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# APPLICANT'S SUPPLEMENTAL RESPONSE TO DATA REQUEST 16 AND 26: ADDITIONAL INFORMATION REGARDING CUMULATIVE IMPACTS

In this section of Applicant's Supplemental Response to CEC Staff Data Requests 16 and 26, Applicant describes the changes to the Cumulative Impacts section that will result from the changes to the Project Description, relating to the removal of RMS 3. Per staff's request, Applicant uses a strike-out/underline format to identify changes to the Cumulative Impacts section of the Application for Certification that will result from the changes to the Project Description.

The Cumulative Impacts sub-sections that have been modified are listed in the table of contents below. If there has been no change to a Cumulative Impacts sub-section relating to Applicant's Supplemental Response to Data Request 16 and 26, the section is labeled "no changes" in the table of contents below.

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#### 5.17 CUMULATIVE IMPACTS

- 5.17.1 Introduction (See Section 2.1.1 for updated project description)
- 5.17.2 Laws, Ordinances, Regulations, and Standards
- 5.17.2.1 Federal

### National Environmental Policy Act of 1969

NEPA establishes a public, interdisciplinary framework for Federal agencies reviewing projects under their jurisdiction to consider environmental impacts. NEPA's basic policy is to assure that all branches of government give proper consideration to the environment prior to undertaking any major federal action that significantly affects the environment.

The BLM, as lead Federal agency for the Project, is responsible for preparation of an Environmental Impact Statement (EIS) in compliance with NEPA to evaluate the environmental impacts of the portions of the Rio Mesa SEGF on federal lands. The Rio Mesa Solar III plant and Portions of the Project gen-tie line, upgraded Bradshaw Trail access road, and 33kV construction/emergency backup power supply line are located on <a href="mailto:public lands">public lands</a> administered and managed by the BLM. NEPA compliance is required for thisese portions of the Project through preparation of a Draft and Final EIS. The Applicant anticipates that BLM may consider RMS 1 and 2 as a connected action under NEPA. BLM is also responsible for Native American consultation, including government to government consultation regarding project facilities on BLM land.

At the federal level, the NEPA implementing regulations require that all federal agencies consider the cumulative effects of their actions on the environment. As defined under NEPA, "cumulative effects can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7)." CEQ regulations for implementing NEPA require that agencies analyze the direct, indirect, and cumulative effects of a proposed action and any reasonable alternatives to that proposed action (40 CFR 1502.16, 1508.25, and 1508.27[b][7]).

5.17.2.2 State (no changes)

5.17.2.3 Local (no changes)

#### 5.17.3 Affected Environment

In order to analyze the affected environment, the movement and transportation of materials and energy must be considered. To determine the cumulative effects of projects on the social environment, it is necessary to obtain information regarding human populations, economic and health indicators, and infrastructure requirements. For this reason, different spatial boundaries may exist for different environmental resources included in the analysis. Factors to consider include:

• the size and nature of the Project and its anticipated effects;



- the availability of existing data and knowledge about the Project and its environmental effects;
- the feasibility of collecting new data and knowledge;
- the size, nature, and environmental effects of past, existing, and future projects and activities in the area;
- the characteristics and sensitivity of the receiving environment (extent and degree of existing stress);
- relevant ecological boundaries (watersheds, major ecological features, etc.); and
- relevant jurisdictional boundaries.

The CEC's Rules of Practice and Procedure and Power Plant Site Certification Regulations relative to cumulative effects differ by discipline. NEPA's regulations relating to cumulative effects do not define specific radii for cumulative effects to be assessed. For this Project, cumulative effects have been considered within a regional perspective, including linear and ancillary features associated with and considered part of the Project. The study areas for the cumulative effects analyzed differ among resource areas, as appropriate to each resource. This approach is based on guidance from the CEC and BLM and further described in Section 5.17.5.

