

Executive Summary

In 2010, Solargen Inc., the predecessor in interest to current applicant Panoche Valley Solar, LLC's (PVS or Applicant), applied to the County of San Benito (County) for a Conditional Use Permit (CUP) to construct and operate a solar photovoltaic project in the Panoche Valley. The Applicant also applied to the County for whole or partial cancellation of nearly 7,000 acres of California Land Conservation Act of 1965 ("Williamson Act") contracts. The County prepared a Final Environmental Impact Report (2010 Final EIR) that included a comprehensive analysis of the project's environmental impacts pursuant to the California Environmental Quality Act (CEQA). In October and November 2010, the County Board of Supervisors ("Board") unanimously certified the 2010 Final EIR, approved the CUP, approved the cancellation of the Williamson Act contracts, and approved a Development Agreement. Rather than approving the project as originally proposed and analyzed in the 2010 Draft EIR, the County approved Alternative A Revised, which was a reduced density alternative that was described and analyzed in the 2010 Final EIR. Alternative A Revised is referred to as the "Approved Project" in this Supplemental EIR.

In August 2014, PVS requested that the County modify the approved CUP. Based on subsequent consultation with state and federal resource agencies and further design and engineering, the Approved Project has been further reduced in size, but will be constructed over a shorter 18-month timeframe as opposed to five years. In addition, PG&E has identified specific telecommunication upgrades that are required to serve the project that will be installed within the existing PG&E right-of-way and at existing PG&E facilities. This Supplemental Environmental Impact Report (SEIR) assesses the environmental impacts that may result from these incremental changes to the Approved Project, which are referred to as the "Revised Project." The SEIR does not reanalyze the environmental impacts of the project as a whole. The incremental changes incorporated in the Revised Project that are analyzed in the SEIR are described briefly in Section A.2 and in detail in Section B of this SEIR. Figure ES-1 (at the end of the Executive Summary) shows the location of the project, and Figure ES-2 shows the boundaries of the originally proposed project, the Approved Project, and the Revised Project.

This Executive Summary summarizes the requirements of the CEQA Statute and Guidelines, provides an overview of the Revised Project, summarizes the alternatives considered in 2010, outlines the changes to the impacts of the project and the adopted mitigation measures that would result from the Revised Project, and discloses areas of controversy and issues to be resolved.

ES.1 Changes to the Approved Project

The Approved Project and the Revised Project are located on the same proposed site in the Panoche Valley, an unincorporated area of eastern San Benito County. The Approved Project would have generated 399 megawatts (MW) and would have been located on 3,202 acres with 2,203 acres of permanent disturbance for the project footprint. The Revised Project would generate 247 MW and would be located on 2,506 acres with 1,888 acres of permanent disturbance for the project footprint. The Approved Project would have been constructed in five phases over five years. The Revised Project would be constructed in one phase lasting approximately 18 months.

The Revised Project includes the following changes:

- **Reduced Project Footprint.** The project footprint and overall disturbance area has been refined and reduced, which has resulted in a larger on-site conservation area for species conservation.
- **Increase in Peak Construction Personnel and Construction Traffic.** Based on an accelerated construction schedule (one 18-month construction phase as opposed to a 5 year construction

schedule), the number of daily construction workers traveling to/from the Project site and working at the site has increased by a maximum of 200 workers per day to 550 workers per day.

- **Water Usage.** Due to the accelerated construction schedule, the applicant is proposing to increase the amount of water used during the temporary construction period. However, due to the reduced size of the project, the amount of water used to wash panels once the project is operational has been reduced.
- **Additional Water Storage During Construction.** The applicant proposes to construct new temporary construction water ponds and three temporary water tanks near existing or new wells.
- **Revised Internal Circulation.** Permanent on-site access roads would be eliminated from the project and interstitial space (dirt paths between rows of PV panels) would be utilized as transportation corridors as needed for maintenance. No installation of gravel or compaction would be required with the exception of the project perimeter road and access to the substation and operations and maintenance area.
- **Fencing.** Based on coordination with and input from the United States Fish and Wildlife Service (USFWS) and CDFW and revised biological data, the implementation plan for installation of fencing at the Project has been refined.
- **Applicant Proposed Measures/Mitigation Measures.** The Applicant has requested changes to a number of the applicant proposed measures (APMs) and mitigation measures that were adopted by the County in 2010 when the project was approved. An explanation of the requested changes and the effect of these changes on the prior analysis of project's environmental impacts are described in the appropriate discipline's analysis in Section C.
- **Other changes within the Project Footprint.** The Revised Project includes a reduced number of inverters and transformers and minor modifications to the electrical substation and interconnection facilities.
- **Telecommunications Upgrades:** Based on interconnection studies performed by the California Independent System Operator (CAISO) and in consultation with Pacific Gas & Electric's (PG&E), specific reliability upgrades have been identified for nearby substations, interconnection facilities and telecommunications infrastructure (which include installation of optical ground wire [OPGW] on PG&E's existing transmission line and a microwave system). Interconnection facilities including the project switchyard and structures needed to tie in the existing transmission line to the Project site were described in the Final EIR.

ES.2 Agency Review Processes

ES.2.1 San Benito County Process

The County has prepared this SEIR to evaluate the environmental impacts of the applicant's proposed modification to the 2010 Use Permit. This SEIR evaluates and mitigates the potential impacts associated with the Revised Project, and explains how they differ from those of the Approved Project.

The Planning Commission (or the Board on appeal) is the decision-making body on the modification to the CUP. If granted, the County's approval will again include the approval of a mitigation monitoring and reporting program to ensure that the Revised Project implements all of the previously adopted mitigation measures and any revised measures recommended in this SEIR. The County would not issue any grading or

building permits until the Applicant complies with those conditions that must be satisfied prior to issuance of grading or building permits..

The Board of Supervisors conditionally approved cancellation of the Williamson Act contracts affecting the project site in 2010 and that approval remains effective today. As a result, once the Applicant complies with all conditions of approval of the cancellation, which includes payment of the cancellation fee, the Williamson Act contracts will be officially cancelled and the applicant can proceed with construction and operation.

ES.2.2 California Public Utilities Commission Process

The California Public Utilities Commission (CPUC) regulates the activities of California's investor-owned utilities, including PG&E. Prior to the CPUC making a decision on approval of the work, the PG&E work must be evaluated under CEQA.

The CPUC has exclusive jurisdiction over the telecommunications improvements that PG&E would complete ("PG&E Upgrades"), most of which are off-site, and may rely on the SEIR in order to issue the requisite approvals to proceed with the upgrades. The CPUC approvals would include PG&E's request to take ownership of the Project switchyard, the interconnection work and upgrades to the telecommunications facilities for the Moss Landing-Panoche 230 kV transmission line.

ES.3 Project Objectives

PVS has identified the following five basic project objectives:

- Maximize renewable energy output through construction of a large-scale 247 MW solar energy facility to help meet mandatory State renewable energy goal, including the California Renewable Portfolio Standard for 2020;
- Locate the facility in a high solar resource area;
- Minimize environmental impacts by locating the facility on a site that has access to high-voltage electrical transmission lines that do not require substantial upgrading to accommodate the energy generated;
- Minimize impacts on the community and the environment by locating the facility in a remote location, on land with compatible topography, and outside of parkland and designated habitat conservation areas; and
- Achieve full operation in 2016 to qualify for the Investment Tax Credit under the Energy Improvement and Extension Act of 2008 (H.R. 1424).

ES.4 Environmental Analysis

This section summarizes whether the incremental changes to the Approved Project (the Revised Project) would create any new significant environmental impacts that were not analyzed in the 2010 Final EIR or substantially increase the severity of any previously identified impacts. This analysis is presented in detail in Section C of the SEIR, The section also summarizes whether any new information has been developed since the 2010 approval. Within each section below, the impacts of both the Revised Project and the PG&E Upgrades are summarized.

ES.4.1 Summary of Environmental Impacts by Discipline

The Revised Project would cause the same 4 significant unmitigable impacts relating to aesthetics and construction noise as the Approved Project. The Revised Project also would cause similar environmental impacts as the Approved Project for all other environmental resource areas.

Aesthetics

Revised Solar Project. The aesthetic impacts of the Approved Project would be reduced with the Revised Project due to its smaller size and shorter construction schedule. Therefore, no changes are required and none have been made to the adopted aesthetics mitigation measures to address any new or more severe impacts.

The Revised Project's construction period would be approximately 18 months as opposed to the 5-year period originally defined, so visible construction equipment would be present for a significantly shorter timeframe. Nonetheless, the construction impact remains significant and unmitigable due to the visibility of construction equipment, materials, and activities..

PG&E Upgrades. The on-site and off-site PG&E Upgrades would result in a less than significant aesthetic impact during construction even though construction activities would be visible due to the very short construction period and the relatively low number of viewers. Once installed, the new optical groundwire would not be noticeably different from the existing shield wire on the Moss Landing-Panoche 230 kV transmission line, so no long-term visual effects would result from this telecommunications upgrade component. Similarly, the visual impact of microwave facilities at Panoche Mountain, Call Mountain, and the Helm Substation would be less than significant because of their proposed installation where other similar infrastructure currently exists. Construction and operation of the new microwave tower (approximately 100' feet tall) at the Panoche Valley Solar switchyard would not result in a significant change in the structural contrast and developed character of the Project area because this tower height is consistent with the existing transmission towers.

Cumulative Impacts. Aesthetic impacts are largely site specific and there are no other cumulative projects that are close enough to the project site to contribute to a cumulative aesthetic impact. Therefore, like the Approved Project, the Revised Project would not combine with impacts of other projects, including those of the PG&E upgrades, because the Project site is visually isolated from the adjacent landscape by the surrounding hills and no other projects are proposed within Panoche Valley. Therefore, there would be no cumulatively significant impact.

Overall Impacts. The Revised Project would not result in any new significant direct or cumulative aesthetic impacts or a substantial increase in the severity of any previously identified impacts. The Revised Project would continue to have significant impacts to aesthetic resources during the temporary construction period and once operational.

Agriculture

Revised Solar Project. The agricultural impacts of the Approved Project would be reduced with the Revised Project due to the smaller project footprint. Therefore, no changes are required to and none have been made to the adopted agriculture mitigation measures to address any new or more severe agriculture impacts.

Impacts to agriculture are assessed based on the predicted interaction between construction, operation, and maintenance activities and the agricultural resources of the project site and vicinity. Due to the

reduced size of the Revised Project, impacts to on-site soils and agriculture activity would be reduced from those of the Approved Project. Four mitigation measures adopted in 2010 defining habitat restoration, a grazing plan, implementation of conservation easements, and monitoring, would equally apply to the Revised Project to ensure that impacts are less than significant.

Nearly the entire project site is currently enrolled in Williamson Act contracts. However, the County has conditionally approved the cancellation of these contracts in 2010, Therefore, once the applicant pay the cancellation fee and satisfies any other conditions, there will be no conflict with Williamson Act contracts and applicant can commence construction of the Revised Project. Nonetheless, the Revised Project is subject to the same mitigation adopted in 2010 that requires the Applicant to acquire agricultural conservation easements on agricultural land to compensate for the loss of agricultural land preserved in the County. With the implementation of all of the previously adopted mitigation, conflicts with Williamson Act contracts, existing zoning for agricultural use, and objectives in the County General Plan's Agriculture and Conservation and Open Space Elements would be less than significant.

