

ADDENDUM

to the

Environmental Impact Report

for the AV Apollo Solar Project

Original Final EIR (SCH# 2017081038) (by Sunbow Solar LLC, Syracuse Solar LLC, and Tours LLC)

Volume 1

Chapters 1 through 5

Gettysburg Solar Project (PP21403)
Gettysburg Solar Farm, LLC

(Willow Springs) Specific Plan Amendment No. 8, Map No. 231-21
(Willow Springs) Specific Plan Amendment No. 9, Map No. 231-21
Zone Change Case No. 5, Map No. 231-21
Conditional Use Permit No. 5, Map No. 231-21
Conditional Use Permit No. 6, Map No. 231-21



Kern County
Planning and Natural Resources Department
Bakersfield, California

May 2021

Table of Contents

CHAPTER 1 - Introduction and Overview	1-1
1.1 - Introduction.....	1-1
1.2 - Project Overview	1-2
1.3 - Addendum Organization	1-4
1.4 - Addendum Scope of Environmental Review	1-4
1.5 - Basis for an EIR Addendum	1-8
1.6 - Evaluation of Alternatives.....	1-9
1.7 - Adoption and Availability of Addendum.....	1-9
 CHAPTER 2 - Modified Project Description	 2-1
2.1 - Introduction and Background	2-1
2.1.1 - Modified Project Location	2-1
2.1.2 - Project Site and Surrounding Land Uses	2-1
2.2 - Modified Project Characteristics	2-2
2.2.1 - Project Facilities	2-2
2.2.2 - Construction.....	2-6
2.2.3 - Operations and Maintenance	2-10
2.2.4 - Decommissioning.....	2-12
2.3 - Entitlements Required.....	2-13
2.3.1 - Specific Plan Amendments.....	2-13
2.3.2 - Zone Change	2-14
2.3.3 - Conditional Use Permit.....	2-14
 CHAPTER 3 - Environmental Analysis.....	 3-1
3.1 - Aesthetics.....	3-2
3.1.1 - Setting	3-2
3.1.2 - Impact Analysis.....	3-2
3.2 - Agriculture and Forestry Resources	3-11
3.2.1 - Setting	3-11
3.2.2 - Impact Analysis.....	3-11
3.3 - Air Quality.....	3-17
3.3.1 - Setting	3-17
3.3.2 - Impact Analysis.....	3-18
3.4 - Biological Resources	3-24
3.4.1 - Setting	3-24
3.4.2 - Impact Analysis.....	3-25
3.5 - Cultural Resources.....	3-39
3.5.1 - Setting	3-39
3.5.2 - Impact Analysis.....	3-39

3.6 - Energy	3-46
3.6.1 - Setting	3-46
3.6.2 - Impact Analysis.....	3-46
3.7 - Geology and Soils.....	3-51
3.7.1 - Setting	3-51
3.7.2 - Impact Analysis.....	3-51
3.8 - Greenhouse Gas Emissions	3-62
3.8.1 - Setting	3-62
3.8.2 - Impact Analysis.....	3-62
3.9 - Hazards and Hazardous Materials.....	3-66
3.9.1 - Setting	3-67
3.9.2 - Impact Analysis.....	3-67
3.10 - Hydrology and Water Quality	3-76
3.10.1 - Setting	3-76
3.10.2 - Impact Analysis.....	3-77
3.11 - Land Use and Planning.....	3-87
3.11.1 - Setting	3-87
3.11.2 - Impact Analysis.....	3-134
3.12 - Mineral Resources.....	3-138
3.12.1 - Setting	3-138
3.12.2 - Impact Analysis.....	3-138
3.13 - Noise.....	3-142
3.13.1 - Setting	3-142
3.13.2 - Impact Analysis.....	3-143
3.14 - Public Services	3-150
3.14.1 - Setting	3-150
3.14.2 - Impact Analysis.....	3-152
3.15 - Transportation.....	3-159
3.15.1 - Setting	3-159
3.15.2 - Impact Analysis.....	3-159
3.16 - Tribal Cultural Resources	3-169
3.16.1 - Setting	3-169
3.16.2 - Impact Analysis.....	3-169
3.17 - Utilities and Service Systems.....	3-173
3.17.1 - Setting	3-173
3.17.2 - Impact Analysis.....	3-173
3.18 - Wildfire	3-182
3.18.1 - Setting	3-182
3.18.2 - Impact Analysis.....	3-182
3.19 - Irreversible Impacts.....	3-188
3.20 - Growth Inducement.....	3-189

CHAPTER 4 - List of Preparers..... 4-1

4.1 - Lead Agency.....	4-1
------------------------	-----

4.2 - Project Proponent	4-1
4.3 - Technical Assistance	4-1
CHAPTER 5 - References	5-1

List of Figures

Figure 1-1 Regional Location Map	1-3
Figure 2-1 Proposed Modified Project Site	2-3
Figure 2-2 Existing Specific Plan Land Use Designations	2-15
Figure 2-3 Existing Zoning	2-16
Figure 2-4 Proposed Zoning	2-17
Figure 2-5 Proposed Specific Plan Land Use Designations	2-18
Figure 2-6 Proposed Amendment to the Circulation Element	2-19
Figure 2-7 Proposed Site Plan	2-20
Figure 3.1-1 Key Observation Point Location	3-9
Figure 3.1-2 Existing and Simulated Views of Modified Project Site	3-10
Figure 3.4-1 National Hydrography Dataset (NHD)- National Wetlands Inventory (NWI)	3-37
Figure 3.4-2 Wildlife Corridors	3-38

List of Tables

Table 2-1 Proposed Modified Site and Surrounding Land Uses, Designations, and Zoning	2-1
Table 2-2 Proposed Specific Plan Amendments	2-13
Table 2-3 Proposed Zone Changes	2-14
Table 3.3-1 Short-Term Modified Project Emissions (tons per year)	3-18
Table 3.3-2 Post-Modified Project (Operational) Emissions (tons per year)	3-19
Table 3.3-3 Comparative Analysis Based on MDAB 2020 Inventory	3-23
Table 3.8-1 Estimated Annual GHG Emissions (MT/Year)	3-63

Table 3.11-1 Consistency Analysis with Kern County General Plan and Willow Springs Specific Plan for Land Use.....	3-88
Table 3.13-1 Estimated Construction Equipment Sound Levels at 50 Feet.....	3-144
Table 3.13-2 Nearest Residence's Distances from Project Construction in Each Direction.....	3-145
Table 3.15-1 Trip Generation Construction Phase: Non-Peak Period.....	3-160
Table 3.15-2 Trip Generation Construction Phase: Peak Period.....	3-160
Table 3.15-3 Trip Generation.....	3-162

CHAPTER 1 - INTRODUCTION AND OVERVIEW

1.1 - Introduction

As Lead Agency, the Kern County Planning and Natural Resources Department prepared an Environmental Impact Report (EIR) for the AV Apollo Solar project (referred to herein as the “approved project”) which evaluated 60 megawatts (MW) of solar development on three individual sites totaling approximately 493.5 acres. The Kern County Planning Commission certified the AV Apollo Solar Project Final EIR (referred to herein as the “certified EIR” or “EIR”) (State Clearinghouse No. 2017081038) on June 25, 2020, which consisted Conditional Use Permit (CUP) No. 37, Map 214; CUP No. 38, Map 214; CUP No. 39, Map 214 and CUP No. 41, Map 214 (Resolutions 45-20, 46-20, 47-20 and 48-20). Throughout this document, the term “approved project site” includes the three sites of a combined 493.5 acres evaluated in the EIR and the associated generation tie route.

This Addendum considers modifications to the approved project, which include the construction of a 30 MW photovoltaic electric generating solar PV facility including approximately 30 MW of battery energy storage, on approximately 158 acres (APN 374-011-06 and 374-011-39) and a generation-tie (gen-tie) route along Rosamond Boulevard, referred to herein as the “proposed modified project” or “proposed project modification.” The modified project includes consideration of (Willow Springs) Specific Plan Amendment No. 8, Map No. 231-21; (Willow Springs) Specific Plan Amendment No. 9, Map No. 231-21 (Circulation Element); Zone Change Case No. 5, Map No. 231-21; Conditional Use Permit No. 5, Map No. 231-21; and Conditional Use Permit No. 6, Map No. 231-21. A site plan of the modified project illustrating the facility’s design is included in Appendix A.

The modified project is located 6.5 miles southeast of the approved project. Based on the existing Willow Springs Specific Plan designation and zoning, the proposed modified project requires new Specific Plan Amendments, Zone Changes, and Conditional Use Permits. This Addendum has been prepared to determine whether the proposed modified project would result in new or substantially more severe significant environmental impacts compared with the impacts disclosed in the certified EIR. The following modifications are now being proposed: based on the existing Specific Plan designation and zoning, a Specific Plan Amendment to eliminate the 4.4 designation is requested. A Specific Plan amendment to amend the Circulation Element of the Specific Plan to eliminate future road reservations along the North and South midsection lines of Section 21, Township 9 North, Range 13 West, San Bernardino Base & Meridian (SBB&M), within the project site is also requested. The project would require an amendment to Zone Map 231-21 to change the zone district from OS and E (2.5) RS FPS to A (Exclusive Agriculture) and A FPS to allow for the construction and operation of a utility scale solar facility with approval of a Conditional Use Permit, pursuant of Kern County Zoning Ordinance 19.12.030.G.

This Addendum has been prepared to determine whether the proposed modified project would result in new or substantially more severe significant environmental impacts compared with the impacts disclosed in the certified EIR. The inclusion of all of the relevant

mitigation measures identified in the certified EIR to the proposed modified project will be implemented by the project proponent as project features where appropriate.

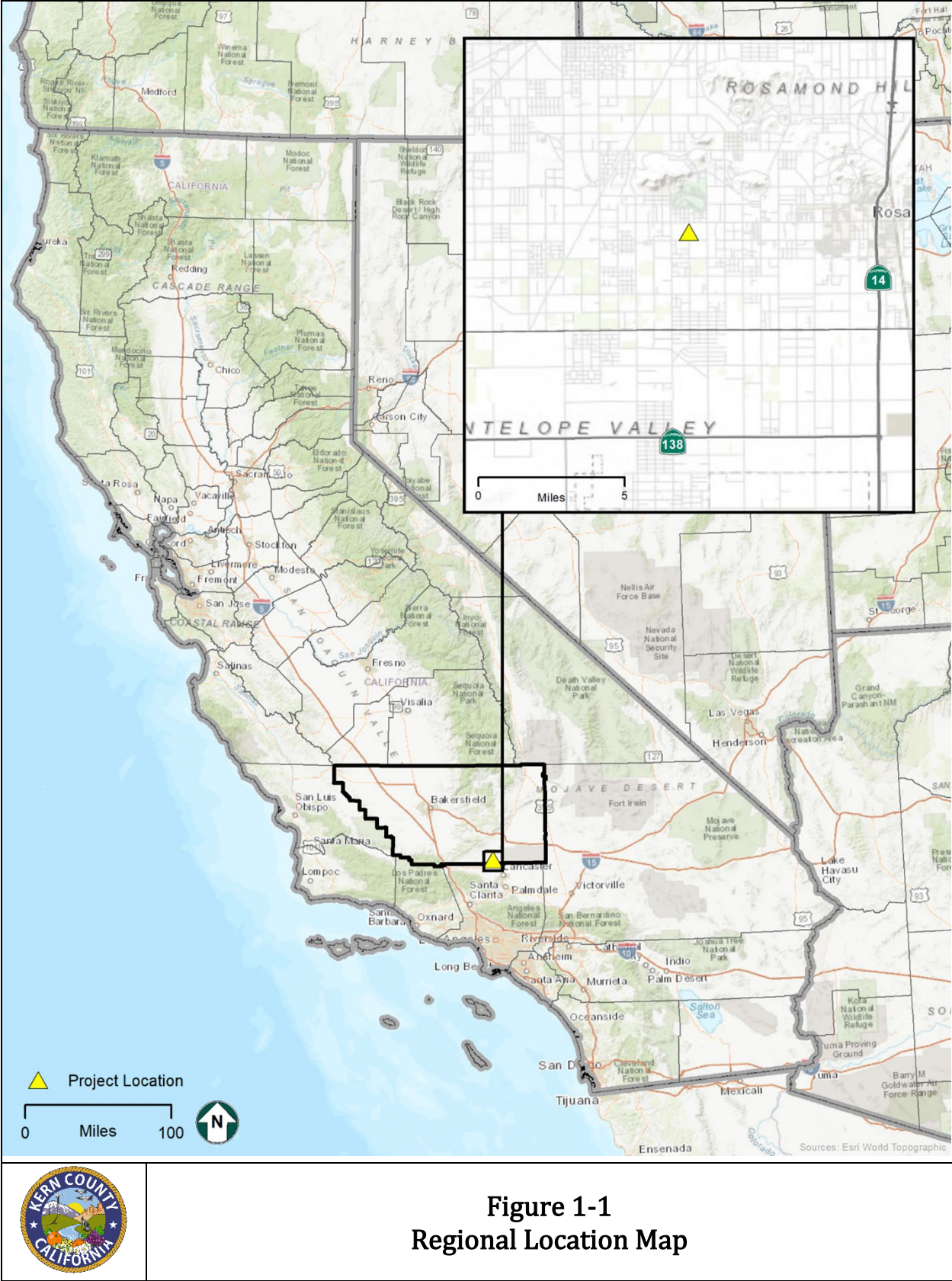
Lead Agency Contact Information

Kern County Planning and Natural Resources Department
Mr. Randall Cates, Planner III, Advanced Planning Unit
2700 "M" Street, Suite 100
Bakersfield, California 93301
Phone: (661) 862-8612

1.2 - Project Overview

The certified EIR analyzed the construction and operation of a 60-megawatt (MW) photovoltaic (PV) solar energy generation facility sited on 493.5-acres, consisting of three sites: Sunbow Solar (Sunbow), Syracuse Solar (Syracuse), and Tours Solar (Tours) sites and located approximately nine miles southwest of the unincorporated community of Mojave and approximately eight miles northwest of the unincorporated community of Rosamond. The proposed modified project is located approximately 6.5 miles southeast of the approved project, on Rosamond Boulevard, just east of the Rosamond Boulevard/80th Street West intersection, approximately five miles west of State Route (SR) 14 within the unincorporated community of Rosamond (see **Figure 1-1, *Regional Location Map***).

The proposed modified project is like the approved project in all material respects, only smaller and therefore less impactful. It would allow for the construction and operation of a 30 MW photovoltaic electric generating solar PV facility including approximately 30 MW of battery energy storage on approximately 158 acres of undeveloped land. Power generated by the proposed modified project would be transferred to the Southern California Edison (SCE) Antelope-Cal Cement-Rosamond 66kV line. The route for associated gen-tie transmission lines for the modified project would be either on the south or north side of the Rosamond Boulevard right-of-way and will require a Franchise Agreement with the County of Kern.



The project proponent is requesting:

- (a) Amendment to the Land Use, Open Space and Conservation Element of the Willow Springs Specific Plan from the existing 5.3/4.4 (Residential, Maximum 10 Units/Net Acre / Comprehensive Planning Area) to 5.3 (Residential, Maximum 10 Units/Net Acre) (SPA 8, Map 231-21);
- (b) Amendment to the Circulation Element of the Willow Springs Specific Plan to eliminate future road reservations along the N/S midsection line of Sec 21 T9N R13W, SBB&M within the project site (SPA 9, Map 231-21);
- (c) Changes in zone classification from the existing OS (Open Space) and E 2½ RS FPS (Estate - 2½ acres - Residential Suburban Combining, Floodplain Secondary Combining) zone districts to the A FPS (Exclusive Agriculture – Floodplain Secondary Combining) Districts (ZCC 5, Map 231-21);
- (d) Conditional Use Permit to allow for the construction and operation of a solar facility and associated infrastructure, including energy storage, in the A Zone District pursuant to Chapter 19.12.030.G of the Kern County Zoning Ordinance (CUP 5, Map 231-21); and
- (e) Conditional Use Permit to allow for a communication tower in the A Zone District pursuant to Chapter 19.12.030.F of the Kern County Zoning Ordinance (CUP 6, Map 231-21).

1.3 - Addendum Organization

This document is organized as follows pursuant to the requirements of the CEQA Guidelines:

- Chapter 1, Introduction and Overview describes the background of the proposed modified project; explains the rationale for preparing an Addendum to the EIR as the appropriate form of environmental review pursuant to CEQA; and explains the purpose, scope, and content of the Addendum.
- Chapter 2, Modified Project Description, describes the location and details of the proposed modified project.
- Chapter 3, Environmental Analysis, evaluates whether the proposed modifications to the approved project would result in new or substantially more severe significant environmental impacts compared with the impacts disclosed in the certified EIR.
- Chapter 4, List of Preparers, lists the individuals involved in preparing the Addendum.
- Chapter 5, References, lists the documents and individuals consulted during preparation of the Addendum.

1.4 - Addendum Scope of Environmental Review

This Addendum evaluates whether the proposed modifications to the approved project would trigger a requirement for a Subsequent EIR under CEQA Guidelines Section 15162, or whether CEQA evaluations of the project's modifications can be addressed in accordance with the preparation of an Addendum in accordance with CEQA Guidelines Section 15164.

This Addendum confirms that a Subsequent EIR is not required because the certified EIR retains considerable informational value and relevance to the decision-making process, and none of the standards of Guidelines Section 15162 that would require a Subsequent EIR are satisfied. This Addendum also includes any additions or changes to the previously certified EIR required by the modifications to the project as required by CEQA Guidelines Section 15164.

The certified EIR assessed the environmental impacts of the AV Apollo Solar project, a 60 megawatts (MW) solar PV energy generation facility located on approximately on 493 acres. Components of the facility included:

- Installation of up to a total combined of 60-MW of solar PV modules made of crystalline-silicon or thin-film material covered by glass, mounted on a galvanized metal fixed tilt racking or single axis tracking systems embedded into the ground;
- If fixed tilt technology is not used, a solar tracking system consisting of drive motors, drive arms and hydraulic systems that allow for rotation of solar panels from east to west, tracking the suns position over the course of the day;
- Underground and above ground medium voltage collections systems throughout the project site;
- Medium voltage inverters and step-up transformers;
- Three onsite solar substation(s) (one on each site) between 1 and 2 acres in size including circuit breakers, switches, remote terminal units, telecommunication equipment, and main step-up transformer(s);
- Onsite switchyard(s);
- Onsite access roads;
- Perimeter security fencing 7- to 8-feet high with barbed wire;
- Concrete pads sized and installed to accommodate the associated equipment (inverters, switchgear, transformers, etc.);
- Meteorological data collection systems and supervisory control and data acquisition (SCADA);
- Up to three unmanned Operations and Maintenance (O&M) buildings;
- Up to three 2-acre battery energy storage facilities and associated appurtenances;
- Telecommunication equipment including underground and overhead fiber optics and wireless communications infrastructure such as cell, satellite, or microwave tower. This equipment would be both onsite and offsite. The offsite telecommunication infrastructure would be installed in SCE's existing right of ways along Backus Road;
- A 66-kV gen-tie route (partially onsite and partially offsite) from the Sunbow site to the proposed SCE switching station (located between the Syracuse Site and Tours Site);
- Upgrades to the SCE system including a new onsite 66-kV switching station as detailed below:
 - Multiple dead-end substation structures;
 - Multiple Potential transformers with steel pedestal support structures;
 - Multiple 66-kV line drops;

- Box rack structures, circuit breakers, disconnect switches, and requisite foundations;
- Mechanical electrical equipment room (MEER) measuring approximately 30 feet by 20 feet to be built onsite and house the following equipment:
 - Batteries and battery charger (which are separate from the Energy Storage System as described below);
 - Light and power selector switch;
 - Light and power panel;
 - AC distribution panel;
 - Direct current (DC) distribution panel;
 - Relay protection;
 - Telecommunication equipment;
 - Appurtenant facilities;
- Current differential relays via diversely routed dedicated communications channels to the proposed project;
- Perimeter fence which includes two strands of barbed wire and a double door 18-foot gate around the new onsite switching station;
- Grounding grid to cover the substation area and an additional 10 feet outside the perimeter fence;
- Perform grading and site preparation for the substation area and additional 10 feet outside the perimeter fence;
- All required control cable trenches from the relay room to the switchyard;
- Metering equipment and appurtenant equipment;
- Power system controls, including Remote Terminal Units (RTUs) and appurtenant equipment; and
- Several 66-kV transmission tower structures located onsite and within SCE's existing right of way, including insulator/hardware assemblies, appropriate number of spans of conductor and All-Dielectric Self Supporting (ADSS) fiber optic cable underground conduit, cable, and appurtenant facilities.

For complete descriptions of approved onsite facilities, please refer to the certified EIR. The potential impacts of these facilities were assessed in the certified EIR and approved in the CUPs for the approved project. The proposed modified project contains the same general facilities identified in the certified EIR, but for a 30 MW photovoltaic electric generating solar PV facility, including approximately 30 MW of Battery Energy Storage System (BESS), on an additional approximate 158 acres of undeveloped land.

As discussed in the certified EIR, the approved project was determined to have a less than significant or no impact regarding the environmental impact areas to Population and Housing and Recreation. Although the proposed modified project would provide new employment, long-term employment opportunities would be minimal. Construction workers are expected to travel to the project site from various local communities, and the majority would likely be from the existing labor pool. The number of workers anticipated to relocate to the area is not expected to be substantial. Therefore, the proposed modified project would not directly induce the development of any new housing or businesses. Additionally, the

proposed modified project would not require households to be relocated as result of the modified project. Therefore, displacement of existing housing would not occur.

The proposed modified project does not include new recreational facilities and would not appreciably increase demands on existing facilities. The temporary increase in use of recreation facilities during construction that might be caused by an influx of workers would be minimal. As result, there would not be a detectable increase in the use of parks or other recreational facilities.

Therefore, as previously mentioned, the proposed modified project would not affect any of those resources in any manner differently than the approved project and would therefore also have no impact on those resource. Therefore, those topics are not analyzed in this Addendum.

The certified EIR established that, with mitigation incorporated, the approved project would result in less-than-significant impacts related to the following environmental impact areas:

- Agriculture and Forestry Resources (Project and Cumulative);
- Air Quality (Project);
- Biological Resources (Project);
- Cultural Resources (Project and Cumulative);
- Energy (Project and Cumulative);
- Geology and Soils (Project and Cumulative);
- Greenhouse Gas Emissions (Project and Cumulative);
- Hazards and Hazardous Materials (Project and Cumulative);
- Hydrology and Water Quality (Project and Cumulative);
- Land Use and Planning (Project and Cumulative);
- Mineral Resources (Project and Cumulative);
- Noise (Project and Cumulative);
- Public Services (Project and Cumulative);
- Transportation and Traffic (Project and Cumulative);
- Tribal Cultural Resources (Project and Cumulative);
- Utilities and Service Systems (Project and Cumulative); and
- Wildfires (Project).

The certified EIR established that the approved project would result in significant and unavoidable impacts with regard to the following environmental impact areas:

- Aesthetics (Project and Cumulative)- Significant project-level and cumulative impacts as a result of changes to visual character of the site and its surroundings;
- Air Quality (Cumulative)- Significant cumulative impacts as a result of construction-period air pollution;
- Biological Resources (Cumulative)- Significant cumulative impacts as a result of reduction or loss of habitat; and

- Wildfire (Cumulative)- Significant cumulative impacts as result of the project's incremental contribution to wildfire risks.

This Addendum will address the impact of the proposed modified project on each of the environmental resource areas previously analyzed in the EIR, as well as changes in the circumstances under which the project, as modified, will be undertaken. It will examine whether there is any new information of substantial importance not known with the exercise of reasonable diligence when the EIR was Certified that concerns the items detailed in CEQA Guidelines Section 15162(a)(3), detailed below.

1.5 - Basis for an EIR Addendum

An agency may prepare an addendum to a certified EIR pursuant to CEQA Guidelines Section 15164 "if some changes or additions are necessary but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred."

Section 15162 states that a subsequent EIR is required if any of the following conditions exist:

- (1) Substantial changes are proposed in the project which will require major revisions to the previous EIR ... due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR ... due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified ... shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As noted above, and discussed in further detail below, none of the proposed modifications to the approved project satisfy the conditions set forth in §15162, and an EIR Addendum is therefore an appropriate CEQA compliance document to address the proposed Project modifications, in accordance with CEQA Guidelines §15164.

Similar to the approved project analyzed in the certified EIR, the proposed modified project is also located within the Kern County portion of the high Mojave Desert region, the Antelope Valley, the Eastern Kern Air Basin, and the Antelope Valley Groundwater Basin. The general area of development of the approved project is similar in nature to that of the proposed modified project and has a similar environmental condition as being generally disturbed land with a mix of native and non-native plants species. The type of solar equipment to be used, the construction methodology, as well as the general nature of the proposed modified project is very close in character to that of the approved project. The conditions and setting of the approved project are similar in nature to that of the modified project and therefore retains its informational value and is appropriate to rely on herein.

The analysis of the proposed modified project indicates that there are no greater impacts created by the modified project in relation to the approved project; the modified project has either less impacts or similar impacts, with incorporation of new and revised mitigation measures.

1.6 - Evaluation of Alternatives

CEQA requires a comparative evaluation of a proposed project and alternatives to the project, including the “No Project” alternative. The certified EIR addressed a reasonable range of alternatives for the approved project. There is no new information indicating that an alternative that was previously rejected as infeasible is in fact feasible, or that a considerably different alternative than those previously studied would substantially reduce one or more significant effects on the environment already previously disclosed in the certified EIR.

1.7 - Adoption and Availability of Addendum

In accordance with CEQA Guidelines Section 15164(c), an addendum to an EIR need not be circulated for public review but can be included in or attached to the certified EIR. The decision-making body must consider the Addendum with the certified EIR prior to making a decision on the project (CEQA Guidelines Section 15164(d)). Although not required, this Addendum is available for public review at the Kern County Planning and Natural Resources Department, 2700 “M” Street, Bakersfield, California 93301.

CHAPTER 2 - MODIFIED PROJECT DESCRIPTION

2.1 - Introduction and Background

This chapter of the Addendum describes the proposed modified project as proposed by the project proponent. The proposed modified project would allow the construction and operation of a 30 Megawatt (MW) photovoltaic electric generating solar PV facility, including approximately 30 MW of battery energy storage, on approximately 158 acres in the eastern high desert region of unincorporated Kern County. The modified project would distribute the power generated at the site via a generation tie line that will be built from the proposed modified project site along Rosamond Blvd. and terminate approximately 1.25 miles east, at SCE's Rosamond Substation. The power would then be sold to California investor-owned utilities, municipalities, or other purchasers in the furtherance of the goals of the California RPS and other similar renewable programs in the State.

2.1.1 - MODIFIED PROJECT LOCATION

The proposed modified project site is located in the Antelope Valley region of unincorporated area of Kern County (see **Figure 1-1, *Regional Location Map***). The proposed modified project site is within the Willow Springs Specific Plan area.

The site is located along Rosamond Boulevard, just east of the Rosamond Boulevard/ 80th Street West intersection, within the unincorporated area community of Rosamond. The surrounding land uses include industrial development, and the Willow Springs International Raceway is located to the north. The remaining surrounding properties are generally undeveloped, with some sparse residential development to the west.

The major north-south route in the region is SR 14, a four-lane highway located approximately 5 miles east of the project site. The closest east-west routes near the project site are SR 138 (also known as Avenue D), which is a two-lane road approximately 5.5 miles south, and SR 58, which is a four-lane highway, and intersects with SR 14 approximately 13.5 miles northeast from the project area. Other roads serving the modified project site include Rosamond Boulevard, which is adjacent to the north, 60th Street West to the east and 90th Street West to the west. Paved and unpaved roadways, generally following section lines, are found throughout the area.

Primary access to the proposed modified project is from Rosamond Boulevard.

2.1.2 - PROJECT SITE AND SURROUNDING LAND USES

The approved project and surrounding area consist largely of undeveloped lands, sparse residential dwellings, and dirt roads. Existing development immediately surrounding the approved project site includes rural access roads, scattered rural residences, and wind and solar renewable energy facilities. Topography across the approved project site is relatively flat, with a topographic gradient of approximately 2 percent that slopes to the south east.

The proposed modified project would be comprised of two parcels (Assessor's Parcel Numbers 374-011-06 and -39 [approximately 79 acres respectively]). The project site and adjacent land are currently vacant/undeveloped (**Figure 2-1, *Proposed Modified Project Site***). Similar to the approved project, as mentioned above, the proposed modified project site is surrounded by sparse residential, commercial/industrial development and renewable energy facilities. The nearest sensitive receptors are an abandoned structure located 323 feet northwest of the proposed modified project, and residences located approximately 0.17 miles to the northwest and southwest of the proposed modified project site. There is one known non-residential receptor, the Tropico Middle School, located 1.77 miles to the east.