#### 5.17.3.1 Environmental Setting and Past Actions

As described in greater detail in Section 5.6 of this AFC, the Project is located in a sparsely populated area in the southeastern portion of unincorporated Riverside County. The <u>Generating Project</u> is located in the Palo Verde Valley <u>partially solely on private land and portions of the Project gen-tie line, upgraded Bradshaw Trail access road, and 33kV construction/emergency backup power supply line and partially are located on public land administered by the BLM. The project site is roughly bounded by the existing Imperial Irrigation District transmission line Bradshaw Trail to the north and the Western Area Power Administration (WAPA) transmission line to the northwest and east, respectively. The existing TransCanada Gas Transmission Company (TCGT) North Baja Transmission Line borders the site on the east. Bradshaw Trail intersects the project site at an east-west orientation. The Colorado River forms the border between eastern Riverside County and La Paz County, Arizona, approximately five miles to the east.</u>

The closest community to the project site is Palo Verde, which is approximately 2.3 miles east of the southeast corner of the project site in the northeastern corner of Imperial County, on the southern border of Riverside County. According to the 2010 U.S. Census, Palo Verde had a population of 171 in 2010 (Census 2010). Apart from the approximately 640 acres that encompasses Palo Verde, the northeastern portion of Imperial County within the project vicinity primarily consists of recreation and previously disturbed lands, the Chocolate Mountain Aerial Gunnery Range (CMAGR) as well as agriculture lands adjacent to the Colorado River. The CMAGR is located approximately 16 miles southwest of the Project.

The western portion of La Paz County, Arizona, which is in the project vicinity, is very sparsely populated. It is primarily comprised of Colorado River Indian Tribe land, the U.S. Military-owned Yuma Proving Grounds, BLM-administered land, and wildlife refuges adjacent to the Colorado River. A relatively small amount of privately-owned land is located north of the Cibola National Wildlife Refuge.

The nearest community to the project site in La Paz County is the town of Quartzsite, approximately 20 miles east of the city of Blythe. The population of Quartzsite was 3,677 in 2010. The community of Ripley, located along State Route 78 is 6.8 miles from the project site. According to the 2010 U.S. Census, Ripley had a population of 692 in 2010. The city of Blythe is the nearest city to the project site, located approximately 13 miles to the northeast. The population of Blythe was 20,817 in 2010.

Portions of the project vicinity are managed under the BLM California Desert Conservation Area Resource Management (CDCA) Plan (BLM 1980, as amended), including the Northern and Eastern Colorado Desert Coordinated Management (NECO) Plan, which amended the CDCA Plan. The NECO planning area encompasses over 5 million acres and hosts 60 sensitive plant and animal species. Lands within the planning area also are popular for hiking, hunting, rockhounding, and driving for pleasure. Several commercial mining operations, livestock grazing lands, and utility transmission lines exist in the area as well. In addition, the Palo Verde Valley Area Plan (Area Plan), an extension of the Riverside County General Plan (RCGP), guides the character of the valley. The Area Plan is bounded by Imperial County to the south, previously disturbed desert lands to the north and west, and the Colorado River to the east.

Existing land uses surrounding the Project consist primarily of previously disturbed land and agricultural land, including important farmlands designated by the California Department of Conservation Farmland Mapping and Monitoring Program and Riverside County. The Palo Verde Valley is well known for its agricultural land, with the areas surrounding Blythe and Ripley being heavily farmed. Agriculture is the major economic activity in the Palo Verde Valley.

Although primarily characterized by previously disturbed land and agricultural land, there is some urban and rural development in the project vicinity, including very-low-density residential dwellings. The nearest commercial and industrial land uses are located in the city of Blythe. Blythe Municipal Airport is located approximately 4.7more than 9 miles north of the project site. The Chuckwalla and Ironwood State Prisons, situated approximately 15 miles west of Blythe, are located in a non-contiguous island of the city of Blythe. The prisons are one of the major sources of employment in the Palo Verde Valley and, combined, house approximately 8,000 inmates and employ a staff of approximately 2,000. The Blythe Energy Project is an operational 520 MW, base-load, natural gas-fired combined-cycle power plant located in the city of Blythe. Multiple utility transmission lines and substations are located in the project vicinity. Transportation infrastructure in the project vicinity includes Interstate 10 (I-10) to the north and State Route 78 to the west.

The U.S. Fish and Wildlife Service (USFWS) Cibola National Wildlife Refuge is located approximately five miles south of the project site. The BLM administers four wilderness areas, two long-term visitor areas, three areas of critical environmental concern (ACECs), and other recreational areas and opportunities within approximately 20 miles of the project site. Riverside County and the City of Blythe oversee several recreation areas, parks, and wildlife areas within the project vicinity. The project site is located within the Chocolate-Mule Mountains Herd Area. The Chocolate-Mule Mountains Herd Management Area is approximately 10 miles south of the project site. Table 5.17-3 provides a summary of past actions that have contributed to the existing environmental conditions within the project vicinity and the resources that may have been affected.