PG&E Upgrades. The PG&E Upgrades would be located on farmland in San Benito and Fresno Counties, including Grazing Land managed by BLM. The permanent conversion of farmland would be a less than significant impact due to the very small amount of land affected (less than an acre). Similarly, impacts to Williamson Act lands would take place within areas with existing utility infrastructure and because permanent impacts on FMMP-designated Farmland would be very small (about than 10 square feet), this impact would also be less than significant, and no mitigation is required.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative agricultural impacts. When combined with impacts from the PG&E Upgrades as well as past, present, and reasonable future projects, the loss of agriculture land would contribute to the decrease in agricultural land throughout the State and in particular in San Luis Obispo, Fresno, and San Benito Counties. However, the potential cumulative loss of agricultural was previously analyzed in the 2010 Final EIR. As the 2010 Final EIR explained, these impacts would be considered potentially significant, but would be mitigated to less than cumulatively significant with implementation of the mitigation measures that were recommended in the 2010 Final EIR and ultimately adopted for the Approved Project. The Revised Project would continue to implement these measures with a slight modification to the sheep grazing mitigation, which does not affect the overall impacts conclusions

Overall Impacts. All of the agricultural resources impacts for the Revised Project, the PG&E Upgrades, and cumulative impacts would be less than significant with implementation of mitigation.

Air Quality

Revised Solar Project. The air quality impacts of the Approved Project would be similar to those of the Revised Project in that the Revised Project would result in the same type of pollutant emissions that are described in the 2010 Final EIR. However, due to the compressed construction schedule (approximately 18 months compared to the Approved Project schedule of approximately 5 years), there would be more intense daily construction activity for a shorter period of time. With minor changes to mitigation measures, this compressed construction schedule would not lead to more severe air quality impacts.

The air quality analysis evaluates impacts from construction emissions (from construction vehicles and dust) and the emissions from operational vehicles and dust. Similar to the Approved Project, construction activities under the Revised Project would generate dust and exhaust emissions of criteria pollutants and toxic air contaminants that would be likely to exceed the Monterey Bay Unified Air Pollution Control District (APCD) significance thresholds without mitigation. The same mitigation

measures that were recommended in the 2010 Final EIR and ultimately adopted would be implemented to reduce construction vehicle emissions, reduce fugitive dust, and designate a dust compliance monitor. However, one mitigation measure, has been modified due to the increased daily ground disturbance, and now requires that watering occur three times daily to prevent significant impacts from fugitive dust from increased ground disturbance activity.

Operation, maintenance, and inspections of the Revised Project would generate slightly less dust and exhaust emissions of criteria pollutants and toxic air contaminants than the Approved Project due to the reduced Project footprint, and would not likely exceed the Monterey Bay Unified APCD thresholds after application of the recommended mitigation. Although the size and generating capacity of the Revised Project would be smaller than the Approved Project, operation of the Revised Project would still produce electricity that displaces power from traditional fossil fuel power plants.

PG&E Upgrades. Due to the short construction period, the limited extent of equipment use, and the small footprint of the proposed upgrades, pollutant emissions during construction would not occur at a significant level. The operation and maintenance activities and emissions would be comparable to those occurring for the existing transmission and communication systems. These emissions would not occur in quantities notably different from those already occurring as the existing systems are inspected and maintained, and would not result in a significant impact.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative air quality impacts. There are no major stationary emission sources or other cumulative construction proposed within a 10-mile radius of the Revised Project site that would contribute to any cumulative air quality impacts. Additionally, the PG&E Upgrades would result in negligible emissions that when combined with the daily construction emissions would not cause pollutant emissions levels to exceed applicable thresholds. As a result, no significant additional emissions would be caused by cumulative projects near the site. With mitigation identified for the Revised Project, the cumulative impacts of the Revised Project would not be significant.

Overall Impacts. All of the air quality impacts for the Revised Project would be less than significant. Mitigation is required to reduce construction impacts for the Revised Project to less than significant. All air quality impacts for both the PG&E Upgrades and cumulative impacts would be less than significant.

Climate Change

Revised Solar Project. The climate change impact of the Approved Project would be similar with the Revised Project. Both the Approved Project and the Revised Project result in the same sources of greenhouse gas (GHG) emissions. These emissions include both direct emissions, such as those emitted by stationary sources at the project site or caused by project activity onsite, and indirect emissions, including emissions from any offsite facilities used for project support as a result of the construction or operation.

As with the Approved Project, use of construction equipment and mobilizing the workforce and materials to develop the site would generate GHG emissions. Although the construction schedule for the Revised Project would be compressed to approximately 18 months from about 5 years, the amortized annual emissions of the Revised Project would be lower than that of the Approved Project because the Revised Project would involve a smaller development overall and less overall ground disturbance. Construction emissions amortized over the anticipated 30 year life of the project would not exceed the CARB Mandatory Reporting applicability level of 2,500 metric tonnes CO₂ per year. GHG production from construction would be adverse, but less than significant.

Operation, maintenance, and inspections would result in GHG emissions from the use of carbon-based fuels (gasoline, diesel fuel, and propane) for these activities. Due to the reduced project footprint and the reduced number of project components, greenhouse gas emissions for operation, maintenance, and inspections would be lower for the Revised Project than for the Approved Project, and this impact would remain less than significant. The GHG emissions caused by the construction, operations, and life cycle of the project would be more than offset by the reduction in greenhouse gas from traditional fossil fuel source due the renewable energy generated by the Revised Project, and as such, would be considered adverse, but less than significant. The power generated by the project would avoid GHG emissions and would be considered a beneficial impact.

PG&E Upgrades. The PGE Upgrades would generate the same sources of greenhouse emissions as the Approved Project and the Revised Project only at much smaller scale. Although construction activities would generate exhaust emissions of GHG, the total emissions would not occur at a significant level due to the short construction period, the limited extent of equipment use, and the small footprint of the proposed upgrades. This impact would remain less than significant. The operation and maintenance activities and emissions would be comparable to those occurring for the existing transmission and communication systems. These emissions would not occur in quantities notably different from those already occurring as the existing systems are inspected and maintained. GHG emissions from operation and maintenance activities would be less than significant. Moreover, the volume of GHG emissions that would be avoided by the Revised Project would more than offset any negligible GHG emissions from the PGE upgrades.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative GHG impacts. As the 2010 Final EIR explained, the GHG emissions caused by the construction, operations, and life cycle of such a large scale renewable energy project and the PG&E Upgrades would be more than offset by the emissions avoided by the project, once it's operational, and as such, would be considered adverse, but less than significant. Construction and operation of both the Revised Project and the PG&E Upgrades would cause a less than significant contribution to cumulatively considerable greenhouse gas emissions.

Overall Impacts. All of the climate change and greenhouse gas impacts of the Revised Project, the PG&E Upgrades, and cumulative impacts would be less than significant.

Biological Resources

Revised Solar Project. The biological resources impacts of the Revised Project would be reduced compared with the Approved Project because of the smaller project footprint. There are no changes to the significance of biological resource impacts from the conclusions of the 2010 Final EIR; the impact determinations that were presented in the Final EIR remain accurate. With implementation of the previously approved Applicant Proposed Measures and mitigation measures and the revised measures described in the SEIR, Revised Project impacts to biological resources would remain less than significant.

The Revised Project site is located in eastern San Benito County in the Panoche Valley. The Ciervo-Panoche Region has been identified in the *Recovery Plan for Upland Species of the San Joaquin Valley, California* (USFWS, 1998) as an important area for the conservation for many federally and state-listed plants and animals. These include the San Joaquin kit fox (*Vulpes macrotis mutica*), giant kangaroo rat (*Dipodomys ingens*), and blunt-nosed leopard lizard (*Gambelia sila*). In addition, the National Audubon Society has identified the Ciervo-Panoche Region, and specifically the Panoche Valley, as a globally significant *Important Bird Area*.

The Approved Project (Alternative A Revised) would have resulted in development of 3,302 acres within project fencing, and preservation of a contiguous area of 1,680 acres along the southern boundary of the project. With implementation of the mitigation measures presented in the 2010 Final EIR, and the additional mitigation lands both within the original project boundary and in Valadeao Ranch and Silver Creek Ranch, the impacts of the Approved Project would have been less than significant for all direct and indirect impacts to biological resources, including cumulative impacts.

The Revised Project would result in development of 2,506 acres within project fencing. The gap along the bottom of the Revised Project fencing would be 5 to 6 inches rather than 2 feet as described in the 2010 Final EIR. This change is based on consultation with CDFW and USFWS. The proposed mitigation lands continue to include the Valadeao Ranch, the Silver Creek Ranch, and the on-site Valley Floor Conservation Lands, which are all described in the Final 2010 EIR. However, the Valley Floor Conservation Lands were increased from 2,411 acres as described in the 2010 Final EIR to approximately 2,514 acres. This area includes an expanded 52-acre blunt-nosed leopard lizard buffer around blunt-nosed leopard lizard sightings, a widened San Joaquin kit fox corridor and higher density giant kangaroo rat areas.

PG&E Upgrades. The PG&E Upgrades associated with the Revised Project include installation of approximately 17 miles of optical ground wire (OPGW) between the Panoche Valley Solar Project site and the existing Panoche Substation. They also include construction of up to three new microwave communication towers and upgrades to one existing microwave tower. The environmental setting for these upgrades includes the area surrounding the Moss Landing–Panoche 230 kV transmission line between the Project site and the Panoche Substation, Call Mountain (west of the Panoche Valley), Panoche Mountain (northeast of the Panoche Valley), and the area surrounding the Helm Substation (approximately 13 miles southwest of the City of Mendota). The approach for the PG&E route analysis was the same as the Supplemental EIR; to utilize all available data related to biological resources, and to independently review, verify, and supplement these data in order to compile a concise and accurate description of the baseline biological conditions

While PG&E has an existing Habitat Conservation Plan (HCP), the San Joaquin Valley Operations and Maintenance (O&M) HCP, which applies to the portion of the route within Fresno County, PG&E will not utilize the San Joaquin Valley HCP for incidental take of species for this work. Incidental take of any special-status species will be authorized through a 2081 issued by CDFW for this work and through the Biological Opinion issued by USFWS for the Project. The species protection measures included in those documents will be used to avoid and minimize impacts to biological resources. However, for the purposes of the analysis, measures were presented as Avoidance and Minimization Measures (AMMs) to be implemented by PG&E prior to, and during, construction activities associated with the PG&E upgrades and interconnection work. With implementation of AMMs, impacts to biological resources resulting from the PG&E work would be less than significant.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative biological resources impacts. The geographic extent for the analysis of cumulative impacts related to biological resources has not changed since the preparation of the 2010 Final EIR. However, the cumulative impacts scenario includes additional projects (including solar) approved within the larger Ciervo-Panoche region, areas of western Fresno County, regions of western Kern County in the San Joaquin Valley, eastern San Luis Obispo County, and northern Santa Barbara County.

Cumulative effects from the development of the Revised Project are essentially the same as those identified in the 2010 Final EIR. Project design and construction methodology has been further refined since 2010 resulting in an overall reduction in permanently disturbed areas and an increase in the

mitigation lands. The Revised Project includes an approximately 2,506-acre project area, reduced from the estimated project area of the Approved Project of 3,302 acres. Ground disturbance associated with permanent Revised Project features have also been reduced to a maximum of 1,888 acres from the Approved Project which included up to 2,203 acres of permanent disturbance. Finally, additions to the mitigation package have increased the Valley Floor Conservation Area to 2,514 acres from the 2,411 acres described under the Approved Project.

In total, the Applicant has acquired rights to a total mitigation area of 24,174 acres (Valley Floor Conservation Area - 2,514, Valadeao Ranch Conservation Lands -10,772 acres and the Silver Creek Ranch Conservation Lands - 10,890 acres),. As described above, and in the 2010 Final EIR, these mitigation lands are comprised of approximately 10,782 acres within the Panoche Valley that have slopes less than 11 percent contiguous with the Valley floor, are occupied by San Joaquin kit fox, giant kangaroo rat, and blunt-nosed leopard lizard, and are considered likely to contain the same genetically distinct populations of these species that occur on the project site.

Through the implementation of mitigation measures, impacts of the Revised Project would not combine with impacts of the PG&E Upgrades or other projects to result in cumulatively considerable impacts.

Overall Impacts. All of the biological resources impacts of the Revised Project, the PG&E Upgrades, and cumulative impacts would be less than significant with implementation of mitigation.