The proposed modified project site has a split designation of 5.3/4.4 – (Residential max 10 units/net acre/Comprehensive Planning Area) and 7.1 (Light Industrial) by the Willow Springs Specific Plan (**Figure 2-2, *Existing Specific Plan Land Use Designations***). The proposed modified project site is also split-zoned and classified as in the OS (Open Space) and E (2.5) RS FPS (Estate 2.5 ac min/Rural Suburban Combining/Floodplain Secondary Combining) zone districts by the Kern County Zoning Ordinance (**Figure 2-3, *Existing Zoning Map***).

The Federal Emergency Management Agency (FEMA) floodplains map indicates that the southerly half of the proposed modified project is within the identified FEMA designated 100-year floodplain. Specific Plan land use designations and zone classifications for the proposed modified project and surrounding areas is provided in **Table 2-1, *Proposed Modified Site and Surrounding Land Uses, Designations, and Zoning***.

2.2 - Modified Project Characteristics

The proposed modified project includes the development of a 30 MW ac photovoltaic energy generation facility, including approximately 30 MW of battery energy storage, on approximately 158 acres. The project would include either a fixed tilt or single axis system, but at this time, the PV technology that would be used for the proposed modified project has not been determined. No changes are proposed to the approved project's site plan or the nature of the project facilities.

The proposed modified project would consist of approximately 125,000 crystalline modules or 100,000 thin film modules arranged in a grid pattern over the project. Power generated by the proposed modified project would be transferred to SCE's Antelope-Cal Cement-Rosamond 66kV line. The route for associated gen-tie transmission lines for the modified project would be either on the south or north side of the Rosamond Boulevard right-of-way and will require a Franchise Agreement with the County of Kern. The proposed modified project would install an energy storage facility and appurtenances that would provide energy storage capacity for the electric grid. The storage system would consist of battery banks housed in electrical enclosures and buried electrical conduit. The battery enclosures would have fire suppression equipment installed that would automatically suppress thermal emergencies. The energy storage technology has not been determined at this time, but could include any commercially available battery technology, including but not limited to lithium ion, lead acid, sodium sulfur, and sodium or nickel hydride.



Figure 2-1
Proposed Modified Project Site

Table 2-1
Proposed Modified Site and Surrounding Land Uses, Designations, and Zoning

Location	Specific Plan Designation	Zone Classification	Land Use
Project Site	5.3 (Maximum 10 Units/Net Acre)/ 4.4(Comprehensive Plan); 7.1(Light Industrial)	OS (Open Space); E 2½ RS FPS (Estate - 2½ acres - Residential Suburban, Floodplain Secondary)	Vacant Land
North	7.1 (Light Industrial)	M-1 PD (Light Industrial Precise Development); OS (Open Space)	Light Manufacturing, Vacant Land, Residential
South	8.1/2.5 (Intensive Agriculture/Flood Hazard); 8.3 (Extensive Agriculture); 8.3/2.5 (Extensive Agriculture/Flood Hazard); 5.5 (Maximum 1Unit/Net Acre)	E 2½ RS FPS (Estate - 2½ acres -, Residential Suburban, Floodplain Secondary); E 2½ RS MH FPS (Estate - 2½ acres -, Residential Suburban, Mobile Home, Floodplain Secondary)	Vacant Land
East	5.3 (Maximum 10 Units/Net Acre)/ 4.4(Comprehensive Plan); 7.1(Light Industrial)	OS (Open Space); E 2½ RS FPS (Estate - 2½ acres -, Residential Suburban, Floodplain Secondary)	Vacant Land
West	5.3 (Maximum 10 Units/Net Acre)/ 4.4(Comprehensive Plan); 7.1(Light Industrial)	OS (Open Space); E 2½ RS FPS (Estate - 2½ acres -, Residential Suburban, Floodplain Secondary)	Vacant Land, Residential

The solar PV generating facilities would consist of solar arrays mounted on either fixed or tracking structures mounted to vertical posts. The proposed solar facilities are intended to operate year-round and would generate electricity during daylight hours when electricity demand is at its peak.

The proposed modified project would distribute the power generated at the site via a generation tie line that will be built from the proposed modified project site along Rosamond Boulevard and terminate approximately 1.25 miles east, at SCE's Rosamond Substation. The power would then be sold to California investor-owned utilities, municipalities, or other purchasers in the furtherance of the goals of the California RPS and other similar renewable programs in the State. The project proponents may eventually choose to decommission and remove all or none of the systems from the sites. If the site is decommissioned, it would be converted to another use consistent with the applicable land use regulations in effect at that time (see **Figure 2-7- Proposed Site Plan**) .

Construction activities on the proposed modified project would be the same as the activities described in the certified EIR. Similar to the approved project site, the proposed modified project site has nearly level to gently sloping topography. Grading will be minimal and includes grubbing and general smoothing on the site. Site preparation, construction activities, and the construction sequence and equipment would not change. Operation of the proposed modified project also would be the same as described in the EIR. The operation and maintenance activities and decommissioning program would not change.

2.2.1 - PROJECT FACILITIES

Solar PV Panels

The certified EIR describes the solar PV panels that would be used for the proposed modified project, although the proposed modified project would use fewer panels than the approved project. Solar energy would be captured by PV panels, of which an estimated 125,000 individual panels (100,000 panels if thin film modules are used) would be installed on-site. The layout of the single axis tracker solar panels would be aligned in rows in the north-south direction (or in an east-west direction if a fixed tilt racking system were used instead). The maximum height of the single axis tracker solar panels would be up to 12 feet above grade at the beginning and end of each day. A fixed tilt racking system would be less than 12 feet high. Each solar panel would be attached to embedded piers using a support structure. Module layout and spacing is typically optimized to balance energy production versus peak capacity and depends on the sun angles and shading due to the surrounding horizon of the site. If a tracking system is used, the modules would typically be mounted with the longer side-oriented east to west across the tracker system's north-south axis. Individual arrays of modules would be combined to generate the total plant capacity.

Solar Trackers

The certified EIR describes the solar trackers that would be used for the proposed modified project, although the proposed modified project would use fewer trackers than the approved project. The PV module rows would be oriented north-to-south if single-axis trackers are used. A solar tracking mechanism is used to maximize the solar energy conversion efficiency by keeping the modules perpendicular to the sun's energy rays throughout the day. This completed assembly of PV modules mounted on a framework structure is called a "tracker" because it tracks the sun from east to west. If used, single-axis trackers would increase the efficiency of energy production from the arrays relative to a fixed tilt system.

If the use of trackers is incorporated into the final project design, there are two types of tracker systems that may be selected for the proposed project; a centralized system or a decentralized system. A centralized tracker system uses one motor to control multiple rows of PV modules through a series of mechanical linkages and/or gearboxes. A decentralized system utilizes a single motor and/or gearbox for each row of PV modules. The exact tracker manufacturer and model would be determined in the final design. All trackers are intended to function identically in terms of following the motion of the sun.

Module layout and spacing is optimized to balance energy production versus peak capacity and would depend on the sun angles and shading caused by the horizon surrounding the proposed modified project site. The spacing between the rows of trackers is dependent on site-specific features and would be identified in the final design. The final configuration would allow for sufficient clearance for maintenance vehicles and panel access.

Fixed Tilt Racking System

The certified EIR describes the fixed tilt racking system that would be used for the proposed modified project, although the proposed modified project would use fewer racks than the approved project. The PV module rows would be oriented east-to-west if a fixed tilt racking system is used. The solar panels would be in a fixed tilt position that allows for the most sunlight specific to the geography of the proposed modified project site. The exact manufacturer and model would be determined in the final design should this system be chosen for the proposed modified project.

Electrical Collector System and Inverters

The certified EIR describes the electrical collector system and inverters that would be used for the proposed modified project, although the proposed modified project would use fewer inverters than the approved project.

The AC-DC electrical collection system includes all cables and combiners that collect electricity from the panels, delivers it to the inverters, collects it from the inverters, and ultimately delivers it to the modified project switching station(s). The collection system would likely be installed along internal access roads to collect power from the rows of modules and deliver it to the switching station. This collection system would likely be installed in subsurface trenches, though in some areas of the site, part or all of the collection system may be housed in above-grade raceways mounted on supports approximately 24-36 inches above ground level. The collection system would be rated at between 1,000-2,000 volts DC until it reached the inverters and a 33 kV AC intermediate voltage system between the inverters and the project switching station.

The modified project would use a typical unmanned field control system. The controls generally include a field supervisory controller in a central location and local microprocessor controllers connected to each tracker, if trackers are to be used. The field control system monitors solar insolation, wind velocity, and tracker performance and status, and communicates with all of the local microprocessor controllers. When the appropriate conditions exist, the field supervisory controller initiates the trackers' daily tracking of the sun, and at the end of the day stows the trackers in the solar array.

The DC electricity produced by the solar panels is converted to three-phase alternating current by a series of inverters. The 30 MW (ac) facility would require up to 30 inverters. Alternating current is the type of electricity usable by the electric utility and is the form required to connect to the transmission system. The inverter pad equipment includes a transformer that steps up the electricity in its new form to an output voltage of 33 kV. This

electricity is then transmitted via the medium voltage collection system to the switching station.

Energy Storage Facility

The certified EIR describes the energy storage facility that would be used for the proposed modified project, although the proposed modified project would use only one such facility, whose dimensions would differ slightly from the approved project's energy storage facility.

The modified project would install an energy storage facility and appurtenances that would provide energy storage capacity for the electric grid. The project could include a battery storage system capable of storing up to 30 MW of electricity. The storage system would consist of battery banks housed in electrical enclosures and buried electrical conduit. The battery enclosures would have fire suppression equipment installed that would automatically suppress thermal emergencies. The energy storage technology has not been determined at this time, but could include any commercially available battery technology, including but not limited to lithium ion, lead acid, sodium sulfur, and sodium or nickel hydride.

Operation and Maintenance Facility

The certified EIR describes the operation and maintenance facility that would be used for the proposed modified project, although the proposed modified project would use only one such facility, whose dimensions would differ slightly from the approved project's operation and maintenance facilities.

The modified project would include an unmanned operations and maintenance building measuring approximately 30 feet x 30 feet, an unmanned communication building measuring approximately 20 feet x 30 feet, and a gravel parking area of approximately 2,000 square feet in size. The operations and maintenance building would include storage space for spare parts and materials for the day-to-day operations and maintenance of the facility. Communications would be provided by the local utility. Bottled water would be provided for maintenance crews during on site activities.

Maintenance personnel are expected to visit the Site several times per year for routine maintenance and the PV modules may be cleaned up to four times a year. Modified project traffic volumes are expected to be minimal during operation of the facility.

On-Site Meteorological Station

The certified EIR describes the on-site meteorological station that would be used for the proposed modified project, although the proposed modified project would use only one such station.

The proposed modified project would include an on-site solar meteorological station located near the O&M building, which would consist of solar energy (irradiance) meters, as well as

an air temperature sensor and wind anemometer. This equipment, specifically the wind anemometer, would have an estimated height of approximately 15 feet.

Site Access and Security

During construction, operation, and decommissioning the proposed modified project site would be accessed from Rosamond Boulevard. The necessary road improvements would be completed per County code and regulations. As in the certified EIR, typical site access would be approximately 20 feet wide, accommodating 56 foot turning radii in both directions. The rows of solar panels would be separated by access ways. Internal site circulation would include approximately 20-foot-wide perimeter roads consisting of crushed stone and approximately 15-20-foot-wide operations and maintenance roads among the solar arrays consisting of crushed stone or native soil.

The certified EIR describes the security features for the proposed modified project. Chain-link security fencing would be installed around the site perimeter, switchyard(s), substation(s) and other areas requiring controlled access, in order to restrict public access during construction and operations. The security fence would be approximately 7-8 feet tall with a string of barbed wire along the top. The fence posts would be set in concrete. Fencing would be designed to comply with wildlife agency requirements. Additional security may be provided through the use of closed-circuit video surveillance cameras and intrusion systems. Signs would be installed to achieve appropriate safety and security as expected in a solar power facility. Proposed signage includes signs specifying high voltage danger, site under surveillance, caution electric shock, etc. Any signs as required by the National Electrical Code would also be installed.

The modified project's lighting system would provide operation and maintenance personnel with illumination for both normal and emergency conditions. Lighting would be designed to provide the minimum illumination needed to achieve safety and security objectives. Lighting would be directed downward and shielded to focus illumination on the desired areas only and to avoid light spillage on adjacent properties. Light fixtures would be mounted at the entrance and each inverter station. Lighting would be no brighter than required to meet safety and security requirements, and lamp fixtures and lumens would be selected accordingly. All project lighting would be switched and without timers. All lighting at the proposed solar facilities would be designed to meet Kern County Zoning Ordinance Chapter 19.81 (Outdoor Lighting "Dark Skies Ordinance").

Telecommunication Facilities

The certified EIR describes the telecommunication facilities that would be used for the proposed modified project. The proposed modified project would require telecommunications facilities to meet the communication requirements for interconnecting with the SCE station and to support project operations during monitoring. During operation, the SCADA system would allow individual solar inverter modules and other project elements to be monitored and controlled in the O&M building from remote locations. Additional fiber

optic lines required for the operational phase of the modified project would be located in proximity to the other telecommunication facilities.

2.2.2 - CONSTRUCTION

Schedule and Workforce

The certified EIR generally describes the construction activities that would take place at the proposed modified project, although timing and workforce size will differ slightly.

The construction activities for the proposed modified project fall into three main categories: (1) site grading and earthwork; (2) solar array construction; and (3) electrical interconnection to transmission owner infrastructure. The entire process is estimated to take approximately 8 to 10 months. Site grading and earthwork is anticipated to begin during the 3rd quarter of 2021, with operations beginning in the 1st quarter of 2022. Construction would primarily occur during daylight hours, Monday through Friday. Additional hours/days may be necessary to facilitate the schedule.

The construction workforce would consist of laborers, craftsmen, supervisory personnel, support personnel, and construction management personnel. The average workforce is expected to be approximately 70 construction, supervisory, support, and construction management personnel on-site during construction. The on-site workforce has been conservatively estimated to peak at approximately 150 individuals for short periods of time, which is typically a few weeks. It is anticipated that the construction workforce would commute to the site each day from local communities. Construction staff not drawn from the local labor pool would stay in nearby hotels and nonetheless support the local economy.

During construction, dusk-to-dawn security lighting would be required for the construction staging areas, parking area, construction office trailer entries, and site access points. Lighting is not planned for typical construction activities because construction activities would occur primarily during daylight; however, if required, any lighting would temporary and be limited to that needed to ensure safety and security.

Multiple portable toilets would be used during construction, and wastewater would be trucked off-site for disposal by a licensed sewage disposal company for treatment at a licensed or government wastewater treatment facility.

Site Grading and Earthwork

The certified EIR describes the site grading and earthwork activities that would occur at the proposed modified project.

Beginning work on the project site would involve preparing the land for installation of arrays, related infrastructure, access driveways, and temporary construction staging areas. Prior to initial construction mobilization, 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.

Site preparation would involve the removal and proper disposal of existing vegetation and debris that would unduly interfere with project construction or the health and safety of onsite personnel. Dust minimizing techniques would be employed, such as maintaining natural vegetation where possible, utilizing “mow-and-roll” vegetation clearance strategy, placement of wind control fencing, application of water, and application of dust suppressants. Conventional grading would be minimized to the maximum extent possible to reduce unnecessary soil movement that may result in dust. Earthworks scrapers, excavators, dozers, water trucks, paddlewheels, haul vehicles and graders may all be used to perform grading. Land-leveling equipment, such as a smooth steel drum roller, would be used to even the surface of the ground and to compact the upper layer of soil to a value recommended by a geotechnical engineer for structural support. Access roads may be additionally compacted to 90 percent or greater, as required, to support construction and emergency vehicles. Certain access roads may also require the use of aggregate to meet emergency access requirements. Soil movement from grading would be balanced on the site, and it is anticipated that no import or export of soils would occur.

Trenching would be required for placement of underground electrical and communications lines, and may include the use of trenchers, backhoes, excavators, haul vehicles, compaction equipment and water trucks. After preparation of the site, the pads for structures, equipment enclosures and equipment vaults would be prepared per geotechnical engineer recommendations.

Solar Array Construction

The certified EIR describes the solar array construction activities for the proposed modified project. Erection of the solar arrays would include support structures and associated electrical equipment. First, steel piles would be driven into the soil using pneumatic techniques, similar to a hydraulic rock hammer attachment on the boom of a rubber-tired backhoe excavator. If shallow bedrock, or other obstructions are encountered, the pile locations would be predrilled and then grouted in place with concrete. The piles are typically spaced approximately 10-20 feet apart. Once the piles have been installed, the horizontal array support structures would be installed. The final design of the horizontal array support structures may vary, depending on the final selection of the PV technology, as well as whether a fixed tilt or tracking system is selected. Once the support structures are installed, workers would begin to install the solar modules. Solar array assembly and installation would require trenching machines and excavators, compactors, concrete trucks and pumpers, vibrators, forklifts, boom trucks, graders, pile drivers, drilling machines, and cranes.

Concrete would be required for the footings, and pads for the medium voltage transformers, inverters, O&M building, and communications building. Concrete may also be required for pile foundation support depending on the proposed mounting system chosen for installation and whether or not obstructions are encountered when trying to drive piles. Final concrete

specifications would be determined during detailed design engineering. Concrete would be purchased from an off-site supplier and trucked into the proposed modified project.

During this work, there would be multiple crews working on the site with vehicles, including special vehicles for transporting the modules and other equipment. As the solar arrays are installed, the solar switchyard would be constructed, and the electrical collection and communication systems would be installed. Within the solar fields, the electrical and communication wiring would be installed in underground trenches, although some of the mid-voltage collection runs and communications may be on overhead lines. Collection trenches would likely be mechanically excavated.

The wiring would connect to the appropriate electrical and communication terminations and the circuits would be checked and electrical service would be verified. Additionally, if a tracker system is utilized, the motors would be checked, and control logic verified. Once all of the individual systems have been tested, the overall project would be ready for testing under fully integrated conditions.

Electrical Interconnection to Transmission Owner Infrastructure

The proposed modified project would connect to with the existing SCE Rosamond Substation, located approximately 1.25 miles east of the project, via a newly constructed gen-tie that will originate at the project site and terminate at the substation. The gen-tie would be built within the County right of way.

Construction Water Use

The certified EIR generally describes the construction water use for the proposed modified project, although the construction period and overall water needs will differ due to the proposed modified project's smaller size.

Water needed for construction is expected to be trucked from an offsite water purveyor and/or pumped from an onsite well. The proposed modified project construction is estimated to occur over 8 to 10 months. Construction water demands are estimated to be approximately 50 acre-feet (15,000 gallons/day x approximately 300 days = 4,500,000 gallons for dust control and 40,000 gallons/day x 300 days = 12,000,000 gallons for site preparation and miscellaneous construction, a total of 16,500,000 gallons or approximately 50 acre-feet).

Initial construction water usage would be in support of site preparation and grading activities. During earthwork for grading of access road foundations, equipment pads and project components, the main use of water would be for compaction and dust control. Smaller quantities would be required for preparation of the concrete required for foundations and other minor uses. Subsequent to the earthwork activities, water usage would be used for dust suppression and normal construction water requirements that are associated with construction of the building, internal access roads, and solar arrays.

Solid and Nonhazardous Waste

The certified EIR generally describes the solid waste from construction activities for the proposed modified project, although construction activities will differ due to the proposed modified project's smaller size.

The proposed modified project site would produce a small amount of solid waste from construction activities. This may include paper, wood, glass, plastics from packing material, waste lumber, insulation, scrap metal and concrete, empty non-hazardous containers, and vegetation wastes. These wastes would be segregated for recycling. Non-recyclable wastes would be placed in covered dumpsters and removed on a regular basis by a certified waste-handling contractor for disposal at a Class III landfill. Vegetation wastes generated by site clearing and grubbing would be chipped/mulched and spread on site or hauled offsite to an appropriate green waste facility.

Hazardous Materials

The certified EIR generally describes the hazardous materials from construction activities for the proposed modified project, although construction activities will differ due to the proposed modified project's smaller size.

The hazardous materials used for construction would be typical of most construction projects of this type. Materials would include small quantities of gasoline, diesel fuel, oils, lubricants, solvents, detergents, degreasers, paints, ethylene glycol, dust palliative, herbicides, and welding materials/supplies. A hazardous materials business plan would be provided to the Kern County Public Health Services Department, Environmental Health Services Division/Hazardous Materials Section. The hazardous materials business plan would include a complete list of all materials used onsite and information regarding how the materials would be transported and in what form they would be used. This information would be recorded to maintain safety and prevent possible environmental contamination or worker exposure. During project construction, safety data sheets for all applicable materials present at the site would be made readily available to onsite personnel.

Hazardous Waste

The certified EIR generally describes the hazardous waste from construction activities for the proposed modified project, although construction activities will differ due to the proposed modified project's smaller size.

The proposed modified project site would produce a small amount of hazardous waste from construction activities. These wastes may include waste paint, spent construction solvents, waste cleaners, waste oil, oily rags, waste batteries, and spent welding materials. Workers would be trained to properly identify and handle all hazardous materials. Hazardous waste would be either recycled or disposed of at a permitted and licensed treatment and/or disposal facility. All hazardous waste shipped offsite for recycling or disposal would be

transported by a licensed and permitted hazardous waste hauler and disposed of at an approved location.

2.2.3 - OPERATIONS AND MAINTENANCE

Operation and Maintenance Activities

The certified EIR generally describes the operations and maintenance activities for the proposed modified project.

The modified project would include an on-site O&M building to be unmanned and monitored remotely 24 hours per day, seven days a week.

The PV panel surfaces may be washed seasonally to increase the average optical transmittance of the flat panel surface. Panel washing is expected to take 10 days to complete per wash, up to four times per year or a total of 40 days per year to complete. Additional staff of two to five people would be required during panel washing and are expected to be hired from the local community.

The facility's regular maintenance program would be largely conducted on-site during daytime hours as a safety precaution. Equipment repairs would typically take place in the early morning or evening when the plant is producing the least amount of energy. Key program elements include:

- Responding to plant failures and emergencies in a timely manner;
- Maintaining and managing a pre-qualified group of routine maintenance and repair firms who can address the operational and maintenance needs throughout the life of the facility;
- Creating an optimized cleaning schedule to be more responsive to location and type of installation;
- Maintaining an inventory of spare parts to facilitate timely repairs to maintain plant output;
- Using trouble-ticketing to effectively record, track and escalate all maintenance problems; and
- Conducting on-site maintenance as required to clear weeds, grass and ground cover for ground-mount systems.

Prudent security measures would be taken to ensure the safety of the public and facility. The proposed modified project would be fenced along all borders with locking gates at the specified points of ingress and egress. As proposed, the fence is anticipated to be seven feet in height. Off-site security personnel may be dispatched during nighttime hours or be on-site depending on security risks and operating needs. The modified project site would provide illumination for both normal and emergency conditions. Lighting would be designed to provide the minimum illumination needed to achieve safety and security and would be downward-facing and shielded to focus illumination on the desired areas only.

The modified project site would produce a small amount of waste associated with maintenance activities. PV solar system wastes typically include broken and rusted metal, defective or malfunctioning modules, electrical materials, and empty containers and other miscellaneous solid materials, including typical household refuse generated by workers. Most of these materials would be collected and delivered back to the manufacturer for recycling.

Operations Water Use

Long-term operational water demand is not expected to be more than 2-3 acre-feet per year, primarily to support PV panel washing activities, which is anticipated to occur 2 to 4 times a year, as needed. Water for panel washing is expected to come from a local purveyor or an on-site well.

Solid and Nonhazardous Waste

The proposed modified project site would produce a small amount of waste associated with maintenance activities. PV solar system wastes typically include broken and rusted metal, defective or malfunctioning modules, electrical materials, and empty containers and other miscellaneous solid materials, including typical household refuse generated by workers. These materials would be collected and delivered back to the manufacturer for recycling. Solid waste, if generated during operation, would be subject to the Material Disposal and Solid Waste Management Plan to be prepared for the proposed project. Shipping materials, construction waste, and other general solid wastes would be separated for recycling where possible/available. Remaining trash would be disposed of by a local waste hauler service for disposal at a Class III landfill.

Hazardous Materials

Similar to the approved project, the proposed modified project, amounts of hazardous materials would be minimal. Limited amounts of hazardous materials would be stored or used on the site during operations, which includes diesel fuel, gasoline and motor oil for vehicles, mineral oil to be sealed within the transformers and lead acid-based, and/or lithium-ion batteries for emergency backup. Appropriate spill containment and clean-up kits would be maintained during operation of the project.

Hazardous Waste

The certified EIR generally describes the hazardous waste from operation and maintenance activities for the proposed modified project, although operation and maintenance activities will differ due to the proposed modified project's smaller size.

The proposed modified project would produce a small amount of hazardous waste associated with maintenance activities, which could include defective or malfunctioning modules, electrical materials, unused paint, solvents, cleaners, waste oil, oily rags, and batteries. Workers would be trained to properly identify and handle all hazardous wastes.

Fuels and lubricants used in operations would be subject to the Spill Prevention, Containment, and Countermeasure Plan to be prepared for the proposed project. Hazardous waste would be either recycled or disposed of at a permitted and licensed treatment and/or disposal facility. All hazardous waste shipped offsite for recycling or disposal would be transported by a licensed and permitted hazardous waste hauler and disposed of at an approved location.

2.2.4 - DECOMMISSIONING

The certified EIR describes the decommissioning activities for the proposed modified project.

The modified project proponent expects to sell the renewable energy produced by the product under the terms of a long-term Power Purchase Agreement (PPA) or directly into the wholesale market. The life of the solar facility is anticipated to be up to 35 years; however, the project proponent may, at its discretion, choose to extend the life of the facility, update technology and re-commission, or decommission and remove the system and its components. If and when a decommissioning event occurs, the solar site could then be converted to other uses in accordance with applicable land use regulations in effect at that time.

When the modified project decommissioning occurs, structures would be removed from the site. Above-ground equipment that would be removed would include module posts and support structures, on-site transmission poles that are not shared with third parties and the overhead collection system within the modified project site, inverters, transformers, electrical wiring, equipment on the inverter pads, and related equipment and concrete pads. The substation would be removed if it is owned by the project, however if a public or private utility assumes ownership of the substation, the substation may remain on-site to be used as part of the utility service to supply other applications. Project roads would be restored to their pre-construction condition unless the landowner elects to retain the improved roads for access throughout that landowner's property. The area would be thoroughly cleaned, and all debris removed. As discussed above, most materials would be recycled to the extent feasible, with minimal disposal to occur in landfills in compliance with all applicable laws. A collection and recycling program would be executed in the event system components are manufactured with hazardous materials.

A collection and recycling program would be executed to promote recycling of project components and minimize disposal of project components in landfills. All decommissioning and restoration activities would adhere to the requirements of the appropriate governing authorities and in accordance with all applicable federal, state, and county regulations. The project proponent expects a secondary market for PV modules to develop over time. Although energy output may diminish, PV modules are expected to continue to have a productive life and can be decommissioned from a prime location or re-commissioned in another location.

2.3 - Entitlements Required

The required discretionary approvals needed for the proposed modified project include: Specific Plan Amendments, Zone Change Classifications, and Conditional Use Permits; described as follows:

2.3.1 - SPECIFIC PLAN AMENDMENTS

Land Use

A Specific Plan Amendment to the Land Use Element of the Willow Springs Specific Plan (WSSP) is proposed. The modified project site has existing split land use designations of Map Codes 5.3/4.4 (Residential, Maximum 10 Units, Net Acre/Comprehensive Planning Area) and 7.1 (Light Industrial). The existing land use designations are proposed to change from the Map Code 5.3/4.4 (Residential, Maximum 10 Units, Net Acre/Comprehensive Planning Area) designation to Map Code 5.3 (Residential, Maximum 10 Units, Net Acre) with all physical constraints to remain in place. The proposed Specific Plan Amendments to the Land Use Element of the WSSP are further described in **Table 2-2, *Proposed Specific Plan Amendments***.

**Table 2-2
Proposed Specific Plan Amendments**

Assessor's Parcel	Existing Map Code	Proposed Map Code	Acreage (approximate)
374-011-06	5.3/4.4 7.1	5.3 7.1	79.09
374-011-39	5.3/4.4 7.1	5.3 7.1	79.31
Total Acreage (approximate)			158.4

Circulation

The project proponent is also requesting amendments to the Circulation Element of the Willow Springs Specific Plan (WSSP) to eliminate future road reservation along the North and South midsection line of Section 21, Township 9 North, Range 13 West, SBB&M, within the proposed modified project site, increasing the siting potential of the solar panels, as setback requirements from road reservations would no longer be required (**Figure 2-6, *Proposed Amendment to the Circulation Element***).