# Table 5.17-3 Past Actions within the Project Vicinity (no changes)

#### 5.17.4 Environmental Consequences (no changes)

5.17.4.1 Present and Reasonably Foreseeable Future Actions (no changes)

California Desert Conservation Area and La Paz County, Arizona (no changes)

Project Vicinity (no changes)

5.17.4.2 Incomplete and Unavailable Information (no changes)

#### 5.17.5 Cumulative Effects by Resource

The following sections describe the cumulative effects of the Rio Mesa SEGF when considered in combination with past, present, and reasonably foreseeable future projects located in the project vicinity, by resource area.

- 5.17.5.1 Air Quality (no changes)
- 5.17.5.2 Biological Resources (no changes)
- 5.17.5.3 Cultural Resources (no changes)
- 5.17.5.4 Geologic Hazards and Resources (no changes)
- 5.17.5.5 Hazardous Materials Handling (no changes)

#### 5.17.5.6 Land Use

Cumulative land use impacts were evaluated within the project vicinity as defined in Section 5.17.4. Cumulative land use impacts could occur if the land use impacts associated with development of the Project were increased or compounded by other related past, present, and reasonably foreseeable probable future projects. The Project will be consistent with applicable plans and policies, will not physically divide an established community, and will not conflict with any applicable plan, policy, or regulation adopted for purposes of avoiding or mitigating an environmental effect, including the Chocolate-Mule Mountains Herd Management Area. The Project-proposed secondary access road north of 34th Avenue will not-convert approximately 1.55 acres of Prime Farmland and approximately 0.67 acres of Farmland of Statewide Importance (2.2 acres total) of any farmland currently used or proposed to be used for agricultural purposes to nonagricultural use (access road acreage impacts are based on a 24-foot-wide ROW). The 2.2 acres includes both fallow and active agricultural land. or otherwise result in significant impacts to farmland. The Applicant will submit a Change of Zone Application to the Riverside County

Planning Department to ensure consistency with applicable land use plans, policies, and regulations. Although the Rio Mesa SEGF will install fencing that will close off a portion of the Chocolate-Mule Mountains Herd Area, the Chocolate Mule Mountains Herd Management Area is located approximately 10 miles to the south of the Project and will not be affected.

A small portion of active farmland will be converted to nonagricultural use as a result of the access road improvements and paving of 34th Avenue. However, the small amount of farmland necessary for road improvements represents a relatively small amount of farmland in the Palo Verde Valleywill result in a small effect to agricultural land that is within existing Riverside County ROW for purposes of road improvements, and will not significantly alter agricultural uses in the Study Area.

If past, present, and reasonably foreseeable future projects were to result in direct or indirect impacts to Prime Farmland or Farmland of Statewide Importance, the incremental effects of the Project could contribute to impacts to these farmlands that could be considered cumulatively significant. However, the projects that will likely be under construction before or concurrently with the Rio Mesa SEGF, including the BSPP, PSPP, DSSF, RSEP, GSEP, and the Devers-Palo Verde No. 2 transmission line including the new SCE CRS will not directly or indirectly impact Prime Farmland of Farmland of Statewide Importance. RSEP will have less than significant impacts to established federal rangeland area within the CDCA, but these impacts will not compound or increase the indirect farmland impacts of the Project. Therefore, the incremental indirect effects of the Project on Prime Farmland and Farmland of Statewide Importance will not contribute to cumulatively considerable impacts on farmland.

Moreover, these reasonably foreseeable future projects will not receive discretionary approvals without determinations of consistency with applicable plans and policies, including policies pertaining to development, farmland protection, habitat conservation, and other policies adopted for purposes of avoiding or mitigating an environmental effect. In conclusion, the Rio Mesa SEGF will not create land use impacts that could be increased or compounded by past, present, or reasonably foreseeable future projects causing adverse land use impacts. Therefore, cumulatively considerable land use impacts will not occur.

- 5.17.5.7 Noise (no changes)
- 5.17.5.8 Paleontological Resources (no changes)
- 5.17.5.9 Public Health and Safety (no changes)

#### 5.17.5.10 Socioeconomics

Temporary cumulative socioeconomic impacts could occur when overlapping construction schedules of multiple projects create a demand for workers that cannot be met by the local labor force, thereby inducing in-migration of non-local labor and their households. Operational cumulative socioeconomic impacts could occur when multiple projects cause a substantial increase population in an area that leads to demand for housing, schools, public services, or utilities that exceeds available capacity. Environmental justice impacts also are discussed in this section.

