



**Planning Department**  
**168 North Edwards Street**  
**Post Office Drawer L**  
**Independence, California 93526**

Phone: (760) 878-0263  
FAX : (760) 872-2712  
E-Mail : [inyoplanning@inyocounty.us](mailto:inyoplanning@inyocounty.us)

## **DRAFT MITIGATED NEGATIVE DECLARATION OF ENVIRONMENTAL IMPACT** **AND INITIAL STUDY**

**PROJECT TITLE:** Renewable Energy Permit 2023/01-SBC

**PROJECT LOCATION:** The Project site is located approximately 2.5 miles north of the unincorporated community of Trona, California. The property is owned by SBC Investment, Assessor parcel numbers 038-340-20 and 038-340-21, and lies within the Inyo County Southern Energy Development Area (SEDA). Site access is from Trona Wildrose Road and Bri-Mar Lane.

**PROJECT DESCRIPTION:** The applicant is applying for a Renewable Energy Permit to construct a 2.0 Megawatt (MW) photovoltaic solar facility using approximately 4,625 single-axis tracker solar panels. The project site is located on two 5-acre parcels that are largely flat or gently sloped. There are no above-ground water sources of any kind and much of the site is denuded of all vegetation.

### **FINDINGS:**

- A. The proposed project is consistent with goals and objectives of the Inyo County General Plan.
- B. The proposed project is consistent with the provisions of the Inyo County Zoning Ordinance.
- C. Potential adverse environmental impacts will not exceed thresholds of significance, either individually or cumulatively.
- D. Based upon the environmental evaluation of the proposed project, the Planning Department finds that the project does not have the potential to create a significant adverse impact on flora or fauna; natural, scenic, and historic resources; the local economy; public health, safety, and welfare. This constitutes a Mitigated Negative Finding for the Mandatory Findings required by Section 15065 of the CEQA Guidelines.

The 30-day public review period for this Draft Mitigated Negative Declaration will expire on December 30, 2023. Inyo County is not required to respond to any comments received after this date.

Additional information is available from the Inyo County Planning Department. Please contact Project Planner Cynthia Draper (760-878-0265) if you have any questions regarding this project.

Cathreen Richards  
Director, Inyo County Planning Department

11/27/2023  
Date



## **INYO COUNTY PLANNING DEPARTMENT**

### **CEQA APPENDIX G: INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM**

#### **EVALUATION OF ENVIRONMENTAL IMPACTS:**

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analyses,” may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

- a) the significance criteria or threshold, if any, used to evaluate each question; and
- b) the mitigation measure identified, if any, to reduce the impact to less than significance issues.



**Planning Department**  
**168 North Edwards Street**  
**Post Office Drawer L**  
**Independence, California 93526**

**Phone: (760) 878-0263**  
**FAX: (760) 872-2712**  
**E-Mail: [inyoplanning@inyocounty.us](mailto:inyoplanning@inyocounty.us)**

## **INYO COUNTY PLANNING DEPARTMENT**

### **APPENDIX G: CEQA INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM**

1. Project title: Renewable Energy Permit 2023-01/SBC
2. Lead agency name and address: Inyo County Planning Department, PO Drawer L, Independence, CA 93526
3. Contact person and phone number: Cynthia Draper: (760) 878-0265
4. Project location: The Project site is located on two 5-acre parcels in Inyo County, north of the unincorporated town of Trona California. APN's 038-340-20 and 038-340-21.
5. Project sponsor's name and address: Larry Trowsdale, 82532 2<sup>nd</sup> Street, Trona, CA 93562
6. General Plan designation: APN 038-340-20- HC Heavy Commercial; APN 038-340-21-RE Res Estate
7. Zoning: APN 038-340-20- C4 Heavy Commercial; APN 038-340-21- RR Rural Residential
8. Description of project: The applicant is applying for a Renewable Energy Permit to construct a 2.0 megawatt (MW) photovoltaic solar facility using approximately 4,625 single-axis tracker solar panels. The project site is located on two 5-acre parcels in Trona California.
9. Surrounding land uses and setting: The property is surrounded by undeveloped land, sparse residential dwellings, and commercial uses (such as equipment storage). Developed areas include the Trona Airport, scattered residences, and scrap yards.