2.3.2 - ZONE CHANGE

Zone changes are proposed for the proposed modified project to allow for the construction and operation of a utility scale solar facilities. The proposed modified project site is currently within the OS (Open Space) zone district and E 2½ RS FPS (Estate - 2½ acres - Residential Suburban Combining, Floodplain Secondary Combining) zone district, neither of which allow the development of solar facilities. Zone changes are proposed to change all the existing OS and E 2½ RS zones to A zones; the FPS combining zone district will remain in place. The proposed zone changes are further described in **Table 2-3, Proposed Zone Changes**.

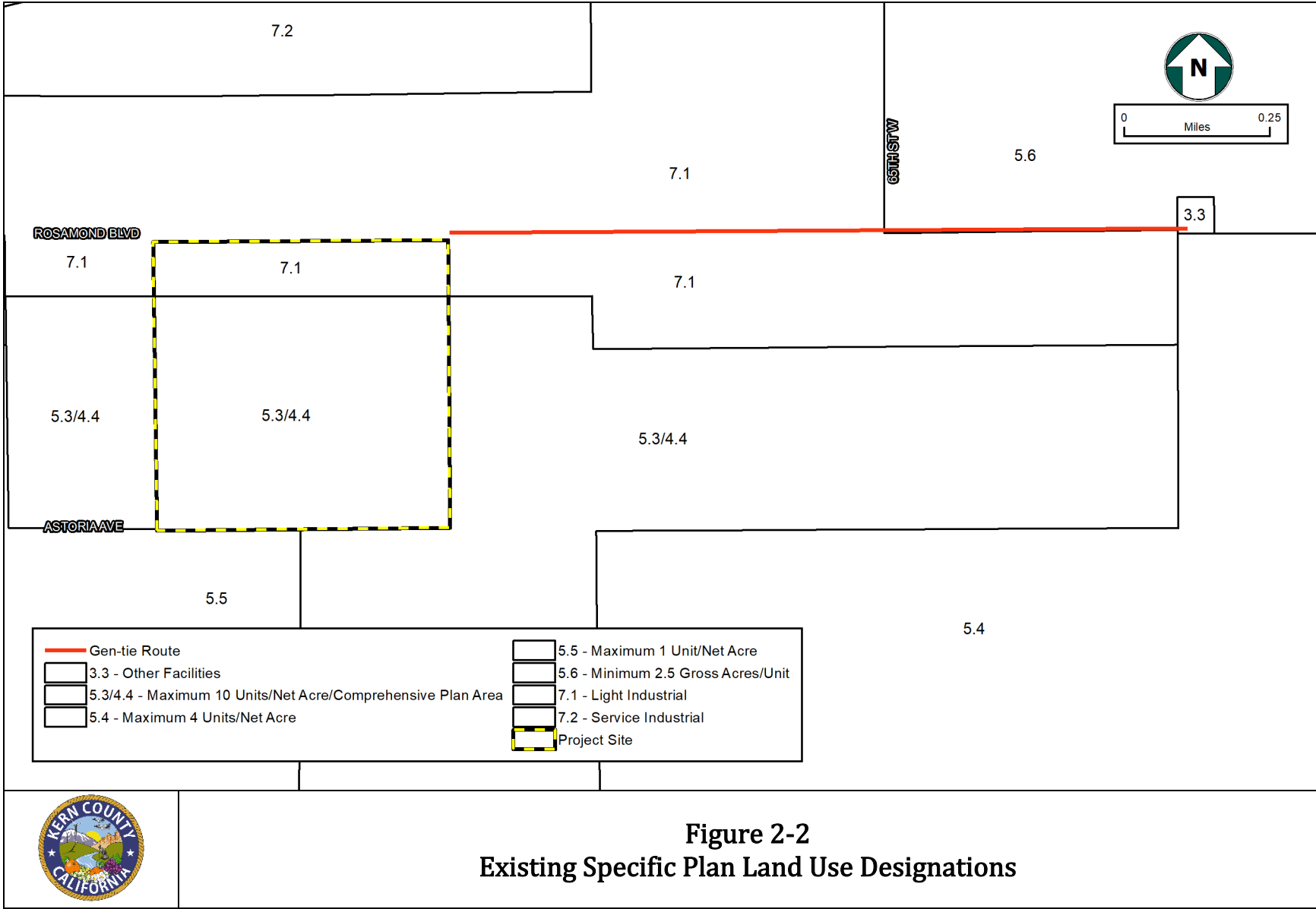
**Table 2-3
Proposed Zone Changes**

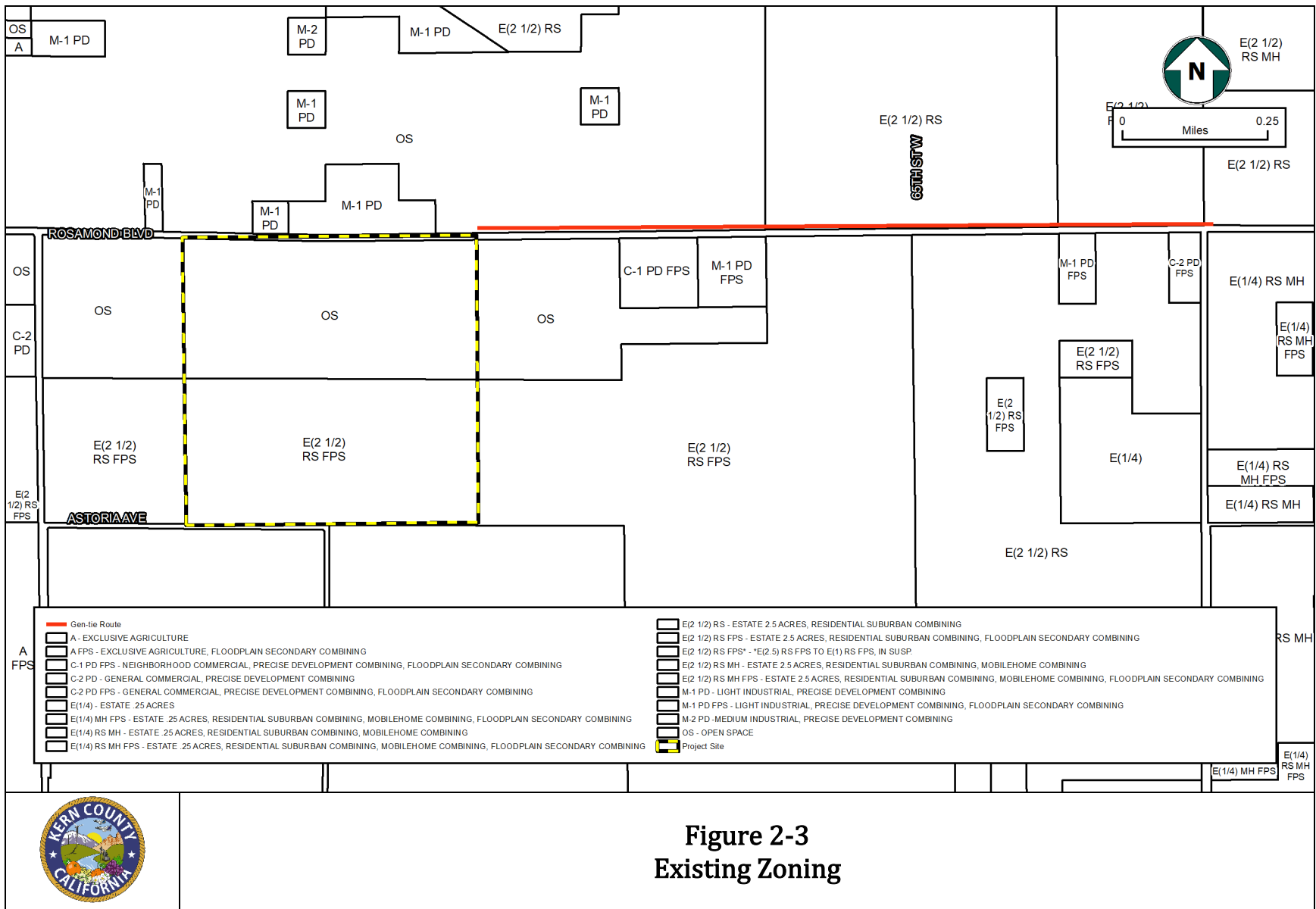
Assessor's Parcel	Existing Zone	Proposed Zone	Acreage
374-011-06	OS E 2 ½ RS FPS	A FPS	79.09
374-011-39	OS E 2 ½ RS FPS	A FPS	79.31
Total Acreage Subject to Zone Change			158.4

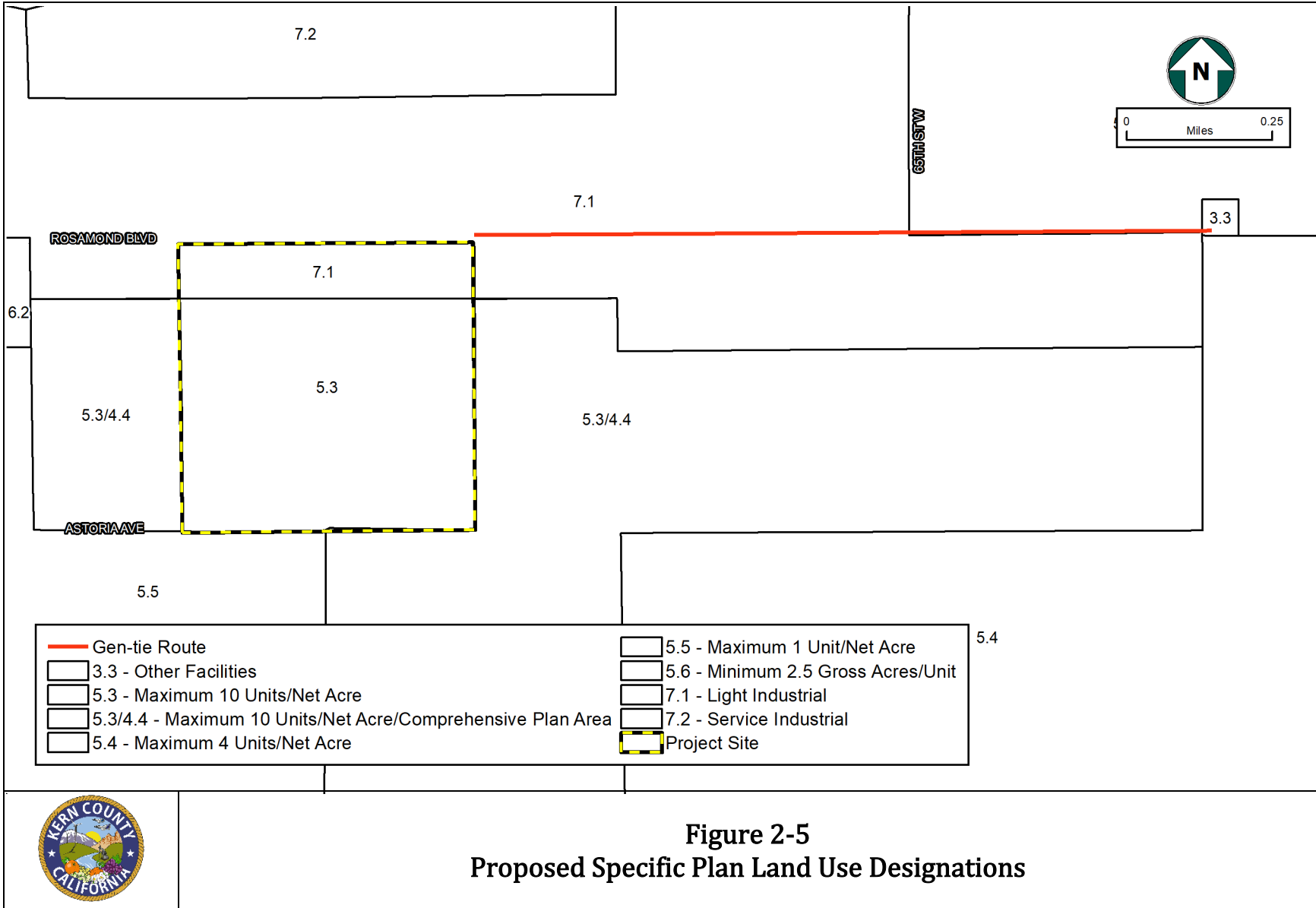
Also see **Figure 2-2, Existing Specific Plan Land Use Designations**; **Figure 2-3, Existing Zoning**; **Figure 2-4, Proposed Zoning** and **Figure 2-5, Proposed Specific Plan Designations**.

2.3.3 - CONDITIONAL USE PERMIT

Conditional Use Permits (CUP) are being proposed for the proposed modified project to allow for the construction and operation of a 30 MW PV solar facility and associated infrastructure, including approximately 30 MW of energy storage, in the A (Exclusive Agriculture) zone district pursuant to Chapter 19.12.030.G of the Kern County Zoning Ordinance. Additionally, a separate CUP would be required to allow for a communication tower in the A zone district pursuant to Chapter 19.12.030.F of the Kern County Zoning Ordinance.







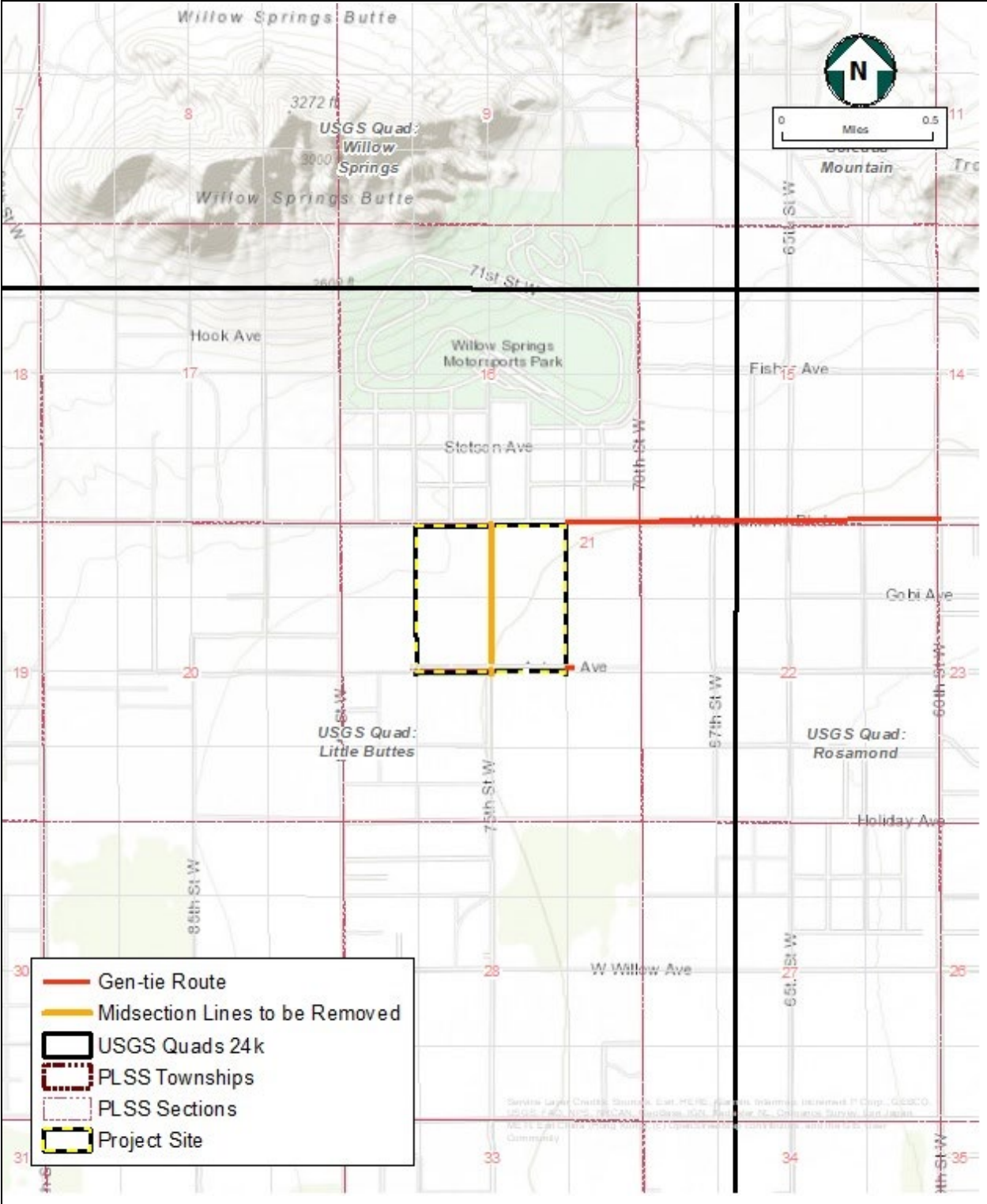


Figure 2-6
Proposed Amendment to the Circulation Element

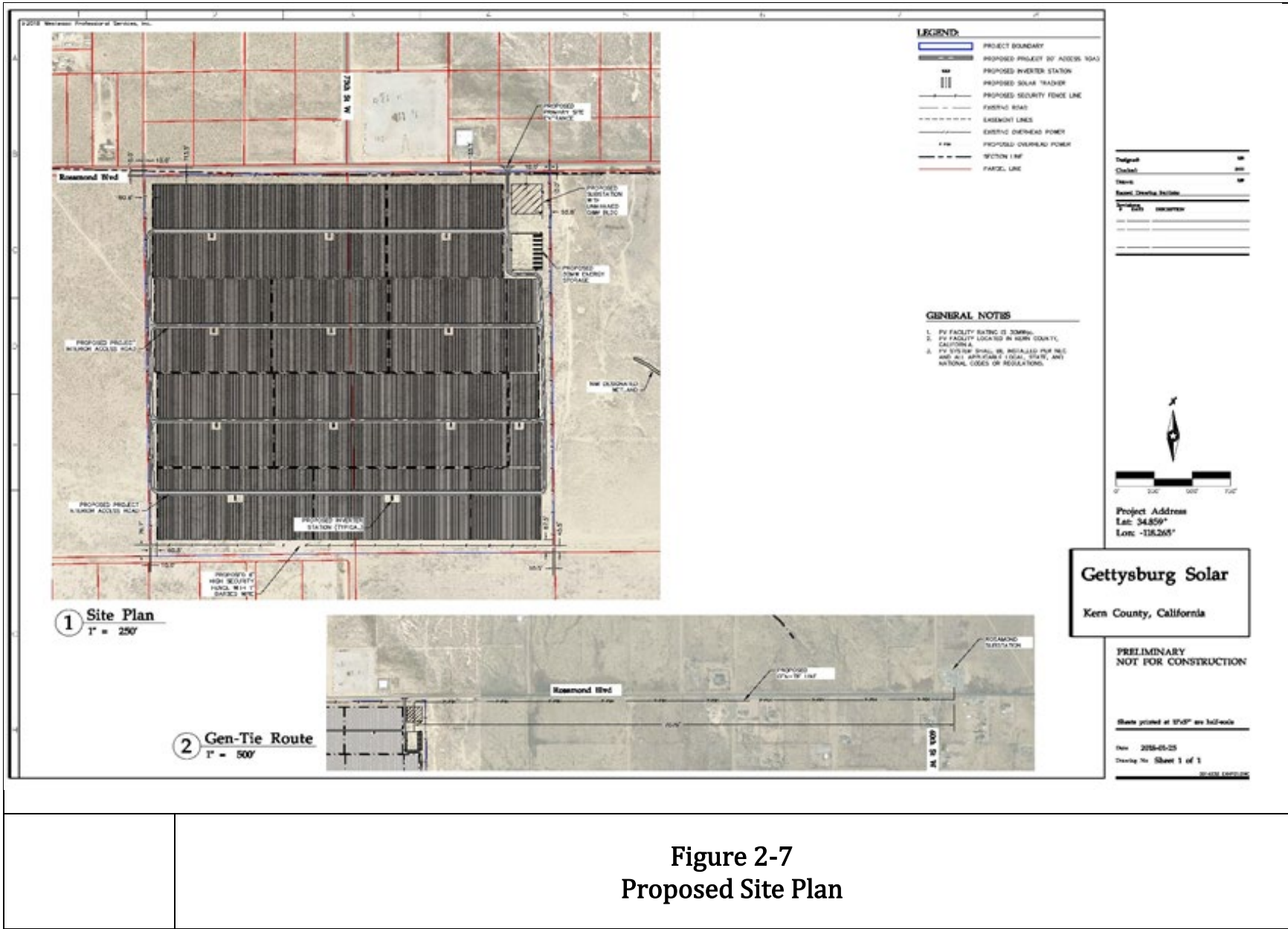


Figure 2-7
Proposed Site Plan

CHAPTER 3 - ENVIRONMENTAL ANALYSIS

This Addendum evaluates the potential for the proposed modified project to result in new or substantially more severe significant impacts compared to the impacts disclosed in the certified EIR. The environmental analysis provided in this section describes the information that was considered in evaluating the questions contained in the Kern County California Environmental Quality Act (CEQA) Checklist. The information used in this evaluation includes the certified EIR, the proposed modified project description, new technical studies, literature reviews, and field reconnaissance.

The proposed modified project would incorporate and implement all mitigation measures identified in the certified AV Apollo Solar Project EIR, with revisions as noted for applicability to the proposed modified project. Specific mitigation measures relevant to a particular impact of the proposed modified project are cited in the same manner as in the EIR and the associated Mitigation Monitoring and Reporting Program (MMRP) adopted in conjunction with the AV Apollo Solar Project approvals.

3.1 - Aesthetics

This section evaluates whether the impacts of the proposed modified project to aesthetics require a subsequent EIR pursuant to CEQA Guidelines Section 15162.

The lead agency determined that the approved project would not result in significant impacts to some of these environmental issue areas; this issue area was scoped out of the certified EIR. It was determined that the project would not:

- (b) Substantially damage scenic resources, including, but not limited to, tress, rock outcroppings, and historic buildings within a State scenic highway.*

The proposed modified project site, according to the Caltrans California Scenic Highway Mapping System, the closest Eligible State Scenic Highway is the portion of SR north of SR 58, which is approximately 7.3 miles northeast of the project. Thus, no impacts to scenic resources within a scenic highway would occur. No further analysis is warranted.

3.1.1 - SETTING

The visual setting of the proposed modified project and its surrounding area is substantially the same as that of the approved project site. The land surrounding the proposed modified project is mostly undeveloped land or scattered residential development and renewable energy projects (solar and wind), industrial development, and the Willow Springs International Raceway is located to the north. Power collection lines are visible along some roads adjacent to the site. Lands in the vicinity of the proposed modified project area are the same as those described in the certified EIR. There are new scenic views or historic buildings on or near the project.

The Antelope Valley region has recently experienced significant growth of man-made features, particularly solar arrays and power lines. In the vicinity, there are several solar projects currently under construction or that have been completed. The closest solar projects are the RE Rosamond Two solar project and the Willow Springs Solar Array. The RE Rosamond Two solar site is approximately 2.5 miles north of the proposed project site and the Willow Springs Solar Array site is approximately 3.5 miles west and southwest of the proposed modified project.

3.1.2 - IMPACT ANALYSIS

Project Impacts

This section evaluates the potential for the proposed modified project to result in new or substantially more adverse significant impacts to aesthetics in relation to the following questions as stated in the Kern County CEQA Checklist:

- (a) Have a substantially adverse effect on a scenic vista?*

The certified EIR established that there are no local areas designated as a scenic vista within the vicinity of the approved project. However, the approved project site is located approximately 7.9 miles southeast of the Pacific Crest Trail (PCT), which is designated as a National Scenic Trail by the U.S. Forest Service. The PCT is a public recreational facility recognized as offering views that can be considered scenic. However, given the 7.9-mile distance, views of the approved project site are likely non-existent and if there is a view, it would not be a predominant subject of views from the PCT. Therefore, the approved project does not have a substantial effect on a scenic vista and impacts would be less than significant.

The proposed modified project site is approximately 6.5 miles south of the approved project, and approximately 13.4 miles from the PCT. The approved project is even more distant and unlikely to be viewed from the PCT, and as noted above, there are no other designated scenic vistas identified in the vicinity of the modified project. Therefore, the modification as described would not result in additional aesthetic impacts to a scenic vista or view than what was analyzed in the certified EIR, and do not change the finding in the certified EIR that the aesthetic impact related to scenic vistas is less than significant. Based on the foregoing, no new or revised mitigation measures are required.

With respect to the above-described aesthetic impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described aesthetic impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such aesthetic impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified Final EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified Final EIR of *less than significant*.

- (c) *Substantially degrade the existing visual character or quality of public views of the site and its surroundings?*

The certified EIR considered construction of the solar facilities, new gen-tie routes and other project-related infrastructure as part of the approved project. The certified EIR established that during temporary construction activities, impacts to the visual character of the area would be less than significant.

However, once operational, the approved project would result in the substantial degradation of the existing visual character or quality of the site and its surroundings. The certified EIR imposed Mitigation Measures MM 4.1-1 and MM 4.1-2 to help reduce the visual impacts. Mitigation Measures MM 4.1-1 would be incorporated to reduce visual impacts by regular debris clearing to avoid visual impacts from debris collection. Mitigation Measure MM 4.1-2 would require the revegetation of disturbed areas following construction decommissioning, which would help reduce potentially significant aesthetic impacts related to vegetation. However, it was determined that there are no feasible mitigation measures that can be implemented to preserve the existing open space landscape character at the project site while at the same time developing a solar energy facility. Therefore, impacts to visual character as a result of the approved project would remain significant and unavoidable despite implementation of these mitigation measures.

The proposed modified project would result in similar visual impacts to the existing character of the surrounding area. In order to determine whether the proposed modified project would substantially degrade the existing visual quality of the site, a visual simulation was prepared comparing the existing visual setting with simulated portrayals of the post-project visual conditions.

Figure 3.1-1 shows the location of KOP-1. This viewpoint looks southeast from what would be the closest sensitive receptor, an abandoned structure located just northwest of the proposed modified project site, across Rosamond Boulevard. **Figure 3.1-2** shows the existing (pre-development) view from KOP-1 toward the project site. The area is largely flat and has low-lying desert scrub vegetation and mountains are visible in the background. The post-development view from KOP-1 shows that solar arrays would appear as a dark blue/grey horizontal band with silver elements in the middle ground. The solar arrays will be set back from the roadway and surrounded by a chain link fence. The solar arrays would appear large and take up more visual space on the south side of Rosamond Boulevard. This increases discordance in the existing expanse of vegetation and would contribute to a substantial reduction of vegetation visibility, disharmony in the view's colors, and clearly visible and additional cultural modifications. The proposed modified project would be subject to Mitigation Measures MM4.1-1 and MM 4.1-2. However, as with the approved project, visual impacts as a result of the proposed modified project would be potentially significant.

Mitigation Measure MM 4.1-6 will be required as a standard measure imposed when solar projects abut residentially zoned properties. The certified EIR for the approved project did not include this measure. The addition of Mitigation Measure MM 4.1-6 to install fencing with slats or similar view-screening materials along areas adjacent to parcels with an established residence or zoned for residential use is not considered new information, it merely imposes standard mitigation intended to reduce visual impacts of the proposed modified project. However, the addition of this measure would not change the finding in the

certified EIR of a significant and unavoidable impact related to the visual character of the site.

For these reasons, the proposed project modification would be similar to those of the approved project and would not result in a new or substantial increase in the severity of the impacts to visual character or quality of the site and its surroundings than was previously disclosed in the certified EIR. The proposed project modification would not result in additional impacts substantially greater than analyzed in the certified EIR and does not change the finding in the certified EIR of significant and unavoidable.

MITIGATION MEASURES

MM 4.1-6 (New): The project proponent/operator shall install metal fence slats or similar view-screening materials as approved by the Kern County Planning and Natural Resources Department in all on-site perimeter fencing adjacent to parcels with an established residence or zoned for residential use (E [Estate Residential], R-1 [Low-Density Residential], R-2 [Medium-Density Residential], R-3 [High-Density Residential] or PL (Platted Lands) zoning), unless the adjacent property is owned by the project proponent/operator (to be verified by the Kern County Planning and Natural Resources Department) or a public or private agency that has submitted correspondence to the Planning and Natural Resources Department requesting this requirement be waived. Should the project proponent/operator sell the adjacent property, slat fencing or similar view-screening materials shall be installed prior to the sale.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified Final EIR of *significant and unavoidable*.

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

Light

Construction of the approved project would generally occur during daytime hours between 7:00 a.m. and 6:00 p.m. and would go no later than 6 p.m. in order to meet the construction schedule. All lighting would be directed downward and shielded to focus illumination on the desired work areas only, and to prevent light spillage onto adjacent properties. During construction, dusk-to-dawn security lighting would be required. Lighting is not planned for typical construction activities because construction activities would occur primarily during daylight. Per Mitigation Measure MM 4.1-4, any nighttime construction would use lighting designed to provide the minimum illumination needed, thereby minimizing adverse impacts on any nearby residents. As a result, construction of the approved project would result in less-than-significant impacts to nighttime views.