The geographic scope of analysis for cumulative socioeconomic effects will include the counties and communities within an approximate two-hour commute from the project site, including eastern Riverside County and portions of Imperial County, California and La Paz, Maricopa, and Yuma Counties in Arizona. Communities include Coachella, Palm Springs, Palm Desert, Cathedral City, and Indio in Riverside County, California; El Centro and Calexico in Imperial County, California; the City of Yuma in Yuma County, Arizona; and Lake Havasu City in Mohave County, Arizona. This geographic scope is appropriate because socioeconomic effects of the Project including job creation, tax revenue generation, expenditures, and impacts to housing supply, schools, public services, and utilities have potential to occur throughout this area. However, socioeconomic effects will primarily occur within Riverside County.

The Project will have substantial beneficial socioeconomic impacts during construction and operations in terms of job creation, expenditures, and tax revenues In fact, the positive incremental impacts of the Project, including job creation, expenditures, and tax revenues, will combine with the similar positive socioeconomic impacts from other present and reasonably foreseeable future projects in the project vicinity, including BSPP, RSEP, PSPP, DSSF, and GSEP, to create even greater positive cumulative impacts to the local economy.

Construction of the BSPP, RSEP, PSPP, DSSF, and GSEP may overlap with construction of the Project. Construction of the Devers-Palo Verde No. 2 transmission line including the new SCE CRS is expected to be complete and in service by third quarter 2013, prior to commencement of Project construction in fourth quarter 2013.

The CEC Decision for BSPP analyzed average and peak construction labor needs by construction craft for the BSPP, PSPP, GSEP, RSEP, and DSSF and compared them to the available labor force for these projects. This analysis determined that these projects will have total peak month labor needs of 4,189 workers and total peak month local housing need of 562 housing units. The Project will have peak month labor needs of 2,2002,500 workers in months 22 and 23during month 21. Assuming 15 percent of workers seek temporary local housing during construction consistent with the assumption for other reasonably foreseeable future projects, the Project will have a temporary local housing need of approximately 300628 housing units during peak construction in months 22 and 23-21.

Under the conservative assumption that peak construction periods overlap for all reasonably foreseeable projects including the Project, there would be demand for 8621,190 temporary housing units in the cumulative area. There are approximately 22,000 total motel or hotel rooms within a two-hour commute from the project site. In addition, the communities closest to the project site had very high vacancy rates in 2010, ranging from 17.5 to 60.2 percent with a combined total of 2,936 vacant units. The communities throughout the entire Study Area had vacancy rates ranging from 5 to 60.2 percent, with a total of 72,831 vacant units. RV parks and campsites also are available as temporary housing. Available housing supply in the study area far exceeds conservative estimates of cumulative demand. There is ample supply of housing units to accommodate workers drawn from outside the two-hour commute area, such as boom crane operators, boilermakers, electricians, pipefitters, welders, and other specialized crafts for which workers are in short supply. In addition, the RSEP includes plans for on-site accommodations for construction workers. Therefore, the incremental effects of the Project, when considered together with other past, present, and reasonably foreseeable future projects, will not result in cumulatively significant, adverse impacts to housing supply during construction. Moreover, the temporary placement of

construction workers within existing housing units, motel and hotel rooms, RV parks, and campsites will not result in adverse impacts to schools, public services, or utilities since these facilities have already been accounted for in existing plans for public services and utilities.

Operational labor needs of the reasonably foreseeable future projects and the Project are substantially smaller than construction labor needs and will not contribute to a cumulatively significant increase in demand for housing that exceeds available supply. In addition, cumulative increases in demand for schools caused by permanent relocation of full-time employees within the cumulative area will be addressed by the payment of development impact fees as well as through the payment of property taxes by the projects. The Palo Verde Unified School District is currently below enrollment capacity, enrollment capacity has been declining, and these trends are expected to continue. Therefore, increased demand within this district would have some beneficial effects.

Cumulative operational impacts to public services including police, fire, hazardous materials handling, and medical resources and facilities will not be cumulatively considerable due to compliance with existing LORS, including preparation of worker safety and fire prevention programs. All reasonably foreseeable future projects and the Project will comply with LORS addressing operational impacts to public services. For additional details on these LORS refer to Sections 5.1 Air Quality, 5.5 Hazardous Materials, 5.9 Public Health, 5.12 Traffic and Transportation, 5.14 Waste Management, 5.15 Water Resources, and 5.16 Worker Safety.