Cultural and Paleontological Resources

Revised Solar Project. The Revised Project would not affect any known cultural resources that were not identified in the 2010 Final EIR or cause a substantial increase the severity of any previously analyzed significant cultural resources. Such impacts are largely site-specific and there have been no changes to the physical conditions on the project site since 2010 that would result in a new or more severe impact. The cultural and paleontological resources analysis addresses whether ground disturbing activities associated with the Revised Project could potentially cause impacts within the currently defined area of potential effect.

No new historical resources or unique archaeological resources have been identified in the study area since 2010. Therefore, like the Approved Project, the Revised Project would have less than significant impacts on historical or archaeological resources. Although the area of ground disturbance is reduced under the Revised Project, the possibility of accidental discovery and disturbance of unknown archaeological resources, Native American human remains, or significant paleontological resources still exists. The Revised Project occupies a smaller area than the Approved Project, and involves installation (and subsequent removal during decommissioning) of fewer solar panels. However, operation and decommissioning activities could still affect previously unidentified remains. These impacts would remain less than significant with implementation of the same mitigation measures adopted for the Approved Project.

PG&E Upgrades. Although the PG&E Upgrades would involve only a small amount of ground disturbance (such as for preparation of pulling/stringing sites), the possibility of accidental discovery and disturbance of unknown archaeological resources, Native American human remains, or significant paleontological resources still exists. These risks would be reduced through the implementation of Avoidance and Minimization Measures (AMMs) that would be implemented as part of the PG&E work. These impacts would be less than significant.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative cultural resources impacts. The Revised Project would not significantly impact any known

cultural or paleontological resources. The Project may impact previously unidentified cultural and paleontological resources during construction and decommissioning. However, any such site(s) are expected to be similar to other sites found throughout the region and potential impacts would be mitigated to less than significant through application of mitigation. As a result, the combination of those impacts would not be cumulatively considerable.

Overall Impacts. All of the cultural and paleontological resources impacts of the Revised Project, the PG&E Upgrades, and cumulative impacts would be less than significant with implementation of mitigation.

Geology, Soils, and Minerals

Revised Solar Project. The geology, soils, and mineral resources impacts of the Approved Project would be similar to those of the Revised Project. Such impacts are largely site-specific and the geologic or soils conditions on the project site have not changed since 2010 in a way that would result in a new or more severe impact.

Although the total area for grading activities has increased, the topography of the Revised Project area remains flat to gently sloping. Applicant Proposed Measures would ensure that areas of soil disturbance are restored and that stream crossings would be constructed in a manner that minimizes disturbance to drainages. Impacts related to erosion or loss of topsoil would remain less than significant. No new faults or liquefaction zones have been identified in the Project area. No new structures designed for human occupancy would be constructed under the Revised Project. No new mineral resources or active mining operations have been identified. The design for the septic system and leach field has not changed. The soil is still appropriate for an on-site septic system. As with the Approved Project, the Revised Project site includes potentially corrosive and expansive soils that could expose people or structures to potential substantial adverse effects. This impact would remain less than significant with implementation of mitigation.

PG&E Upgrades. Installation of the OPGW along the 17-mile upgraded section of the Moss Landing–Panoche transmission line would involve soil disturbance for preparation of pulling/stringing sites as well as for minor improvements to existing access roads. Although this soil disturbance could result in soil erosion, these activities would occur on generally flat terrain and total disturbance areas associated with primary telecommunications upgrades is limited to approximately 5.62 acres. Compliance with existing regulations as well as implementation of PG&E’s Avoidance and Minimization Measures would ensure that this impact would be less than significant. Construction of the new and upgraded microwave communication towers would not result in any significant impacts for geology, soils, and minerals.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative geology, soils and minerals impacts. Geologic materials and faults, minerals, and soils occur at specific locales and are unaffected by activities not acting on them directly and any impacts of the Revised Project or PG&E Upgrades would be site-specific. Therefore Revised Project impacts would not have the potential to combine with similar effects from either the PG&E Upgrades or other projects and would not be cumulatively considerable.

Overall Impacts. All of the geology, soils, and minerals impacts of the Revised Project, the PG&E Upgrades, and cumulative impacts would be less than significant with implementation of mitigation.

Hazards and Hazardous Materials

Revised Solar Project. Construction and operation of the Revised Project would not result in any additional or more severe hazards and hazardous materials impacts compared to the Approved Project. The hazards and hazardous materials resources analysis describes the potential hazards (other than geologic hazards) associated with the Revised Project site, infrastructure, activities, and materials that could impact human health and the environment.

The same equipment that was described in the Final EIR would be used to construct the Revised Project. Construction activities would be shorter but more intense. The risk of a leak or accidental spill of hazardous materials would be the same as described in the Final EIR, and the same APMs and mitigation measures would apply. The Revised Project no longer includes evaporation ponds associated with water treatment, and therefore the risk of mobilizing contaminants through brine harvesting no longer exists. With implementation of mitigation measures, this impact would remain less than significant. The nearest school, Panoche Elementary School, is located over a mile from the Revised Project boundary, and therefore the Revised Project would not cause hazardous emissions within one-quarter mile of an existing or proposed school.

The Project site is not listed as a hazardous materials site, and no new nearby hazardous materials sites have been identified. Glint and glare impacts of the Revised Project would be reduced compared to the Approved Project due to the reduced project footprint and the reduced number of PV panels. This impact would remain less than significant. The risk of loss, injury, or death involving wildland fires would remain less than significant with implementation of mitigation. The Revised Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Grading and other soil disturbing activities associated with construction of the Revised Project could mobilize the fungus that causes Valley Fever. This impact would be less than significant with implementation of mitigation to educate workers and the public, and to protect construction workers. Generation of disease vectors, such as mosquitos and rodents, would remain less than significant with implementation of mitigation.

PG&E Upgrades. Construction and operation (including inspection and maintenance) of the PG&E Upgrades would involve the use of heavy machinery, including helicopters. If not properly maintained, this machinery could leak potentially hazardous materials, including diesel fuel, gasoline, lubricant oils, hydraulic fluid, antifreeze, and transmission fluid. An accidental spill or leak of these materials could contaminate soil, surface water, groundwater, or affect construction workers or the public. Several components of the PG&E Upgrades (including the microwave towers at the Call and Panoche Mountain sites and the OPGW in the Panoche Hills) are located in remote open space where fire risk is generally high. Vehicles idling on dry vegetation or personnel smoking near dry vegetation could ignite a wildfire. These impacts would be less than significant with implementation of AMMs.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative hazards and hazardous materials impacts. The projects that have been constructed or proposed in the area of potential cumulative effects have changed since 2010. However, even considering the new project list, the Revised Project and the PG&E upgrades would not combine with impacts of other projects. There are no other projects in the immediate vicinity of the solar project site or near PG&E upgrades that would present similar hazardous conditions with the potential to result in a cumulatively significant impact.

Overall Impacts. All of the hazards and hazardous materials impacts of the Revised Project, the PG&E upgrades, and cumulative impacts would be less than significant with implementation of mitigation.

Land Use and Recreation

Revised Solar Project

The land use and recreation impacts of the Approved Project would be similar to the Revised Project. The land use and recreation section evaluates whether the construction or presence of the Revised Project would disrupt, displace, or divide land uses; conflict with a federal, State, or local land use plan, goal, standards, or policy; reduce or impact visitation to established recreation areas; or increase the use of or change the character to established recreation areas, diminishing the recreational value.

Land Use. Like the Approved Project, construction and operation of the Revised Project would displace current grazing use of the site. Land uses within one mile of the Revised Project site remain as described for the Approved Project and include rural residential properties and agricultural uses. The very small, rural, Panoche Elementary School is over one mile from the Revised Project site. The presence of construction crews, the operation of construction equipment and resulting construction noise, and increased construction-related traffic on local roads would be potentially disruptive, particularly during the late evening and early morning hours. The construction traffic and other construction activities for the Revised Project would occur over a shorter time period, but would be more intense compared to the Approved Project. This impact would be less than significant with implementation of mitigation. Although the Project footprint and the amount of permanently disturbed land have decreased under the Revised Project, grazing land still would be permanently displaced by Project implementation. However, all of the parcels that would be required for Project implementation are located on property that is under option for purchase by the Applicant. This impact would remain less than significant.

Recreation. Recreational users of the surrounding BLM lands and Mercy Hot Springs could be disrupted by construction-related traffic, which would be more intense than under the Approved Project but would occur over a shorter period of time. This impact would be less than significant. The Revised Project would require a peak daily workforce of up to 550 workers, compared to a peak daily workforce of 200 workers under the Approved Project. Some of these workers could choose to camp on the surrounding BLM land in lieu of other temporary housing options. However, BLM rules and regulations limit camping in the surrounding area to 15 days for every three month period. This restriction would ensure that any excess demand placed on BLM recreational facilities would be less than significant. Construction, operation, and maintenance of the Revised Project would change the character of Panoche Valley and the surrounding hills, which support a variety of recreational opportunities. Traffic and noise impacts would be shorter but more intense under the Revised Project compared to the Approved Project. The noise caused by construction could frighten or displace wildlife, including birds. Construction noise could also impact the recreational experience for campers and hikers in the surrounding hills although only daytime noise levels would be affected by construction. The largest long-term change to the character of the Project site and the surrounding hills would be visual change caused by Project structures and night lighting. Overall, impacts to recreational areas and programs from Revised Project construction and operation would remain adverse but less than significant.

PG&E Upgrades

Construction of the PG&E Upgrades would occur over a period of 12 to 16 weeks. Construction traffic would utilize local roadways in and around the Panoche and Tumey Hills. This increased traffic would temporarily disrupt access to the surrounding hills and increase travel times for visitors (such as hikers,

campers, hunters, and wildlife viewers). However, due to the short construction period and the small number of construction vehicles, this impact would be less than significant. The addition of new microwave towers would result in visual changes that could negatively impact recreational users of the surrounding hills, including campers, hikers, and birdwatchers. The proposed microwave tower will be approximately 100 feet tall located on the Revised Project site would be a visible project component and similar in height to existing transmission structures and proposed tubular steel poles and any other project components in the Panoche Valley. It would be adjacent to the existing transmission line, as well as next to the proposed new substation equipment and PV panels. Due to distance between recreational users of the surrounding BLM lands and the proposed new microwave tower (approximately 3 miles or more), this impact would be less than significant.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative land use and recreation impacts. The projects that have been constructed or proposed in the area of potential cumulative effects have changed since 2010. However, even considering the new project list, the mitigation measures recommended for land use and recreation as well as traffic mitigation measures, would reduce the contribution of the Revised Project and the PG&E Upgrades to cumulative impacts to less than significant.

Overall Impacts. All of the land use and recreation impacts of the Revised Project, the PG&E Upgrades, and cumulative impacts would be less than significant with implementation of mitigation.

Noise

Revised Solar Project. Like the Approved Project, the Revised Project would primarily generate noise impacts during construction, which was comprehensively analyzed in the 2010 Final EIR in the context of a five year phased construction schedule. The Revised Project includes a much shorter construction schedule, which means the overall duration of construction noise would be reduced. Although construction of the Revised Project would result in a shorter period during which construction noise would occur, the compressed construction schedule would cause higher average daily noise levels due to the additional heavy equipment that would be needed to construct the project in a shorter timeframe. As noted in the 2010 Final EIR, the existing ambient noise levels in the project area range from 35 dBA Ldn to 60 dBA Ldn¹ along Panoche Road and Little Panoche Road. The 2010 Final EIR also estimated that noise levels generated from construction would be approximately 95 dBA Leq at 50 feet from the construction activity and would range from 52 dBA Leq to 83 dBA Leq at the nearest sensitive receptor (approximately 200 feet from the closest work area), which could result in a substantial temporary increase of the existing ambient noise levels by more than 5 dBA Ldn. While Revised Project construction activities would be intermittent and more short-term and temporary in nature than the Approved Project, like the 2010 Final EIR's conclusion for the Approved Project, on-site construction noise for the Revised Project would still be considered significant and unavoidable.