Once operational, all lighting at the approved solar facility would also conform to applicable Kern County Dark Sky Ordinance requirements. Lighting would be used from dusk to dawn once the facilities are operational. Restrictions on light fixture height are also imposed by the ordinance. If improperly designed or oriented, such lighting may result in light trespass that falls outside the boundaries of the site. Under particularly adverse conditions, spillover lighting causes annoyance, discomfort, or loss in visual performance because of its intensity, direction, or source type and visibility. To avoid such impacts, the approved project would be required to implement Mitigation Measure MM 4.1-3, which requires compliance with the Dark Sky Ordinance and for all lighting to be directed downwards and shielded.

Similar to the approved project, the proposed modified project would be built during daylight hours and comply with all with development standards, the Kern County Zoning Ordinance Chapter 19.81 (Outdoor Lighting “Dark Skies Ordinance”), as well as the goals, policies, and implementation measures of the Kern County General Plan, as well as Mitigation Measures MM 4.1-3 and MM 4.1-4.

Glare

Most of the construction activities related to the approved project are planned to occur during daylight hours. Increased truck traffic and the transport of the solar arrays and construction materials to the site and transmission lines would temporarily increase glare conditions during construction. However, this increase in glare would be minimal and temporary.

Once operational, the approved solar facility may produce glare, but it is not expected to cause extreme visual discomfort or impairment of vision for residents because the panels are designed to absorb as much sunlight as possible and, therefore, would have minimal reflectivity. Similarly, and also due to their low reflectivity, the panels would not be expected to cause visual impairment for motorists on area roadways. To further reduce glare potential, the approved project would be required to implement Mitigation Measures MM 4.1-4 and MM 4.1-5, which require the use of nonreflective and non-glare materials when feasible. With implementation of these mitigation measures, impacts would be less than significant.

The proposed modified project would be designed and use similar equipment and materials that is not expected to create glare. The modified project would also implement Mitigation Measures MM 4. 1-4 and MM 4.1-5 to further reduce glare impacts to passing motorists.

The certified EIR determined that, with the implementation of Mitigation Measures MM 4.1-5 through MM 4.1-5 and compliance with development standards, the Kern County Zoning Ordinance, as well as the goals, policies, and implementation measures of the Kern County General Plan, would reduce the potential for spillover lighting to adversely affect residents, motorists, recreationists, and workers as a result of the approved project to a less-than-significant level. These measures to be implemented by the modified project to use only the minimum illumination required, mandating the use of non-reflective building materials

where appropriate, and requiring the use of solar panels and hardware that minimize glare and spectral highlighting to the extent feasible.

The proposed project modifications as described, would not result in additional aesthetic impacts to what was analyzed in the certified EIR, and do not change the finding in the certified EIR that the aesthetic impacts related to light, and glare are less than significant. Based on the foregoing, no new or revised mitigation measures are required.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

The certified EIR concluded that the impacts of the approved project would combine with impacts of past, present, and reasonably foreseeable projects to create a substantial adverse effect on the aesthetics of the approved project site and its surroundings and therefore, would contribute to significant and unavoidable cumulative impacts. The cumulative projects analyzed in the certified in EIR, remain the same.

The proposed modified project would not result in any new or substantially more adverse cumulative impacts to aesthetics and visual resources than those disclosed in the certified EIR and would be mitigated to the maximum extent practicable by the incorporation of all feasible and applicable mitigation measures. However, even with the implementation of Mitigation Measures MM 4.1-1 through MM 4.1-6, the impacts of the proposed modified project would be considered significant and unavoidable because it has been determined in the certified EIR that the approved project results in a significant and unavoidable cumulative aesthetic impact.

The existing visual characteristics of the nearby vicinity to the proposed modified project already includes an industrial view, as there is an existing industrial development and a racetrack directly to the north, as well as existing electrical transmission poles and wires. In the vicinity, there are several solar projects currently under construction or that have been completed. The closest solar projects are the RE Rosamond Two solar project and the Willow Springs Solar Array. The RE Rosamond Two solar site is approximately 2.5 miles north of the proposed project site and the Willow Springs Solar Array site is approximately 3.5 miles west and southwest of the proposed modified project. These have already created impacts on the sense of open areas generally associated with the California desert area as well as removing iconic types of vegetation, such as Joshua Trees, that attract people to locate in desert communities and is contrary to various goals of the County to promote tourism in the desert

area. The size and scope of already existing development of over 30,000 acres of solar projects are increased by the proposed modified project, however, aesthetic impacts associated with the modified project would not result in substantially increased impacts beyond what was previously analyzed, and the cumulative aesthetic impacts associated would remain significant and unavoidable at the cumulative level.

The proposed project modification would not generate substantially more adverse cumulative impacts to aesthetics and visual resources than those disclosed in the certified EIR and would be mitigated to the maximum extent practicable by the incorporation of all feasible and applicable mitigation measures.

MITIGATION MEASURES

New Mitigation Measures MM 4.1-6 is required and no revised mitigation measures are required beyond those included in the previously certified Final EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *significant and unavoidable*.





Existing View



Proposed View



Figure 3.1-2
Existing and Simulated Views of Modified Project Site

3.2 - Agriculture and Forestry Resources

This section evaluates whether the impacts of the proposed modified project to agricultural and forest resources require a subsequent EIR pursuant to CEQA Guidelines Section 15162.

The proposed modified project site does not contain designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; therefore, the project would not result in the conversion of designated Farmland to nonagricultural uses. The project site is not zoned for forest land or timberland and does not contain forest land; therefore, the modified project would not result in the loss of forest land or conversion of forest land to non-forest uses. Further, the modified project would not result in the cancellation of an open space contract made pursuant to the California Land Conservation Act of 1965 or Farmland Security Zone Contract for any parcel of 100 or more acres (Public Resources Code Section 15206(b)(3)). No further analysis is warranted.

3.2.1 - SETTING

The certified EIR analyzed the environmental and regulatory setting with respect to agriculture and forest resources. The certified EIR and the proposed modified project are located in the Antelope Valley in south central portion of Kern County. Although many areas in the area are zoned for agricultural uses, land uses in the region consist of primarily undeveloped native desert vegetation interspersed with scattered residences and renewable energy projects (solar and wind).

Both the approved project site and the proposed modified project site are undeveloped and dominated by native desert vegetation and are traversed by dirt roads. Topography across the project sites is relatively flat as the site is located on the bajada of the Tehachapi Mountains, which consists of overlapping alluvial fans with southern trending slopes.

3.2.2 - IMPACT ANALYSIS

Project Impacts

The certified EIR for the approved project conducted evaluations of the following questions stated in the CEQA Guidelines Appendix G Checklist:

Would the project:

- (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 nonagricultural use?*

The proposed modified project is not within land designated under the FMMP as Prime Farmland, Unique Farmland or Farmland of Statewide Importance. The California Department of Conservation (CDC) FMMP, designates the project site as nonagricultural and natural vegetation. Surrounding properties are designated as either: (a) vacant or disturbed,

(b) rural residential, or (c) nonagricultural and natural vegetation (California Department of Conservation, 2018a). As such, the proposed modified project is not considered to be prime, unique, or important farmland. The proposed modified project modifications as proposed, would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and will not change the finding in the certified EIR of less than significant.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above described agricultural and forest resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such agricultural and forest resource impact evaluation has been identified. Therefore, with respect to this criterion, the proposed modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the proposed modified project would not increase the severity of a significant impact as previously identified and analyzed in the Certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE

The proposed modifications to the project do not change the findings in the certified Final EIR of *less than significant*.

(b) Conflict with existing zoning for agricultural use or a Williamson Act Contract?

The proposed modified project site is not zoned for agricultural use, nor is it under a Williamson Act Contract. None of the adjacent properties are zoned for agricultural uses and therefore, there would be no impact resulting from a conflict with agricultural uses or a Williamson Act land use contract. The certified EIR included Mitigation Measure MM 4.2-1 which requires the posting of a note on site plans stating the County's support for nonresidential operations within the County (including agriculture, oil, mining, manufacturing, and other nonresidential operations), noticing potential purchasers near such uses that they may be subject to inconveniences or discomforts arising from such operations to the extent allowed by law, and informing those purchasers that their legal rights are not waived.

The proposed modified project as described does not change the finding in the certified EIR of less than significant. The modified project and the surrounding parcels are not zoned for agricultural uses and there would be no impacts to agriculture. However, the proposed

modified project will comply with Mitigation Measure MM 4.2-1 and impacts would be less than significant.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above described agricultural and forest resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such agricultural and forest resource impact evaluation has been identified. Therefore, with respect to this criterion the proposed modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the findings in the certified Final EIR of *less than significant*.

- (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])?*

The proposed modified project site is not zoned for forest land or timberland and does not contain forest land. Furthermore, the proposed discretionary actions are consistent with the Kern County Zoning Ordinance regulations for solar uses and would not result in the rezoning of forest land or timberland. Therefore, the proposed modified project as described does not change the findings in the certified EIR of less-than-significant impact. With the approval of the proposed Zone Changes and CUPs the proposed modified project would be consistent and would not result in the rezoning of forest land or timberland.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above described agricultural and forest resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of

reasonable diligence at the time the previous EIR was certified, relevant to such agricultural and forest resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the Certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the Certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the findings in the certified Final EIR of *less than significant*.

(d) Result in the loss of forest land or conversion of forest land to non-forest use?

The Certified EIR confirmed that the approved project site is not identified as forest or timberland nor is it in the vicinity of any forests or timberlands. There is no change in these circumstances, as the proposed modified project site is not identified as forest or timberlands nor is it in the vicinity of any forests or timberlands. The proposed modified project modifications as described do not change the finding in the certified EIR of a less-than-significant impact.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above described agricultural and forest resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such agricultural and forest resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the Certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the Certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE

The proposed modifications to the project do not change the findings in the certified Final EIR of *less than significant*.

- (e) *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?*

The certified EIR confirmed that the approved project site consists of undeveloped land dominated by native desert vegetation. Although the approved project site is currently zoned for agricultural uses, the site is not currently and has never been used for agriculture. Therefore, the conversion of the undeveloped project site to a solar facility would not result in the conversion of farmland to a nonagricultural use nor the conversion of forest land to non-forest use and would have no impact of the conversion of farmland or forest land to another use. The proposed modified project site is not zoned for agriculture nor has it been under active crop cultivation. Therefore, the proposed modified project does not change the finding in the certified EIR of a less-than-significant impact.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the proposed modified project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above described agricultural and forest resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such agricultural and forest resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE

The proposed modifications to the project do not change the findings in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

The certified EIR concluded that although the approved project would develop a solar facility on land zoned for agricultural uses, it would not result in the loss of farmland as the project site does not and has never contained agricultural uses. Further, the development of solar power generating facilities on the project site is not anticipated to affect the potential for agricultural production to occur in adjacent or more distant areas within the Antelope Valley. It was determined that the approved project would not contribute to cumulative impacts related to agriculture in Kern County.

Similarly, the impacts of the proposed modified project will not combine with impacts of past, present, and reasonably foreseeable projects to create a substantial adverse effect on agriculture and forest resources and would, therefore, cumulative impacts would be cumulatively less than significant.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE

The proposed modifications to the project do not change the findings in the certified EIR of cumulatively ***less than significant***.

3.3 - Air Quality

This section evaluates whether the impacts of the proposed modified project to air quality resources require a subsequent EIR pursuant to CEQA Guidelines Section 15162. Information in this section is based primarily on the Air Quality Impact Analysis prepared for the modified project (Trinity Consultants, 2020) located in Appendix B of this EIR addendum and incorporated by reference herein. The analysis was prepared in accordance with the Eastern Kern Air Pollution Control District's (EKAPCD) Rule 210.1 New and Modified Stationary Source Review (NSR), Guidelines for Implementation of the California Environmental Quality Act (CEQA) and Kern County Planning Department's Guidelines for Preparing an Air Quality Assessment for Use in Environmental Impact Reports documents.

The lead agency determined in the certified EIR that the following environmental issue area would result in less-than-significant impacts and was, therefore, scoped out of requiring further review in the certified EIR:

- (d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

As discussed in the certified EIR, the approved project would not have any stationary sources or equipment located onsite that would generate objectionable odors. During construction activities, only short-term, temporary odors from vehicle exhaust and construction equipment engines would occur. However, these odors would not affect a substantial number of people because the site is located in sparsely inhabited areas, and any odors would be temporary and would be dispersed rapidly. The proposed modified project would exhibit comparable characteristics related to odors, and no additional analysis is warranted.

3.3.1 - SETTING

The environmental setting for air quality is the same as described in the certified EIR. The proposed modified project is located in the Mojave Desert Air Basin and is governed by the regulations of the U.S. Environmental Protection Agency (USEPA), California Air Resources Board (CARB), and Eastern Kern Air Pollution Control District (EKAPCD).

The regulatory framework pertaining to air quality (including federal, State, and local regulations) has not changed since the preparation of the certified EIR. The USEPA, CARB, and EKAPCD classify an area as attainment, unclassified, or nonattainment depending on whether or not the monitored ambient air quality data shows compliance, insufficient data available, or noncompliance with the ambient air quality standards, respectively. Federal and California air quality standards relevant to the proposed modified project include the following criteria pollutants: ozone, fine particulate matter with an aerodynamic diameter of 10 microns in size or less (PM₁₀), fine particulate matter with an aerodynamic diameter of 2.5 microns in size or less (PM_{2.5}), carbon monoxide (CO), nitrogen dioxide (NO₂), and sulfur dioxide (SO₂). These standards, along with regional thresholds of significance, are regulated and enforced by EKAPCD in the proposed modified project area. The EKAPCD is currently classified as:

- Moderate non-attainment for the one-hour state O₃ standard,
- Non-attainment for the federal and state eight-hour O₃ standards,
- Non-attainment for the state 24-hour PM₁₀ standard, and
- In attainment or unclassified for all other ambient air quality standards.

3.3.2 - IMPACT ANALYSIS

Project Impacts

This section evaluates the potential for the proposed modified project to result in new or substantially more adverse significant impacts to air quality in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

(a) *Conflict with or obstruct implementation of the applicable air quality plan?*

The certified EIR concluded that in general, the approved project would not conflict with or obstruct implementation of the applicable air quality plan with implementation of mitigation measures. Construction-period air pollutant emissions were determined to not exceed EKAPCD standards. Operational-period emissions were determined to be consistent with the Air Quality Attainment Plan implemented for the area by the EKAPCD. The 158-acre proposed modified project site is 333.5 acres smaller area to be developed than the approved project site. This will result in less ground disturbance and shorter periods in which emissions are produced during the proposed modified project's construction phase; therefore, the emissions will not exceed the thresholds established by the EKAPCD, as shown in **Table 3.3-1, Short-Term Project Emissions (tons per year)**.

Emissions associated with operation of the 30-mw solar facility as proposed by the project modifications would be similarly less than those associated with operation of the approved 60 mw solar project, as indicated in **Table 3.3-2, Post-Project Emissions (tons per year)**. The certified EIR applied Mitigation Measures MM 4.3-1 through MM 4.3-8 to further reduce impacts to air quality in the area. These mitigation measures provide various means by which dust generation and emissions from construction vehicles would be reduced. Implementation of these mitigation measures would also be obligatory for the proposed modified project.

Table 3.3-1
Short-Term Modified Project Emissions (tons per year)

	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
<i>2020 Mitigated Emissions</i>						
Total Construction Emissions	0.23	2.26	1.55	0.005	0.38	0.18
EKAPCD Significance Criteria	25	25	NA	27	15	15
Exceed (Yes/No)	NO	NO	NO	NO	NO	NO

Source: (Trinity Consultants, 2020); Appendix B

Table 3.3-2
Post-Modified Project (Operational) Emissions (tons per year)

	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
<i>Mitigated Emissions</i>					
Total Emissions	0.0001	0.0032	0.0011	0.0274	0.0028
<i>SJVAPCD Significance Threshold</i>	25	25	NA	15	15
Exceed (Yes/No)	NO	NO	NO	NO	NO

Similar to the approved project, the proposed modified project is anticipated to operate for 30 to 35 years, after which the land could be converted to other uses in accordance with applicable land use regulations in effect at that time if its CUP is not extended. The modified project will be required to develop a decommissioning plan and financial assurances for review and approval by the Kern County Planning and Natural Resources Department. All decommissioning and restoration activities would adhere to the requirements of the appropriate governing authorities and in accordance with all applicable federal, State, and County regulations.

At such time as the facility is decommissioned, equipment operation and site restoration activities would result in impacts to air quality. Given the fact that much of the construction equipment necessary to construct the modified project would also be required to decommission the site, it is reasonable to assume that decommissioning activities would be similar in nature to activities associated with construction of the modified project. Impacts would be similar, but less than those of construction, because no grading would occur. Therefore, assuming that the total emissions for construction would be utilized for decommissioning, impacts would be less than significant as they would not exceed EKAPCD thresholds.

As noted in the certified EIR, visibility at offsite locations may also be impacted by emissions of airborne PM from short-term construction activities. Federally designated Class I areas are of particular concern. These include many wilderness areas and national parks. In addition, military aircraft use areas within the Upper Mojave Desert region, such as Edwards Air Force Base, Fort Irwin, China Lake Naval Weapons Station and the R-2508 Airspace Complex are also sensitive to reduced visibility from airborne PM. Visibility impact analyses are intended for stationary sources of emissions which are subject to the PSD requirements in 40 CFR Part 60; they are not usually conducted for area sources. 40 CFR Section 52.21 (b)(23)(i) establishes the Significant Emission Rate for PM₁₀ at 15 tons/year. Because the project's PM₁₀ emissions increase are predicted to be less than the PSD threshold levels, an impact at any Class 1 area within 100 kilometers of the project is highly unlikely. Adherence to local rules and regulations would result in less-than-significant impacts regarding fugitive dust and reduced visibility.

The modified project is smaller in size and require less ground disturbance, and therefore generate less fugitive dust. The proposed modifications to the project do not change the

finding in the certified EIR of less than significant. No new or revised mitigation measures are required.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(b) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors). Specifically, if implementation of the project would exceed any of the following adopted thresholds:*

(ii) *Eastern Kern Air Pollution Control District*

Operational and Area Sources:

- *Reactive Organic Gases (ROG)*
25 tons per year.
- *Oxides of nitrogen (NO_x)*
25 tons per year.
- *Particulate Matter (PM₁₀)*
15 tons per year.
- *Stationary Sources - Determined by District Rules:*
25 tons per year.

With respect to determining the significance of the approved project's contribution to regional emissions, Kern County, in its *Guidelines for Preparing an Air Quality Assessment for Use in Environmental Impact Reports* document, projects that produce emissions that exceed the adopted thresholds of the EKAPCD for ROG, NO_x, and PM₁₀ shall be considered significant for a project level and/or cumulatively for impacts to air quality. Thus, based on Kern County's guidance, because the approved project air emissions of ROG, NO_x, and PM₁₀ do not exceed the EKAPCD's thresholds for project specific impacts, then it would not result in a cumulatively considerable net increase of these pollutants for which the project region is in non-attainment under an applicable federal or State ambient air quality standard.

Since the proposed modified project's construction and operational emissions would not exceed the EKAPCD thresholds for ROG, NO_x or PM₁₀ (see **Tables 3.3-1 and 3.3-2**, above), the proposed modified project's contribution to air quality impacts related to construction and operation would not be cumulatively considerable by the incorporation of Mitigation Measures MM 4.3-1 through 4.3-8 of the certified EIR.

As discussed below, an AQIA prepared for the modified project confirms that the construction and operation of the modified project will generate less than the applicable *EKAPCD* emission thresholds for NO_x and all other criteria pollutants (Trinity Consultants, 2020). It is assumed all minor projects (i.e., projects with criteria pollutant emissions below the threshold of significance) emit the same, relatively high amount of criteria pollutants, thereby overestimating actual project health risks for projects whose emissions are well below threshold. The proposed modified project is half the size of the approved project and as shown, is anticipated to emit minimal amounts of any criteria pollutant during construction or operations (see **Tables 3.3-1** and **3.3-2** above, and **Table 3.3-3**, below). Therefore, the modified project is making a reduced contribution to any cumulatively considerable net increase in criteria pollutants.

For these reasons, the proposed modifications to the project would not result in new or substantially more severe significant impacts than those disclosed in the certified EIR and does not result in a change to the EIR's determination that the proposed project would not result in cumulatively considerable net increases of any criteria pollutant for which the region is in nonattainment. Based on the foregoing, no new or revised mitigation measures are required.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *significant and unavoidable*.

(c) Expose sensitive receptors to substantial pollutant concentrations?

The EIR determined that due to the approved project site's rural location, and the lack of any significant air pollutant emissions sensitive receptors would not be exposed to substantial pollutant concentrations. The approved project was analyzed for the potential to expose any sensitive receptors to TACs, criteria pollutants, Valley Fever, or asbestos. Based on the analysis, the approved project was determined to have less-than-significant impacts with implementation of Mitigation Measures MM 4.3-1 through MM 4.3-8, as well as MM 4.3-9 and MM 4.3-10, related specifically to Valley Fever.

The proposed modified project is located in the same rural area and within the same air basin, and the facilities planned for the proposed modified project (solar panels, inverters, combiners, transformers, and gen-tie power lines) are identical in construction process and operating characteristics to those for the approved project. As noted in Section 3.13, *Noise*, the closest sensitive receptor is a residence approximately 323 feet to the northwest. There is one known non-residential receptor within 2 miles of the modified project site, that is the Tropico Middle School located 1.7 miles to the east. The proposed modified project would

result in emissions of Hazardous Air Pollutants (HAPs) and would be located near existing residents; therefore, a Health Risk Assessment was prepared as part of the AQIA (Trinity Consultants, 2020). Results determined the maximum predicted cancer risk for the proposed modified project is 1.59E-07, and the maximum chronic non-cancer hazard index is 6.86E-04. Since the point of maximum impact remained below the significance threshold for cancer and chronic risk, the modified project would not have an adverse effect to any of the surrounding communities. Therefore, the potential health risk attributable to the proposed modified project is determined to be less than significant based on the following conclusions:

- Potential carcinogenic risk from the proposed modified project is below the significance level of one in a million at each of the modeled receptors; and
- The hazard index for the potential chronic non-cancer risk from the proposed modified project is below the significance level of 0.2 at each of the modeled receptors.
- The hazard index for the potential acute non-cancer risk was not calculated since there is no acute risk associated with DPM emissions; therefore, the proposed modified project is considered below the significance level.

Therefore, potential risk to the population attributable to emissions of HAPs from the proposed Project would be less than significant. For these reasons, the proposed modifications to the project do not change the finding in the certified EIR of less than significant. Based on the foregoing, no new or revised mitigation measures are required.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

The certified EIR concluded that the impacts of the approved project will combine with impacts of past, present, and reasonably foreseeable projects to create a substantial adverse effect on air quality during the construction period with respect to ROG, NO_x and PM₁₀ emissions and would, therefore, result in significant and unavoidable cumulative impacts. The construction period for the proposed modified project will be shorter and as is noted in **Table 3.3-3**, the proposed modified project itself would not exceed significance thresholds for ROG, NO_x, PM₁₀, or other pollutants. Because Kern County has determined that the EKAPCD's project-level thresholds are defined, for purposes of determining cumulative effects, as the baseline for "considerable," the proposed modified project would not create substantially more adverse cumulative impacts to air quality than those disclosed in the certified EIR.

**Table 3.3-3
Comparative Analysis Based on MDAB 2020 Inventory**

Emissions Inventory Source	Pollutant (tons/year)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Kern County – 2020 ²	3,577	11,315	19,345	3,139	5,913	2,810
MDAB – 2020 ²	20,842	51,246	71,102	4,709	52,378	14,491
Proposed Project	0.0001	0.0032	0.0001	0.0000	0.0274	0.0028
Proposed Project's % of Kern ¹	0.0000	0.0000	0.0000	0.0000	0.0005	0.0001
Proposed Project's % of MDAB ¹	0.0000	0.0000	0.0000	0.0000	0.0001	0.0000

Source: Appendix B

Notes: 1) Percentages equaling 0.0000 could represent a percent <0.00005.

2) This is the latest inventory available as of June 2020, excluding Natural Sources.

The certified EIR analyzed the generated emissions of ozone and particulate matter from the approved project and confirmed that the construction of the approved project would be cumulatively considerable for ROG, NO_x and PM₁₀. The combined construction emissions from the approved project and other potential related projects located within one mile and six miles from the project site would exceed the EKAPCD's significance threshold for ROG, NO_x, and PM₁₀. The certified EIR found that this impact was significant and unavoidable and that no other feasible or effective measures were available.

The cumulative operational emissions generated by the approved project during the concurrent operation of the related projects within six miles of the project site and the proposed modified project would not exceed EKAPCD threshold levels and impacts would be less than significant. The operational emissions of the proposed modified project are less than that found in the approved project, and therefore would also be less than cumulatively significant.

Based on this analysis, the proposed modifications to the project would not create new or substantially more adverse cumulative impacts to air quality than those disclosed in the certified EIR and would be mitigated to the maximum extent practicable by the incorporation of Mitigation Measures MM 4.3-1 through 4.3-10 of the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *significant and unavoidable during construction*.

3.4 - Biological Resources

This section evaluates whether the impacts of the proposed modified project to biological resources require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section is based on a Biological Analysis Report (BAR) prepared for the proposed modified project, which can be found in Appendix C (Quad Knopf, Inc, 2020a).

3.4.1 - SETTING

The certified EIR discussed regulation that is normally applicable to biological resources, followed by a description of the physical setting of both the site and surrounding lands. The EIR included a comprehensive analysis of special-status and sensitive species, local habitats and vegetation communities, and jurisdictional waters over the approved project site.

Similar to the approved project, the proposed modified project is located on undeveloped land that has been disturbed in the past by off-highway vehicles (OHVs) and illegal trash dumping. The site contains a matrix of native and non-native vegetation. Surrounding parcels exhibit similar conditions or have been completely disturbed through agricultural practices or urban development. Dirt and paved roads run along the edges of the site, which are used by nearby residents for access to their private properties. It is noted that the proposed modified project is somewhat different in characteristics to the approved project. Species such as Mojave ground squirrel and desert tortoise were unlikely to be present on the modified project due to the site being outside their natural range and the lack of suitable habitat. There was no evidence of either of these species on the modified project site during the various biological surveys conducted (Quad Knopf, Inc, 2020a). Any other special status plant and animal species are expected to be as described in the certified EIR, as summarized in **Tables 4.4-1 and 4.4-2**.

The land surrounding the proposed modified project is mostly a mix of native and non-native vegetation, with undeveloped land or scattered residential development. The Tehachapi Willow Springs Raceway is located to the north. The community of Rosamond shares its western border with the eastern end of the proposed modified project, although the majority of its population resides about three miles east of the proposed modified project. OHV use is a common recreational activity in the region and is evident on the proposed modified project site.

In the vicinity, there are several solar projects currently under construction or that have been completed. The closest solar projects are the RE Rosamond Two solar project and the Willow Springs Solar Array. The RE Rosamond Two solar site is approximately 2.5 miles north and the Willow Springs Solar Array site is approximately 3.5 miles west and southwest of the site.

3.4.2 - IMPACT ANALYSIS

Project Impacts

As in the certified EIR analysis, this Addendum evaluates the potential for the proposed project modification to result in new or substantially more severe significant impacts to biological resources in relation to the following questions as stated in the Kern County CEQA Checklist:

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 Wildlife (CDFW) [Now California Department of Fish and Wildlife] or U.S. Fish and Wildlife Service (USFWS)?*

Preparation of the BAR required an evaluation of existing information available from the California Department of Fish & Wildlife (CDFW), U.S. Fish & Wildlife Service (USFWS), California Native Plant Society (CNPS), and various environmental documents prepared for past projects in the region. The entire proposed modified project modification area (158 acres) was analyzed for special-status species by qualified biologists was subject to reconnaissance-level surveys conducted in 2017, 2018 and 2020.

Based on the results of the initial reconnaissance surveys, species-specific surveys were conducted as part of the field investigations within potentially suitable habitats. No sensitive natural communities or natural aquatic habitats would be affected by the proposed modified project. The following discussion of special-status plants and wildlife summarizes the results of the BAR. Please refer to Appendix C for a complete discussion of the methodology and results of the biological surveys.

Special-Status Plants

For this Addendum, reconnaissance-level surveys were conducted across the proposed project modification for the 15 special-status plant species known to occur or with potential to occur within the vicinity of the proposed modified project (see Appendix C for a list of all special status species). The approved project identified 21 special status species known to occur or with potential to occur within the approved site. It should be noted that there are no Joshua trees (*Yucca brevifolia*) found on the modified project site.