In addition, cumulative operational impacts to utilities will not be cumulatively considerable. The Project will utilize on-site groundwater and treatment wastewater on-site. There is no potential for the Project to contribute to cumulative impacts to water or wastewater systems. Cumulative impacts to groundwater are discussed below under 5.17.5.15. Cumulative demand for natural gas from reasonably foreseeable future projects and the Project will not exceed existing capacity and require the construction of new facilities or infrastructure to meet demand. Cumulative impacts to electrical infrastructure will not occur.

The Project will not result in significant adverse environmental or public health impacts that could impact any human populations. As a result, there is no potential for the Project to result in disproportionate adverse impacts to communities of concern in the area, including minority or low-income populations. Due to their nature as solar energy projects and their location in relation to the Project and communities of concern, reasonably foreseeable future projects will not compound or increase Project effects in a manner that would result in significant adverse environmental or public health impacts. Therefore, the incremental effects of the Project will not contribute to cumulatively considerable, disproportionate adverse impacts to communities of concern, including low-income and minority populations. No cumulatively significant environmental justice impacts will occur.

#### 5.17.5.11 Soils (no changes)

#### 5.17.5.12 Traffic and Transportation

The geographic scope of analysis for cumulative traffic and transportation impacts includes the freeway, highway, and roadway facilities that will be utilized by the Project during construction and operations. These facilities include I-10, State Route 78, 34th Avenue, 30th Avenue Bradshaw Trail, Lovekin

Boulevard, 28th Avenue, and Neighbours Boulevard. The project site can be accessed from 34th Avenue and 30th Avenue (Bradshaw Trail). The preferred access to the site will be along 34th Avenue-Bradshaw Trail. Truck traffic will only use the preferred access-at 34th Avenue. In conjunction with construction and operation of the Project, the Applicant proposes to pave (subject to BLM approval) the segment of 34th Avenue-Bradshaw Trail between the project site and one mile west of State Route 78 will be paved as a two lane undivided roadway. and the eastbound approach at the intersection of State Route 78 and 34th Avenue-Bradshaw Trail will be improved to include a stop sign. Reasonably foreseeable future projects are not expected to increase vehicle trips on segments of any facilities used by the Project, with the exception of I-10. Reasonably foreseeable future projects will add vehicle trips to I-10 temporarily during their construction periods and during long-term operations.

With the temporary increase in vehicle trips during construction of the Project, I-10 will remain at level of service (LOS) C. However, increased vehicle trips associated with the potential overlap of construction schedules for BSPP, PSPP, GSEP, and DSSF could increase or compound the incremental effects of the Project on east- and west-bound segments of I-10, thus causing LOS to potentially decrease to LOS E or LOS F on a temporary basis during Project construction. However, the incremental effects of construction vehicle trips will not be cumulatively considerable because the Project will stagger worker shifts during construction so that some workers depart the site between 2:00 PM and 4:00 PM, which is outside the evening peak period of 4:00 PM to 6:00 PM. In addition, the other reasonably foreseeable future projects are anticipated to implement measures to reduce their traffic impacts. As a result, the temporary incremental traffic impacts of Project construction will be less than cumulatively considerable. Temporary cumulative traffic impacts will be less than significant. Temporary but adverse cumulative impacts to on- and off-ramps along I-10 are not anticipated to occur because ramps utilized by Project construction vehicle trips are not anticipated to be utilized by construction vehicle trips generated by other reasonably foreseeable future projects.

Operations will require approximately 100150 full-time employees, with up to 80 employees at the site at a given time. As a result, operational vehicle trips added to freeways, highways, and roadways including I-10 will be minimal. Operations under the Project will not adversely affect LOS for any freeway, highway, roadway, or intersection. Direct traffic impacts during Project operations will be less than significant. Similar to the Project, operational vehicle trips will be minimal for each of the reasonably foreseeable projects, although some trips will occur along east- and west-bound segments of I-10. When considered together with the operational vehicle trips of the reasonably foreseeable projects, the incremental traffic effects of Project operations will not adversely affect LOS for east- or west-bound I-10. As a result, operational incremental traffic impacts of the Project will not be cumulatively considerable. Long-term cumulative traffic impacts will be less than significant. Moreover, adverse cumulative impacts to on- and off-ramps along I-10 are not anticipated to occur during operations because ramps utilized by Project operational vehicle trips are not anticipated to be utilized by operational vehicle trips generated by other reasonably foreseeable future projects.