Operation of the project would not increase permanent noise levels in the project area by more than 5 dBA. The inverters and transformers that would be installed for each power array could potentially exceed San Benito County's daytime noise level standard of 45 dBA Leq for rural residential land uses, because they are not proposed to be enclosed. Implementation of mitigation would reduce the potential for permanent noise levels to exceed the County's daytime noise level standards or to exceed the ambient noise levels by more than 5 dBA Ldn at the nearest residences to less than significant. With the exception of panel washing, all operational noise associated with inspection and maintenance of the

¹ "dBA Ldn" is a measure of existing noise levels in a logarithmic decibel scale.

Revised Project would be similar to that described in the 2010 Final EIR, and would remain adverse but less than significant. As defined for the Final EIR, washing of panels outside of the daytime hours (7:00 a.m. to 7:00 p.m.) could result in significant operational noise impacts. Implementation of mitigation would reduce this potential adverse impact to less than significant.

PG&E Upgrades. Construction of the PG&E Upgrades would include the use of heavy machinery, including helicopters, for a period of 12 to 16 weeks, approximately 2 to 3 weeks at any given work area along the alignment. These construction activities (especially the use of helicopters) could result in a temporary increase in ambient noise levels. However, construction activities would be very temporary and limited to daytime hours (generally 7:00 a.m. to 7:00 p.m.) and common operating procedures to reduce noise (i.e., mufflers, and engine shrouds, limits on idling time of construction equipment) would be utilized to reduce noise. As such, this impact would be adverse, but less than significant.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative noise impacts. The projects that have been constructed or proposed in the area of potential cumulative effects have changed since 2010, as described in Section D. However, even considering the new project list, the Revised Project would not combine with impacts of the PG&E Upgrades or other projects because the timeframe for construction of the other projects would not overlap and, even if construction overlapped, these project are geographically too far to contribute to any cumulative noise impacts. Therefore, the contribution of the construction noise from the PG&E Upgrades and the Revised Project would not result in a cumulatively significant impact.

Overall Impacts. Construction of the Revised Project would result in a significant and unavoidable impact to ambient noise levels. All of the other noise impacts of the Revised Project, the PG&E Upgrades, and cumulative impacts would be less than significant with implementation of mitigation.

Population and Housing

Revised Solar Project. The population and housing impacts of the Approved Project would be similar to the Revised Project. The population and housing analysis includes an assessment of whether the project labor force would require housing beyond the supply of local housing and temporary housing facilities and whether the project would induce population growth due to the need for workers from outside the project study area.

The required permanent labor force remains unchanged. The size of the peak daily construction workforce has increased from 200 workers to 550 workers. The duration of construction labor demand has decreased from approximately 5 years to approximately 18 months. Considering the continued high unemployment in the three-county study area, this impact would remain beneficial.

No new housing would be constructed in connection with the Revised Project. Housing vacancy rates have increased substantially from 2010 to 2014 in all three counties that are included in the Project study area (DOF, 2014). In Fresno County, the vacancy rate has increased from 6.4% to 8.3%. In San Benito County, the vacancy rate has increased from 3.8% to 6.0%. In Santa Clara County, the vacancy rate has increased from 2.3% to 4.4%. Neither the temporary nor the permanent workforce associated with the Revised Project would place a demand on housing that would exceed local supply. This impact would remain less than significant. Although the peak daily construction workforce has increased from 200 workers to 550 workers, these workers would be drawn primarily from the existing population within the three-county Project study area and would not contribute to substantial population growth. Also, any construction workers that relocate due to the Revised Project would represent a temporary

increase in population. The size of the permanent labor force required for operation has not changed. Therefore, this impact would remain less than significant.

PG&E Upgrades. No impacts to population and housing would occur as a result of the PG&E Upgrades. Construction would be performed by existing PG&E staff over a period of 12 to 16 weeks. Construction activities would not create a substantial demand for labor or a change in local employment. No additional housing would be required, and the supply of local and temporary housing would not be exceeded. Construction of the PG&E Upgrades would not induce population growth.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative population and housing impacts. The projects that have been constructed or proposed in the area of potential cumulative effects have changed since 2010. However, even considering the new project list, the Revised Project would not combine with impacts of the PG&E Upgrades or other projects to result in a cumulatively considerable impact.

Overall Impacts. All of the population and housing impacts of the Revised Project, the PG&E Upgrades, and cumulative impacts would be less than significant.

Public Services, Utilities, and Service Systems

Revised Solar Project. The public services, utilities, and service systems impacts of the Approved Project would be similar to the Revised Project. The increase in peak labor workforce and peak daily traffic volumes would place additional demands on fire and police protection services. With implementation of the previously recommended and adopted APMs and mitigation and the minor changes to certain measures described in the SEIR, this increase in peak labor workforce and traffic would not lead to more severe public service impacts.

Analysis of impacts to public services, utilities, and service systems includes a review of changes in demand for public services (i.e., fire protection, police protection, schools, and hospitals) and for natural gas, electricity, local water, wastewater, and solid waste facilities during construction and operation of the Revised Project.

The size of the peak daily construction workforce has increased from approximately 200 workers (considered in the 2010 Final EIR) to 550 workers in the Revised Project. The duration of construction has decreased from approximately 5 years to approximately 18 months. Although the structural footprint and construction timeline of the Revised Project would be reduced compared to the Approved Project, both construction and operation of the Revised Project would place a demand on fire protection services that substantially exceeds the existing service capacity. With implementation of mitigation, impacts on fire protection services would be less than significant.

On-site security for the Revised Project would be provided for in the same manner as described for the Approved Project. However, the Revised Project would place substantial additional demand for support on California Highway Patrol (CHP) officers or County Sheriff deputies who are responsible for traffic safety due to the increased construction personnel and resulting traffic. With implementation of mitigation, impacts on police protection services would remain less than significant. The permanent labor force for the Revised Project remains unchanged and no impacts to school services would occur because the permanent workforce would be drawn from the surrounding communities and no additional housing or schools would be required.

The water supply and wastewater facilities for the Revised Project would remain as described for the Approved Project. No new public water supply systems would be required during construction or

operation of the Revised Project. Wastewater would be discharged through a septic tank and leach field. Demands would not be placed on public water supply and wastewater systems. Given the smaller solar field, the impact on solid waste facilities would be less intense. Overall, adverse impacts to local water, wastewater, and solid waste facilities would be less than significant.

PG&E Upgrades. None of the impacts addressed for the solar project would occur as a result of construction or operation of the PG&E Upgrades due to the small number of personnel required, the very short-term nature (12-16 weeks) of the construction activities, and the small permanent changes to PG&E facilities that would result. The PG&E Upgrades would be constructed by existing PG&E personnel, and no occupied structures would be constructed. The upgrades would not place any additional demands on public utilities or services.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative public service and utilities impacts. The projects that have been constructed or proposed in the area of potential cumulative effects have changed since 2010. The operation of the Revised Project and the construction or operation of the PG&E Upgrades would not result in a negative impact on the performance objectives for police or fire services or an increase in school enrollment. As with the Revised Project, the projects included in the cumulative projects list would be expected to implement traffic control measures, where practicable, to ensure that emergency access is not obstructed for fire and police services. Furthermore, with implementation of mitigation the Revised Project would not combine with impacts of other projects to result in a cumulatively significant impact. Therefore, the Revised Project's contribution would not be cumulatively considerable and would be less than significant with mitigation incorporated.

Overall Impacts. All of the public services, utilities, and service systems impacts of the Revised Project, the PG&E Upgrades, and cumulative impacts would be less than significant with implementation of mitigation.

Transportation and Circulation

Revised Solar Project. The transportation and circulation impacts of the Approved Project during the 18 month construction period would be more severe with the Revised Project due to the increased peak daily traffic volumes. The Revised Project would add 1,150 one-way vehicle trips to the existing traffic on these roads, compared to 298 trips with the Approved Project, which could potentially reduce road safety. Mitigation measures have been strengthened to improve project traffic safety and ensure that impacts remain less than significant.

The increase in traffic would place additional physical stress on local roadways. With recommended changes to mitigation measures, this increase in peak traffic would not lead to more severe transportation and circulation impacts. The transportation and circulation analysis indicates whether the construction or presence of the Revised Project would substantially increase congestion and travel delays on regional and local roadways. It also considers whether project construction or operation would create unsafe conditions on public roadways or conflict with adopted policies, plans, or programs supporting alternative transportation modes.

Traffic-related impacts during operations and decommissioning of the Revised Project would be essentially the same as for the Approved Project. Construction impacts would occur during a shorter time period than described in the 2010 Final EIR; construction would take place over 18 months rather than over 5 years. Therefore, traffic impacts would be shorter in duration, but more intense over the 18 month construction period. Though the project traffic would result in an increase in traffic along each of

the roadways, the increase will still be within roadway capacities. However, because the substantial increase in daily and hourly vehicle traffic may increase the likelihood of vehicle collisions, mitigation would be required to reduce this impact to less than significant.

Traffic volume data collected in 2010 along Panoche and Little Panoche Roads showed volumes of existing traffic that were well below capacities of each roadway. Although the addition of project traffic would result in an increase in traffic along each of these roadways, such an increase would have little effect on roadway operations and the total volume of traffic would remain within the roadway capacities. In addition, under the Revised Project work schedule, employees would generally be coming to and from the Project site during non-peak times when few other vehicles are using these roadways. With implementation of mitigation, impacts related to traffic congestion would remain less than significant.

PG&E Upgrades. PG&E Upgrades would require minimal personnel and very limited material and equipment deliveries. Work areas for PG&E Upgrades would be accessed from existing roads, including Panoche Road east of Little Panoche Road. PG&E's OPGW installation along the 17-mile segment would be completed in approximately 12-16 weeks, and at any one location the construction would take from 2 to 3 weeks. Helicopters would be used to transport electrical workers to the towers, deliver materials, and assist in pulling the OPGW from tower to tower. Approximately 12-20 construction personnel would be utilized during an approximate 16 week period for installation of the OPGW. Construction of new microwave communication towers would take approximately 2-6 months at each site and would utilize existing access roads. PG&E would implement standard traffic control measures to reduce any impacts to highway safety. Because of the low volume of existing traffic on area roads, the limited work involved, and the short duration of construction activities, this impact would be less than significant with implementation of PG&E's AMMs.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative traffic and transportation impacts. With mitigation and APMs, and AMMs, construction of the Revised Project and the PG&E Upgrades would result in less than significant impacts to transportation. The worst-case trip generation for the solar project would be approximately 1,150 peak trips. The traffic generated during construction activities for the Revised Project would occur for a short period of time (approximately 18 months) and would be dispersed throughout different portions of the project route. Operation and maintenance traffic to and from the Revised Project would be very similar to existing conditions and is not expected to conflict with applicable congestion management programs. Other developments addressed in the updated cumulative projects list may generate traffic during construction or operation, but are not located in areas where the project roads would be directly affected. Other projects listed in the cumulative projects list would obtain approvals from relevant agencies, which would likely require mitigation measures related to transportation and traffic impacts, if necessary. Therefore the contribution of the Revised Project and the PG&E Upgrades to cumulative impacts would not be cumulatively considerable and would be less than significant.

Overall Impacts. All of the transportation and circulation impacts of the Revised Project, the PG&E Upgrades, and cumulative impacts would be less than significant with implementation of mitigation.

Water Resources

Revised Solar Project. Like the Approved Project, the Revised Project would utilize existing wells and local groundwater during construction and operation. The Revised Project, however, would result in an increase in peak groundwater usage during the 18-month construction period, placing additional short-term strain on the underlying aquifer. However, previously adopted mitigation measures have been

strengthened to test and monitor groundwater levels, so the analysis concludes that the increased peak groundwater demand would not result in any additional or more severe impacts. Analysis of water resources includes an assessment of whether the accelerated construction schedule of Revised Project would substantially deplete local groundwater supplies, violate any water quality standard or waste discharge requirements, or substantially alter the existing drainage pattern of the site resulting in flooding offsite. It also evaluates whether construction activities would place structures in a floodplain resulting in flooding, flood diversions, or erosion. The SEIR addresses whether construction or operation of the project could cause an accidental release of contaminants or create any substantial new sources of polluted runoff.