<b>Location:</b>	<b>Use:</b>	<b>Gen. Plan Designation</b>	<b>Zoning</b>
North	MH on foundation	Residential Estate (RE)	Rural Residential (RR-5.0)
South	Vacant/Trailer connect	Residential Estate (RE)	Rural Residential (RR-5.0)
East	Vacant	Residential Estate (RE)	Rural Residential (RR-5.0)
West	Vacant	Public Service Facilities (PF)	Public District (P-40)

**10. Other public agencies whose approval is required**: Inyo County Building and Safety, Inyo County Environmental Health, Inyo County Public Works.

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

In compliance with AB 52 and Public Resource Code Section 21080.3.1(b), tribes identified as being local to Inyo County were notified via certified letter about the project and the opportunity for consultation on this project. The tribes notified were as follows: The Cabazon Band of Mission Indians, the Torres Martinez Desert Cahuilla Indians, the Twenty-Nine Palms Band of Mission Indians, the Big Pine Paiute Tribe, the Fort Independence Paiute Tribe, the Lone Pine Paiute Tribe, and the Timbisha Shoshone Tribe. None of the Tribes requested consultation.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

- The Kern Valley Indian Community commented on the Project stating that the Tribe had concerns regarding possible impacts to prehistoric cultural resources that could be found throughout the area and recommended that a culturally affiliated Native American consultant monitor accompany archaeologists conducting phase one surveys of the project and during all ground disturbing activities related to facility construction and transmission tie in facilities.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics Resources        | <input type="checkbox"/> Agriculture & Forestry   | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources        | <input type="checkbox"/> Cultural Resources       | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology /Soils              | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials      |
| <input type="checkbox"/> Hydrology/Water Quality     | <input type="checkbox"/> Land Use / Planning      | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                       | <input type="checkbox"/> Population / Housing     | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                  | <input type="checkbox"/> Transportation           | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire                 | <input type="checkbox"/> Mandatory Findings of Significance |

**DETERMINATION**

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Cynthia Draper, Assistant Planner  
Inyo County Planning Department



Date

# INYO COUNTY PLANNING DEPARTMENT ENVIRONMENTAL CHECKLIST FORM

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------------	---	------------------------------------	--------------

**I. AESTHETICS** -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

*No, the Project is not located near a scenic vista. The Project is near the valley floor within an area that is visually characterized by junk yards, and outdoor storage of vehicles and equipment in a high desert environment. The Project is within the Trona SEDA, which has its location and boundaries in an area that lacks an abundance of scenic resources. (PEIR, 4.1-15.)*

*The Project is consistent with the PEIR analysis and mitigation measures. The potentially applicable mitigation measures (AES-1 through 6, and 9) require that site-specific visual studies be prepared/or utility-scale projects (i.e., generating greater than 20 MW) and/or smaller-scale projects as determined by a qualified county planner to have a potential to impact visual resources in individual SEDAs. Here, the Project involves a small, commercial-scale facility that, due to its size and location, has been determined by a qualified planner to not have a potential to impact visual resources, including a scenic vista.*

[https://www.inyocounty.us/sites/default/files/2023-04/Final %20PEIR %20Volme%20 II.pdf](https://www.inyocounty.us/sites/default/files/2023-04/Final%20PEIR%20Volme%20II.pdf)

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

*No, the area has previously been disturbed with roads, storage units, and weed abatement. It is devoid of natural resources such as rock outcroppings and trees.*

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

*No, the Project will not affect the overall scenic integrity of the area. The Project is in a rural, non-urbanized area and surrounded by property owners that frequently use the area for storage and scrap yards. Public views are mainly from Trana-Wildrose Road, and the Project will not substantially degrade the existing visual character of the area from the perspective of passing motorists as the area is characterized by scrap yards and outdoor storage of materials. The low height of the panels (12 foot maximum, comparable to a single-story house) would not obstruct views of the Argus range to the west or the Slate range to the east.*

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

*No, due to the small size of the facilities, and their location and design, the Project will not significantly impact daytime or nighttime views. Construction will take place during the daytime hours only. Operation will not involve new light sources that affect nighttime views. The Project will use solar panels that integrate anti-reflective technology to minimize daytime glare, which is consistent with PEIR Mitigation Measure AES-6 (requiring that certain projects treat solar panels with anti-reflective coating). The boundaries and locations of SEDAs, including the Trona SEDA, were sited in areas without an abundance of scenic resources. (PEIR, 4.1-15.)*

**II. AGRICULTURE AND FOREST RESOURCES:** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including The Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology Provided in Forest Protocols adopted by the California Air Resources Board. Would the project:



	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------	---	------------------------------	-----------

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the project is not located on land designated as farmland.*

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the project is not located on land zoned exclusively for agriculture. Inyo County has no Williamson Act contracts.*

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the project site does not include forest land or timber land, or land zoned for forest land, timberland, or timberland production*

d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the project is not located on forestland.*

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the project is not located on farmland and is not conducive to future use as farmland.*

**III. AIR QUALITY:** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	-------------------------------------	--------------------------	--------------------------

*No, there is no applicable air quality plan for the area in which the Project is proposed. The Project is in an area considered to be in attainment for P M-10 in reference to National Ambient Air Quality Standards. The predominant air quality concern is windblown dust. The applicant will control dust during construction by standard techniques that include use of a water truck to wet down disturbed areas, the use of limestone to stabilize the ground surface, and application of dust suppressants including EarthGlue, which will ensure there are no significant impacts. The applicant will be conditioned to obtain any required permits, and follow best management practices, required by the GBUAPCD. Additionally, the Project is consistent with the PEIR analysis and mitigation measures. The GBUAPCD considers short-term construction equipment exhaust emissions to be less than significant. (See PEIR, p. 4.3-10.) The potentially-applicable air quality mitigation measures (AQS-1 through 3) applied to utility-scale projects of greater than 20 MW and did not apply to smaller, commercial-scale projects unless determined to be needed on a case-by-case basis by a qualified County planner. Here, the Project involves a small commercial-scale facility that does not present significant air quality impacts. Due to the size, location, low emissions well below all applicable thresholds and design that incorporates dust controls and suppressants, AQS-1 through 3 are unnecessary to apply.*

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------	---	------------------------------	-----------

*No, the Project is located in an area in attainment for PM-IO. The Project will be following air quality standards, as the applicant is conditioned to obtain any required permits and to follow best management practices as set forth by GBUAPCD. The GBUAPCD considers short-term construction equipment exhaust emissions to be less than significant.*

*PEIR, p. 4.3-10.) Project construction and operations will generate emissions that are well below all applicable air quality thresholds and standards.*

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

*No, the Project is not in an area that is in non-attainment under any applicable standard. The operation of the solar project is not anticipated to result in a substantial increase in vehicular or stationary emissions once installed. As a result, long-term emissions resulting from Project operation are anticipated to be well below all applicable thresholds. The GBUAPCD considers short-term construction equipment exhaust emissions to be less than significant. PEJR, p. 4.3-10.) The Project would not contribute to a cumulatively considerable net increase in non-attainment pollutants during operation, and impacts would be less than significant*

d) Expose sensitive receptors to substantial pollutant concentrations?

*No, the proposed Project will not expose sensitive receptors to any new substantial pollutant concentrations. The construction process is low impact, involving minor leveling and digging of shallow trenches for placing underground conduits, and installation of a single 20' x 20' concrete pad/or a transformer. There are no nearby schools or hospitals. Few houses are in proximity to the Project Area. During construction, windblown dust will be controlled by watering, the application of limestone, and the application of a dust suppressant. Vehicle emissions will be well below applicable thresholds of significance during construction and operations. During Project operation, the solar facility will not produce pollutants.*

e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

*No, the proposed project will not produce objectionable odors during the life of the operation. The project will use typical construction techniques and the odors would be typical of most construction sites and temporary in nature.*

**IV. BIOLOGICAL RESOURCES:** Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

*No, the Biological Evaluation (BE) of the Project Area indicates that the Project will not adversely impact sensitive or special status native species. No CDFW or USFWS designated special status species were found in the Project Area. Topography on the site is largely flat, averaging approximately 1,650 feet of elevation. The natural habitat in the Project Area is characterized by impacted remnants of scrubland that presents poor habitat for native species. There is no U.S. Geological Survey (USGS) designated blue-line drainage, and no natural above-ground water sources of any kind.*

*The BE was performed by qualified biologists who surveyed the Project Area and a 250-foot buffer around it. The BE found no evidence of Desert Tortoise, Mohave Ground Squirrel, Burrowing Owl, Desert Kit Fox, American Badger, Nesting Migratory Birds or other Special Status Wildlife.*

*Desert holly and beavertail cactus, which are included in the California Desert Native Plant Act (CDNPA) and codified in Division 23 of the California Food and Agriculture Code, were found on the Project site. The CDNPA protects certain desert plant species from unlawful harvesting on public and private lands. It is only applicable within named counties. Inyo County is one of those counties. The CDNPA establishes that covered plants may be removed upon the issuance of a permit by the agricultural commissioner or sheriff in which the plants are located. Mitigation will include proof of permit by the agricultural commissioner or sheriff and will be included as a Condition of Approval.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------------	---	------------------------------------	--------------

