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CHAPTER 5. OTHER CEQA CONSIDERATIONS

This chapter summarizes the information presented in Chapter 3.0 of this Environmental Impact Report (EIR) to address the broader questions posed by the California Environmental Quality Act (CEQA) Guidelines Section 15126.2. These include significant effects that cannot be mitigated to less-than-significant levels, significant irreversible environmental changes, and growth-inducing impacts. In addition, Appendix F of the CEQA Guidelines requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy to ensure energy implications are considered in project decisions. Energy consumption is addressed below under Section 5.4, Energy Conservation.

5.1 GROWTH-INDUCING IMPACTS

The CEQA Guidelines (Section 15126.2(d)) identify a project to be growth-inducing if it fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 3.14, Population and Housing, of this EIR specifically addresses whether the project would induce growth and/or impact populations and housing in the area. The following summarizes this discussion.

The project does not propose any residential use, including but not limited to a residential subdivision, mobile home park, or construction for a single-family residence, that would cause an increase in population. The project also does not include a recreational component, such as a hotel, resort, campground, or other facility, that would attract or accommodate an increase in visitors to the area that would indirectly cause temporary increases in population.

During construction, the project would temporarily add an average of 200 construction workers for daily operations and approximately 300 construction workers during peak construction activities to the region. Few of these workers, if any, would relocate to the area with their families and are not expected to induce substantial population growth in the Baker or Barstow areas. Once construction is complete, the project would not require any permanent on-site workers.

As discussed in Section 1.2, Project Objectives, of Chapter 1, Executive Summary, the project would assist the State of California in achieving or exceeding its Renewables Portfolio Standard and greenhouse gas emissions reduction objectives by developing and constructing new California Renewables Portfolio Standard–qualified solar power generation facilities producing approximately 300 megawatts (MW). As such, the project would not directly induce growth related to provision of additional electric power. Rather, energy demand, as determined by the California Public Utilities Commission, with input from the California Energy Commission, drives generation procurement; procurement does not drive an increase in either utility customers or energy consumption. Furthermore, implementation of the project would not permit any other investor-owned utility to expand its service territory. For these reasons, and as further described in Chapter 3.14 of this EIR, the project would not directly or indirectly induce substantial population growth.

5.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

A detailed analysis of significant environmental effects, mitigation measures, and infeasible mitigation measures is discussed in Chapter 2.0 of this EIR. The following effects have been identified in Chapter

3.1, Aesthetics, and are significant environmental effects of the project that cannot be mitigated to a less-than-significant level:

- **Impact AES-3**: The project would, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings.
- **Impact C-AES-1**: The project could cumulatively contribute, in combination with other past, present, and reasonably foreseeable future projects, to a cumulative aesthetic impact.

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(c) requires an EIR to consider significant, irreversible environmental changes, such as the use of nonrenewable resources and irretrievable commitment of resources. Section 15126.2(c) states that the use of nonrenewable resources during the initial and continued phases of a project may be irreversible if a large commitment of these resources makes their removal, indirect removal, or use thereafter unlikely. Nonrenewable resources such as natural gas, petroleum products, asphalt, steel, copper and other metals, sand, and gravel are considered to be commodities that are available in a finite supply. Several irreversible commitments of limited resources would result from implementation of the project. Such resources include, but are not limited to, the loss of lumber, gravel, concrete, asphalt, petrochemical construction materials, metals, and water consumption.

5.3.1 Irreversible Commitment of Resources

Construction of the project would require fossil fuels, a nonrenewable resource, to power construction vehicles. In exchange for using nonrenewable and non-retrievable resources, the project would provide a source of clean, renewable energy. Over the operational life of the project, it would contribute incrementally to the reduction in demand for fossil fuel–based electricity generation. Therefore, the incremental reduction in fossil fuels would be a beneficial effect of the commitment of nonrenewable resources. Temporary and long-term commitment of water resources would occur as a result of construction, operation, and maintenance of new solar facilities. Adoption of the project would change the visual landscape and character of the site and would affect candidate, sensitive, and/or special-status species, sensitive natural communities, and wildlife access and movement. However, all impacts to biological resources would be mitigated to a less-than-significant level. Decommissioning and deconstructing the project would restore the visual character and biological resources of the area upon completion.