The Applicant's groundwater assessment report concludes that predicted drawdown levels during the construction phase and long-term operation are unlikely to significantly impair existing water supply well use in the valley. However, due to the lack of detailed information about the groundwater basin characteristics, which was explained in the 2010 Final EIR, the potential for the Revised Project's water use to negatively affect groundwater remains potentially significant, and mitigation is required. There is a potential for the Revised Project's water use to lower the water levels in off-site wells (those outside the solar project boundaries), which was an impact that was previously identified and analyzed in the 2010 Final EIR. In order to ensure that this impact does not become severe due to the accelerated construction schedule, implementation of two previously adopted, but modified comprehensive mitigation measures would be required. These mitigation measures would ensure that groundwater extraction for the Revised Project would be properly monitored and that drawdown at nearby private wells would not exceed five feet. As a result of implementing these two measures, the impact of the Revised Project's water use would be less than significant.

The total graded area for the Project would increase from 200 acres (for the Approved Project) to 392 acres (with the Revised Project). The Revised Project also includes setbacks from existing drainages. Because the majority of the Project site occupies relatively flat terrain, it is not anticipated that the grading activities for the Revised Project would result in changes to drainage patterns, create flooding on- or off-site, or degrade water quality through erosion and sedimentation. Similarly, flooding would not result from the creation of impervious surfaces or the placement of structures in a floodplain. These impacts would remain less than significant.

The same equipment that was described in the Final EIR would be used to construct the Revised Project. The Revised Project would compress the construction schedule from five years to approximately 18 months. Construction activities would be shorter but more intense. The risk of a leak or accidental spill of hazardous materials would be the same as described in the 2010 Final EIR, and the same mitigation measures would apply. With implementation of mitigation, this impact would remain less than significant.

PG&E Upgrades. The PG&E Upgrades would involve a minor amount of soil disturbance for preparation of pulling/stringing sites and construction of approximately 9 new wood poles along the upgraded portion of the transmission line, and excavation and construction of the new microwave communication towers. No surface water resources exist on or near the microwave communication tower sites. The three unnamed drainages within the ROW of the upgraded portion of the transmission line will not be disturbed by the upgrades, as no work would be performed within in the bed and bank of the drainages. Any erosion caused by the PG&E Upgrades would be minimized through implementation of required permits and protective measures. This impact would be less than significant.

Construction of the PG&E Upgrades would involve the use of heavy machinery, including helicopters and other motorized equipment. This machinery could leak potentially hazardous materials, including diesel

fuel, gasoline, lubricant oils, hydraulic fluid, antifreeze, and transmission fluid. A leak or accidental spill of these materials could contaminate nearby waterways, including Panoche Creek and three unnamed drainages. This risk of contamination would be reduced through compliance with existing regulations and implementation of AMMs, resulting in this impact being less than significant.

Cumulative Impacts. The Revised Project would not result in any new or substantially more severe cumulative water resources impacts. The projects that have been constructed or proposed in the area of potential cumulative effects have changed since 2010. However, even considering the new project list, the Revised Project would not combine with impacts of the PG&E Upgrades or other projects because they would occur within different watersheds and basins, so there would not be a cumulatively significant impact.

Overall Impacts. All of the water resources impacts of the Revised Project, the PG&E Upgrades, and cumulative impacts would be less than significant with implementation of mitigation.

ES.4.2 Growth-Inducing Effects

Section 15126.2(d) of the CEQA Guidelines provides the following guidance on growth-inducing impacts: a project is identified as growth inducing if it “could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” The Revised Project would have no new or substantially more severe potential growth inducing components than the Approved Project. Construction or operational employment for the Revised Project would be unlikely to induce growth in the area.

ES.4.3 Significant Irreversible Commitment of Resources

Section 15126.2(c) of the CEQA Guidelines defines an irreversible impact as an impact that uses nonrenewable resources during the initial and continued phases of the project. Irreversible impacts can also result from permanent loss of habitat, damage caused by environmental accidents associated with project construction, or operational resource use. Like the Approved Project, construction of the Revised Project would necessitate some use and long-term conversion of agricultural land and vegetation and habitat removal. Development of the Revised Project would not change the previously defined significant irretrievable commitment of habitat for threatened and endangered species, or the commitment of nonrenewable resources during project construction and ongoing utility services during project operations. Similarly, the Revised Project would also consume nonrenewable resources (oil, gas, etc.) during construction and operation. Compliance with all applicable building codes, County policies and goals, and the mitigation measures adopted in 2010 and those proposed for modification in this EIR would ensure that all natural resources are conserved to the maximum extent possible.

ES.5 Areas of Controversy

Pursuant to CEQA Guidelines Section 15132(b)(2), areas of controversy and issues to be resolved that are known to the County or were raised during the scoping process for the Supplemental EIR include:

- Loss of biological resources and their habitat (including giant kangaroo rat, San Joaquin kit fox, mountain plover, and the blunt-nose leopard lizard and other protected species), and potential restrictions to wildlife movement;
- Effects of drought on biological resources and groundwater levels, and potential effects of climate change;

- Impacts to Panoche Elementary School students due to shorter, more intense construction period;
- Cumulative impacts of all the solar projects in the region;
- Increased daily traffic due to shorter construction period;
- Potential project water use to lowering groundwater levels;
- A variety of suggested alternatives.

This is not an exhaustive list of areas of controversy, but key issues that were raised during the scoping process. The 2010 Final EIR addressed each of these areas of concern or controversy in detail, examined project-related and cumulative environmental impacts, identified significant adverse environmental impacts, and proposed mitigation measures designed to reduce or eliminate potentially significant impacts. Appendix 1 to this EIR includes the 2014 Notice of Preparation and the response letters submitted.

ES.6 Issues to be Resolved

Section 15123(b)(3) of the CEQA Guidelines requires the summary section of an EIR to identify any "issues to be resolved including the choice among alternatives and how to mitigate significant effects." The major issues on the Approved Project were resolved by the County in its 2010 decision process, and this Supplemental EIR documents the following major issues of concern:

- In order to complete construction in 18 months, the daily traffic levels for the Revised Project would be substantially greater than those of the Approved Project. Mitigation has been modified to ensure that impacts remain less than significant.
- To complete grading quickly prior to construction, groundwater usage for dust control watering could be much more intensive. Mitigation has been modified to ensure that impacts remain less than significant.

ES.7 Summary of Alternatives Analysis

The 2010 Final EIR presented a complete analysis of alternatives, compliant with Section 15126.6 of the CEQA Guidelines, which states that an EIR must address "a range of reasonable alternatives to 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." Based on the significant and unavoidable impacts of the originally proposed project on aesthetics, biological resources, and noise, along with the proposed project objectives, five alternatives (including the No Project Alternative) were considered. One of the five alternatives, "Alternative A Revised," was approved by the County.

ES.7.1 Alternatives Considered

The 2010 Final EIR analyzed four alternatives and described five additional alternatives that were considered but eliminated from further analysis. As described in Sections ES.1, the County approved one of the alternatives that was developed and analyzed in the Final EIR: "Alternative A Revised." In 2014, that Approved Project has been further reduced in size and reconfigured to create the Revised Project evaluated in Section C of this Supplemental EIR. Alternatives evaluated in the 2010 Final EIR included: Alternative A Revised, Alternative B Revised, Alternative C Revised, the Westlands CREZ Alternative, and the No Project Alternative. No new alternatives are evaluated in this Supplemental EIR, and no new

impact analysis is presented for alternatives, but the status of the Westlands CREZ Alternative has been updated. The impacts of the Revised Project, as defined in Section C of this Supplemental EIR, remain consistent with the conclusions presented in the 2010 Final EIR.

Alternative A Revised

Alternative A Revised is the configuration that was approved by the County in 2010. It was developed by the Applicant to avoid the highest density occupied giant kangaroo rat and blunt-nosed leopard lizard habitat by increasing the density of PV panels on the western side and northern end of the proposed project site and removing panels from the southern side and southeastern corner of the proposed site. A key element of this alternative was the provision of a biological conservation easement on the 1,683 acres of the project site that would be avoided by the rearrangement of panels. This alternative would also reduce panel height to 12.5 feet (compared with 25 feet for the proposed project). This alternative would be located on approximately 3,202 acres and would generate 399 MW of power, compared with Alternative A Revised eliminated the significant impacts to biological resources, resulting in less than significant impacts. In addition, given the reduced footprint reduced the severity of impacts to aesthetics, noise, agriculture, cultural resources, and water resources.

Alternative B Revised

Alternative B Revised was about 72 percent of the size of the originally proposed project and about 57 percent of the size of Alternative A Revised. It was located on approximately 1,394 acres and would generate 183 MW of power. This alternative was designed to reduce impacts to high-quality giant kangaroo rat habitat and provide a north-south San Joaquin kit fox movement corridor along the east side of the valley. This alternative would also mitigate habitat impacts with a biological conservation easement on 3,491-acres of the project site that would be avoided by the rearrangement of panels. This alternative would also reduce panel height to 12.5 feet.

Like Alternative A Revised, this alternative eliminated the significant impacts on biological resources, resulting in less than significant impacts. In addition, given the reduced footprint, Alternative B Revised reduced the severity of impacts to aesthetics, noise, agriculture, cultural resources, and water resources.

Alternative C Revised

Alternative C Revised was located on approximately 862 acres and would generate 110 MW of power. This alternative provided both north-south and east-west wildlife movement corridors, and enabled the mitigation of impacts to biological resources on the site to less than significant levels. This alternative would also mitigate habitat impacts with a biological conservation easement on 4,023-acres of the project site that would be avoided by the rearrangement of panels. This alternative would also reduce panel height to 12.5 feet.

Like Alternatives A and B Revised, this alternative eliminated the significant impacts on biological resources, resulting in less than significant impacts. In addition, given the reduced footprint, Alternative C Revised reduced the severity of impacts to aesthetics, noise, agriculture, cultural resources, and water resources.

Westlands CREZ Alternative

This alternative was included in response to scoping comments suggesting use of more disturbed agricultural lands with less valuable habitat for biological resources. The Westlands Water District has a

lease contract with Westside Holdings, a private investment group, to develop the Westlands Solar Park on approximately 30,000 acres of fallow agriculture land for up to 5,000 MW of solar power generation. The farmland was retired over the past decade because of a combination of water shortages and salt buildup that makes the soil unsuitable for crop production (Sheehan, 2010). According to the developer, Westside Holdings LLC, the Westlands Solar Park in Kings and Fresno Counties has a potential solar resource of up to 2,400 MW.

The Westlands Solar Park is being made available to solar developers for phased generation development. Since the County approved the Approved Project in 2010, four events have been made public at Westlands:

- Two solar projects (18 and 15 MW) have been constructed at Westlands.
- In July 2014, Los Angeles-based real estate investment firm CIM Group announced it has partnered with Westside Holdings, LLC, to invest in development of solar resources at Westlands (Lindt, 2014). No development specifics have been made available (Lindt, 2014).
- In 2013, the City of Anaheim has executed a Power Purchase Agreement with Westlands for a 2 MW project to be located just south of Naval Air Station Lemoore, with phased construction of a 2-MW project followed by a 20-MW solar farm (Anaheim, 2013; Lindt, 2014).
- On March 15, 2013, Westlands issued a Notice of Preparation for a Master EIR for development within the solar park (Westlands, 2013). In the NOP, the proposed components of the solar area are defined as generation facilities of up to 2,400 MW, transmission upgrades in the Henrietta-Gates corridor, Path 15 transmission upgrades, and Gates-Gregg transmission upgrades. The Draft Master EIR has not yet been published.