The proposed modified project has somewhat different biological and soils characteristics than the approved project. Unlike the approved project, the modified project does not contain Joshua trees, Lemmon's jewelflower and Clokey's cryptantha. No special-status plant species were found to occur on the proposed modified project site or within the survey area, but two special-status plant species have potential to occur within the modified project survey area; the alkali mariposa lily and recurved larkspur. These species are discussed

below and certified EIR Mitigation Measure MM 4.4-1 and MM 4.4-6 have been modified to include these specific sensitive plant species that have the potentially present on the modified project site.

ALKALI MARIPOSA LILY

Alkali mariposa lily was not found to occur on the modified project site or within the survey area and it is unlikely to occur because of the high levels of disturbance that have occurred. Nonetheless, there is a slight possibility that there could be isolated individuals of this species present. If present, direct impacts could include the destruction or injury of individuals of the plant species. Spread of dust during construction could also cause an impact to individuals outside of the modified project footprint but within the modified project survey area. Indirect impacts could occur through the spread of invasive, non-native species, but such species are already prevalent within the modified project footprint. Mitigation Measure MM 4.4-1 requires an appropriate spring plant survey to be conducted and Ecological Sensitive Area fencing be established, if necessary, which when applied to the modified project, would similarly protect the alkali mariposa lily and recurved larkspur. Mitigation Measure MM 4.4-6 requires an Environmental Awareness Training and Education Program to be presented to construction crews. This measure would be modified to include alkali mariposa lily and recurved larkspur. Implementation of revised Mitigation Measure MM 4.4-1, MM 4.4-4, MM 4.4-5, revised MM 4.4-6, MM 4.4-7 and MM 4.4-8 of the certified EIR, impacts to the alkali mariposa lily would be reduced to a less-than-significant level.

RECURVED LARKSPUR

The recurved larkspur was not found to occur on the modified project site or within the survey area and it is unlikely to occur because of the high levels of disturbance that has occurred. Nonetheless, there is a slight possibility that there could be isolated individuals of this species present. If present, direct impacts could include the destruction or injury of individuals of the plant species. Spread of dust during construction could also cause an impact to individuals off the project footprint but within the survey area. Indirect impacts could occur through the spread of invasive, non-native species, but such species are already prevalent within the project footprint. With Implementation of revised Mitigation Measure MM 4.4-1, MM 4.4-4, MM 4.4-5, revised MM 4.4-6, MM 4.4-7 and MM 4.4-8 of the certified EIR, impacts to the recurved larkspur, would be reduced to a less-than-significant level.

The proposed modified project would not result in new or substantially more severe significant environmental impacts compared with the impacts disclosed in the certified EIR related to special-status plants and would not result in a change to the finding in the certified EIR of less-than-significant impacts relative to special-status plants. Mitigation MM 4.4-1 and MM 4.4-6 have been revised to address impacts to the alkali mariposa lily and recurved larkspur.

Special-Status Wildlife

The BAR states that other than desert kit fox, no other special-status species were found to occur on the modified project site or within the survey area during the on-site survey, but 6 special-status wildlife species have potential to occur within the modified project survey area from time to time including the western burrowing owl, Swainson's hawk, Townsend's big-eared bat, loggerhead shrike, American badger and LeConte's thrasher. These species are discussed below. The modified project site contains low quality habitat for these species, and therefore it is unlikely for them to inhabit the site indicating a low potential for nesting and foraging.

WESTERN BURROWING OWL

Unlike the approved project site, there is no evidence that the western burrowing owl is present within the modified project's survey area. There were only a few potential small mammal burrows present on the modified project site, indicating a low potential for nesting and foraging. The Alkali desert scrub and urban habitat types provide some foraging habitat but there is no evidence that those areas are being used by the burrowing owl. Because the species is present in the region year-round it is possible for a transient burrowing owl to occur on-site at any time and it is possible that a burrowing owl burrow could be created onsite or within the survey area. Potential direct impacts to the burrowing owl could include crushing or destroying a burrow with a burrowing owl inside, altering the daily behaviors of individual owls and effect foraging activities or rearing of young caused by noise and vibration from the proposed modified project construction activities. Similar indirect impacts could occur to owls residing near the modified project footprint. Implementation of Mitigation Measures MM 4.4-5, MM 4.4-6, MM 4.4-7, MM 4.4-8, and MM 4.4-10, of the certified EIR, would reduce any impacts to the species to a less-than-significant level.

SWAINSON'S HAWK

The modified project site itself has low quality nesting and foraging habitat, although the larger survey area supports suitable foraging habitat for Swainson's hawk and there are suitable nesting trees in the vicinity. This species may be present on the project at any time as a forager or transient and may breed in the vicinity. Implementation of Mitigation Measures MM 4.4-5, MM 4.4-6, MM 4.4-7, MM 4.4-8, and MM 4.4-12, of the certified EIR, would reduce any impacts to the species to a less-than-significant level.

TOWNSEND'S BIG-EARED BAT

There is no evidence that the Townsend's big-eared bat is present within the modified project survey area because there is no suitable roosting habitat. However, potential foraging habitat exists in the vicinity of the site. Because this species is highly mobile, this species may be present on the site as a transient forager. There is no suitable roosting habitat on the modified site, and therefore direct impacts to individuals are not expected and indirect impacts would not be substantial. No measures are warranted.

LOGGERHEAD SHRIKE

There is no evidence that the loggerhead shrike is present within the modified project survey area. However, the alkali desert scrub habitat could, from time to time, potentially support foraging loggerhead shrikes. Prey abundance for the species is present and potential nesting habitat located outside of the modified project boundaries. Direct impacts could include loss of foraging habitat and interruption of nesting behavior, although the species is not expected to nest on the project site. Implementation of Mitigation Measures MM 4.4-5, MM4.4-6, MM4.4-12, and MM 4.4-13 of the certified EIR, would reduce any impacts to the species to a less-than-significant level.

AMERICAN BADGER

There is no evidence that the American badger is present within the modified project survey area, but potential denning and foraging habitat exists in the vicinity of the BSA. Because this species is highly mobile, it could be present on the site as a transient forager at any time. Direct impacts could include injury or death of individuals, entrapment in trenches or pipes, and loss of foraging and denning habitat. Construction activities could result in crushing or destroying a den with a badger inside. If badgers are present during construction, noise, vibration, and the presence of construction workers could alter normal behaviors and affect reproductive success. Implementation of Mitigation Measures MM 4.4-5, MM 4.4-6, MM 4.4-7, MM 4.4-8, and MM 4.4-11 of the certified EIR, would reduce any impacts to the species to a less-than-significant level.

LECONTE'S THRASHER

There is no evidence that the LeConte's Thrasher is present within the modified project survey area, however the alkali desert scrub habitat occurring on the project site could potentially support foraging loggerhead shrikes. Prey abundance for the species is present within the BSA. Direct impacts could include loss of foraging habitat and interruption of nesting behavior. Implementation of Mitigation Measures MM 4.4-5, MM 4.4-6, MM 4.4-12, and MM 4.4-13 of the certified EIR, would reduce any impacts to the species to a less-than-significant level.

DESERT KIT FOX

There is positive evidence that the desert kit fox can occur within the modified project survey area. The site provides suitable denning and foraging habitat, and this species could be present at any time. Direct impacts resulting in injury, death, or entrapment in trenches or pipes could occur if a fox travels into the construction area. Construction activities could result in crushing or destroying a den with a kit fox inside. Noise, vibration, and the presence of construction workers may alter normal behaviors, which could affect reproductive success. Implementation of Mitigation Measures MM 4.4-5, MM 4.4-6, MM 4.4-7, MM 4.4-8, and MM 4.4-11 of the certified EIR, would reduce any impacts to the species to a less-than-significant level.

NESTING MIGRATORY BIRDS AND RAPTORS

The modified project survey area contains suitable habitat for a wide variety of nesting native bird species. Several bird species were observed on or in the vicinity of the project site. Various species of migratory birds will construct nests in a variety of habitats and structures, and nests may be found in trees or shrubs, in man-made structures, and directly on the ground. Because the project supports several types of habitat suitable for nesting birds, it is likely that migratory birds will nest on the project. There were no suitable nesting sites for raptors present on the project site. Although there were no nests observed on the project site during the survey, project activities adjacent to nesting birds could result in direct impacts to nests from noise and vibration caused by construction activities. Altered behaviors in nesting adults could result from construction activities and increased human presence which could lead to nest failure. Implementation of Mitigation Measures MM 4.4-5, MM 4.4-6, MM 4.4-7, MM 4.4-12, and MM 4.4-13 of the certified EIR, would reduce any impacts to nesting migratory bird and raptor species to a less-than-significant level.

WINTERING MIGRATORY BIRDS AND RAPTORS

The modified project survey area contains suitable foraging habitat for a wide variety of wintering migratory birds and raptors. Because the project site could provide foraging opportunities for these species it is likely that these migratory birds and raptors may be present from time to time as transient foragers during the winter migratory period. Project activities could result in direct impacts in foraging behavior from noise and vibration caused by construction activities. Implementation of Mitigation Measures MM 4.4-5, MM 4.4-6, MM 4.4-7, MM 4.4-12, and MM 4.4-13 of the certified EIR, would reduce any impacts to wintering migratory bird and raptor species to a less-than-significant level.

As discussed above, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. Because there are no Joshua trees found on the modified project site, impacts to biological resources would be considered less than those on the approved project.

The minor revisions as shown below in underline/~~strikeout~~ to revised Mitigation Measure MM 4.4-1 and MM 4.4-6 do not reflect new information or substantial changes with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described biological resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such biological resource impact evaluation has been identified. Therefore, with respect to this criterion, the proposed modified project would not result in any new impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

MM 4.4-1 (revised): On the ~~Sunbow and Syracuse Project~~ sites, Ecological Sensitive Area fencing shall be established around Lemmon's jewelflower, ~~and~~ Clokey's cryptantha alkali mariposa lily and recurved larkspur plants, if they occur, to ensure that they are not destroyed during project activities. Prior to establishing fencing, an appropriate spring season survey shall be conducted to map the current extent for these species. If project activities cannot avoid those areas, the project proponent/operator shall coordinate mitigation efforts with California Department of Fish and Wildlife and Kern County. The project proponent/operator shall salvage topsoil and relocation of seed bank within a 50-foot radius of any plants destroyed during project activities and reestablish the topsoil and seed bank in an undisturbed portion of the site and notify California Department of Fish and Wildlife within 10 days prior to collecting seed from any Lemmon's jewelflower, ~~and~~ Clokey's cryptantha alkali mariposa lily and recurved larkspur plants that would be destroyed. Seed shall be collected at the end of the annual growing season. All final correspondence and confirmation with California Department of Fish and Wildlife shall be submitted to Kern County Planning and Natural Resources Department.

MM 4.4-6 (revised): Prior to the issuance of grading or building permits, and for the duration of construction activities, and within a minimum of one-week initial ground disturbance, all construction workers shall attend an Environmental Awareness Training and Education Program that will be presented by an authorized biologist. Any personnel associated with construction that did not attend the initial training shall be trained by the authorized biologist prior to working on the project site. Any employee responsible for the operations and maintenance or decommissioning of the project facilities shall also attend the Worker Environmental Awareness Training and Education Program prior to starting work on the project and on an annual basis. The Program shall be developed and presented by the project qualified biologist(s) or designee approved by the qualified biologist(s). The Program shall include the components described below.

1. Information on the life history and identification of the Lemmon's jewelflower ~~and~~ Clokey's cryptantha alkali mariposa lily and recurved larkspur, western burrowing owl, California horned lark, American badger, desert kit fox, loggerhead shrike, prairie falcon, Swainson's hawk, and Crotch's bumblebee, as well as other wildlife, special-status plant species, and the California Department of Fish and Wildlife-regulated drainages that may be affected during construction activities. The program shall also discuss the legal protection status of each species, the definition of "take" under the Federal Endangered Species Act and California Endangered Species Act, measures the project proponent/operator shall implement to protect the species, reporting requirements, specific measures for workers to avoid take of special-status plant and wildlife species, and penalties for violation of the requirements outlined in the California Environmental Quality Act mitigation measures and agency permit requirements.

2. An acknowledgement form signed by each worker indicating that the Worker Environmental Awareness Training and Education Program has been completed shall be kept on file at the construction site.
3. A copy of the training transcript and/or training video, as well as a list of the names of all personnel who attended the Worker Environmental Awareness Training and Education Program, and signed acknowledgement forms shall be submitted to the Kern County Planning and Natural Resources Department.
4. A copy of the training transcript, training video or informational binder for specific procedures shall be kept available for all personnel to review and be familiar with as necessary.
5. A sticker shall be placed on hard hats indicating that the worker has completed the Worker Environmental Awareness Training and Education Program. Construction workers shall not be permitted to operate equipment within the construction areas unless they have attended the Worker Environmental Awareness Training and Education Program and are wearing hard hats with the required sticker.
6. The construction crews and contractor(s) shall be responsible for preventing unauthorized impacts from construction activities to sensitive biological resources that are outside the areas defined as subject to impacts by project permits. Unauthorized impacts may result in project stoppage, and/or fines depending on the impact and consultation with the California Department of Fish and Wildlife and/or U.S. Fish and Wildlife Service.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (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 CDFW or USFWS?*

Similarly, to the approved project, the modified project has no riparian habitats or sensitive natural communities on the site (Quad Knopf, Inc, 2020a). Therefore, the proposed modifications to the project do not change the finding in the certified EIR. No new or revised mitigation measures are required. Impacts will remain less than significant as stated in the certified EIR.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the proposed modified project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the

above-described biological resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such biological resource impact evaluation has been identified. Therefore, with respect to this criterion, the proposed modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (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?*

The approved project included multiple ephemeral drainages that were either avoided or would be impacted. The drainages that could not be avoided would result in a significant impact, and Mitigation Measure MM 4.3-14 was imposed that required a report detailing a plan outlining how drainages would be avoided. Mitigation Measure MM 4.4-15 requires the approved project to obtain a Section 1602 permit from the California Department of Fish and Wildlife, and if necessary, a Section 401 certification from the Regional Water Quality Control Board.

However, as shown in **Figure 3.4-1, National Hydrography Dataset-National Wetlands Inventory** there are no wetlands or water features on or in the vicinity of the proposed modified project. Therefore, the modified project would have no impacts to jurisdictional aquatic resources and no measures are warranted.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the proposed modified project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described biological resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such biological resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new impacts not already analyzed in

the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *no impact*.

- (d) *Would the Project 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?*

There are no water features on or in the vicinity of the proposed modified project site, that could act as potential corridors for aquatic species (Quad Knopf, Inc, 2020a). No wildlife nursery sites have been identified on or in the vicinity of the proposed modified project.

The approved project is located with a known movement “corridor.” That corridor in its entirety is approximately 24 miles wide and the approved project lies within the easternmost portion of that corridor, impacting only a small fraction of the corridor.

However, as shown in **Figure 3.4-2, Wildlife Corridors**, the proposed modified project lies outside of the easternmost portion of an identified wildlife movement corridor. The proposed modified project site and surrounding area, especially to the west where the corridor is located, contain expanses of open habitat with little development. The proposed modified project would not block or substantially alter the ability of species to use the corridor. On a more local level, the most likely areas for wildlife movements would be within larger drainages, uninterrupted spans of native vegetation. The modified project would not result in significant impacts to localized movements of species because of extensive habitat existing within the surrounding area. The proposed modified project would not have any impacts to wildlife movement corridors and no measures are warranted.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the proposed modified project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described biological resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such biological resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already

analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

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

Local policies and ordinances protecting biological resources are provided in Section 1.10.10 of the Kern County General Plan and Biological Resources Section of the Willow Springs Specific Plan, which provide for the conservation of oak trees, oak woodlands and the protection of sensitive vegetation and wildlife species. There are no trees, including oak trees or oak woodlands on the proposed modified project site. Based on the biological reconnaissance and rare plant surveys conducted on the modified project site, Joshua trees are also absent.

The proposed modified project would not result in new or substantially more severe significant environmental impacts compared with the impacts disclosed in the certified EIR. Based on the foregoing, no new or revised mitigation measures are required.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described biological resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such biological resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *no impact*.

- (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?*

Similar to the approved project, the proposed modified project is located within the West Mojave Plan (WMP) planning area. However, the WMP applies only to federal public lands managed by the BLM and is not an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). The site is also located within a Development Focus Area of the Desert Renewable Energy Conservation Plan (DRECP) planning area, which means that the area is expected to support fewer sensitive status species than areas identified with conservation potential and is therefore more likely to be appropriate for renewable energy development. However, the DRECP at this time only applies to federal public lands managed by the BLM and is not an adopted HCP or NCCP. The proposed project occurs on private land and, therefore, is not subject to the WMP or the DRECP. There are no impacts because the proposed project would not conflict with the provisions of an adopted habitat conservation plan.

Therefore, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described biological resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such biological resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE

The proposed modifications to the project do not change the finding in the certified EIR of *no impact*.

CUMULATIVE IMPACTS

The certified EIR determined that cumulative impacts for a project would be significant if the incremental effects of the individual project are considerable when combined with the effects of past projects, other current projects, and probable future projects. As described above, the approved project impacts would be significant and unavoidable with implementation of Mitigation Measures MM 4.4-1 through MM 4.4-15. Similarly, the proposed modified project does not result in any greater impacts than those analyzed in the certified EIR, and with implementation of the applicable Mitigation Measures MM 4.4-1 through MM 4.4-15, impacts would also be significant and unavoidable.

The certified EIR concluded that the impacts of the approved project, when combined with the impacts of past, present, and reasonably foreseeable projects, would contribute to the cumulatively considerable adverse effects on biological resources. However, as the above analysis demonstrates, development of the modified project will not create any new significant impacts or increase the severity of such impacts. The proposed modified project is, therefore, not increasing the severity of any contribution to cumulatively considerable adverse effects on biological resources. The cumulative projects analyzed in the certified EIR, remain the same.

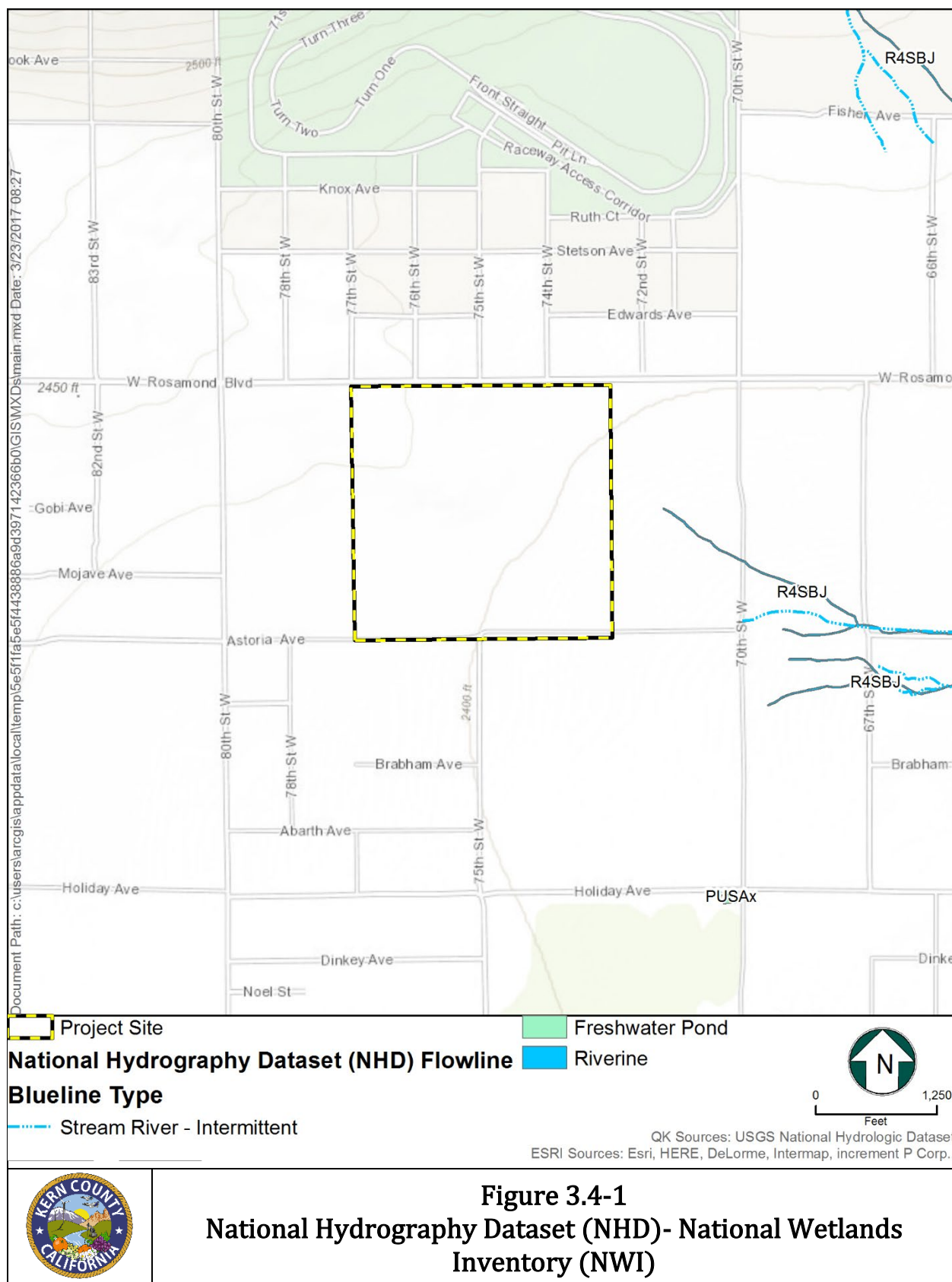
Regarding the above-described biological resource impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described biological resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such biological resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

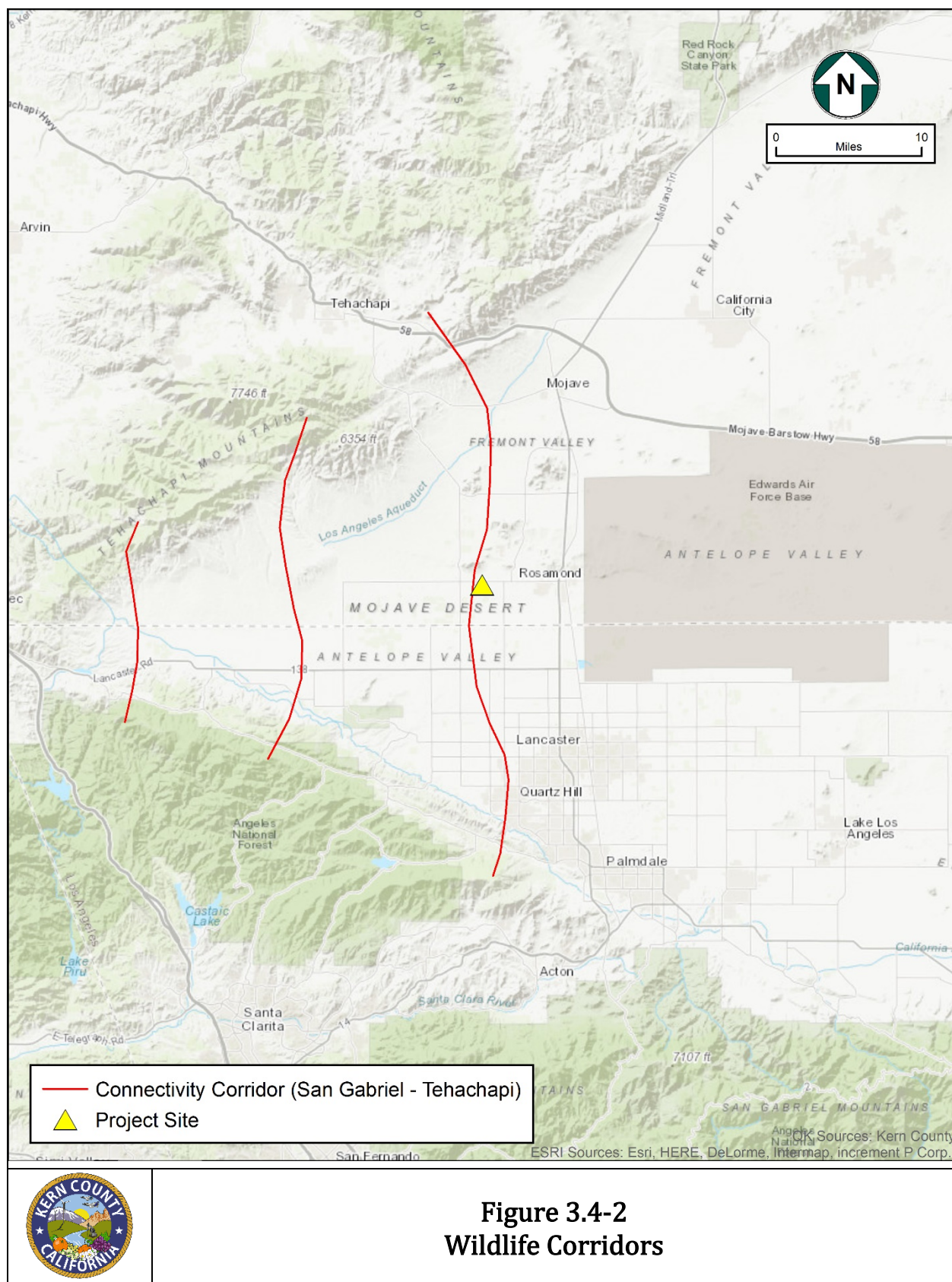
MITIGATION MEASURES

No new mitigation measures are required beyond those included in the previously certified EIR, as revised above.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *significant and unavoidable*.





3.5 - Cultural Resources

This section evaluates whether the impacts of the modified project to cultural resources require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section is based on a Phase I Cultural Resources Survey (ASM Affiliates, 2018) and a Phase II Cultural Resources Survey (ASM Affiliates, 2020) prepared for the proposed modified project. These reports can be found in Appendix D of this Addendum.

3.5.1 - SETTING

The Phase I and Phase II Cultural Resources Surveys provide information on the proposed modified project gathered from records searches through the California Historical Resources Information System (CHRIS) and through fieldwork conducted in 2018 and 2020. Pedestrian archaeological and historic architecture surveys were undertaken to identify cultural resources in the proposed project addition and to determine potential effects to these resources posed by the proposed modified project. Resources older than 45 years located in the proposed modified project were identified and documented. The proposed modified project site consists of undeveloped though disturbed land. Evidence of disking is apparent at the eastern end of the study area, where vegetation is sparsest, and the entire study area has likely been disked in the part. Project setting information for the proposed modified project, including information on the area's history, ethnography, and regulatory environment, is the similar as that for the approved project, as both projects are located within the same geographic area. This information is provided in the certified EIR.

3.5.2 - IMPACT ANALYSIS

Project Impacts

As in the certified EIR analysis, this Addendum evaluates the potential for the proposed modified project to result in new or substantially more adverse significant impacts to cultural resources in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

- (a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?*

Within the approved project site, four cultural resources were identified including one archaeological site (P-15-016512 [CA-KER-9092]) and three isolates (SS-ISO-1, SS-ISO-2, and SS-ISO-3). For the purposes of this project P-15-016512 is assumed to be eligible for listing in the California Register and, therefore, qualifies as a historical resource. The resource is located in a no-build area of the project and will not be directly impacted by project-related ground disturbance. It was determined that construction the approved project could uncover unknown archaeological resources. As such, the certified EIR imposed Mitigation Measures MM 4.5-1 though MM 4.5-4 would require establishing an

Environmental Sensitivity Area around the known site prior to construction, cultural resources sensitivity training for construction workers, avoidance of prehistoric archaeological site CA-KER-9092, the presence of archaeological and Native American monitors during construction, and appropriate treatment of unearthened archaeological resources during construction. With implementation of these measures, impacts would be mitigated to a less-than-significant level. However, Mitigation Measures 4.5-1 through MM 4.5-4, as specifically written in the certified EIR, cannot be applied to the proposed modified project, because they reference sites not located on the modified project site. Therefore, revised mitigation measures, as shown below, are proposed that shall be applied to proposed modified project.

During Phase I pedestrian surveys of the proposed modified project, project archaeologists identified six archaeological sites. Based on this information, a Phase II survey and test excavations were conducted to determine whether subsurface cultural deposits are present at these sites and, if so, the nature and significance of any such deposit.

