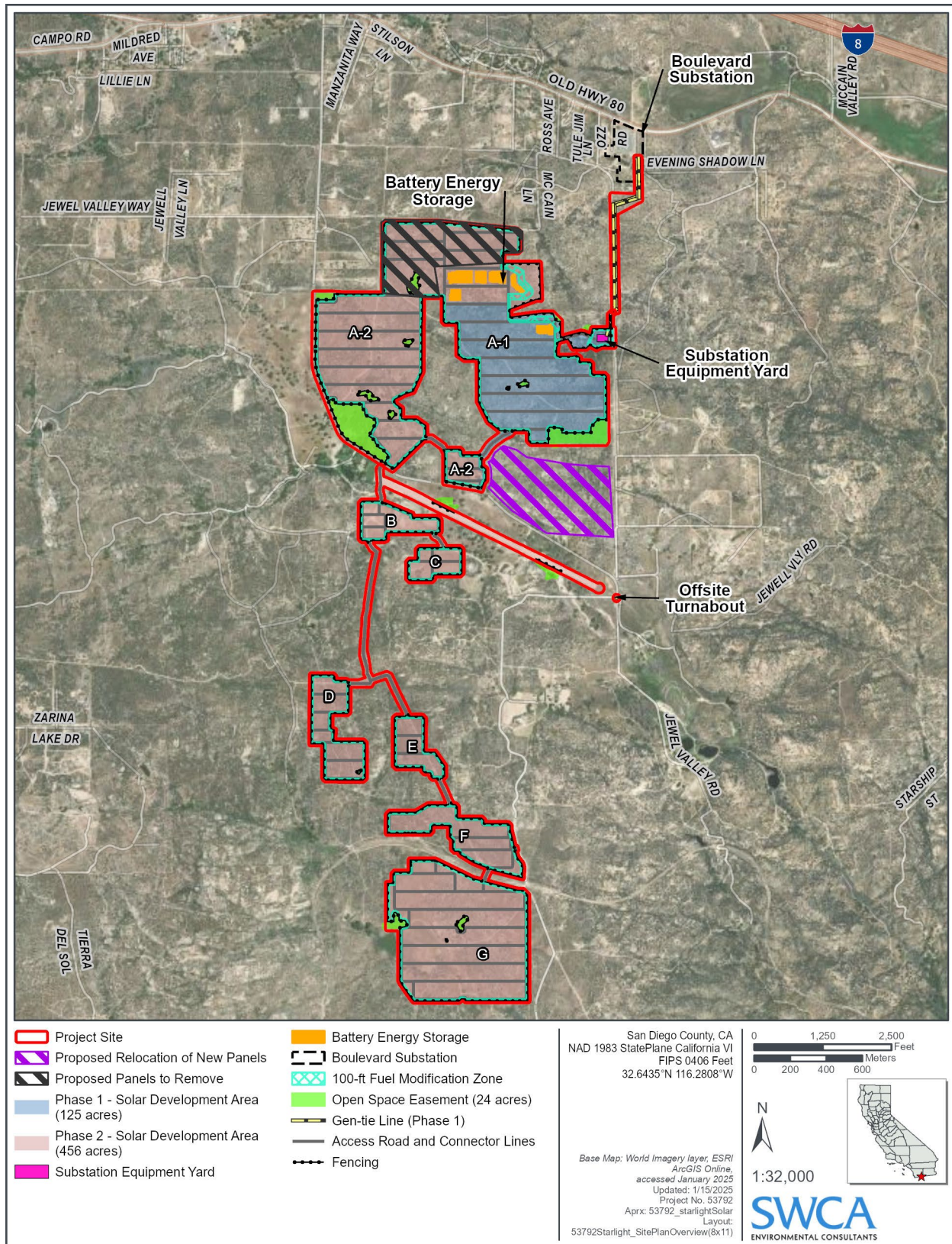


Figure 4-1. Visual Buffer Alternative