The Final EIR found that, while many of the impacts of the Proposed Project would be similar to the impacts of a solar project at the Westlands CREZ Alternative, this alternative would likely have substantially fewer impacts to biological resources than the proposed project because it has been actively farmed for many years and is not considered high-quality habitat. In addition, it would have reduced impacts to aesthetics and agriculture, but would potentially create greater impacts to water resources.

ES.7.2 Alternatives Eliminated from Further Consideration

The 2010 Final EIR considered several additional alternatives, but eliminated them from detailed consideration. They are described briefly below.

- **Site Alternatives**, including a brownfield alternative and a Mojave Desert BLM land alternative, were eliminated because development of brownfield sites present regulatory challenges and liability hurdles and the feasibility of the project is uncertain. Several large Mojave Desert sites have been developed since 2010 and many also present significant impacts to biological resources.
- **Distributed Solar Photovoltaic Alternative**, in which generation would occur in smaller projects (up to 20 MW, including rooftops). These distributed generation (or “DG”) projects are rapidly being developed in California in addition to utility-scale projects. In 2010, the Final EIR reported over 500 MW of distributed solar PV systems existing in California. As of late 2014, California has over 4,800 MW of all types of distributed renewable systems that includes projects 20 MW or smaller with another 2,200 MW in development.
- **Wind Alternative** was eliminated due to its ground disturbance, more severe visual impacts, and lack of specific wind resources in the San Benito County area.

- **Conservation and Energy Demand Reduction Alternative** was eliminated as a separate alternative because it is the focus of separate and ongoing policy initiatives in California, and will continue to grow in addition to utility-scale projects.

ES.7.3 No Project Alternative

The No Project Alternative is described and analyzed in Section E.5 of the 2010 Final EIR. The 2010 Final EIR defined the No Project Alternative in which construction and operation of Panoche Valley Solar Farm would not occur. The baseline environmental conditions for the No Project Alternative are the same as for the proposed project. The baseline conditions would continue to occur into the future, undisturbed, in the absence of project-related construction activities, unless other development occurred on the site.

The objectives of the proposed project would remain unfulfilled under the No Project Alternative. This means that the contribution of the proposed project to meeting California's renewable generation goals would not occur. Three possibilities for the No Project Alternative were considered in the 2010 Final EIR:

1. The current uses of the project site would be retained.
2. Development of other solar projects could occur in the Panoche Valley.
3. Development of solar projects could occur in other parts of the County or in other California counties.

ES.7.4 Comparison of Alternatives and Environmentally Superior Alternative

The Final EIR compared the four retained alternatives with the proposed project. The County identified the Environmentally Superior Alternative, as required by CEQA Guidelines Section 15126.6(d) and (e)(2). Based on the analysis presented in Section E, the Westlands CREZ Alternative would be the environmentally superior alternative based on a significant reduction in impacts to biological resources. However, it was noted that biological surveys had not been performed on the Westlands CREZ Alternative and would be required to confirm this conclusion. San Benito County does not have the authority to approve the Westlands CREZ Alternative or require the Applicant to move the proposed project to this location. As such, the analysis of the Westlands CREZ Alternative serves to foster informed decision-making and public participations but functions essentially as the No Project Alternative (CEQA Guidelines Section 15126.6(a)).

Based on the analysis presented in Section E and on the impact analysis for the proposed project presented in Section C of this EIR, **Alternative C Revised** was identified as the environmentally superior alternative among the remaining alternatives. This alternative is selected because it would have a smaller footprint than the proposed projects and the other on-site alternatives, and it would eliminate the most severe significant impacts of the proposed project.

ES.8 Summary of Impacts and Mitigation Measures

The tables on the following pages provide a summary of the impacts of the Revised Project and of the PG&E Upgrades. Not all impacts from the 2010 Final EIR apply to the Revised Project and PG&E Upgrades. Impacts from the 2010 Final EIR that no longer apply are not shown in the tables below. The mitigation measures associated with each impact are to be implemented by the project applicant in order to reduce the environmental impacts to a less than significant level.

Some of the impacts of the Revised Project are minimized by implementation of Applicant Proposed Measures (APMs). These measure are not listed in the tables below, but are presented in Section B.10 of this SEIR. The impacts of the PG&E Upgrades (Table IST-5) are all less than significant with incorporation

of Avoidance and Minimization Measures (AMMs). The AMMs are presented in Section B.11.3 of this SEIR.

In accordance with CEQA, the summary tables identify the following types of potential impacts associated with the proposed development:

Revised Project:

- Significant and unmitigable impacts (Class I) – Table IST-1
- Significant impacts, mitigable to less than significant with mitigation (Class II) – Table IST-2
- Adverse impacts, less than significant (Class III) – Table IST-3
- Beneficial impacts (Class IV) – Table IST-4

PG&E Upgrades:

- Adverse impacts, less than significant (Class III) – Table IST-5

Table IST-1. Summary of Significant Unmitigable (Class I) Impacts for the Revised Project

Impact	Mitigation Measure
Aesthetics	
Impact AE-1: Long-term visibility of construction activities, equipment, and night lighting	AE-1.1: Reduce night lighting impacts
Impact AE-3: Proposed project would introduce structure contrast, developed character, view blockage, and glare (KVPs 1 through 4)	AE-3.1: Treat surfaces of project structures and buildings
Noise	
Impact NS 1: Construction noise would result in a substantial temporary or periodic increase in ambient noise levels which would substantially disturb sensitive receptors	NS-1.1: Shield construction staging areas. NS-1.2: Implement noise-reducing features and practices for construction noise. NS-1.3: Provide advanced notice of construction. NS-1.4: Limit pile driving activities BR-16.2: Minimize impacts of foundation support installations
Impact NS 2: Construction noise may violate local rules, standards, and/or ordinances	NS-1.1: Shield construction staging areas NS-1.2: Implement noise-reducing features and practices for construction noise NS-1.3: Provide advanced notice of construction NS-1.4: Limit pile driving activities BR-16.2: Minimize impacts of foundation support installations

Table IST-2. Summary of Significant but Mitigable (Class II) Impacts for the Revised Project

Impact	Mitigation Measure(s)
Aesthetics	
Impact AE-2: Long-term visibility of land scars and vegetation clearance	BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan
Agriculture	
Impact AG-1: Project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared by the Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program (FMMP), to non-agricultural use	BR-1.2: Develop and implement a Grazing Plan for the project site. BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources

Table IST-2. Summary of Significant but Mitigable (Class II) Impacts for the Revised Project

Impact	Mitigation Measure(s)
Impact AG-2: Project would conflict with Williamson Act contracts, existing zoning for agricultural use, or objectives in the County General Plan's Agriculture and Conservation and Open Space Elements	AG-2.1: Create agricultural conservation easement(s) BR-1.2: Develop and implement a Grazing Plan for the project site BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.5: Create permanent conservation easement/s as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan for mitigation land
Impact AG-3: Construction and operation of project would impair agricultural use of nearby properties	AQ-1.1: Reduce fugitive dust BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site BR-G.5: Create permanent conservation easement/s as compensation for impacts to biological resources LU-1.1: Establish construction liaison LU-1.2: Provide advance notification of construction LU-1.3: Provide quarterly construction updates WR-1.1: Groundwater Monitoring and Reporting Plan WR-6.1: Accidental spill control and environmental training WR-6.2: Store fuels and hazardous materials away from sensitive water resources WR-6.3: Maintain vehicles and equipment
Air Quality	
Impact AQ 1: Construction activities would generate dust and exhaust emissions of criteria pollutants and toxic air contaminants	AQ-1.1: Reduce fugitive dust AQ-1.2: Designate a dust complaint monitor
Impact AQ 4: Project-related emissions may be inconsistent with relevant air quality management plans	AQ-1.1: Reduce fugitive dust AQ-1.2: Designate a dust complaint monitor
Biological Resources	
Impact BR-1: Construction activities would result in temporary and permanent losses of native vegetation	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Wetland Habitat Mitigation and Monitoring Plan and a Habitat Management Plan for mitigation lands BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site
Impact BR-2: The project could result in the establishment and spread of noxious weeds, invasive and non-native plants	BR-G.1: Implement a Worker Environmental Education Program. BR-G.2: Implement Best Management Practices. BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site.

Table IST-2. Summary of Significant but Mitigable (Class II) Impacts for the Revised Project

Impact	Mitigation Measure(s)
Impact BR-3: The project could disturb special-status plant species or their habitat	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and a Habitat Management Plan for mitigation lands BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site AQ-1.1: Reduce Fugitive Dust
Impact BR-5: The project could alter the hydric and solar regimes in the area potentially eliminating required food sources for various species of wildlife	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan for and a Habitat Management Plan mitigation lands BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site AQ-1.1: Reduce Fugitive Dust
Impact BR-6: Construction activities, including the use of access roads, grading, and heavy equipment, would result in disturbance to wildlife and may result in wildlife mortality	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and a Habitat Management Plan for mitigation lands BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site BR-6.1: Conduct pre-construction surveys for nesting and breeding birds and implementation of avoidance measures AQ-1.1: Reduce Fugitive Dust

Table IST-2. Summary of Significant but Mitigable (Class II) Impacts for the Revised Project

Impact	Mitigation Measure(s)
Impact BR-7: The project could result in injury or mortality of, and loss of habitat for, terrestrial California Species of Special Concern	<p>BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and a Habitat Management Plan for mitigation lands BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site BR-6.1: Conduct pre-construction surveys for nesting and breeding birds and implementation of avoidance measures BR-7a.1: Conduct focused pre-construction surveys for western spadefoot toad and implement avoidance measures BR-7a.2: Conduct focused pre-construction surveys for San Joaquin coachwhip and coast horned lizard and implement avoidance measures BR-7b.1: Conduct pre-construction surveys for non-breeding birds designated as California Species of Special Concern BR-7c.1: Conduct focused pre-construction surveys for short-nosed kangaroo rat, San Joaquin pocket mouse, and Tulare grasshopper mouse and implementation of avoidance measures BR-14.1: Implement Avian Power Line Interaction Committee guidelines (APLIC). AQ-1.1: Reduce fugitive dust</p>
Impact BR-8: The project could result in the loss of vernal pool fairy shrimp, and loss of occupied vernal pool fairy shrimp habitat	<p>BR-G.1: Implement a Worker Environmental Education Program. BR-G.2: Implement Best Management Practices. BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring. BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and a Habitat Management Plan for mitigation lands BR-8.2: Avoid disturbance to ephemeral pools occupied by vernal pool fairy shrimp to the maximum extent practicable, and mitigate for any unavoidable impacts. BR-8.3: Avoid seasonal depressions and known waterbodies. AQ-1.1: Reduce fugitive dust.</p>
Impact BR-9: The project could result in the loss of individual California tiger salamanders or the permanent or temporary loss of CTS habitat	<p>BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and a Habitat Management Plan for mitigation lands BR-9.1: Conduct pre-construction surveys for California tiger salamander and implement avoidance measures AQ-1.1: Reduce fugitive dust</p>

Table IST-2. Summary of Significant but Mitigable (Class II) Impacts for the Revised Project

Impact	Mitigation Measure(s)
Impact BR-10: The project would result in the loss of individual blunt-nosed leopard lizards and their habitat	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and Habitat Management Plan for mitigation lands BR-10.1: Conduct pre-construction surveys for blunt-nosed leopard lizard and implement avoidance measures AQ-1.1: Reduce fugitive dust
Impact BR-11: The project will result in loss of habitat for wintering mountain plovers	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and Habitat Management Plan for mitigation lands AQ-1.1: Reduce fugitive dust
Impact BR-12: The project could result in the loss of foraging habitat for golden eagles, California condors, and other special-status raptors	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and Habitat Management Plan for mitigation lands BR- 6.1: Conduct pre-construction surveys for nesting and breeding birds and implementation of avoidance measures BR-12.2: Avoid and report California condors AQ-1.1: Reduce fugitive dust
Impact BR-13: The project could result in the loss of burrowing owl, loss of foraging habitat for burrowing owl and loss of occupied burrowing owl habitat	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and Habitat Management Plan for mitigation lands BR-13.1: Focused pre-construction burrowing owl surveys and implementation of avoidance measures AQ-1.1: Reduce fugitive dust
Impact BR-14: The project could result in electrocution or collision with overhead wires by State and/or federally protected birds	BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan for mitigation lands BR-14.1: Implement Avian Power Line Interaction Committee guidelines (APLIC) BR-14.2: Prepare and Implement an Avian Conservation Strategy and Eagle Conservation Plan BR-23.1: Create conservation easement on all project areas retired from the development footprint