Five of the sites (P-15-019837, P-15-019838, P-15-019839, P-15-019840, and P-15-019841) were determined to be small surface lithics scatters resulting from stone tool production and/or maintenance. These five sites lack subsurface artifacts and deposits with their archaeological assemblages systematically collected during the study. They are recommended as not California Register of Historical Resources (CRHR) eligible or unique, due to the small size of their recovered artifact assemblages, the limited variety of artifacts these contain (almost all entirely lithic debitage or waste flakes) and the absence of subsurface deposits. The collection of all artifacts from these five sites, furthermore, has served to mitigate any adverse impacts to these five cultural resources that would result from the construction of the proposed modified solar project.

Site P-15-019836 contains a subsurface archaeological deposit that extends to approximately 40-centimeters (cm) below the ground surface. The quantity of artifacts recovered from this site, including the presence of formal tools and burnt animal bone, indicates that this site was likely a small camp. It has the potential to provide additional information about prehistory and is thus recommended as CRHR eligible under Criterion 4, research potential. It is further recommended that adverse impacts to this site be mitigated by its preservation in place, or that a data recovery (salvage) excavation be conducted at the site to reduce adverse impacts to a less-than-significant level. The modified project facility layout has been designed to completely avoid Site P-15-019836. That area will be fenced off with a 25-foot buffer, to avoid impacts during construction, operations, or decommissioning. To protect this cultural resource, Mitigation Measures MM 4.5-2 and MM 4.5-3 would be revised to include P-15-019836, as shown below in ~~strikeout~~/underline. With implementation of MM 4.5-1, revised MM 4.5-2, revised MM 4.5-3, and MM 4.5-4, development of the proposed modified project would not impact the known cultural resource.

While no aboveground CRHR-eligible sites have been identified within the proposed project addition, Site P-15-019836 contains a subsurface archaeological deposit that extends to approximately 40-centimeters (cm) below the ground surface to minimize the potential for

loss of undiscovered cultural resources, Mitigation Measures MM 4.5-1 and MM 4.5-4 would be imposed. MM 4.5-3 and MM 4.5-2 would be revised to include P-15-019836 and would also be imposed on the modified project.

The proposed modified project does not change the finding in the certified EIR of less than significant impacts. There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described cultural resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such cultural resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

MM 4.5-2 (revised): The project proponent shall ensure the following measure is implemented for the prehistoric archaeological site located within the ~~Tours Parcel~~-modified project (~~P-15-016512 [CA-KER-9092]~~ P-15-019836):

1. Prior to conducting initial ground disturbance in the vicinity of the prehistoric archaeological site (~~P-15-016512 [CA-KER-9092]~~ P-15-019836, and in coordination with the Lead Archaeologist and Native American monitor(s), an exclusion area (i.e. the prehistoric archaeological site (~~P-15-016512 [CA-KER-9092]~~ P-15-019836 and all areas within 10 feet thereof) shall be temporarily marked with exclusion markers or protective fencing as determined by the Lead Archaeologist in consultation with the Native American monitor.
2. The construction zone shall be narrowed or otherwise altered to avoid the exclusion area (i.e. the prehistoric archaeological site ~~P-15-016512 [CA-KER-9092]~~ P-15-019836 and all areas within 10 feet thereof).

MM 4.5-3 (revised): The services of an archaeological monitor working under the supervision of the Lead Archaeologist as identified through coordination with appropriate Native American tribes, shall be retained by the project proponent/operator to monitor, on a full-time basis, ground disturbing activities associated with project-related construction activities, as follows:

1. All ground-disturbing activities within 50 feet of prehistoric archaeological site ~~P-15-016512 [CA-KER-9092]~~ P-15-019836 shall be monitored.

2. For all other ground-disturbing activities within the project area, initial excavation or grading activities shall be monitored by archaeological and Native American monitors. During the course of this initial monitoring, if the qualified archaeologist can demonstrate that the level of monitoring should be reduced or discontinued, or if the qualified archaeologist can demonstrate a need for continuing monitoring, the qualified archaeologist, in consultation with the Kern County Planning and Natural Resources Department, may adjust the level of monitoring to circumstances as warranted.
3. The archaeological monitors and Native American monitors shall work under the supervision of the Lead Archaeologist. The Lead Archaeologist, archaeological monitors, and Native American monitors shall be provided all project documentation related to cultural resources within the project site prior to commencement of ground disturbance activities. Should the services of any additional individuals be retained (as the Lead Archaeologist, archaeological monitor, or Native American monitor) subsequent to commencement of ground disturbing activities, such individuals shall be provided all proposed project documentation related to cultural resources within the project area, prior to beginning work. Project documentation shall include but not be limited to previous cultural studies, surveys, maps, drawings, etc. Any modifications or updates to project documentation, including construction plans and schedules, shall immediately be provided to the Lead Archaeologist, archaeological monitor, and Native American monitor.
4. The archaeological monitor shall keep daily logs and the Lead Archaeologist shall submit monthly written updates to the Kern County Planning and Natural Resources Department. After monitoring has been completed, the Lead Archaeologist shall prepare a monitoring report detailing the results of monitoring, which shall be submitted to the Kern County Planning and Natural Resources Department and to the Southern San Joaquin Valley Information Center at California State University, Bakersfield.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?*

As discussed above, four archaeological resources were identified within the approved project site, including one historical prehistoric archaeological site (P-15-016512) and three isolates (SS-ISO-1, SS-ISO-2, and SS-ISO-3). The isolates lack archaeological context and, therefore, generally do not provide sufficient information to be considered significant resources. For the purposes of this project, CA-KER-9092 is assumed to be eligible for listing in the California Register. The resource is located in a no-build area of the approved project and will not be directly impacted by project-related ground disturbance. The certified EIR

imposed Mitigation Measures MM 4.5-1 through MM 4.5-4. With implementation of these measures, impacts would be less than significant.

Underground excavations in the proposed modified project area could uncover finds requiring evaluation by a qualified professional. To minimize the potential for loss of undiscovered cultural resources, the EIR applied Mitigation 4.5-1 to the approved project which would also be obligatory with respect to the proposed modified project. This mitigation measure requires a qualified archaeologist be contacted if during construction, any cultural resources are encountered.

Although the proposed modified project identified P-15-019836, the modified project facility layout has been designed to completely avoid Site P-15-019836. That area will be fenced off with a 25-foot buffer, to avoid impacts during construction, operations, or decommissioning. To protect this cultural resource, Mitigation Measures MM 4.5-2 and MM 4.5-3 would be revised to include P-15-019836, as shown above in ~~strikeout~~/underline. With implementation of MM 4.5-1, revised MM 4.5-2, revised MM 4.5-3, and MM 4.5-4, development of the proposed modified project would not impact the known cultural resource. Therefore, the proposed modifications to the project do not change the finding in the certified EIR of less than significant.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described cultural resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such cultural resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new mitigation measures are required beyond those included in the previously certified EIR, as revised above.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(c) *Disturb any human remains, including those interred outside of formal cemeteries?*

There is no indication, either from the archival research results or the archaeological survey, that any particular location in the approved or modified project sites have been used for human burial purposes in the recent or distant past. However, in the event that human remains are inadvertently discovered during project construction activities, the human remains could be inadvertently damaged, which would be a significant impact. The certified EIR included Mitigation Measure 4.5-5 to reduce this potential impact to below a level of significance by requiring work to cease immediately halt work, and the Kern County Coroner will be contacted to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.4 (e)(1) of the California Environmental Quality Act Guidelines and ensures the proper handling of sites where human skeletal remains are discovered. Implementation of this mitigation measure would also be obligatory for the proposed modified project. The proposed modified project would not change the finding in the certified EIR of less than significant. No new or revised mitigation measures are required.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described cultural resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such cultural resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

The certified EIR concluded that the impacts of the approved project when combined with impacts of past, present, and reasonably foreseeable projects to not create a cumulatively considerable impact. The above analysis demonstrates, the modified project's implementation will not create any significant new impacts or increase severity in such impacts. The modified project is therefore not increasing the severity of any contribution to cumulatively considerable adverse effects on cultural resources. As the above analysis confirms, the proposed modified project has no different impacts than was identified in the

certified EIR. Cumulative projects analyzed in the certified EIR, remain the same as the approved project.

With respect to the above-described cultural resource impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described cultural resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such cultural resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new mitigation measures are required beyond those included in the previously certified EIR, as revised above.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.6 - Energy

This section evaluates whether the impacts of the proposed modified project on energy resources require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section is based on an Energy Consumption Technical Memorandum prepared for the proposed modified project, which can be found in Appendix E (Quad Knopf. Inc., 2020b).

3.6.1 - SETTING

The certified EIR included an evaluation of the project's energy consumption standards, in accordance with CEQA Guidelines Section 15126.4, to evaluate whether there is any wasteful, inefficient, or unnecessary consumption of energy caused by the approved project. The certified EIR confirmed that neither the construction, transportation or other operational aspects of the approved project involved any inefficient, wasteful, or unnecessary energy consumption.

The proposed modified project is similar in nature; therefore, neither the construction, transportation or other operational aspects of the proposed modified project would involve any inefficient, wasteful, or unnecessary energy consumption.

3.6.2 - IMPACT ANALYSIS

Project Impacts

As in the certified EIR analysis, this Addendum evaluates the potential for the proposed modified project to result in new or substantially more adverse significant impacts to energy in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

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

Energy demand during the construction phase would result from the transportation of materials, construction equipment, and employee vehicle trips. The solar panels would be delivered from the Port of Long Beach via heavy duty trucks, 111 miles to the project site and would require approximately 463 trips. Using a typical fuel efficiency of 5.85 miles per gallon, the delivery of the solar panels is expected to require approximately 18,000 gallons of diesel. Total fuel used by construction workers is expected to be approximately 26 gallons. Construction equipment includes but is not limited to bore/drill rigs, cement and mortar mixers, cranes, excavators, graders, off-highway trucks, rubber-tired dozers, scrapers, tractors, and forklifts. According to calculations in CalEEMod and construction equipment data provided by the project proponent, the construction of the solar panels is expected to consume approximately 40,000 gallons of diesel fuel. The construction phase of the proposed project, including the delivery of solar panels, is expected to require a total of

approximately 58,000 gallons of diesel fuel. The project will not use natural gas during the construction phase. Fuel efficiency standards for medium- and heavy-duty trucks apply to trucks used during construction of the project, per CAFE standards. Minimal electrical usage is anticipated during construction (Quad Knopf. Inc., 2020b).

This is 0.003 percent of Kern County's annual gasoline fuel use in 2018 and 0.044 percent of Kern County's annual diesel fuel use in 2018. Therefore, due to the reduced size of the proposed modified project, the gallons of gasoline and diesel would be significantly lower.

Energy demand during the operational phase would result from maintenance equipment and employee vehicle trips. Water trucks would clean the solar panels quarterly and result in a total of approximately 1,320 miles traveled per year. According to calculations in CalEEMod and construction equipment data provided by the project applicant, the water trucks would require approximately 300 gallons of diesel per year; no electricity will be used during panel cleaning activities. General maintenance trucks would add 231.4 total miles traveled per year, which would require approximately 10 gallons of gasoline year. Finally, employee light auto/light truck trips would add another 386 miles traveled per year and approximately 16 gallons of gasoline per year. In total, the operation phase of the proposed modified project is anticipated to require approximately 300 gallons of diesel and approximately 26 gallons of gasoline on an annual basis. The Project will not use natural gas during the operation phase.

No major changes in electricity usage are anticipated throughout construction of the proposed modified project. In addition, construction of the modified project would not result in any natural gas consumption on the site. Therefore, the modified project would not result in wasteful, inefficient, or unnecessary consumption of electricity or natural gas, and impacts would be less than significant. Energy consumption associated with decommissioning activities are anticipated to be similar to construction activities. The consumption of fuels during construction and decommissioning would be irreversible. Although construction and decommissioning activities would be temporary and the project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources if available control measures are not implemented, impacts would be further reduced with implementation of Mitigation Measure MM 4.3-2 of the certified EIR which would reduce transportation fuel use during construction. Additionally, Mitigation Measure MM 4.3-2 would also ensure compliance with Title 13, California Code of Regulations, Section 2449 et seq., which imposes construction equipment idling restrictions. Compliance with Title 13 would also help to reduce unnecessary fuel consumption during project construction. With implementation of this mitigation, the proposed modified project would not result in the wasteful, inefficient, or unnecessary consumption of transportation fuels and impacts would be reduced to less than significant.

Similar to the approved project, non-renewable energy resources of transportation fuel would be consumed during operation of the project. However, the consumption of these resources would be minimal and predominantly associated with worker commute trips and occasional panel washing activities. No major changes in electricity usage are anticipated throughout operation of the project. This electricity generation would assist State investor-

owned utilities in meeting their obligations under State RPS guidelines by providing a renewable energy alternative to the utilities' existing power mix. In addition, operation of the modified project would not result in any natural gas consumption on the site. Therefore, the proposed modified project would not result in wasteful, inefficient, or unnecessary consumption of electricity or natural gas, and impacts would remain less than significant.

With respect to the above-described energy resource impact evaluation standards, there are no changes proposed by the proposed modified project that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described energy resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such energy resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Similar to the approved project, construction equipment would comply with federal, State, and regional requirements where applicable. With respect to truck fleet operators, the USEPA and NHTSA have adopted fuel efficiency standards for medium- and heavy-duty trucks. The proposed modified would use similar equipment used during construction and operations of the approved project. Therefore, similar energy modeling was applied to reduce fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

In addition, construction equipment and trucks used for the proposed modified project would be required to comply with CARB regulations regarding heavy-duty truck idling limits of 5 minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions,

compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

In order to meet the AB 32 GHG emissions reduction mandate, the Climate Change Scoping Plan relies on achievement of the 33 percent RPS by 2020 and 50 percent by 2030. The proposed modified project and other similar projects are essential to achieving the RPS. Furthermore, the modified project is reasonably expected to displace region-wide and statewide emissions of GHGs over the expected life of the project. The reduction in GHG emissions is a direct result of increasing the share of renewable energy available to investor-owned utilities required to meet RPS. The modified project directly aligns with the goals of RPS by generating 125 gWh of electricity over its lifespan.

Additionally, the modified project would be compliant with the Attorney General's Recommended Measure regarding renewable energy. Because the project is below regional regulatory thresholds and could result in a reduction of GHG emissions, no mitigation measures are required. Additionally, development of the modified project would be consistent with the goal and related policies in the Energy Element of the Kern County General Plan to encourage safe and orderly commercial solar development, like the project.

Overall, because the main objectives of the modified project are to assist California Investor-Owned utilities in meeting their obligations under California's RPS Program and assist California in meeting the GHG emissions reduction goal of 1990 level GHG emissions by 2020, as required by AB 32, and the future reduction goal of 40 percent below 1990 levels by 2030, the proposed modified project would be compliant with the applicable recommended actions of the CARB Climate Change Scoping Plan, as well as applicable federal, State, and local policies. Specifically, the modified project would assist the State and regulated utility providers to generate a greater portion of energy from renewable sources consistent with the 2020 and 2030 RPS. Therefore, this impact would remain less than significant.

With respect to the above-described energy resource impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described energy resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such energy resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

The analysis concluded that the impacts of the proposed modified project when combined with impacts of past, present, and reasonably foreseeable projects would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. The proposed modified project modifications will not create a significant impact on energy consumption. There is no change in this circumstance from the previously certified EIR. Cumulative project analyzed in the certified EIR, remain the same.

With respect to the above-described energy resource impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described energy resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such energy resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

Now new or revised mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.7 - Geology and Soils

This section evaluates whether the impacts for the modified project on geology and soils require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section is based on the Preliminary Geotechnical Evaluation prepared for the modified project which can be found in Appendix F (BSK, 2018), and a Paleontological Resource Assessment (Department of PaleoServices, 2018)

Kern County determined in the certified EIR that the following environmental issue areas would result in no impacts or less-than-significant impacts and, therefore, were scoped out. These include:

- (a) *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving:*
 - (iii) *Seismic-related ground failure, including liquefaction; or*
 - (iv) *Landslides.*
- (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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse;*
- (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; or*
- (e) *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater.*

3.7.1 - SETTING

The certified EIR analyzed the regulation that is normally applicable to geological and soil resources as well as description of the physical setting of both the approved site and surrounding lands. The proposed modified project shares common physical setting of both the modified project site and surrounding lands. An analysis was then provided to determine whether the impact(s) would be less than significant, significant without mitigation, or significant and unavoidable. The below analysis confirms that there are no changes in these circumstances affecting the modified project.

3.7.2 - IMPACT ANALYSIS

Project Impacts

This Addendum evaluates the potential for the proposed modified project to result in new or substantially more adverse significant impacts to geology and soils in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

(a)(i) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – 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?

Neither the approved project or the proposed modified project is located in a Fault-Rupture Hazard Zone and no known active faults have been mapped in the project area. The nearest Fault-Rupture Hazard Zone is associated with the San Andreas Fault located approximately 13 miles southwest of the modified project site (BSK, 2018).

While, like the approved project, the modified project would introduce workers to the site, the majority of these workers would be present during construction, which would only occur for a short duration. During operation, onsite workers would be limited to periodic maintenance visits and there would be no full-time onsite employees. Thus, the potential to expose people to substantial adverse effects involving rupture of a known earthquake fault is considered low. Furthermore, construction of the project would be subject to all applicable ordinances of the 2020 Kern County Building Code (Chapter 17.08). Kern County has adopted the CBC 2020 Edition (CCR Title 24), which imposes substantially the same requirements as the International Building Code (IBC), 2020 Edition, with some modifications and amendments. These requirements would ensure that project structures comply with minimum standards related to structural strength and general stability. Therefore, given the absence of any known active faults in the project area, the limited duration of employees onsite, and required compliance with the Kern County Building Code, impacts related to fault rupture would remain less than significant.

There are no changes proposed by the proposed modified project that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described geology and soils impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such geology and soils impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*

(a)(ii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – strong seismic ground shaking?

The approved project and the proposed modified project are located in a highly seismic region within the influence of several fault systems, including the San Andreas and Garlock Fault systems that are capable of generating ground motions that could affect the project area. Therefore, the project proponent is required to design the modified project infrastructure to withstand substantial ground shaking in accordance with applicable California Building Code seismic design standards, Kern County Building Code, Chapter 17.08 standards, and as recommended by a California licensed professional geotechnical engineer in the site-specific geotechnical review.

Estimated ground motion may be moderate to very intense in the proposed modified project site, with numerous faults in the area that are capable of producing strong ground motion. The threshold of significance could be exceeded if habitable structures are not designed to withstand seismic loading that could result in structure damage or collapse (BSK, 2018). However, the modified project does not include the construction of a habitable Operations and Maintenance (O&M) building; the O&M building will be unmanned and be used for storage or equipment only. Additionally, the certified EIR imposed Mitigation Measure MM 4.7-1 to the approved project, which requires a final geotechnical study be completed to ensure that approved project facilities are built to withstand probable seismically induced ground shaking, this measure would also be obligatory for the proposed modified project.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described geology and soils impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such geology and soils impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*

(a)(iii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – including liquefaction

The certified EIR established that potential for liquefaction at the surface is low and the approved project is not located within a current, mapped California Liquefaction Hazard Zone. Additionally, liquefaction generally occurs when the depth to groundwater is less than 50 feet. The depth to groundwater for the proposed modified project is currently greater than 50 feet, therefore, the potential for liquefaction and seismic related ground failure is considered low (BSK, 2018).

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described geology and soils impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such geology and soils impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*

(a)(iv) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – landslides?

The proposed modified project and surrounding areas are essentially flat, the project does not include any habitable structures, and the potential hazard due to landslides from adjacent properties is not applicable. Debris or mudflow flows may occur during intense rainfall induced sheet flow events (BSK, 2018).

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the modified project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described geology and soils impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such geology and soils impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified Project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(c) Result in substantial soil erosion or the loss of topsoil?

According to the Kern County General Plan Safety Element, the modified project site is not within a zone that is prone to soil erosion (Kern County, 2009). Like the approved project site, the proposed modified project site is essentially flat, which would minimize the possibility for the formation of significant rills or gullies by water. As noted in Section 3.4, *Biological Resources*, no drainages were observed on the site.

With respect to soil erosion by wind, earthwork at the proposed modified project site during construction might cause some disturbed soils to be affected by wind erosion. The soils on the modified project site are predominantly silty sand, with minimal existing vegetative cover increases the site's erosion potential. Although the modified project site is relatively flat grading will be minimal. However, construction activities like grubbing, grading, and excavation could loosen soil and contribute to soil loss and erosion by wind and stormwater runoff. As noted in Section 3.3, *Air Quality*, the approved and modified projects would comply with all EKAPCD rules and regulations, including by MM 4.3-1, MM 4.3-2 and MM 4.3-4 during construction, operations and decommissioning activities. Implementation of these mitigation measures reduce wind-related soil erosion.

Additionally, development of a Storm Water Pollution Prevention Plan (SWPPP) is required for the approved project per Kern County National Pollutant Discharge Elimination System Program (NPDES) requirements, that would contain all stormwater runoff onsite. The SWPPP would include various types of Best Management Practices (BMPs) to prevent

erosion and sedimentation from occurring during construction. All temporary erosion control measures required by the Kern County Grading Code (Chapter 17.28.140) would be included as BMPs in the SWPPP. The approved project would be required to submit grading plans accompanied by a soils engineering report, engineering geology report, and drainage calculations pursuant to the Kern County Grading Code (Section 17.28.070) to the Kern County Public Works Department to obtain required grading permits. The modified project would also be subject to compliance with these local codes and regulations.

The approved project would implement Mitigation Measure MM 4.10-1, as described in Section 3.10, *Hydrology and Water Quality*, which would require the preparation of a hydrologic study and final drainage plan. Mitigation Measure 4.10-1 would ensure that the retention basin and other stormwater management features are consistent with existing regulatory requirements to minimize any erosion or sedimentation resulting from project implementation. The proposed modified project would comply with MM 4.10-1 and pertinent local and State codes and regulations.

Implementation of BMPs and compliance with existing regulations will be necessary during construction and operation of the proposed modified project to minimize potential soil erosion at the site. New construction and grading projects requiring a SWPPP will also require an Erosion Control Plan (ECP) to reduce the potential of soil erosion and sedimentation.

After construction at the proposed site, traffic from maintenance vehicles could contribute to soil erosion, but internal roads would be stabilized, and due to the limited amount of traffic, the potential impacts are considered low.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described geology and soils impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such geology and soils impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*

- (d) *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 offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?*

As noted in the certified EIR, based on groundwater data obtained from existing wells in the approved project vicinity, groundwater in the area is located greater than 330 feet bgs. The depth to groundwater at the proposed modified project is currently estimated to be greater than 211 feet bgs, therefore, the potential for liquefaction, subsidence and seismic related ground failure is low (BSK, 2018). As noted previously, the modified project site is flat and there is little risk of landslide.

Hydrocompaction is the consolidation of loose dry surface soils from the infiltration of water. Materials of unusually low density deposited in areas of low rainfall undergo significant compaction when they become thoroughly wetted. The modified site soils may have a potential for hydrocompaction. Hydrocompaction materials consist of sediments loosely placed by wind or by mudflow, that when saturated, the material hydrocompacts (settlement). The conceptual geotechnical study for the modified project provides measures for effectively mitigating risks associated with hydrocompacted soils if encountered at the modified project site. As noted above, the certified EIR imposed Mitigation Measures 4.7-1, which would confirm the findings of the conceptual geotechnical study regarding soil conditions and their ability to support the proposed improvements over the long term and includes recommendations to address any unstable soils including the potential for lateral spreading, seismic settlement, and collapse. This measure would also be obligatory for the proposed modified project.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described geology and soils impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such geology and soils impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (e) *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?*

The soils in the northern portion of the proposed modified project site are generally silty sand and sand; expansive soils are not anticipated to occur within the site boundary (BSK, 2018). Expansive soils may be present in the southern section of the site. Pursuant to MM 4.7-1, a final geotechnical engineering evaluation will confirm the actual site conditions. Any recommendations based on the results of the evaluation would be performed according to standard geotechnical engineering practices (BSK, 2018). The modified project would comply with MM 4.7-1 regarding soil conditions and would include recommendations to address any unstable soils including the potential for lateral spreading, seismic settlement, and collapse.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described geology and soils impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such geology and soils impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (f) *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?*

The approved project and the proposed modified project do not require any permanent employees onsite; the O&M building would be unmanned and without facilities. The proposed modified project will not include a septic system or other disposal facility and there would be no impacts.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described geology and soils impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such geology and soils impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *no impact*.

- (g) *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The approved project is on land consisting of younger Quaternary alluvium that is not considered typically paleontologically sensitive. although surface grading and very shallow excavation within the younger Quaternary alluvium is unlikely to impact sensitive paleontological resources, excavations deeper than 5 feet could extend into the older Quaternary alluvium and impact significant vertebrate fossil resources. Mitigation Measures MM 4.7-2 through MM 4.7-4 require Paleontological Resources Awareness Training for construction workers, use of a qualified paleontological monitor during construction activities that occur below 5 feet in depth (not including excluding pile driving), and appropriate treatment of accidentally uncovered paleontological resources, impacts to paleontological resources would be reduced to less than significant.

The proposed modified project site is immediately underlain by Holocene to Pleistocene-age alluvial deposits derived from regional erosion of the surrounding highlands (Department of PaleoServices, 2018). Impacts to paleontological resources may occur only during excavations that will disturb alluvial deposits of Pleistocene-age. Therefore, in the northern half of the modified project site (i.e., areas underlain by Pleistocene-age old alluvial fan deposits), excavations at all depths have the potential to impact paleontological resources. In the southern half of the proposed modified project site (i.e., areas underlain by Holocene-age alluvial valley deposits or young alluvial fan deposits), only excavations that will extend greater than about 15 feet below existing grade have the potential to impact paleontological resources. This would result in a potentially significant impact to paleontological resources. To minimize the potential impact to paleontological resources, the certified EIR Mitigation Measures MM 4.7-2 through MM 4.7-4 would also be imposed on the proposed modified project. Which requires the use of a qualified paleontological monitor during construction activities that occur below 5 feet in depth (not including excluding pile driving), and appropriate treatment of accidentally uncovered paleontological resources. Implementation of these mitigation measures would also be imposed on the proposed modified project and would ensure that impacts remain less than significant.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described geology and soils impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such geology and soils impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

The certified EIR concluded that impacts of the approved project when combined with impacts of past, present, and reasonably foreseeable Projects would not create a cumulatively considerable impact. The certified EIR concluded that the impacts of the

approved project related to geology and soils would be site specific, and structures constructed will follow the building code requirements. The approved project would not cause a significant impact on geologic or soil resources. Likewise, the modified project's impacts would also be site specific, its structures would follow building code requirements, and it would not cause a significant impact on geologic or soil resources. Cumulative impacts could occur in a seismic event if a potential hazard, such as a power plant or a dam, were located near a populated area and failed as a result of ground shaking. Currently there are no such facilities nor are there any such facilities planned within the development area of the approved project site. As the above project specific analysis demonstrates, the proposed modified project as described in this Addendum EIR, there are no material changes in the above-described circumstances concerning the modified project. The modified project would comply with Mitigation Measures MM 4.7-1 through MM 4.7-4 and MM 4.10-1 and therefore would not generate adverse cumulative impacts to geologic or soil resources beyond than those already disclosed in the certified EIR.

With respect to the above-described geology and soils impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described geology and soils impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such geology and soils impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.8 - Greenhouse Gas Emissions

This section evaluates whether the impacts of the proposed modified project on greenhouse gas emissions require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This analysis is based on the AQIA prepared for the proposed modified project, found in Appendix B of this document (Trinity Consultants, 2020).

3.8.1 - SETTING

Greenhouse gas emissions result in impacts which are global in nature. The environmental and regulatory settings related to greenhouse gas emissions set forth in the EIR adequately describes the setting for the proposed modified project.

3.8.2 - IMPACT ANALYSIS

Project Impacts

As in the EIR analysis, this Addendum evaluates the potential for the modified project to result in new or substantially more adverse significant impacts to greenhouse gas emissions in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project

- (a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

The certified EIR established that the approved project would significantly reduce greenhouse gas emissions by providing an emissions-free source of electricity, offsetting greenhouse gases that would be emitted from facilities producing electricity from nonrenewable resources (e.g., coal or natural gas). In addition, the approved project helps achieve the State's Renewable Portfolio Standard goal of 50 percent by 2030 and 100 percent of electricity generated from renewable sources by 2045. The proposed modified project would not introduce different equipment or facilities that would increase greenhouse gas emissions compared to the approved project.

The proposed modified project will not result in the emissions of hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), or sulfur hexafluoride (SF₆), the other gases identified as GHG in AB32 (Trinity Consultants, 2020). The proposed modified project will be subject to any regulations developed under AB32 as determined by CARB. As demonstrated in the table below, the modified project would have a positive impact on global climate change by reducing the demand for conventional power generation and the rate of global climate change resulting from conventional power generation.