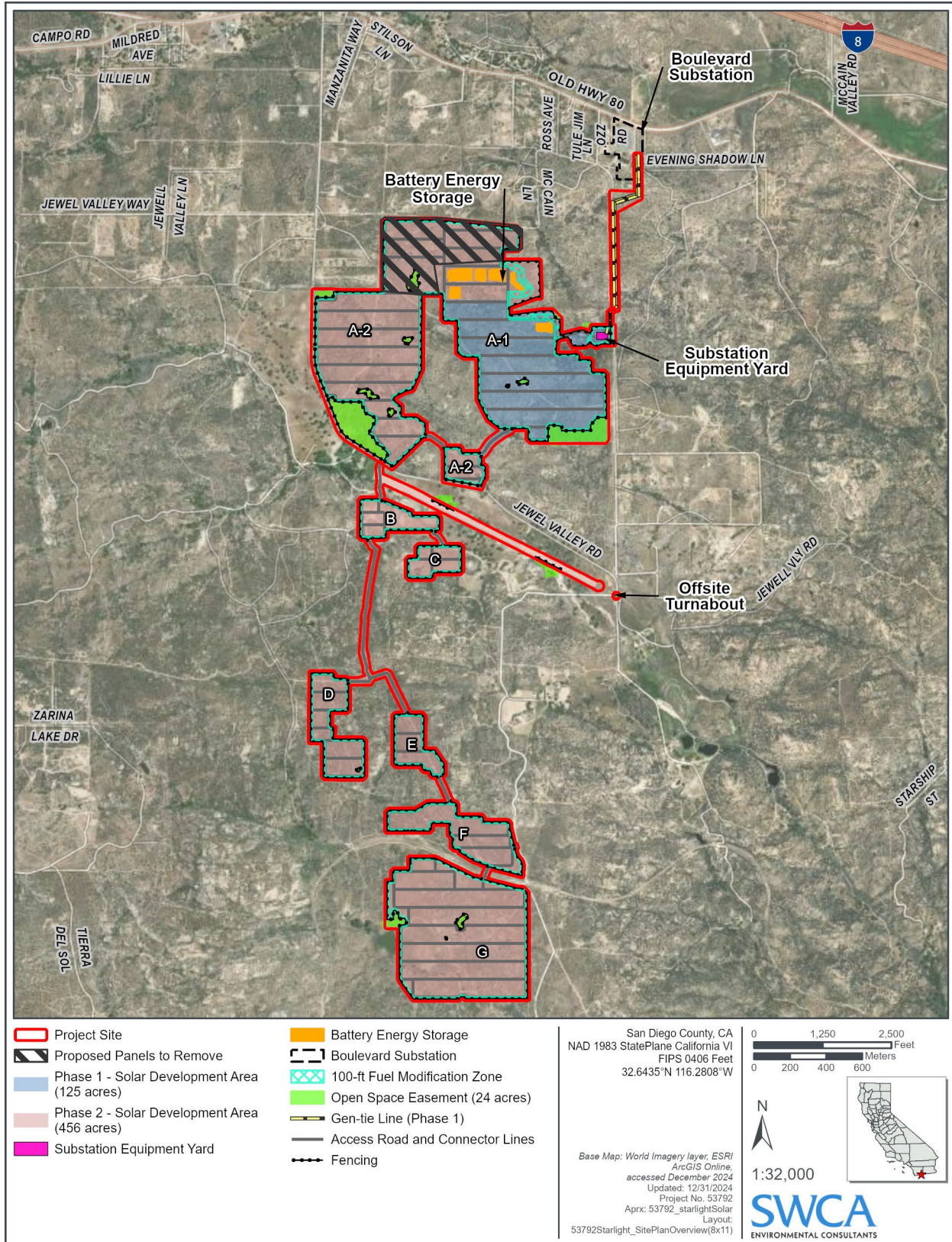


Figure 4-2. Reduced Development Alternative