The Biological Evaluation for this Project can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

*No, there is no identified riparian habitat on the project site, or in close proximity, that would be affected by the project. The USFWS National Wetlands Inventory (USFWS 2014b) shows no freshwater wetlands near the project site. No protected natural areas are located within the SEDA.*

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

*No, there are no federally protected wetlands on the project site, nor would the nature of the project cause fill material or project contaminants to enter flowing water.*

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

*No, although the Project Area could potentially have occurrences of wildlife species, the Project will not interfere with migratory fish or wildlife species. As stated in the BE, there are no known wildlife movement corridors or habitat linkages that intersect the Project Area. The Project Area is within a highly disturbed area and provides minimal linkage between suitable natural habitats for most wildlife species.*

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

*No, there are no local policies or ordinances that address any biological resources found in the project area.*

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

*No, there are no adopted habitat or conservation plans that affect the project site. The proposed project is within an area specifically designated for solar energy development pursuant to the REGPA.*

**V. CULTURAL RESOURCES:** Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

*No, the Project will not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064. 5. The Project Area is vacant and undeveloped. It does not contain resources listed in, or determined to be eligible by, the State Historical Resources Commission for listing in, the California Register of Historical Resources, or any local register of historical resources. The Project Area also does not contain any known structures, features or sites that may be historically significant. The cultural study can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>*

b) Cause a substantial adverse change in the

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------	---	------------------------------	-----------

significance of an archaeological resource pursuant to Section 15064.5?

*No, the project will not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. If any archaeological or cultural resources are discovered on the site, work shall immediately desist and Inyo County staff shall be immediately notified per Chapter 9.52, Disturbance of Archaeological, Paleontological and Historical Features of the Inyo County Code. The County will then work with the operator and local tribal members, including tribal THPOs, to develop a plan for preservation, protection, or relocation of the resource. With this mitigation measure, the Project will not cause an adverse change in the significance of an archaeological resources pursuant to Section 15064.5*

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

*No, there are no known human remains or burial sites in the Project Area. Additionally, it is unlikely that such remains would be discovered due to the minimal nature of earth-disturbance on the Project site. However, if human remains are uncovered, the discovery would be treated in the same manner as an archeological resource described in (Vb) above (i.e., work would cease immediately and remain stopped until a plan was developed for preservation, protection, or removal).*

**VI. ENERGY:** Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

*No, the proposed project is to construct a 2.0-megawatt photovoltaic solar facility which will not require large amounts of energy and is required to meet California Building Standards including Green and Title 24 Standards.*

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

*No, the proposed project is to construct a 2-megawatt photovoltaic solar facility and is located in one of the counties solar energy development areas (SEDAs), as identified by the General Plan. The project will generally advance state and local plans for renewable energy, rather than conflict with or obstruct such plans*

**VII. GEOLOGY AND SOILS:** Would the project:

a) Directly or indirectly cause substantial adverse effects, including the risk of loss injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

*No, the Project is not in an Alquist-Priolo zone. The Project operates with little human intervention and would not expose people to significant risk of injury. In addition, the nature of the solar panels, and their low height, does not make them readily susceptible to adverse effects during seismic activity. Also, subsequent to the approval of the permit, the applicant shall work with the Inyo County Department of Building and Safety to ensure any building activities meet State and County Codes.*

ii) Strong seismic ground shaking?

*No, ground shaking can occur anywhere in the region, but compared to much of the rest of California, this is a less than average seismically active area. The California Building Code ensures that structures be constructed to required seismic standards in order to withstand such shaking.*

iii) Seismic-related ground failure, including liquefaction?