#### 5.17.5.13 Visual Resources (no changes)

## 5.17.5.14 Waste Management (no changes)

#### 5.17.5.15 Water Resources

Cumulative impacts for water resources were evaluated on a surface watershed and groundwater aquifer basis. The project site, located in Palo Verde Mesa, is underlain by the Palo Verde Mesa Groundwater Basin (PVMGB). Water resources management and use fall under the jurisdiction of Riverside County Department of Public Works, the California Regional Water Quality Control Board (RWQCB), Colorado River Basin Region, the California Department of Toxic Substances Control (DTSC), the United States Army Corps of Engineers, the EPA, the United States Bureau of Reclamation, the BLM, and local water districts and agencies.

Cumulative impacts to water resources could occur as a result of stormwater runoff discharge to surface water resources, the use of groundwater, or impacts to groundwater quality. Operation of the Project has the potential to impact water quality primarily through improper storage and use of materials. Rio Mesa SEGF will adhere to proper material storage and handling as well as any other applicable good housekeeping procedures. Construction and operation of the Rio Mesa SEGF will employ stormwater design BMPs and adhere to a SWPPP, state water quality standards, and other applicable federal, state, and local LORS addressing stormwater runoff and surface water quality. As a result, drainage patterns, drainage volumes and peak flow rates from the site will be similar to existing conditions. Since natural channels/washes will be minimally disturbed and occupied structures will not be placed in areas identified as located within a 100-year floodplain, flooding conditions for the Rio Mesa SEGF will be similar to those under existing conditions. Therefore, construction and operation of the Rio Mesa SEGF will have a less than significant impact to surface water runoff.

None of the solar energy projects that will likely be under construction before or concurrently with the Rio Mesa SEGF, including the RSEP, BSPP, PSPP, and GSEP, are located within the PVMGB. While any other reasonably foreseeable future projects are likely to incrementally increase the potential for stormwater runoff and adverse effects to surface water quality, such projects are also subject to existing LORS that address stormwater runoff management and surface water quality. Therefore, the incremental effects of the Rio Mesa SEGF to surface water runoff, combined with the effects of past, present, and reasonably foreseeable projects, are not cumulatively considerable.

The Rio Mesa SEGF will require use of approximately 400 acre-feet per year (afy) of groundwater for construction and up to 173.3260 afy during operation. Groundwater will be accessed through wells that will be installed on site, and wastewater will be discharged to a treatment process to the extent practicable. Concentrate from the wastewater treatment will be disposed into two evaporation ponds located in the common area. The Rio Mesa SEGF will use less than one-thirdhalf of its available annual water allocation of 600 afy from the Metropolitan Water District of Southern California during operations and approximately two-thirds of the allocation during peak construction. Over 25 to 30 years, Project water use would constitute less than 0.10.2 percent of total water estimated in storage within the PVMGB. At the Project-level, the amount of groundwater use by the Rio Mesa SEGF is considered a less than significant impact.

As stated previously, none of the solar energy projects that will likely be under construction before or concurrently with the Rio Mesa SEGF, including the RSEP, BSPP, PSPP, and GSEP, are located within the PVMGB. While other present and reasonably foreseeable future projects within the PVMGB will incrementally increase the amount of groundwater required for construction and/or operation activities, the cumulative demand for groundwater will not adversely affect the groundwater recharge in the PVMGB. Therefore, the incremental effects of the Rio Mesa SEGF to groundwater use, when combined with the effects of past, present, and reasonably foreseeable future projects, are not cumulatively considerable.

Additionally, the Rio Mesa SEGF will comply with existing LORS addressing groundwater quality and wastewater discharge. As described above, the Rio Mesa SEGF will discharge wastewater to a treatment process. Past, present, and reasonably foreseeable future projects also are subject to applicable LORS addressing groundwater quality and wastewater discharge. Therefore, the Rio Mesa SEGF, when considered together with the effects of past, present, and reasonably foreseeable future projects, will not result in cumulative considerable impacts to groundwater quality. Mitigation measures to ensure water resources impacts will be less than cumulatively considerable are described in Section 5.15.

- 5.17.5.16 Worker Safety (no changes)
- 5.17.6 Mitigation Measures (no changes)
- 5.17.7 Agencies and Agency Contacts (no changes)
- 5.17.8 Permits Required and Permitting Schedule (no changes)
- 5.17.9 References (no changes)