Table IST-2. Summary of Significant but Mitigable (Class II) Impacts for the Revised Project

Impact	Mitigation Measure(s)
Impact BR-15: The project could result in mortality of, and loss of habitat for, special-status bat species	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and Habitat Management Plan for mitigation lands BR-15.1: Survey pre-construction maternity colony or hibernaculum for sensitive bats BR-15.2: Provide substitute roosting habitat BR-15.3: Exclude bats prior to eviction from roosts AQ-1.1: Reduce Fugitive Dust
Impact BR-16: The project could result in the loss of giant kangaroo rat, loss of foraging habitat, and loss of occupied habitat	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and Habitat Management Plan for mitigation lands BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site BR-16.1: Conduct focused pre-construction giant kangaroo rat burrow/precinct surveys and implement avoidance measures BR-16.2: Avoid use of pile driving to install foundation supports BR-16.3: Establish functional giant kangaroo rat habitat corridors across the project footprint AQ-1.1: Reduce Fugitive Dust.
Impact BR-17: The project could result in the loss of San Joaquin antelope squirrel, loss of foraging habitat, and loss of occupied habitat	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and Habitat Management Plan for mitigation lands BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site BR-17.1: Conduct focused pre-construction San Joaquin antelope squirrel surveys and implement avoidance measures AQ-1.1: Reduce Fugitive Dust

Table IST-2. Summary of Significant but Mitigable (Class II) Impacts for the Revised Project

Impact	Mitigation Measure(s)
Impact BR-18: The project could result in mortality of, and loss of habitat for American badgers	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and Habitat Management Plan for mitigation lands BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site BR-18.1: Conduct focused pre-construction surveys for American badger surveys and implementation of avoidance measures AQ-1.1: Reduce fugitive dust
Impact BR-19: The project could result in the loss of San Joaquin kit fox, loss of foraging habitat, and loss of occupied habitat	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and Habitat Management Plan for mitigation lands BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site BR-19.1: Conduct focused pre-construction San Joaquin kit fox surveys and implementation of avoidance measures AQ-1.1: Reduce fugitive dust.
Impact BR-20: The project could result in the loss of jurisdictional wetland habitats	BR-G.1: Implement a Worker Environmental Education Program BR-G.2: Implement Best Management Practices BR-G.3: Develop and implement a Habitat Restoration and Revegetation Plan BR-G.4: Implement biological construction monitoring BR-G.5: Create permanent conservation easements as compensation for impacts to biological resources BR-G.6: Develop and implement Habitat Mitigation and Monitoring Plan and Habitat Management Plan for mitigation lands BR-1.1: Prepare and implement a Weed Control Plan BR-1.2: Develop and implement a Grazing Plan for the project site AQ-1.1: Reduce fugitive dust
Impact BR 22: The project could result in the exposure of wildlife to mortality in the construction water ponds (Class II)	BR-22.1: Fence temporary pond to exclude wildlife
Cultural and Paleontological Resources	
Impact CR 2: Construction of the project may cause an adverse change to buried prehistoric and historical archaeological sites or buried Native American human remains	CR-2.1: Conduct cultural resource monitoring during construction CR-2.2: Treat previously unidentified archaeological resources discovered during construction CR-2.3: Inadvertent discovery of human remains CR-2.4: Implement workers environmental awareness program
Impact CR 3: Operation of the project or decommissioning activities may impact previously unidentified historic or archaeological resources	CR-2.1: Conduct cultural resource monitoring during construction CR-2.2: Treat previously unidentified archaeological resources discovered during construction CR-2.3: Inadvertent discovery of human remains CR-2.4: Implement workers environmental awareness program

Table IST-2. Summary of Significant but Mitigable (Class II) Impacts for the Revised Project

Impact	Mitigation Measure(s)
Impact PA 1: Construction of the project would potentially destroy or disturb significant paleontological resources	PA-1.1: Implement site-specific paleontological recovery PA-1.2: Monitor grading and excavation for unknown and accidentally discovered paleontological resources
Geology, Mineral Resources, and Soils	
Impact GE-4: Project would expose people or structures to potential substantial adverse effects as a result of problematic soils (e.g., corrosive or expansive soils, or collapsible soil)	GE-4.1: Implementation of Geotechnical Report Recommendations
Hazards and Hazardous Materials	
Impact HZ-1: Create a substantial hazard to people or the environment through the routine transport, use, or disposal of hazardous materials or as a result of an accidental release of hazardous materials	HZ-1.2: Protect Workers and Public from Valley Fever WR-6.3: Maintain vehicles and equipment
Impact HZ-5: Expose people or structures to a risk of loss, injury, or death involving wildland fires	HZ-5.1: Cease work during Red Flag Warning
Impact HZ-7: Create a substantial hazard to the public or the environment by mobilizing existing contamination or generating disease vectors	AQ-1.1: Develop and implement a fugitive dust plan AQ-1.2: Designate a dust complaint monitor HZ-1.2: Protect Workers and Public from Valley Fever HZ-7.1: Prohibit standing water.
Land Use and Recreation	
Impact LU-1: Construction would temporarily disrupt, displace or divide land uses	LU-1.1: Establish construction liaison LU-1.2: Provide advance notification of construction LU-1.3: Provide quarterly construction updates
Noise	
Impact NS-4: Permanent noise levels would substantially increase due to operation of project-related stationary noise sources above levels existing without the project	NS-4.1: Locate PV inverters and transformers away from the project's property line
Impact NS-5: Routine inspection and maintenance activities would substantially increase ambient noise levels in the project vicinity above levels existing without the project	NS-5.1: Limit panel washing activities
Public Services, Utilities, and Service Systems	
Impact PS-1: Project construction and operation would place burdensome demands on public services	PS-1.1: Develop and implement service agreement with Hollister Fire Department.
Transportation and Circulation	
Impact TR-1: Construction would create unsafe conditions on public roadways	TR-1.1: Prepare and implement Traffic Control Plan TR-1.2: Rehabilitate, protect and monitor roadway pavement, bridges and culverts TR-1.3: Repair roadway damage
Impact TR-2: Project implementation would increase congestion and travel delays on regional and local roadways or exceed an established level of service standard	TR-1.1: Prepare and implement Traffic Control Plan
Water Resources	
Impact WR-1: Substantially deplete local groundwater supplies or interfere with groundwater recharge	WR-1.1: Groundwater Monitoring and Reporting Plan. WR-1.2: Aquifer Testing and Well Interference Analysis.
Impact WR-6: Construction or operation of the project could result in accidental releases of contaminants that could degrade water quality	WR-6.1: Accidental spill control and environmental training WR-6.2: Store fuels and hazardous materials away from sensitive water resources WR-6.3: Maintain vehicles and equipment

Table IST-3. Summary of Adverse but Less Than Significant (Class III) Impacts for the Revised Project

Impact	[Note: No Mitigation Measures for Class III Impacts]
Aesthetics	
Impact AE-4: Project would introduce panel glint and glare	
Air Quality	
Impact AQ 2: Operation, maintenance, and inspections would generate dust and exhaust emissions of criteria pollutants and toxic air contaminants	
Climate Change/Greenhouse Gas	
Impact CC-1: Construction would generate exhaust emissions of greenhouse gases	
Impact CC-2: Operation, maintenance, and inspections would generate exhaust emissions of greenhouse gases	
Biological Resources	
Impact BR-4: The project would result in the loss of foraging habitat for wildlife	
Impact BR-21: The project would result in Polarized-Light Pollution that may result in negative effects on plant and wildlife communities	
Geology, Mineral Resources, and Soils	
Impact GE 1: Results in triggering or acceleration of geologic processes, such as landslides, substantial soil erosion or loss of topsoil	
Impact GE-2: Project would expose people or structures to potential substantial adverse effects as a result of seismically induced ground failure and/or groundshaking	
Impact GE-3: Project would expose people or structures to potential substantial adverse effects as a result of surface fault rupture at crossings of active and potentially active faults	
Impact GE-6: Project soils would be incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems	
Hazards and Hazardous Materials	
Impact HZ-2: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school	
Impact HZ-4: Create a substantial aeronautical or motor vehicle hazard or result in a significant aerial obstruction within 2 miles of an airport or airstrip	
Land Use and Recreation	
Impact LU-2: Operation and maintenance of the project would permanently disrupt, displace, or divide land uses	
Impact RC-1: Construction activities would temporarily reduce, disrupt, or preclude access and visitation to established recreational areas	
Impact RC-3: Construction or operation and maintenance activities would increase the use of established recreational facilities such that substantial physical deterioration would occur or be accelerated	
Impact RC-4: Construction or operation and maintenance activities would change the character of a recreational area or program, diminishing its recreational value	
Noise	
Impact NS-3: Construction activity would temporarily cause excessive groundborne vibration or groundborne noise	
Population and Housing	
Impact PH-2: Project labor force would require housing that exceeds the supply of local housing or temporary housing facilities	
Impact PH 3: The project would induce substantial population growth	
Public Services, Utilities, and Service Systems	
Impact PS-2: Project construction and operation would place demands on local water, wastewater, and solid waste facilities	
Water Resources	
Impact WR-2: Substantially alter the existing drainage pattern of the site in a manner that results in flooding on- or offsite	
Impact WR-3: Construction activity and excavation could degrade water quality due to erosion and sedimentation	

Table IST-3. Summary of Adverse but Less Than Significant (Class III) Impacts for the Revised Project

Impact	[Note: No Mitigation Measures for Class III Impacts]
Impact WR-4: Creation of new impervious areas could cause increased runoff resulting in flooding or increased erosion downstream	
Impact WR-5: Project features located in a floodplain or water-course could result in flooding, flood diversions, or erosion	