*No, the proposed project is not within an area of soils known to be subject to liquefaction.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------	---	------------------------------	-----------

iv) Landslides? <i>No, the project area is flat or gently sloping and is not in an area prone to landslides.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

*No, Project construction is limited to trenching for conduits, and minor grading to level the ground surface as needed. The limited scale of ground disturbance is not expected to result in a risk of substantial soil erosion or loss of topsoil, and in addition, the placement of limestone will stabilize the surface to protect against the low risk of erosion.*

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

*No, the proposed project is not located in an area with a geologic unit or soil that is known to be unstable. If any questions arise about the quality of the soil during the development of the property, the applicant/developer shall work with Inyo County's Building and Safety Department to employ the proper design standards that mitigate for unstable soils.*

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

*No, the proposed project is not located in an area with a known expansive soil type. If any questions arise about the quality of the soil during the development of the property, the applicant/developer shall work with Inyo County's Building and Safety Department to employ the proper design standards that mitigate for expansive soils.*

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, soils are compatible with septic tanks and other wastewater disposal systems, although the project site will not have either.*

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the project site does not include a unique paleontological or geologic feature.*

**VIII. GREENHOUSE GAS EMISSIONS:** Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

*No. GHGs generated during the construction phase would be minimal and below all applicable thresholds. GHGs during Project operation would be virtually non-existent, and not present a significant impact, because the solar facilities do not generate any GHGs except for occasional visits (estimated weekly) by the applicant in a light vehicle to monitor the facilities.*

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

*No, the proposed project will not conflict with any plan, policy or regulation adopted for the purpose of reducing greenhouse emissions.*

**IX. HAZARDS AND HAZARDOUS MATERIALS:** Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--------------------------------	---	------------------------------	-----------

*No, the proposed project will produce a small amount of waste associated with maintenance activities. Photovoltaic wastes include broken and rusted metal, defective or malfunctioning modules, electrical materials, empty containers and other miscellaneous solid materials. Most of this material will be collected and delivered back to the manufacturer for recycling or disposed of according to legal requirements. The presence of such wastes onsite would not pose a risk to surrounding properties and transporting it off site poses no threat or risk due to the inert nature of the waste materials.*

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

*No, the proposed Project will not involve the use of a significant hazardous material. The operation of a PV solar facility does not involve the presence of any liquid wastes or hazardous materials readily capable of migrating to off-site properties. No battery storage will occur on site, or associated hazardous materials, as the solar facilities will connect directly to existing power lines operated by SCE. No significant hazard to the public or environment through a reasonably foreseeable upset or accident that could result in the release of hazardous materials is anticipated.*

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

*No, the proposed project is not within one-quarter mile of an existing or proposed school, nor will it emit hazardous emissions, or handle acutely hazardous materials, substances, or waste.*

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

*No, the proposed project is not located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.*

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

*No, the Project operates passively and with little human intervention, and there will be no people typically working in the Project Area. The Project also does not pose a danger to Trona Airport maintenance workers because the airport is not a public use airport. Additionally, the airport is not used with enough frequency to pose a danger to anyone working in the Project Area.*

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

*No, the proposed project will not physically interfere with an adopted emergency plan or emergency evacuation plan.*

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

*No, risk of loss, injury, and death involving wildland fires are not significant from this project. Fire risks are identified as moderate at the Project area, and no areas in proximity to it can be considered urbanized. Land surrounding the project site is not heavily vegetated and there are only a few residences in proximity of the project; therefore, the risk of loss, injury or death involving wildland fires is less than significant at this site, and any potential risk is further mitigated by compliance with California Building Standards.*

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--------------------------------------	---	------------------------------------	--------------

**X. HYDROLOGY AND WATER QUALITY:** Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

                

*No, the project will not violate any water quality standards or waste discharge requirements. The project will be subject to regulation by the Lahontan Regional Water Quality Control Board and the Inyo County Environmental Health Department. Preconstruction surveys would be performed, and sediment and erosion controls would be installed in accordance with an approved Storm Water Pollution Prevention Plan (SWPPP). Stabilized construction entrance and exits would be installed at driveways to reduce tracking of sediment onto adjacent public roadways.*

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

                

*No, the Project will not have any effect on local groundwater. The project will not use local groundwater for its water needs, which are limited to dust control. All groundwater needs will be supplied by mobile trucks supplying water to the job site. Water demands are estimated at 40,000 gallons/week for dust control and site preparation and water will be trucked from the owner's (SBC) well located in Trona. The Project will not introduce any significant new areas of impervious surfaces that will prevent groundwater recharge.*

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in a substantial erosion or siltation on- or off-site;

                

*No, the project proposes minimal grading and no new impermeable surfaces. Other than installing a concrete pad, no paving or other activities that will increase impermeable surfaces from the project that would cause erosion or siltation. No drainage patterns will be altered by this project. Other than rare storm related run-off situations, no water passes over or through the site.*

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-

                

*No, the Project will not significantly change the landscape or existing runoff patterns or redirect or block flood flows. No drainage patterns or rates of runoff will be altered by the Project.*

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

                

*No, the project is proposed in an area that is mostly disturbed and should not have substantial changes to runoff patterns. The project has been reviewed by the County Public Works Department and they found no issues regarding grading and runoff. In the unlikely event issues are found during the building permit review, they will be addressed at that time.*

iv) impede or redirect flood flows?