5.4 ENERGY CONSERVATION

As described in Chapter 1 of this EIR, the project would generate electricity from a renewable energy supply (solar) in a location suitable for collection of solar energy. Power produced by the project would be conveyed to the regional electrical grid through an interconnection with the existing Marketplace-Adelanto 500-kilovolt (kV) transmission line operated by the Los Angeles Department of Water and Power. The project also includes up to 300 MW of battery storage to assist with a more stabilized distribution of the energy generated. The project objectives include directly assisting the State of California in achieving or exceeding its Renewables Portfolio Standard and greenhouse gas emissions reduction objectives by developing and constructing new California Renewables Portfolio Standard–qualified solar power generation facilities producing approximately 300 MW.

Based on CEQA Guidelines Appendix F, Energy Conservation, of the State CEQA Guidelines, in order to ensure energy implications are considered in project decisions, CEQA identifies that EIRs include a discussion of the potential impacts of proposed projects, with particular emphasis on avoiding or reducing wasteful, unnecessary, or inefficient use of energy resources as applicable. Environmental effects may include the project's energy requirements and its energy use efficiencies by amount and fuel type during construction, operation, and decommissioning; the effects of the project on local and regional energy supplies; the effects of the project on peak and base period demands for electricity and other forms of energy; the degree to which the project complies with existing energy standards; the effects of the project on energy resources; and the project's projected transportation energy use requirements and its overall use of efficient transportation alternatives, if applicable. As the project is a renewable energy project the environmental effects associated with the generation of energy by the project are evaluated as environmental effects of the project in Chapter 3 of this EIR. Furthermore, with the inclusion of the battery energy storage component the facility would deliver generated electricity to the broader grid beyond peak generation periods and enable effective management by the utilities. Consideration of project-related energy conservation focuses on whether unnecessary or wasteful energy use would occur during construction and decommissioning activities and operation and maintenance.

The project would require construction, operation and maintenance, and decommissioning, all of which would involve use of combustion engines for workers travelling to and from the site and equipment on the site. As described in Chapter 1, the project would involve up to 200 workers during construction and decommissioning phases, with up to 300 workers during peak construction times. The workers would arrive at the beginning of the workday and depart at the end, and no unnecessary or wasting of fuel would result from construction and decommissioning workers travelling to and from the site. Delivery vehicles (materials, components, and water) would be transported directly to the site and the associated vehicles would return directly to their originating facility. Additional heavy machinery and generators would be required on-site to install and then dismantle the facility. Machinery would be of the most efficient available and operated only when necessary as a component of cost-effective project delivery including minimizing idling time, either by shutting equipment off when not in use or reducing the time of idling to 5 minutes at a maximum. All machinery would be in compliance with applicable Mojave Desert Air Quality Management District rules. Construction would be accomplished over an approximately 18-month period, and decommissioning would be accomplished over an 18-month period.

As project construction and decommissioning activities represent a necessary, short-term expenditure of nonrenewable energy in order to achieve a new source of renewable solar energy that would generate electricity for approximately 30 years, the associated energy use is not considered wasteful. Project operation would not include any on-site workers except for maintenance inspections and repairs if necessary. The elimination of manually operated on-site systems avoids unnecessary or wasteful uses of fuel to travel frequently to and from the site. On-site systems would be powered during the day with a feed from the facility, thereby using renewable energy. A nominal minimal amount of backfeed power would be required to keep essential equipment operational during the night. The power necessary during the night would be a very small fraction of the power generated, necessary, and not considered wasteful.