Table IST-4. Summary of Beneficial (Class IV) Impacts for the Revised Project

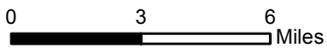
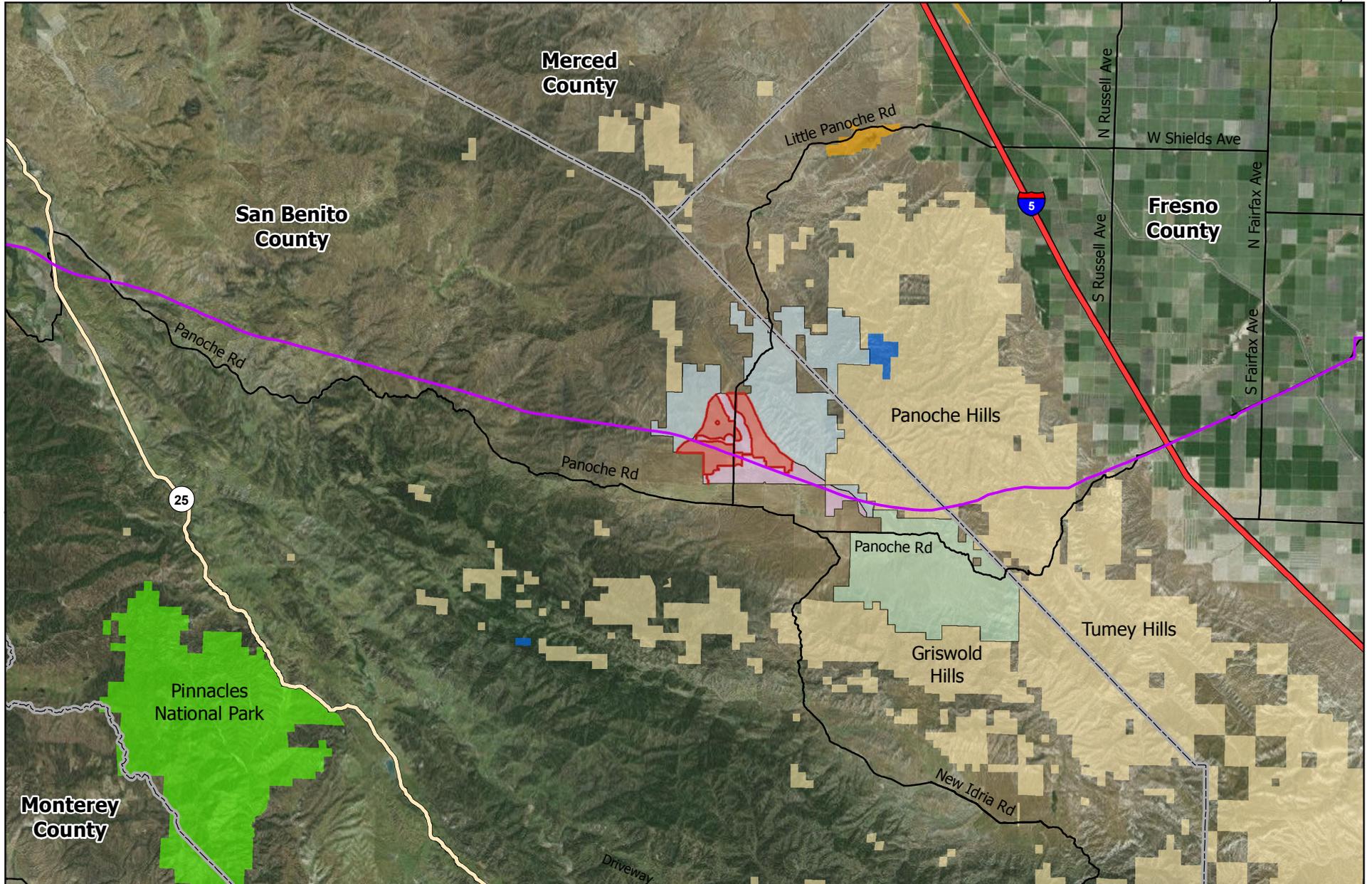
Impact	[Note: No Mitigation Measures for Class IV Impacts]
Air Quality	
Impact AQ 3: Power generated by operation of the solar power plant would indirectly affect operations and emissions from other power plants	
Climate Change	
Impact CC-3: Power generated by operation of the solar power plant would avoid greenhouse gas emissions and land use conversion related to the solar project would alter natural carbon sinks	
Population and Housing	
Impact PH 1: Project labor force requirements would create a substantial demand for labor or a change in local employment	

Table IST-5. Summary of Adverse but Less Than Significant (Class III) Impacts for the PG&E Upgrades

Impact	[Note: No Mitigation Measures for Class III Impacts]
Aesthetics	
Impact AE-1: Long-term visibility of construction activities, equipment, and night lighting	
Impact AE-3: Proposed project would introduce structure contrast, developed character, view blockage, and glare	
Agriculture	
Impact AG-1: Project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared by the Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program (FMMP), to non-agricultural use	
Impact AG-2: Project would conflict with Williamson Act contracts, existing zoning for agricultural use, or objectives in the County General Plan's Agriculture and Conservation and Open Space Elements	
Impact AG-3: Construction and operation of project would impair agricultural use of nearby properties	
Air Quality	
Impact AQ 1: Construction activities would generate dust and exhaust emissions of criteria pollutants and toxic air contaminants	
Impact AQ 2: Operation, maintenance, and inspections would generate dust and exhaust emissions of criteria pollutants and toxic air contaminants	
Impact AQ 4: Project-related emissions may be inconsistent with relevant air quality management plans	
Climate Change/Greenhouse Gas	
Impact CC-1: Construction would generate exhaust emissions of greenhouse gases	
Impact CC-2: Operation, maintenance, and inspections would generate exhaust emissions of greenhouse gases	
Biological Resources	
Impact BR-1: Construction activities would result in temporary and permanent losses of native vegetation	
Impact BR-2: The project could result in the establishment and spread of noxious weeds, invasive and non-native plants	
Impact BR-3: The project could disturb special-status plant species or their habitat	

Table IST-5. Summary of Adverse but Less Than Significant (Class III) Impacts for the PG&E Upgrades

Impact	[Note: No Mitigation Measures for Class III Impacts]
Impact BR-6: Construction activities, including the use of access roads, grading, and heavy equipment, would result in disturbance to wildlife and may result in wildlife mortality	
Impact BR-7: The project could result in injury or mortality of, and loss of habitat for, terrestrial California Species of Special Concern	
Impact BR-9: The project could result in the loss of individual California tiger salamanders or the permanent or temporary loss of CTS habitat	
Impact BR-10: The project would result in the loss of individual blunt-nosed leopard lizards and their habitat	
Impact BR-13: The project could result in the loss of burrowing owl, loss of foraging habitat for burrowing owl and loss of occupied burrowing owl habitat	
Impact BR-14: The project could result in electrocution or collision with overhead wires by State and/or federally protected birds	
Impact BR-16: The project could result in the loss of giant kangaroo rat, loss of foraging habitat, and loss of occupied habitat	
Impact BR-17: The project could result in the loss of San Joaquin antelope squirrel, loss of foraging habitat, and loss of occupied habitat	
Impact BR-18: The project could result in mortality of, and loss of habitat for American badgers	
Impact BR-19: The project could result in the loss of San Joaquin kit fox, loss of foraging habitat, and loss of occupied habitat	
Impact BR-20: The project could result in the loss of jurisdictional wetland habitats	
Cultural and Paleontological Resources	
Impact CR-2: Construction of the project may cause an adverse change to buried prehistoric and historical archaeological sites or buried Native American human remains	
Impact PA-1: Construction of the project would potentially destroy or disturb significant paleontological resources	
Geology, Mineral Resources, and Soils	
Impact GE-1: Results in triggering or acceleration of geologic processes, such as landslides, substantial soil erosion or loss of topsoil	
Hazards and Hazardous Materials	
Impact HZ-1: Create a substantial hazard to people or the environment through the routine transport, use, or disposal of hazardous materials or as a result of an accidental release of hazardous materials	
Impact HZ-5: Expose people or structures to a risk of loss, injury, or death involving wildland fires	
Land Use and Recreation	
Impact RC-1: Construction activities would temporarily reduce, disrupt, or preclude access and visitation to established recreational areas	
Impact RC-4: Construction or operation and maintenance activities would change the character of a recreational area or program, diminishing its recreational value	
Noise	
Impact NS 1: Construction noise would substantially disturb sensitive receptors and violate local rules, standards, and/or ordinances	
Impact NS 2: Construction noise may violate local rules, standards, and/or ordinances	
Transportation and Circulation	
Impact TR-1: Construction would create unsafe conditions on public roadways	
Impact TR-2: Project implementation would increase congestion and travel delays on regional and local roadways or exceed an established level of service standard	
Water Resources	
Impact WR-3: Construction activity and excavation could degrade water quality due to erosion and sedimentation	
Impact WR-6: Construction or operation of the project could result in accidental releases of contaminants that could degrade water quality	

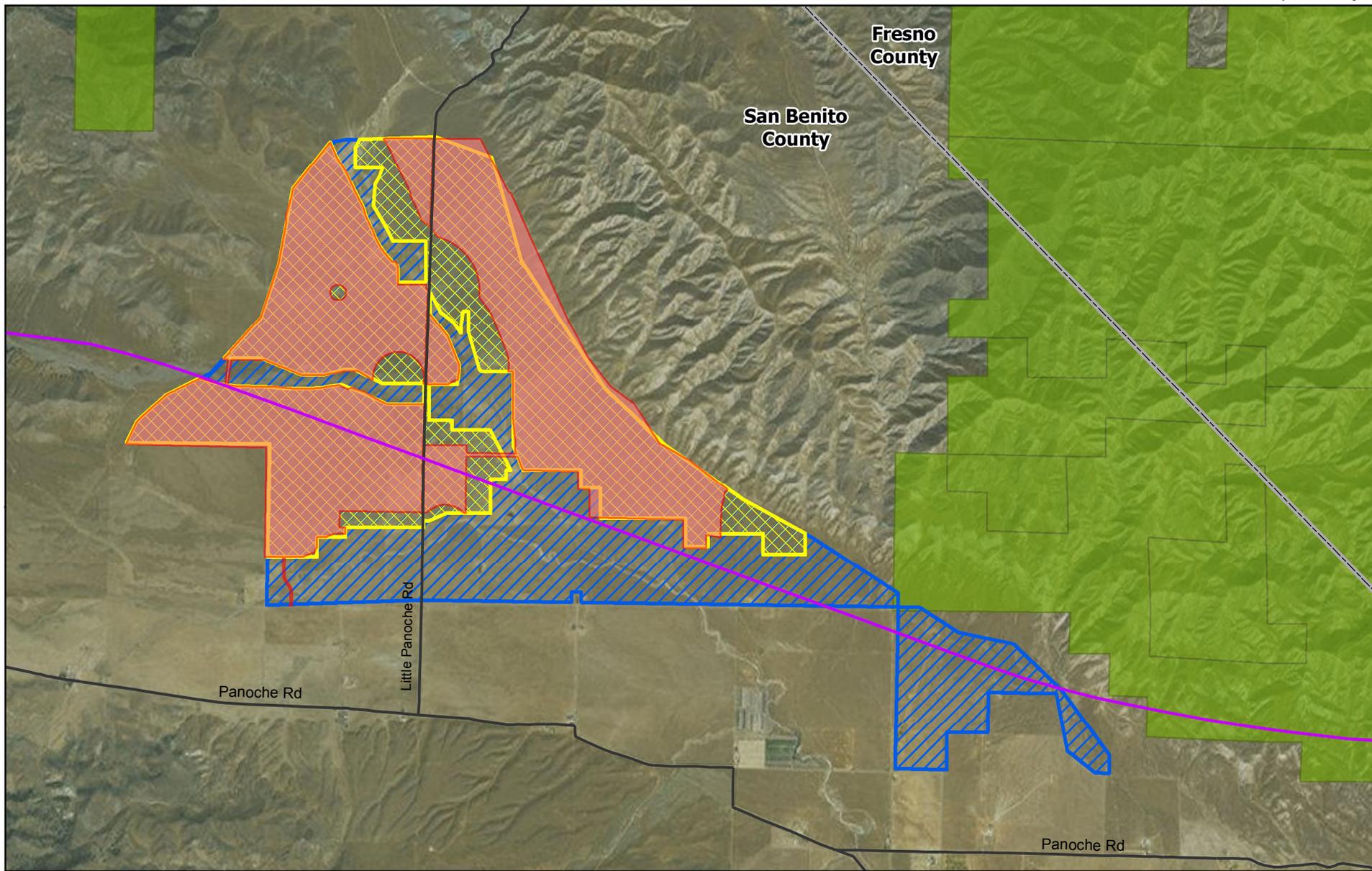


Source: PVS LLC, Platts 2013, ESRI

- | | | |
|----------------------------|---------------------------------------|---------------------------|
| Existing Transmission Line | Revised Project Area | Bureau of Land Management |
| Interstate | Valley Floor Conservation Lands | Bureau of Reclamation |
| State Route | Valadeao Ranch Conservation Lands | National Park Service |
| Local Road | Silver Creek Ranch Conservation Lands | State Lands |
| County Boundary | | |

Figure ES-1

Project Location



Source: BLM, PVS LLC, Platts 2013, ESRI

- 2014 Revised Project Boundary
- Approved Project Boundary (Alternative A Revised)
- 2010 Proposed Project Boundary
- Bureau of Land Management
- County Boundary
- Moss Landing - Panoche 230 kV Transmission Line

Figure ES-2

Revised Project Boundaries