                

*No, the project is proposed in an area that is mostly disturbed and is not located in a flood hazard area.*

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

                

*No, the Project is in an area that is mostly disturbed, and is not located in a flood hazard, seiche or tsunami zone. Note that the BRE identified a potential surface water drainage based on prior mapping but no evidence of any such feature exists onsite and the mapping is therefore considered to be in error or outdated.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------------	---	------------------------------------	--------------

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

*No, the Project will not affect compliance with or implementation of the Lahontan Region water quality control plan and is not in an area included in a sustainable groundwater management plan.*

**XI. LAND USE AND PLANNING:** Would the project:

a) Physically divide an established community?

*No, there is no established community in the vicinity of the Project that can be divided.*

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

*No, the proposed project is consistent with the current zoning and helps to meet the goals for renewable energy generation for the southern portion of the County, as described in the Inyo County 2015 REGPA. This part of Trona is explicitly called out and designated for solar energy generation as part of the southern SEDA.*

**XII. MINERAL RESOURCES:** Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

*No, the Project Area has no known mineral resources of value to the region or state. The Project Area is not in a mapped area of regional or statewide significance by the State Mining and Geology Board. Development of the surface for solar generation would not in any event result in the permanent loss of mineral resources unexpectedly in this location.*

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

*No, there are no known locally-important mineral resources delineated in any land use plan that would be affected by the project.*

**XIII. NOISE:** Would the project result in the:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

*No, all potential noise impacts are within the scope of the PEIR analysis and will be subject to the PEIR mitigation measures. The PEIR evaluated the impacts of construction noise, including the use of construction equipment for grading, trenching, mast installation, installation of concrete footings, movement of heavy equipment and transportation of materials by truck. The PEIR also listed the individual equipment types that would be used to install a solar panel array, and the estimated noise levels associated with each item of equipment. (See PEIR, pp. 4.12-16 - 4.12-18.) The Project would use construction equipment of the types listed in the PEIR, and follow a construction process consistent with, or less impactful than, that anticipated in the PEIR. In this regard, the PEIR focused on utility-scale solar projects. The Project is a far smaller, commercial scale Project that will utilize a construction process that is comparatively light and short term in comparison to utility-scale projects. The Project does not present noise impacts that substantially differ from, or that are more impactful than, those analyzed in the PEIR. As such, the Project is within the scope of the PEIR pursuant to CEQA Guidelines section 15168(c)(2).*

*The PEIR adopted Mitigation Measure MM NOI-2 ("Implement construction noise reduction measures") to ensure that construction noise impacts are avoided or reduced below a level of significance and would have no significant unavoidable adverse impacts. (PEIR, pp. 4.12-18.) The PEIR listed the following five mitigation measures:*

*If utility scale solar development resulting from implementation of the REGPA is proposed within 500 feet of a residence or other*



Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--------------------------------	---	------------------------------	-----------

noise sensitive receptor, the following measures, in addition to applicable BMPs and related information from REAT's Best Management Practices and Guidance Manual (REAT 2010), shall be implemented to reduce construction noise to the extent feasible:

- Whenever feasible, electrical power will be used to run air compressors and similar power tools.
- Equipment staging areas will be located as far as feasible from occupied residences or schools.
- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers.
- Stationary equipment shall be placed such that emitted noise is directed away from sensitive noise receptors
- Stockpiling and vehicle staging areas shall be located as far as practical from occupied dwellings.

