

## C.1 Introduction to Environmental Analysis

### C.1.1 Organization of Section C

Section C describes the potential environmental impacts resulting from the incremental changes to the Panoche Valley Solar Project (PVSP) and the required PG&E transmission upgrades. The analysis in this section is intended to supplement the extensive analysis that was included in the previously certified 2010 Final EIR. This section has been organized as follows:

C.2 Aesthetics	C.9 Hazards and Hazardous Materials
C.3 Agriculture	C.10 Land Use and Recreation
C.4 Air Quality	C.11 Noise
C.5 Climate Change	C.12 Population and Housing
C.6 Biological Resources	C.13 Public Services, Utilities, and Service Systems
C.7 Cultural and Paleontological Resources	C.14 Transportation and Circulation
C.8 Geology, Mineral Resources, and Soils	C.15 Water Resources

### C.1.2 Environmental Assessment Methodology

The methodology used to determine potential impacts of the incremental changes to the project and the transmission upgrades consist of three key components, summarized below. These factors are discussed for each issue area in Sections C.2 through Section C.15, which follow this introduction.

**Environmental Setting Update.** The environmental setting update describes any changes to existing conditions in the project site that have occurred since the County certified the Final EIR in 2010 and the area that will be affected by the transmission upgrades. Pursuant to CEQA Guidelines (Section 15125(a)), the environmental setting used for the supplemental impact analysis reflects the conditions at the time of the issuance of the Notice of Preparation for the Supplemental EIR (October 31, 2014).

**Applicable Regulations, Plans, and Standards.** Each issue area considers whether the 2010 information requires updating to present current public policies, regulations, programs, and standards that apply to the Revised Project.

**Environmental Impacts and Mitigation.** This section evaluates whether the proposed changes to the solar project (e.g., design changes, construction changes, changes to the Applicant Proposed Measures [APMs], etc.) or the transmission system upgrades would result in any new environmental impact that was not previously analyzed and disclosed in the 2010 Final EIR, or substantially increases the severity of any environmental impact that was previously identified and analyzed in the 2010 Final EIR. The analysis is based on the same significance criteria defined in the 2010 Final EIR. In determining whether the incremental change or transmission upgrades results in any new impact or substantially increases the severity of a prior impact, the assessment considers the ability of existing regulations and other public agency requirements, as well as APMs, to reduce potential incremental impacts from the project changes. This section also evaluates any Applicant proposed changes to adopted mitigation measures and APMs and whether these changes result in new or substantially more severe environmental impacts.

If a new or substantially more severe impact results from the project changes or transmission upgrades despite the proposed APMs and application of existing regulations and requirements, the Draft Supplemental Environmental Impact Report (SEIR) recommends mitigation measures to reduce or avoid the impact, where feasible. Once impacts and mitigation measures, as applicable, are presented, the “level of significance after mitigation” is defined in a summary section.

These sections also analyzes whether any of the incremental project changes and transmission upgrades result in new or more severe cumulative impacts for each environmental discipline, and the cumulative project scenario is described in Section D. Section E summarizes the Alternatives considered in the 2010 Final EIR.

## Impact Significance

In the event the analysis identifies a new impact or an increase in the severity of a previously identified impact, the new or more severe impact is characterized as follows:

- **Class I:** Significant impact; cannot be mitigated to a level that is less than significant
- **Class II:** Significant impact; can be mitigated to a level that is less than significant through implementation of recommended mitigation measures
- **Class III:** Adverse impact; but less than significant, so mitigation is not normally recommended
- **Class IV:** Beneficial impact; mitigation is not required
- **No impact**

### C.1.3 Applicant Proposed Measures and Mitigation Measures

#### Applicant Proposed Measures

The Applicant has incorporated many of the design features, measures, and procedures that were previously identified in the 2010 Final EIR into the description of its Revised Project to avoid or reduce impact from project construction and operation. These measures are referred to as Applicant Proposed Measures (APMs) in this document and are considered in the analysis of impacts and in the determinations of impact significance. APMs that will continue to be incorporated into the Revised Project but that have not been modified since 2010 are presented for reference in Appendix 3, and the relevant measures are summarized in each part of Section C. Where the Applicant has proposed changes to the APMs included in the 2010 Final EIR, each proposed change is evaluated to determine whether the change results in a new environmental impact that was not previously analyzed and disclosed in the 2010 Final EIR or substantially increases the severity of an environmental impact defined in the 2010 Final EIR.

#### Mitigation Measures

The mitigation measures adopted by the County in 2010 are presented, and where measures are proposed for modification by the Applicant, the modified measures are presented and evaluated. Measures that are unchanged since the County's adoption in 2010 are presented for reference only in Appendix 3. Each mitigation measure defines the specific requirements to reduce impacts, and also defines the relevant milestone (the timeframe within which the measure must be implemented) and the mitigation monitoring requirement. Section C.1.4 defines the overall mitigation monitoring program and the Applicant's responsibility to provide financial support and documentation.

#### Avoidance and Minimization Measures

For the evaluation of the PG&E transmission system upgrades, PG&E has developed Avoidance and Minimization Measures (AMMs) that PG&E will implement during construction and operation.

## C.1.4 Mitigation Monitoring

Public Resources Code Section 21081.6 establishes two distinct requirements for agencies involved in the CEQA process. Subdivisions (a) and (b) of the section relate to mitigation monitoring and reporting, and the obligation to mitigate significant effects where possible. Pursuant to subdivision (a), whenever a public agency completes an EIR and makes a finding pursuant to Section 21081(a) of the Public Resources Code taking responsibility for mitigation identified in the EIR, the agency must adopt a program of monitoring or reporting which will ensure that mitigation measures are complied with during implementation of the project.

The County is responsible for monitoring of the mitigation measures that were previously adopted for the Approved Project and any additional measures adopted pursuant to this Supplemental EIR. One important step in monitoring is defining the responsibility of the Applicant to support this process. Mitigation Measures EM-1 and EM-2 from the 2010 Final EIR define this process, and are required to support all other mitigation measures and Applicant Proposed Measures defined in this EIR. Mitigation Measure EM-1 has not been modified from the measures adopted in 2010; the text of that measure is presented for reference only in Appendix 3. Mitigation Measure EM-2 has been modified to account for the shorter construction timeframe of the Revised Project; changes are shown in underlined and strikeout text.

**MM EM-2** **Provide documentation for monitoring.** To guarantee the success of the overall environmental monitoring program defined in Mitigation Measure EM-1, the Applicant shall retain a qualified individual to verify that all adopted measures have been successfully implemented. The Applicant shall prepare monitoring reports, on an annual basis, for ~~no less than five years~~ each calendar year in which construction occurs. The first report shall be submitted to the County one year after the initiation of construction, and thereafter on an annual basis until the monitor, in consultation with the County, has determined that all measures have been successfully established. The Applicant, and successors-in-interest, shall agree to complete any necessary remedial measures identified in the report(s) to maintain compliance with all adopted mitigation measures.