Additionally, as noted in **Table 3.8-1**, the proposed modified project is a net negative producer of GHGs that results in a savings of 23,941 MT CO₂e per year, and it will be

significantly less than the EKAPCD's GHG Policy threshold of 25,000 MT of CO₂e per year. The proposed modified project would therefore have a less-than-significant GHG impact.

Table 3.8-1
Estimated Annual GHG Emissions (MT/Year)

	CO ₂	CH ₄	N ₂ O	CO ₂ e
<i>Construction Emissions</i>				
2020 Construction Emission	434.10	0.086	0.014	440.60
<i>Operational Emissions</i>				
Project Operations	1.968	0.000	0.000	1.849
<i>Annualized Construction Emissions</i>	14.470	0.003	0.000	14.687
<i>GHG Savings from Solar</i>	-23922.49	-0.182	-0.101	-23,957.54
<i>Project Emissions</i>	-23,906.05	-0.179	-0.100	-23,941.00
<i>EKAPCD's Significance Threshold</i>	-	-	-	25,000
<i>Significance Threshold Exceeded?</i>	-	-	-	NO

*Note: 0.00 could represent <0.00

1 Per South Coast AQMS's Methodology

Source: Appendix B

With respect to the above-described greenhouse gas impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described greenhouse gas impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such greenhouse gas impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As was noted in the certified EIR, the approved project is consistent with the CARB Scoping Plan as well as applicable federal, State and local policies regarding GHG emissions. Specifically, the approved project would assist the State and regulated utility providers to generate a greater portion of energy from renewable sources consistent with the 2020 and 2030 RPS, including the targets established under SB 100.

Similarly, the proposed modified project would also be consistent with the County's policy to encourage solar development to conserve fossil fuels and improve air quality; and that compliance with the goals, policies, and implementation measures of the Kern County General Plan would be required. Therefore, no additional mitigation measures are proposed.

With respect to the above-described GHG impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described GHG impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such greenhouse gas impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No changes to mitigation measures adopted in previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*

CUMULATIVE IMPACTS

The certified EIR concluded the main contribution of GHG emissions from the approved project would be from construction equipment usage during the construction phase and motor vehicles trips by employees and maintenance vehicles during project operations.

Additionally, the certified EIR concluded that the impacts of the approved project would not combine with impacts of past, present, and reasonably foreseeable projects to create a substantial adverse effect on greenhouse gas emissions. The proposed modified project would similarly have a positive impact on reducing greenhouse gas emissions in the long

term. The approved project's emissions would contribute to the increase in emissions. However, construction emissions would be finite and temporary and would cease at the end of construction activities. Because the proposed modified project is smaller in size, it would generate less emissions during construction than the approved project. It has been demonstrated that the proposed modified project will result in minimal emissions of GHGs during construction and is a net negative producer of GHGs during operation that results in a savings of 23,941 MT CO₂e per year (Trinity Consultants, 2020).

Therefore, the proposed modifications to the project do not create new or substantially more adverse cumulative impacts related to greenhouse gas than those disclosed in the certified EIR. Mitigation measures would not be required for cumulative impacts.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.9 - Hazards and Hazardous Materials

This section evaluates whether the impacts of the proposed modified project to potential hazards and hazardous materials impacts require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section was prepared in part using information from the certified EIR and a Phase I Environmental Site Assessment (ESA) completed for the modified project in Appendix H (Insight Environmental Consultants, 2020).

The lead agency determined that the approved project would not result in significant impacts to some of these environmental issue areas; these issue areas were scoped out of the certified EIR. It was determined that the approved project would not:

- (c) Emit hazardous emissions or involves handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school;*
- (d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;*
- (e) For a project located within the adopted Kern County Airport Land Use Compatibility Plan and would result in a safety hazard or excessive noise for people residing or working in the project area;*
- (f) For a project located within the vicinity of a private airstrip and would result in a safety hazard for people residing or working in the project area;*
- (g) Impair implementation of, or physically interferes with, an adopted emergency response plan or emergency evacuation plan; and*
- (h) Generate vectors (flies, mosquitoes, rodents, etc.) or have a component that includes agricultural waste. Specifically, would the project exceed the following qualitative threshold:*

The presence of domestic flies, mosquitoes, cockroaches, rodents, and/or any other vectors associated with the project is significant when the applicable enforcement agency determines that any of the vectors:

- (i) Occur as immature stages and adults in numbers considerably in excess of those found in the surrounding environment;*
- (ii) Are associated with design, layout, and management of project operations; and*
- (iii) Disseminate widely from the property; and*
- (iv) Cause detrimental effects on the public health or well-being of the majority of the surrounding population.*

Project-related infrastructure would not emit hazardous materials or involve handling hazardous or acutely hazardous materials, substances, or waste within a quarter mile of an existing or proposed school. Furthermore, the proposed modified project site is not

identified in any of the CalEPA hazardous materials lists and, therefore, would not create a significant hazard to the public or environment. The project site is not located within 2 mile of a private airstrip and therefore, would not result in safety hazard for people residing or working in the proposed project area. Since the modified project site is located in an area with several alternative access roads allowing access in the event of an emergency, access would be maintained throughout construction, and appropriate detours would be provided in the event of potential road closures. Construction and operation of the proposed solar arrays and associated facilities would not produce excessive wastes, standing water, or other features that would attract nuisance pests or vectors. Therefore, no further analysis for these issues areas is warranted.

3.9.1 - SETTING

This section discusses the existing conditions and describes the environmental setting for hazardous materials and waste, airports, and wildfire hazards. Residences and other sensitive receptors, such as schools, are also described as their proximate location to the project site affects their exposure to the potential hazards described below. The closest occupied residence is approximately 0.27 miles to the southwest of the proposed modified project site. The Tropic Middle School is located 1.7 miles to the east of the proposed site.

3.9.2 - IMPACT ANALYSIS

Project Impacts

As in the EIR analysis, this Addendum evaluates the potential for the modified project to result in new or substantially more adverse significant impacts to hazards and hazardous materials in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

- (a) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

The certified EIR established that the approved project, including the solar facilities and the gen-tie connection, would not involve the routine transport, use, or disposal of hazardous materials, as defined by the Hazardous Materials Transportation Uniform Safety Act during construction, operations or decommissioning activities. The same analysis applies to the proposed modified project. Most of the hazardous waste generated by the approved project and the proposed modified project would occur during the temporary construction period and would consist of liquid waste, including cleaning fluids, dust palliative, herbicides, and solvents. To minimize the potential hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, the EIR imposed Mitigation Measure MM 4.9-1 to the approved project, which ensures that all handling, storage, and disposal of hazardous materials would be conducted as applicable, pursuant to Article 1 and Article 2 of California Health and Safety Code 6.95 and in accordance with Kern County

Ordinance Code 8.04.030, and in accordance with proven practices to minimize exposure to workers or the public. The proposed modified project would also comply with MM 4.9-1.

Once operational, the modified project would be similar in characteristics as the approved project. Project operations would require the use of transformer oil at the project substations and the energy storage facility could contain battery acids, as well as lead acid, sodium sulfur, and sodium or nickel hydride. All transformers would be equipped with spill containment areas and battery storage would be in accordance with OSHA requirements such as inclusion of ventilation, acid resistant materials, and spill response supplies.

The modified project's decommissioning activities would also be similar to those of the approved project. It is anticipated that all project structures would be fully removed from the ground. Above-ground equipment that would be removed would include electrical wiring, equipment on the inverter pads, and the interconnection transformer pad and associated equipment. Equipment would be de-energized prior to removal, salvaged (where possible). The PV module manufacturer would likely provide module collection and recycling services.

As discussed in Section 4.17, *Utilities and System Services*, of the certified EIR, Mitigation Measure MM 4.17-1 would require debris and waste generated during construction to be recycled to the extent feasible during construction, operation, and decommissioning and the designation of a Recycling Coordinator to facilitate recycling of all waste through coordination with the onsite contractors, local waste haulers, and/or other facilities that recycle construction/demolition wastes. Implementation of these mitigation measures would also be obligatory for the proposed modified project.

The proposed modified project would comply with Mitigation Measures MM 4.9-1 and MM 4.17-1. The proposed project modifications would not result in additional impacts as a result of the accidental release of hazardous materials than what was already analyzed in the certified EIR.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hazards and hazardous materials impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hazards and hazardous materials impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (b) *Would the project 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?*

The certified EIR established that the approved project site is not located within a known oil production field, nor does the site have any known active or abandoned oil wells. As a result, construction and development of the approved project and the proposed modified project is unlikely to expose employees or construction workers to the dangers associated with operating a facility near an oil well. To minimize impacts in the event of a spill, the certified EIR imposed Mitigation Measure MM 4.9-1 and MM 4.17-1 to the approved project, which provides methods to be used to avoid spills and minimize impacts in the event of a spill by providing procedures for handling and disposing hazardous materials as well as public and agency notification procedures for spills and other emergencies including fires. Additionally, in order to minimize an adverse risk related to exposure to hazardous materials resulting from the, grading of the site, the application of herbicides, or other construction or operation processes because of the distance between the sensitive receptors and the project site, the EIR applied Mitigation Measure MM 4.9-2 to the approved project, to regulate the use of herbicides. Implementation of these mitigation measures would also be obligatory for the proposed modified project.

The proposed modified project would not result in any material changes to the setting analyzed in the certified EIR. The proposed modified project would not result in additional or substantially increased significant impacts as a result of the accidental release of hazardous materials than what was already analyzed in the certified EIR.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hazards and hazardous materials impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hazards and hazardous materials impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already

analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

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

The certified EIR confirmed that the approved project site is over 9 miles from the closest school and that the approved project would not emit hazardous materials or involve handling hazardous or acutely hazardous materials, substances, or waste within a quarter mile of an existing or proposed school. As the closest school is over 1.7 miles from the proposed modified project site, there is no change in this determination.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hazards and hazardous materials impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hazards and hazardous materials impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (d) *Be located on a site that 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?*

The certified EIR confirmed that the approved project is not on the California hazardous materials databases. The proposed modified project is also not on the list, and there is no change in the determination.

With respect to the above-described hazards and hazardous materials impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hazards and hazardous materials impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hazards and hazardous materials impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (e) *Result in a safety hazard for people residing or working in the project area, for a project located within the adopted Kern County Airport Land Use Compatibility Plan?*

The certified EIR confirmed that the approved project is not located within two miles of a public use airport and it not within an area covered by the Kern County Airport Land Use Compatibility Plan (ALUCP). There is no material change in these circumstances concerning the proposed modified project, as the nearest airport is approximately 3 miles from the site, and it is not within the ALUCP.

With respect to the above-described hazards and hazardous materials impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the

circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hazards and hazardous materials impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hazards and hazardous materials impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

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

The certified EIR confirmed that the approved project site is located in a rural area with the primary access roads allowing adequate/ingress to the site in the event of an emergency. Additionally, as part of the approved project, additional access roadways (external and internal to the site) would be constructed at various locations along several adjacent local private and public roadways. There is no material change in these circumstances concerning the proposed modified project. The proposed modified project site would be accessed from Rosamond Boulevard, allowing adequate/ingress to the site in the event of an emergency. Additionally, the rows of solar panels would be separated by access ways.

As further described in Section 4.15, *Traffic and Transportation*, of the certified EIR, increased approved project-related traffic would not cause a significant increase in congestion and or significantly worsen the existing service levels at intersections on area roads; therefore, modified project-related traffic would not affect emergency access to the modified project site or any other surrounding location. While impacts would be less than significant, Mitigation Measure MM 4.15-1 would provide further assurances for emergency access. Mitigation Measure MM 4.15-1 requires the preparation of a Construction Traffic Control Plan that considers access for emergency vehicles to the project site. During project operation, Mitigation Measure MM 4.15-2 requires the project operator obtain Kern County approval of all proposed access road designs prior to construction, further ensuring onsite emergency access is adequate. The modified project is similarly located in a relatively sparsely populated area and will have adequate ingress/egress to the site for emergency vehicles (Ruettgers and Schuler, 2020). As is also noted in Section 3.15, *Transportation*, of

this Addendum, the modified project is small and will not result in a large increase in vehicle traffic during construction. Once operational, there would be minimal truck trips to the site, which would be for routine maintenance and for quarterly panel washing activities. The modified project would implement Mitigation Measures MM 4.15-1 and MM 4.15-2, and impacts would be less than significant.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hazards and hazardous materials impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hazards and hazardous materials impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

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

The certified EIR confirmed that the approved project site is not within an area of high or very high fire hazard, as determined by the Kern County General Plan or Cal FIRE; however, there is still potential risk of wildfire. There is no material change in these circumstances concerning the proposed modified project. The proposed modified project site is not in a high or very high fire hazard area, has sparse vegetation onsite and site preparation would involve the removal of additional vegetation, although natural vegetation may be maintained if it does not interfere with project construction or the health and safety of onsite personnel.

The approved and modified projects may include a battery storage component which, while generally burn with difficulty, can in fact burn or become damaged by fire and generate fumes and gases that are extremely corrosive. Dry chemical, carbon dioxide (CO₂), and foam are the preferred methods for extinguishing a fire involving batteries, as water is not effective in battery fires. Class D extinguishers are used for lithium-metal fires only. To further increase safety, the battery units are usually low voltage, encased in a steel enclosure

and are set apart from combustible materials. They are built with a thermal management system that includes coolant pumps, fans, and a refrigerant system to further maintain cool temperatures within the unit.

As discussed further in Section 4.14, *Public Services*, of the certified EIR, the approved project would implement Mitigation Measure MM 4.14-1, which would require the preparation and submittal of a Fire Safety Plan to the Kern County Fire Department for review and approval. The purpose of the Fire Safety Plan would be to eliminate causes of fire, prevent loss of life and property by fire, to comply with County and County Fire Protection District standards for solar facilities, and to comply with the OSHA standard of fire prevention, 29 CFR 1910.39. The fire safety plan would address fire hazards of the different components of the project, including the energy storage system, and would include BMPs to reduce the potential for fire and extinguishment techniques if a fire were to occur. Similarly, the modified project would implement MM 4.14-1 and comply with all local, State and federal regulations related to fire suppression and safety.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hazards and hazardous materials impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hazards and hazardous materials impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

The certified EIR determined that impacts of the approved modified project, when combined with the impacts of past, present, and reasonably foreseeable projects, would create a less than a cumulatively considerable impact. While foreseeable projects have the potential to cause similar impacts, it is assumed these projects would also implement similar BMPs. Conformance with existing State and County regulations, as well as implementation of

Mitigation Measures MM 4.9-1, MM 4.9-2, and MM 4.14-1 (implementation of a Fire Safety Plan), and MM 4.17-1, would further reduce the potential for cumulative impacts. In addition, implementation of appropriate safety measures during construction of the approved project, as well as any other cumulative project, would reduce the impact to a level that would not contribute to cumulative effects. Therefore, impacts related to the use of hazardous materials would not be cumulatively significant as the above project specific analysis confirms, the proposed modified project would not generate adverse cumulative impacts to hazards and hazardous materials impact beyond than those already disclosed in the certified EIR.

With respect to the above-described hazards and hazardous materials impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hazards and hazardous materials impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hazards and hazardous materials impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.10 - Hydrology and Water Quality

This section evaluates whether the impacts of the proposed modified project on hydrology and water quality require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section was prepared in part using information from the certified EIR, a Preliminary Hydrology Study (Quad Knopf, Inc, 2019) and a Water Supply Assessment (Quad Knopf, Inc, 2020c) completed for the modified project, which can be found in Appendix G.

The lead agency determined that the approved project would not result in significant impacts to some of these environmental issue areas; these issue areas were scoped out of the certified EIR. It was determined that the approved project would not:

- (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:*
 - (iv) Impede or redirect flood flows;*
- (d) Result in flood hazard, tsunami, seiche zones, risk release of pollutants due to project inundation*

As discussed in the certified EIR, the approved project would not place housing within a 100-year flood hazard area nor is the area subject to flooding due to failure of levee or dam. Additionally, the approved project is not located near and ocean or enclosed body of water, and therefore, would not be subject to inundation by seiche or tsunami. Due to the relatively flat topography of the approved project site and surrounding area, the potential to be inundated by mudflow is considered remote. The modified project would exhibit comparable characteristics related to flooding, seiches, tsunamis, and no additional analysis is warranted.

3.10.1 - SETTING

The certified EIR discussed the existing conditions related to hydrology and water quality in the study area and described the environmental setting for hydrology and water quality for the approved project. It also assessed the regulatory setting at the federal, State, and local levels. With respect to hydrology and water quality, the proposed modified project would not result in any changes to the regulatory setting at the federal, State, and local levels considered in the certified EIR.

Land uses in the region include a mix of primarily undeveloped land, scattered residences, recreation (racetrack), industrial uses, and renewable energy projects (solar and wind). One utility-scale solar facility, RE Rosamond Two, approximately three miles to the west of the project site. Several other proposed or approved but not yet constructed solar projects are also in close proximity to the modified project site.

The general topography of the site is relatively flat, and the soil types are classified as Adelanto course sandy loam, Aldelanto loamy sand and Rosamond fine sandy loam (Quad Knopf, Inc, 2019).

The modified Project site is located partially within an Area of Minimal Flood Hazard while the other portion is within a zone with a 1% Annual Chance of Flood Hazard (100 year floodplain) as designated by the Federal Emergency Management Agency (FEMA) on the Flood Rate Insurance Maps (FIRM) (Quad Knopf, Inc, 2019). The approved project was completely within the 100 year floodplain.

The approved project site falls predominately within Soil Group A, with some areas in Soil Group C. The proposed modified project site has on Class B hydrologic soils group. *Soils Group A* are characterized by soils having high infiltration rates even when thoroughly wetted, consisting chiefly of deep, well to excessively drained sands or gravel. The soils have high water transmission and low runoff potential. These soils, which are prevalent in the streambeds and on-site areas of the approved project, are excellent for storm water retention basin use.

Soils Group B are characterized by having slow infiltration rates when thoroughly wetted, consisting chiefly of moderately deep to deep, moderately well to well drained soils with moderately coarse textures. These soils have a moderate rate of water transmission and are generally suitable for storm water retention basins on a case-by-case basis. These types of sandy soils are classified as having a low potential for expansion (Quad Knopf, Inc, 2019).

3.10.2 - IMPACT ANALYSIS

Project Impacts

As in the certified EIR analysis, this Addendum evaluates the potential for the proposed modified project to result in new or substantially more severe significant impacts to hydrology and water quality in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

- (a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater water quality?*

As discussed in the certified EIR, the approved project would have to develop a SWPPP, as required by Mitigation Measure MM 4.10-2, and comply with any regional requirements to meet State water quality objectives for the approved project. The proposed modified project must also comply with this mitigation.

The certified EIR confirmed that the approved project site is relatively flat, and construction would involve minimal grading in areas to further flatten the site for facility installation. Excavation would be required to install certain project facilities, including but not limited to

substations and operation and maintenance buildings. Regardless of how minimal, grading and excavation would disturb soil, which has the potential to result in sedimentation of stormwater and subsequent degradation of stormwater quality. Further, any construction activity that results in the accidental release of pollutants, hazardous or potentially hazardous materials could also degrade stormwater quality. Materials that could contribute to this impact include, but are not limited to, diesel fuel, gasoline, lubricant oils, hydraulic fluid, antifreeze, transmission fluid, lubricant grease, cement slurry, and other fluids utilized by construction and maintenance vehicles and equipment. Motorized equipment could leak hazardous materials such as motor oil, transmission fluid, or antifreeze due to inadequate or improper maintenance, unnoticed or unrepaired damage, improper refueling, or operator error.

The proposed modified project is similar to the approved project in all material respects here. The proposed modified project would result in a minimal increase in impervious surfaces on the site from development including the equipment foundations as well as the O&M buildings, substations, and energy storage facilities. The access roads would not be paved. The panels are not considered impervious surfaces; stormwater falling on the panels would drip off and infiltrate into the ground below or run off during larger storm events into constructed drainage basins. Impacts from the installation and connection of the gen-tie line to the proposed SCE switching station would not deplete ground water supplies or create a deficit in the aquifer. Therefore, the proposed modified project would leave large areas of pervious surfaces that would absorb stormwater runoff and would not result in a significant reduction of groundwater infiltration rates associated with precipitation.

To avoid impacts to water quality, the Kern County Public Works Department requires the completion of an NPDES Applicability Form for projects with construction activities that would disturb one or more acre within Kern County. Because stormwater runoff does not discharge to waters of the United States (because the project area drains to a terminal basin that is not hydrologically connected to a navigable waterway), acquisition of coverage under the State Construction General Permit for stormwater is not required. However, because the proposed modified project would disturb more than one acre of ground surface and stormwater would not be contained onsite or discharge into a terminal drainage facility, the project proponent would be required to prepare and implement a SWPPP for the project. The modified project would have to comply with Mitigation Measure MM 4.10-2 of the certified EIR, which requires implementation a SWPPP that would include erosion control and sediment control BMPs designed to prevent soil erosion from occurring and would retain sediment onsite. In addition, the proposed modified project must comply with the Kern County Grading Ordinance, which requires implementation of dust control during all grading operations and the use of temporary drainage and erosion control measures onsite as needed. Furthermore, the proposed modified project would have to comply with Mitigation Measure MM 4.10-1 of the certified EIR, which requires the preparation of a hydrologic study and drainage plan per the Kern County Development Standards and the Kern County Code of Building Regulations prior to issuance of a grading permit. Based on the findings of the hydrologic study, the drainage plan would recommend an onsite design that complies with all channel setback requirements and ensure facilities are located in such a

way to lessen their impact on drainage areas and their water quality. Additionally, Mitigation Measure MM 4.10-2 of the certified EIR requires that ground disturbance be minimized within drainage areas and timed to avoid the rainy season where possible. This decreases the potential of stormwater mixing with construction-related materials and degrading water quality.

Further, as noted in Section 4.9, *Hazards and Hazardous Materials*, of the certified EIR, Mitigation Measure MM 4.9-1 requires the project proponent/operator to prepare a Hazardous Materials Business Plan that would delineate hazardous material and hazardous waste storage areas; describe proper handling, storage, transport, and disposal techniques; describe methods to be used to avoid spills and minimize impacts in the event of a spill; describe procedures for handling and disposing of unanticipated hazardous materials encountered during construction; and establish public and agency notification procedures for spills and other emergencies, including fires. Therefore, potential impacts to stormwater quality from the accidental release of hazardous materials would be minimized. Impacts to water quality would be lessened following compliance with existing regulations and implementation of Mitigation Measures MM 4.9-1, MM 4.10-1, and MM 4.10-2 of the certified EIR. Proposed modified project decommissioning would qualify as a construction project and would be required to comply with the regulations specified above for project construction so as to avoid impacts to water quality during construction.

The proposed modified project's operational impacts would not materially differ from the approved projects. Adherence to the requirements of the approved drainage plan would minimize operational impacts to water quality during operation. Apart from the minimal runoff resulting from the infrequent cleaning of solar panels that would likely percolate into the ground onsite, no other non-stormwater discharges are expected to occur when the proposed modified project is operational. Therefore, with the implementation of Mitigation Measures MM 4.9-1, MM 4.10-1, and MM 4.10-2 of the certified EIR, project operation would not violate water quality standards or waste discharge requirements, or otherwise degrade water quality.

With respect to the above-described hydrology and water quality evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the modified project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hydrology and water quality impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hydrology and water quality impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

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

Water needed for the construction of the proposed modified project will be trucked from nearby water purveyor. The construction process is estimated to take approximately 300 construction days, over the course of an 8- to 10-month period. Construction water demands are estimated to be approximately 50 acre-feet, which is equivalent to approximately 16,500,000 gallons (15,000 gallons/day x approximately 300 days = 4,500,000 gallons for dust control and 40,000 gallons/day x 300 days = 12,000,000 gallons for site preparation and miscellaneous construction). Bottled drinking water will be provided for crews during construction activities (Quad Knopf, Inc, 2020c)

The modified project site is located within the Lancaster subbasin of the Antelope Valley groundwater basin, which is currently within a state of overdraft. Therefore, the proposed modified project could potentially deplete groundwater supplies such that the aquifer volume had a net deficit and/or the local groundwater table level was lowered.

A recent adjudication for the Antelope Valley groundwater rights resulted in the establishment of a Watermaster that is responsible for assigning pumping allocations to groundwater users, with the long-term goal of sustainably managing the Antelope Valley groundwater basin water resource. The proposed modified project would not require installation of new wells onsite for water supply. By complying with the groundwater management regulations in place, the proposed modified project would not result in a significant impact related to the substantial depletion of groundwater supplies.

Surface water flows onsite following storm events mainly percolate into the groundwater basin via the soil. Although the proposed modified project, like the approved project, would introduce impervious surfaces to some areas of the project site from solar panel installation and other facilities, solar panels would be supported by relatively thin poles that would not take up a very large surface area. Building foundations would be relatively small with respect to the rest of the site, and the security fence and gen-tie line poles would not take up much surface area. A substantial number of pervious surfaces would remain both onsite and in surrounding areas to provide areas for groundwater recharge via soil percolation. Therefore, the proposed modified project would not interfere substantially with groundwater recharge.

With respect to the above-described hydrology and water quality evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hydrology and water quality impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hydrology and water quality impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(c)(i) 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 result in substantial erosion or siltation on or offsite?

The proposed modified project would not substantially alter existing drainage patterns. As discussed in the certified EIR, the project proponent would have to develop a SWPPP, as required by Mitigation Measure MM 4.10-2, and comply with any regional requirements to meet State water quality objectives for the approved project. The proposed project modification must also comply with this mitigation. During operations, the approved project's engineering and design plans would be required to comply with the most recent requirements of the Kern County Code of Building Regulations, as well as with Kern County Development Standards and Floodplain Management Ordinance. Mitigation Measure MM 4.10-1 specifically requires preparing a hydrologic drainage plan that is designed to minimize runoff and surface water pollution and will include engineering recommendations to minimize the potential for impeding or redirecting 100-year flood flows. The proposed project modification would also have to comply with this mitigation. The proposed modified project would not result in any new or substantially more adverse impacts resulting in substantial erosion or siltation onsite or offsite than was considered in the certified EIR.

As with the approved project, under post-developed conditions, the soil at the proposed modified project site will continue to remain pervious with minimal paved areas. Access

roads within the project site can be set with gravel where high traffic volumes are expected. Accounting for a slight increase in impervious surfaces the net change between pre-developed and post-developed on-site runoff will be mitigated with a retention basin. Based on SCS, the storm run-off for the proposed modified project area is 0.5 inches (in). With this data and gross area of 79 acres per parcel, totaling 158 gross acres for the project, the required retention basin is 3.76 acre-feet (AC-ft) of volume. According to NOAA, a 10-year rainfall depth in the project site was estimated to be 2.85 inches (Quad Knopf, Inc, 2019). The proposed modified project would not change the finding in the certified EIR of less than significant. No new or revised mitigation measures are required.

With respect to the above-described hydrology and water quality evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hydrology and water quality impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hydrology and water quality impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

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

The Federal Emergency Management Agency (FEMA) floodplains map indicates that the southerly half of the proposed modified project is within the identified FEMA designated 100-year floodplain. Hydraulic calculations performed in accordance with the Kern County Hydrology manual and approved flood modeling software indicate flood depths on site will be minimal, ranging from 0 to 0.65 feet. Flow velocities on site would be less than 2 feet per second. Post development of the site should be planned accordingly to mitigate flood levels and stormwater falling on or otherwise entering the site (Quad Knopf, Inc, 2019).

There are no streams or rivers on or in the vicinity of the proposed project addition, so the modifications to the project would not alter the courses of any such features. In addition, the proposed modified project would be subject to the same standard conditions as the approved project, including preparation of a SWPPP and adherence to the requirements of the Kern County Grading Code and Floodplain Management Ordinance, and like the approved project is relatively smooth. Further, implementation of Mitigation Measure MM 4.10-1 would require preparation of a hydrologic study and drainage plan; the drainage plan would recommend an onsite design that complies with all channel setback requirements and ensure facilities are located in such a way to lessen their impact on drainage areas. Per Mitigation Measure MM 4.10-2, construction-related ground disturbance required within any drainage areas would be minimized and timed to avoid the rainy season when possible. Therefore, ground disturbance within channels would be planned and timed to avoid exacerbation of flooding onsite. The proposed modified project would also maintain pervious surfaces onsite surrounding construction areas, which would help prevent excess flooding. Thus, like the approved project, the proposed modified project would not substantially alter the existing drainage patterns of the site or area and would not substantially increase the rate or amount of surface runoff.

With respect to the above-described hydrology and water quality evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hydrology and water quality impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hydrology and water quality impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(c)(iii) 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 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?