NOI-2 incorporated certain best management practices (BMPs) from REAT's Best Management Practices and Guidance Manual (REAT 20/0) for desert renewable energy projects. In regard to potential noise impacts, the manual lists 10 BMPs:

- 1) Ensure noisy construction activities (including truck and rail deliveries, pile driving and blasting) are limited to the least noise-sensitive times of day (i.e., weekdays only 45 between 7 a.m. and 7 p.m.) for projects near residential or recreational areas.
- 2) Consider use of noise barriers such as berms and vegetation to limit ambient noise at plant property lines, especially where sensitive noise receptors may be present.
- 3) Ensure all project equipment has sound-control devices no less effective than those provided on the original equipment. All construction equipment used should be adequately muffled and maintained. Consider use of battery powered forklifts and other facility vehicles.
- 4) Ensure all stationary construction equipment (i.e., compressors and generators) is located as far as practicable from nearby residences.
- 5) If blasting or other noisy activities are required during the construction period, notify nearby residents and the permitting agencies 24 hours in advance.
- 6) Properly maintain mufflers, brakes and all loose items on construction and operation related vehicles to minimize noise and ensure safe operations. Keep truck operations to the quietest operating speeds. Advise about downshifting and vehicle operations in residential communities to keep truck noise to a minimum.
- 7) Use noise controls on standard construction equipment; shield impact tools. Consider use of flashing lights instead of audible back-up alarms on mobile equipment.
- 8) Install mufflers on air coolers and exhaust stacks of all diesel and gas-driven engines. Equip all emergency pressure relief valves and steam blow-down lines with silencers to limit noise levels.
- 9) Contain facilities within buildings or other types of effective noise enclosures.
- 10) Employ engineering controls, including sound-insulated equipment and control rooms, to reduce the average noise level in normal work areas.

Once the Project is constructed, operational noise sources will be limited to pad-mounted transformers and tracker array motors. Transformers will be located farther than 500 feet from a residence or other noise-sensitive land use and would not require further analysis under MM NOI-1 in the PEIR. Tracker motors generate low noise levels (see PEIR Table 4.12-4) and are sufficiently far from noise-sensitive land uses to have no potential noise-related impacts and to not require further noise study or mitigation. (See PEIR, p. 4.12-19.) As such, the operational impacts are expected to be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

No, the Project involves relatively light ground disturbance with few vehicles. No excessive groundborne vibration or groundborne noise is expected. Considering the types of equipment that will be used, impacts associated with groundborne noise or vibration would be within the scope of the PEIR and less than significant. (See PEIR p. 4.12-15.)

c) For a project located within the vicinity of a private airstrip or, an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------------	---	------------------------------------	--------------

project expose people residing or working in the project area to excessive noise levels?

*No, Trona Airport is not public, nor is it used frequently, and it is typically used by light aircraft only. The proposed Project will have minimal noise levels due to its nature and will not create excessive noise levels for personnel working near the Project Area. The Project Area is not immediately below any established flight path and persons working at the Project Area would not be exposed to any significant level of aircraft noise.*

**XIV. POPULATION AND HOUSING:** Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

*No, The Project is not likely to induce population growth. The project site requires few operations and maintenance personnel and will be monitored mostly remotely from offsite locations. No new residents are expected to result from the Project.*

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

*No, the proposed Project will not displace existing housing or create a situation where replacement housing will be necessary. No housing currently exists in the Project Area. No existing housing will be removed to construct or operate the Project. The Project will have no effect on the level of housing in the Project Area or on surrounding properties.*

**XV. PUBLIC SERVICES:** Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?

*No, the Project is not considered to be located in a high-risk area for fire protection. The Project Area has no trees or established vegetation. The San Bernardino Fire Department (which provides fire protection services in the Trona community) was consulted on the Project. No concerns related to the Project Area were given.*

Police protection?

*No, no new police service will be required because of this project. Offsite private security measures will most likely be used to monitor the Project area.*

Schools?

*No, no new students or residents, or associated school services, will be required because of this project.*

Parks?

*No, no new parks will be required because of this project.*

Other public facilities?

*No, the proposed Project will not create substantial adverse physical impacts associated with a need for any other foreseeable public services.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------	---	------------------------------	-----------

**XVI. RECREATION:** Would the project:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the Project will not increase the use of existing recreational facilities. It is not anticipated that any portion of this Project will result in a change in the level of service required to provide parks or other recreational facilities.*

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the proposed project does not include, nor will it cause, a need for an increase in parks or other recreational facilities that might have an adverse physical effect on the environment.*

**XVII. TRANSPORTATION:**

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the proposed project will not cause a significant increase in traffic, which is substantial in relation to the existing traffic load or capacity of the street system.*

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the project consists of a two 5-acre parcels solar facility. This will not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). The applicant estimates that the construction will take 3 months and will consist of approximately 20 construction, supervisory, support and construction management personnel on-site, and will generate approximately 3-5 daily trips (arrivals and departures) by employees. After construction is complete, the project will be remotely monitored and will have maintenance and equipment repair employees on-site as needed during daytime hours. Therefore, the Project will result in less than significant impacts to this resource. The subject site is not within one-half mile of either an existing major transit stop or high-quality transit corridor.*

c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the proposed project will not result in any design features that increase transportation hazards. No curves or dangerous intersections will be added to the existing unpaved access road leading to the Project area. Automobiles and trucks will be accommodated on the project site.*

d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the project is proposed on a site that is directly off a main road and emergency access will be available.*

**XVIII. TRIBAL CULTURAL RESOURCES:** Would the project:

a) cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------	---	------------------------------	-----------

resources as defined in Public Resources Code section 5020.1(k), or

*No, the proposed project does not encompass a resource eligible for listing in the California Register of Historical Resources, or in a local register or historical resources as defined in Public Resource Code section 5020. 1 (k).*

*A phase 1 cultural study was completed on October 6, 2023 by an ASM associate archaeologist with assistance in the field by a Native American monitor/Tribal Historic Preservation Officer (THPO) for Kern Valley Indian Community. No significant cultural resources were encountered within the Project Area. If any archaeological or cultural resources are discovered on the site, work shall immediately desist and Inyo County staff shall be immediately notified per Chapter 9.52, Disturbance of Archaeological, Paleontological/ and Historical Features of the Inyo County Code.*

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the proposed project does not encompass a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of the Public Resource Code section 5024. 1. See also the response to XVII a)*

**XIX UTILITIES AND SERVICE SYSTEMS:** Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the proposed Project is for the approval of a PV solar facility that will primarily be remotely monitored and involve no continuous human presence. The Project will not result in the construction or relocation of new or expanded utility, wastewater, or other utility service systems. The goal of the Project is to create a sustainable supply of electric power, and it will not increase demand for utilities whatsoever.*

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

*No impact. During operation, water needs will be no more than 0.05 acre-feet per year and will be utilized primarily for panel washing 2-4 times annually. During active construction, light water consumption (relative to other construction uses) will be required for dust suppression. All water needs will be provided by water truck from a water well owned by SBC, located in Trona. No landscaping water will be required.*

c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the Project would not result in new or expanded water or wastewater treatment facilities.*

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the Project will not require changes to the current solid waste capacity to accommodate them. Solid waste needs for the project will be minimal. Most of the volume of solid waste (scrap metals, electrical equipment, and proprietary solar array features) will be collected and recycled.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------	---	------------------------------	-----------

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

*No impact, the Project and any future development will comply with Inyo County's solid waste standards, as required by the Inyo County Department of Environmental Health.*

**XX. WILDFIRE:**

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

*No, there is not an adopted emergency response or evacuation plan for the area in which the project is proposed.*

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?

*No, the Project Area is on flat or gently-sloped land. It lacks vegetation and vegetation is sparse in the surrounding area, which is characterized mainly by desert scrub, making wildfire risks moderate to low. There will be no project occupants, and the project area is physically separated from surrounding structures. The proposed Project does little to add to the wildfire risk in the area. The risk of loss, injury or death involving wildland fires is less than significant at this site, and any potential risk is further mitigated by compliance with California Building Standards.*

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

*No, the project will not cause the need for additional wildfire associated infrastructure.*

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

*No, the topography of the Project Area is generally flat and partially denuded of vegetation. The addition of a solar facility will not create downslope or downstream flooding or landslides.*

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE:**

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

*No, the Project will not impact or degrade the quality of the environment. The limited impact to resources in the Project Area can be mitigated to less than significant levels. Minimization measures have been written into the Mitigation Monitoring Program for the permit and include noise control measures subject to MM NOI-2 for the portions of the Project Area within 500 feet of residential structures, dust mitigation measures to control air quality issues, monitoring efforts of a representative from local native American tribes in case native artifacts or human remains are uncovered and proof of permit by the agricultural commissioner or sheriff for the removal of the Desert Holly and beavertail cactus found on the Project site.*

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--------------------------------	---	------------------------------	-----------

project is considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

*No, the Project does not have impacts that are individually limited, but cumulatively considerable. The only existing and potentially future projects of note in the vicinity are PV solar projects within the Trona SEDA, but the overall number and size of these projects are likely to be less than analyzed in the PEIR. Future solar projects in the Trona SEDA beyond those existing, proposed or planned, appear to be unlikely without significant improvements to offsite SCE transmission infrastructure.*

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

*No, the proposed project has no known environmental effects which will cause substantial adverse effects on human beings either directly or indirectly.*