The proposed modified project does not contain or drain to existing or planned stormwater drainage systems. Additionally, as discussed in the certified EIR, development of the approved project creates a small number of impervious surfaces, but the changes would not substantially increase the amount of stormwater runoff. The project proponent would have to develop a SWPPP, as required by Mitigation Measure MM 4.10-2, and comply with any regional requirements to meet State water quality objectives for the approved project. The proposed project modification must also comply with this mitigation. During operations, the approved project's engineering and design plans would be required to comply with the most recent requirements of the Kern County Code of Building Regulations, as well as with Kern County Development Standards and Floodplain Management Ordinance. Mitigation Measure MM 4.10-1 specifically requires preparing a hydrologic study and drainage plan that is designed to minimize runoff and surface water pollution and will include engineering recommendations to minimize the potential for impeding or redirecting 100-year flood flows. The proposed project modification would also have to comply with this mitigation. The proposed modified project would not result in any new or substantially more adverse impacts resulting in exceeding the capacity of a stormwater drainage system or providing additional sources of polluted runoff than was considered in the certified EIR.

With respect to the above-described hydrology and water quality evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hydrology and water quality impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hydrology and water quality impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

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

The proposed modified project site is located within the South Lahontan RWQCB and is subject to the applicable requirements of the Basin Plan administered by the RWQCB in accordance with the Porter Cologne Water Quality Control Act. The proposed modified project would include required BMPs and drainage control requirements that would be consistent with the Basin Plan.

The project modified site is also located within the Antelope Valley Groundwater Basin, most of which is in an adjudicated area for groundwater management. The adjudication provides a framework to sustainably manage the basin and reduce groundwater level declines and subsidence. To administer the judgment, the court directed appointment of the watermaster (a five-member board). Like the approved project, the proposed modified project would require water for construction and operation phases that would be trucked onto the site from a local purveyor that would be subject to the requirements of the adjudicated basin management. Therefore, the proposed modified project would not conflict with the groundwater management of the basin. The modified project's potential impacts on these evaluation standards are consistent with, and do not substantially increase, the impacts of the approved project.

With respect to the above-described hydrology and water quality evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hydrology and water quality impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hydrology and water quality impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

The EIR determined that impacts of the approved project, when combined with the impacts of past, present, and reasonably foreseeable projects, would not create a substantial adverse effect related to hydrology and water quality. The proposed modified project would not introduce different or substantially more equipment or facilities than what was analyzed in the certified EIR, and would implement Mitigation Measures MM 4.9-1, MM 4.10-1 and MM 4.10-2, that includes the preparation of a Hazardous Materials Business Plan, a SWPPP and adherence to the requirements of the Kern County Statewide NPDES requirements, Kern County Grading Code and Floodplain Management Ordinance. As the above analysis demonstrates, the modified project's implementation will not create new or substantially more severe cumulative impacts to hydrology and water quality than those disclosed in the certified EIR and will be mitigated to the maximum extent practicable by the incorporation of all feasible and applicable mitigation measures. The cumulative projects analyzed in the certified EIR, remain the same.

With respect to the above-described hydrology and water quality evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described hydrology and water quality impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such hydrology and water quality impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.11 - Land Use and Planning

This section evaluates whether the impacts of the proposed modified project on land use and planning require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section was prepared in part using information from the certified EIR.

The lead agency determined that the approved project would not result in significant impacts to some of these environmental issue areas; these issue areas were scoped out of the certified EIR. It was determined that the approved project would not:

(a) Physically divide an established community

As discussed in the certified EIR, the approved project would be constructed on undeveloped lands. Residences or other structures are not located on the approved project site. The closest communities to the approved project site are Mojave, located approximately 9 miles northeast of the approved project site and Rosamond, located 8 miles northwest of the approved project site. Therefore, the approved project would not result in impacts related to the physical division of an established community. The modified project is similarly located away from residential subdivisions, the closest residential areas are located over two miles to the east of the modified project site and would exhibit comparable characteristics and would not physically divide an established community, and no additional analysis is warranted.

3.11.1 - SETTING

The certified EIR provided an evaluation of the potential land use and planning impacts that would be caused by implementation of the approved project. An analysis was then provided to determine whether the impact(s) would be less than significant, significant without mitigation, or significant and unavoidable.

The approved project site is located within the Kern County General Plan (KCGP) and is designated as 8.3 (Extensive Agriculture (Minimum 20 Acre Size, 80 acres with Williamson Act contract)) and within the A (Exclusive Agriculture), A/FP (Exclusive Agriculture – Floodplain Combining), and A/FPS (Exclusive Agriculture – Floodplain Secondary Combining) zone districts. The proposed modified project is located within the administrative boundaries of the Willow Springs Specific Plan (WSSP), which is consistent with the KCGP. Although there are some differences between the WSSP and KCGP, in general, the two documents are similar; therefore, potential land use and planning impacts are similar to those previously identified in the certified EIR. **Table 3.11.-1, *Project Consistency with the Kern County General Plan and the Willow Springs Specific Plan***, illustrates the consistency of the proposed modified project and the approved project related to land use.

Project Consistency with the Kern County General Plan and the Willow Springs Specific Plan

Table 3.11-1, Consistency Analysis with Kern County General Plan and the Willow Springs Specific Plan for Land Use, summarizes the consistency of the project with all applicable goals and policies of the Kern County General Plan and the Willow Springs Specific Plan and relevant planning documents that are applicable to the project site.

**Table 3.11-1
Consistency Analysis with Kern County General Plan and Willow Springs Specific Plan for Land Use**

Policies	Consistency Determination	Project Consistency
Kern County General Plan Chapter 1, Land Use, Open Space and Conservation Element		
1.3 Physical and Environmental Constraints		
Goal 1: To strive to prevent loss of life, reduce personal injuries, and property damage, minimize economic and social diseconomies resulting from natural disaster by directing development to areas which are not hazardous.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	See Section 3.10, <i>Hydrology and Water Quality</i> , of this Addendum EIR. The project site is located partially within an Area of Minimal Flood Hazard while the other portion is within a zone with 1% Annual Chance of Flood Hazard. However, implementation of Mitigation Measure MM 4.10-1 would require preparation of a drainage plan that would design project facilities to have one-foot of freeboard clearance above the calculated maximum flood depths for the solar arrays or the finished floor of any permanent structures. Additionally, per Mitigation Measure MM 4.10-1, grading for the proposed modified project would be designed so that water surface elevations during flood events would not be increased by more than one foot. Further, the proposed modified project would be developed in accordance with the General Plan and Floodplain Management Ordinance. Consistent with this policy, the proposed modified project would develop a solar PV power generating facility that is not located on a hazardous site. See Section 3.9, <i>Hazards and Hazardous Materials</i> , of this Addendum EIR. Further, the proposed modified project would be developed in accordance with the General Plan and Floodplain Management Ordinance. Seismic hazards are described and analyzed in Section 3.7, <i>Geology and Soils</i> , of this Addendum EIR. Mitigation Measure MM 4.7-1, which requires implementation of recommendations from the Geotechnical Engineering Report for the proposed modified project, would ensure site stability to the maximum extent possible during project construction and operation. Final review of the proposed modified project by the Kern County Planning and Natural Resources Department, as well as adherence to all applicable local, state and federal regulations, would ensure that the proposed modified project would not pose significant environmental or public health and safety hazards.

Policies	Consistency Determination	Project Consistency
		Therefore, with implementation of mitigation measures the proposed modified project would be consistent with this goal.
Policy 1: Kern County will ensure that new developments will not be sited on land that is physically or environmentally constrained (Map Code 2.1 [Seismic Hazard], Map Code 2.2 [Landslide], Map Code 2.3 [Shallow Groundwater], Map Code 2.5 [Flood Hazard], Map Codes from 2.6 – 2.9, Map Code 2.10 [Nearby Waste Facility], and Map Code 2.11 [Burn Dump Hazard]) to support such development unless appropriate studies establish that such development will not result in unmitigated significant impact.	Consistent.	See 1.3, <i>Physical and Environmental Constraints</i> , Goal 1, of the Kern County General Plan, above.
Policy 9: Construction of structures that impede water flow in a primary floodplain will be discouraged.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	See Section 3.10, <i>Hydrology and Water Quality</i> , of this Addendum EIR. Because the project site is located partially within an Area of Minimal Flood Hazard while the other portion is within a zone with 1% Annual Chance of Flood Hazard, project facilities would be designed to maintain clearance above the maximum flood depths and grading would not substantially increase flooding depths. Further, the proposed modified project would be developed in accordance with the General Plan and Floodplain Management Ordinance and would implement MM 4.10-1, as described above. Therefore, the proposed modified project would be consistent with this policy.
Policy 10: The County will allow lands which are within flood hazard areas, other than primary floodplains, to be developed in accordance with the General Plan and Floodplain Management Ordinance, if mitigation measures are incorporated so as to ensure that the proposed development will not be hazardous within the requirements of the Safety Element (Chapter 4) of this General Plan.7	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	Section 3.10, <i>Hydrology and Water Quality</i> , of this Addendum EIR. Because the proposed modified project would maintain flood flow conveyance, the proposed modified project would not increase the potential for flooding beyond existing conditions. Flooding in this location would not result in a safety hazard, as the proposed modified project would not establish a substantial permanent population onsite. Further, the proposed modified project would be developed in accordance with the General Plan and Floodplain Management Ordinance.

Policies	Consistency Determination	Project Consistency
Policy 11: Protect and maintain watershed integrity within Kern County.	Consistent with implementation of Mitigation Measures MM 4.10-1 and MM 4.9-1, of the certified EIR.	As discussed in Section 3.10, <i>Hydrology and Water Quality</i> . The proposed project site would implement best management practices during construction to avoid impacts to water quality. The proposed modified project would also comply with a Hazardous Materials Business Plan to reduce mixing of pollutants with stormwater onsite, thereby maintaining the integrity of the Antelope Valley Watershed.
Measure F: The County will comply with the Colbey-Alquist Floodplain Management Act in regulating land use within designated floodways.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	See Section 3.10, <i>Hydrology and Water Quality</i> , of this Addendum EIR. Because the project site is located partially within an Area of Minimal Flood Hazard while the other portion is within a zone with 1% Annual Chance of Flood Hazard, project facilities would be designed to maintain clearance above the maximum flood depths and grading would not substantially increase flooding depths. Further, the proposed modified project would be developed in accordance with the General Plan, Floodplain Management Ordinance and Mitigation Measure 4.10-1. Therefore, the proposed modified project would be consistent with this measure.
Measure H: Development within areas subject to flooding, as defined by the appropriate agency, will require necessary flood evaluations and studies.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	Section 3.10, <i>Hydrology and Water Quality</i> discusses project compliance with all applicable flood regulations, including the County Floodplain Management Ordinance. Mitigation Measure MM 4.10-1 of the certified EIR, would require the project proponent shall complete a hydrologic study and final drainage plan designed to evaluate and minimize potential increases in runoff from the proposed project site, prior to the issuance of a grading permit, which would ensure compliance with this measure.
Measure J: Compliance with the Floodplain Management Ordinance prior to grading or improvement of land for development or the construction, expansion, conversion or substantial improvements of a structure is required.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	See 1.3, <i>Physical and Environmental Constraints</i> , Measure H, of the Kern County General Plan, above.
Measure N: Applicants for new discretionary development should consult with the appropriate Resource Conservation District and the California Regional Water Quality Control Board regarding soil disturbances issues.	Consistent.	Section 3.10, <i>Hydrology and Water Quality</i> , discusses impacts related to soil-disturbing activities and required compliance with Kern County's National Pollutant Discharge Elimination System Applicability legislation, which requires projects to comply with the State Water Resources Control Board's Construction General Permit despite being in a closed watershed.

Policies	Consistency Determination	Project Consistency
1.4 Public Facilities and Services		
Goal 1: Kern County residents and businesses should receive adequate and cost effective public services and facilities. The County will compare new urban development proposals and land use changes to the required public services and facilities needed for the proposed project.	Consistent with implementation of revised Mitigation Measure MM 4.14-2.	As discussed in Section 3.14, <i>Public Services</i> , of this Addendum EIR, the project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise receive for services and facilities thereby supporting a prosperous economy and assuring the provision of adequate public services and facilities.
Policy 1: New discretionary development will be required to pay its proportional share of the local costs of infrastructure improvements required to service such development.	Consistent with implementation of revised Mitigation Measure MM 4.4-12.	As discussed in Section 3.14, <i>Public Services</i> , of this Addendum EIR, implementation of revised Mitigation Measure MM 4.14-2 would require the proposed modified project to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise receive for services and facilities thereby supporting a prosperous economy and assuring the provision of adequate public services and facilities.
Policy 3: Individual projects will provide availability of public utility service as per approved guidelines of the serving utility.	Consistent with implementation of Mitigation Measure MM 4.17-1 of the certified EIR.	Public utility impacts are evaluated in Section 3.17, <i>Utilities and Service Systems</i> , of this Addendum EIR. As described therein, the project would have less-than-significant impacts on water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities. With the implementation of Mitigation Measure MM 4.17-1, a recycling coordinator would ensure the separation and proper disposal of recyclable materials and solid waste during construction and operation resulting in less than significant impact to solid waste providers.
Policy 6: The County will ensure adequate fire protection to all Kern County residents.	Consistent with implementation of revised Mitigation Measure MM 4.14-2.	See 1.4, <i>Public Services</i> , Policy 1, above. The project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise receive for services and facilities thereby supporting a prosperous economy and assuring the provision of adequate public services and facilities.
Policy 7: The County will ensure adequate police protection to all Kern County residents.	Consistent with implementation of revised Mitigation Measure MM 4.14-2.	See 1.4, <i>Public Services</i> , Policy 1, above. The project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise receive for services and facilities

Policies	Consistency Determination	Project Consistency
		thereby supporting a prosperous economy and assuring the provision of adequate public services and facilities.
Policy 15: Prior to approval of any discretionary permit, the County shall make the finding, based on information provided by the CEQA documents, staff analysis, and the applicant, that adequate public or private services and resources are available to serve the proposed development.	Consistent with implementation of revised Mitigation Measure MM 4.14-2 and MM 4.17-1 of the certified EIR.	See 1.4, <i>Public Services and Facilities</i> , Policy 3, above. Also, the project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise receive for services and facilities thereby supporting a prosperous economy and assuring the provision of adequate public services and facilities.
Measure A: Continue to administer the Capital Improvement Program (CIP) and coordinate with public utility providers listing the necessary improvements to Kern County's public services and facilities in collaboration with key service providing agencies and the County Administrative Office as a first step toward the preparation of a long-term Public Services Plan for Kern County. This plan addresses the projected demand for public services throughout the County in comparison with projected revenues and identifies long-term financial trends for the major public service providers. The CIP and General Plan can assure compliance with the provisions of Government Code Sections 65401 and 65402 which require review of all capital facility decisions for consistency with this General Plan.	Consistent with implementation of revised Mitigation Measure MM 4.14-2.	See 1.4, <i>Public Services</i> , Policy 1, above.
Measure B: Determine local costs of County facility and infrastructure improvements and expansion which are necessitated by new development of any type and prepare	Consistent with implementation of revised Mitigation Measure MM 4.14-2.	See 1.4, <i>Public Services and Facilities</i> , Goal 1, above. Also, the project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise

Policies	Consistency Determination	Project Consistency
a schedule of charges to be levied on the developer at the site of approval of the Final Map. This implementation can be effectuated by the formation of a County work group.		receive for services and facilities thereby supporting a prosperous economy and assuring the provision of adequate public services.
Measure C: Project developers shall coordinate with the local utility service providers to supply adequate public utility services.	Consistent.	Project effects related to utilities are discussed in Section 3.17, <i>Utilities and Service Systems</i> , of this Addendum EIR. The proposed modified project would result in less-than-significant impacts to utilities. Furthermore, the proposed modified project would include the development of solar photovoltaic power generation facilities with one energy storage unit designed to produce approximately 60 MW of solar power that would be delivered to the grid, reducing dependence on fossil fuel based energy.
Measure D: Involve utility providers in the land use and zoning review process.	Consistent.	Public utility impacts are evaluated in Section 3.17, <i>Utilities and Service Systems</i> . A will-serve letter from serving utilities would confirm the availability of public utility services for this project.
Measure L: Prior to the approval of development projects, the County shall determine the need for fire protection services. New development in the County shall not be approved unless adequate fire protection facilities and resources can be provided.	Consistent with implementation of Mitigation Measures MM 4.14-1 of the certified EIR and revised MM 14.4-2.	Impacts to fire protection services are evaluated in Section 3.14, <i>Public Services</i> , of this Addendum EIR. Mitigation Measure MM 4.14-1 requires implementation of a fire safety plan during project construction and operation that would include notification procedures and emergency fire precautions to help reduce fire risks and the consequential need for fire protection services onsite. The project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise receive for services and facilities thereby supporting a prosperous economy and assuring the provision of adequate public services and facilities.
1.9 Resource (Map Codes 8.1 Intensive Agriculture)		
Goal 1: To contain new development within an area large enough to meet generous projections of foreseeable need, but in locations that will not impair the economic strength derived from the petroleum, agriculture, rangeland, or mineral resources, or diminish the other amenities which exist in the County.	Consistent.	As discussed in Section 3.2, <i>Agriculture and Forest Resources</i> , of this Addendum EIR, the proposed project site is approximately 158 acres and is not located within an area that is designated by the California Department of Conservation (DOC) as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. The DOC designates the proposed project site as non-agricultural, and natural vegetation. Therefore, the proposed modified project would not impact agricultural areas.

Policies	Consistency Determination	Project Consistency
Goal 2: To protect areas of important mineral, petroleum, and agricultural resource potential for future use.	Consistent.	See 1.9, <i>Resource</i> , Goal 1, above. As discussed in Section 3.12, <i>Mineral Resources</i> , the proposed project site is not located within a mineral resource area.
Goal 3: To ensure that the development of resource areas minimize effects on neighboring resource lands.	Consistent.	Solar facilities are compatible with agricultural uses, and the placement of solar arrays at the proposed project site may deter other urban and suburban land uses from being developed at the proposed project site. This could assist in conserving adjacent areas for agricultural use.
Goal 5: Conserve prime agriculture lands from premature conversion.	Consistent.	See 1.9, <i>Resource</i> , Goal 1, above.
Policy 7: Areas designated for agricultural use, which include Class I and II and other enhanced agricultural soils with surface delivery water systems, should be protected from incompatible residential, commercial, and industrial subdivision and development activities.	Consistent.	See 1.9, <i>Resource</i> , Goals 1 and 3, above.
Policy 11: Minimize the alteration of natural drainage areas. Require development plans to include necessary mitigation to stabilize runoff and silt deposition through utilization of grading and flood protection ordinances.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	As discussed in Section 3.10, <i>Hydrology and Water Quality</i> , there are no drainage features traversing the project site. However, consistent with this policy, the proposed modified project would require the submission of a drainage plan to the County for review and would implement Mitigation Measure 4.10-1.
Policy 14: Emphasize conservation and development of identified mineral deposits.	Consistent.	As discussed in Section 3.12, <i>Mineral Resources</i> , the proposed project site does not contain mineral resources including petroleum. Consistent with this policy, no development would occur that would impact identified mineral deposits.
Policy 16: The County will encourage development of alternative energy sources by tailoring its Zoning and Subdivision Ordinances and building standards to reflect Alternative Energy Guidelines published by the California State Energy Commission.	Consistent.	The proposed modified project proposes the development of solar PV power generating facilities designed to produce approximately 30 MW of solar power. Consistent with this policy, the proposed modified project is requesting Conditional Use Permits in accordance with the provisions of the Kern County Zoning Ordinance.

Policies	Consistency Determination	Project Consistency
Policy 19: Work with other agencies to define regulatory responsibility concerning energy-related issues.	Consistent.	This project would not prevent the ability of the County to work with other agencies to define energy-related issues.
Policy 25: Discourage incompatible land use adjacent to Map Code 8.4 Mineral and Petroleum areas.	Consistent.	As discussed in Section 3.12, <i>Mineral Resources</i> , the proposed project site does not contain mineral resources including petroleum. Furthermore, the proposed project site is located 1.2 miles from the nearest parcel designated by the County as Map Code 8.4. Therefore, the proposed modified project would not encourage incompatible land use adjacent to Map Code 8.4 Mineral and Petroleum areas.
Measure F: Prime agricultural lands, according to the Kern County Interim-Important Farmland 2000 map produced by the Department of Conservation, which have Class I or II soils and a surface delivery water system shall be conserved through the use of agricultural zoning with minimum parcel size provisions.	Consistent.	As discussed in Section 3.2, <i>Agriculture and Forestry Resources</i> , the proposed project site does not contain any prime farmland identified by the California Department of Conservation. Consistent with this policy, no prime agricultural lands, which have Class I or II soils and a surface delivery water system, would be impacted by the proposed modified project.
Measure H: Use the California Geological Survey's latest maps to locate mineral deposits until the regional and Statewide importance mineral deposits map has been completed, as required by the Surface Mining and Reclamation Act.	Consistent.	As discussed in Section 3.12, <i>Mineral Resources</i> , neither the proposed project site nor surrounding areas contain State-designated mineral resource areas. Consistent with this measure, this Addendum EIR utilized the California Geological Survey's latest maps to identify local mineral deposits in the vicinity of the proposed project site.

Policies	Consistency Determination	Project Consistency
1.10 General Provisions		
Goal 1: Ensure that the County can accommodate anticipated future growth and development while maintaining a safe and healthful environment and a prosperous economy by preserving valuable natural resources, guiding development away from hazardous areas, and assuring the provision of adequate public services.	Consistent with implementation of revised Mitigation Measure MM 4.14-2.	The project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise receive for services and facilities thereby supporting a prosperous economy and assuring the provision of adequate public services.
1.10.1 Public Services and Facilities		
Policy 9: New development should pay its pro rata share of the local cost of expansions in services, facilities, and infrastructure that it generates and upon which it is dependent.	Consistent with implementation of revised Mitigation Measure MM 4.14-2.	See 1.4, <i>Public Facilities and Services</i> , Policy 1, above. Impacts to public services are evaluated in Section 3.14, <i>Public Services</i> , of this Addendum EIR. The project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise receive for services and facilities thereby supporting a prosperous economy and assuring the provision of adequate public services.
Policy 15: Prior to approval of any discretionary permit, the County shall make the finding, based on information provided by the California Environmental Quality Act (CEQA) documents, staff analysis, and the applicant, that adequate public or private services and resources are available to serve the proposed development.	Consistent with implementation of revised Mitigation Measure MM 4.14-2. .	Public service impacts are evaluated in Section 3.14, <i>Public Services</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy. The project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise receive for services and facilities thereby supporting a prosperous economy and assuring the provision of adequate public services and facilities.
Policy 16: The developer shall assume full responsibility for costs incurred in service extension or improvements that are required to ensure the project. Cost sharing or other forms of recovery shall be available when the service extensions or improvements have a	Consistent with implementation of Mitigation Measures MM 4.14-1 of the certified EIR and revised MM 4.14-2.	See 1.4, <i>Public Facilities and Services</i> , Policy 1, above.

Policies	Consistency Determination	Project Consistency
specific quantifiable regional significance.		
Measure C: Project developers shall coordinate with the local utility service providers to supply adequate public utility services.	Consistent.	See 1.4, <i>Public Facilities and Services</i> , Policy 1, above.
Measure D: Involve utility providers in the land use and zoning review process.	Consistent.	See 1.4, <i>Public Facilities and Services</i> , Policy 1, above.
1.10.2 Air Quality		
Policy 18: The air quality implications of new discretionary land use proposals shall be considered in approval of major developments. Special emphasis will be placed on minimizing air quality degradation in the desert to enable effective military operations and in the valley region to meet attainment goals.	Consistent with implementation of Mitigation Measures MM 4.3-1 through MM 4.3-7, of the certified EIR.	As discussed in Section 3.3, <i>Air Quality</i> , of this Addendum EIR, the proposed modified project will include all feasible mitigation measures, from the certified EIR, to reduce significant adverse air quality impacts. However, even after the implementation of such measures, the construction and decommission of the proposed modified project may result in significant and unavoidable impacts for PM ₁₀ . Nevertheless, the short term significant and unavoidable impacts that the proposed modified project may bring during the construction and decommissioning phases is outweighed by the long-term air quality benefits the proposed modified project would result in, particularly in regard to its assistance in reducing greenhouse gas emissions and helping the State meet the targets under the Global Warming Solutions Act of 2006 by avoiding carbon dioxide (CO ₂) emissions annually.
Policy 19: In considering discretionary projects for which an Environmental Impact Report must be prepared pursuant to the California Environmental Quality Act, the appropriate decision making body, as part of its deliberations, will ensure that: a. All feasible mitigation to reduce significant adverse air quality impacts have been adopted; and b. The benefits of the proposed project outweigh any unavoidable significant adverse effects on air quality	Consistent.	See 1.10.2, <i>Air Quality</i> , Policy 18, above.

Policies	Consistency Determination	Project Consistency
found to exist after inclusion of all feasible mitigation. This finding shall be made in a statement of overriding considerations and shall be supported by factual evidence to the extent that such a statement is required pursuant to the California Environmental Quality Act.		
Policy 20: The County shall include fugitive dust control measures as a requirement for discretionary projects and as required by the adopted rules and regulations of the San Joaquin Valley Unified Air Pollution Control District and the Kern County Air Pollution Control District on ministerial permits.	Consistent with implementation of Mitigation Measures MM 4.3-1 through MM 4.3-6, of the certified EIR.	Air quality impacts are evaluated in Section 3.3, <i>Air Quality</i> , of this Addendum EIR. As discussed in that section, implementation of Mitigation Measures MM 4.3-1 and MM 4.3-6, of the certified EIR, would further reduce fugitive dust emissions during construction and operation, in compliance with the adopted rules and regulations of the San Joaquin Valley Unified Air Pollution Control District, local Eastern Kern Air Pollution Control District and the Kern County Air Pollution Control District on ministerial permits.
Policy 21: The County shall support air districts' efforts to reduce PM ₁₀ and PM _{2.5} emissions.	Consistent with implementation of Mitigation Measures MM 4.3-1 through MM 4.3-6, of the certified EIR.	See Section 1.10.2, <i>Air Quality</i> , Policy 18, above. Air quality impacts are evaluated in Section 4.3, <i>Air Quality</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy.
Policy 22: Kern County shall continue to work with the San Joaquin Valley Unified Air Pollution Control District and the Kern County Air Pollution Control District toward air quality attainment with federal, State, and local standards.	Consistent with implementation of Mitigation Measures MM 4.3-1 through MM 4.3-8, of the certified EIR.	Air quality impacts are evaluated in Section 3.3, <i>Air Quality</i> , of this Addendum EIR. Consistent with this policy, the proposed modified project would have less than significant impacts on air quality and GHG emissions with implementation of Mitigation Measures MM 4.3-1 through MM 4.3-8, of the certified EIR. The proposed modified project would be in compliance with all applicable San Joaquin Valley Unified Air Pollution Control District, and Eastern Kern County Air Pollution Control District, rules and regulations.
Measure F: All discretionary permits shall be referred to the appropriate air district for review and comment.	Consistent.	Air quality impacts are evaluated in Section 3.3, <i>Air Quality</i> , of this Addendum EIR. Consistent with this measure, the necessary discretionary permits shall be referred to the Eastern Kern Air Pollution Control District for review and comment.

Policies	Consistency Determination	Project Consistency
<p>Measure G: Discretionary development projects involving the use of tractor-trailer rigs shall incorporate diesel exhaust reduction strategies including, but not limited to:</p> <ol style="list-style-type: none"> 1. Minimizing idling time. 2. Electrical overnight plug-ins. 	<p>Consistent with implementation of Mitigation Measures MM 4.3-3 and MM 4.3-7, of the certified EIR.</p>	<p>Air quality impacts are evaluated in Section 3.3, <i>Air Quality</i>, of this Addendum EIR. Consistent with this measure, implementation of Mitigation Measures MM 4.3-3 and MM 4.3-7, of the certified EIR, would require diesel exhaust reduction strategies.</p>
<p>Measure H: Discretionary projects may use one or more of the following to reduce air quality effects:</p> <ol style="list-style-type: none"> 1. Pave dirt roads within the development. 2. Pave outside storage areas. 3. Provide additional low Volatile Organic Compounds (VOC) producing trees on landscape plans. 4. Use of alternative fuel fleet vehicles or hybrid vehicles. 5. Use of emission control devices on diesel equipment. 6. Develop residential neighborhoods without fireplaces or with the use of Environmental Protection Agency certified, low emission natural gas fireplaces. 7. Provide bicycle lockers and shower facilities on site. 8. Increasing the amount of landscaping beyond what is required in the Zoning Ordinance (Chapter 19.86). 	<p>Consistent with implementation of Mitigation Measures MM 4.3-3 and MM 4.3-7, of the certified EIR.</p>	<p>Air quality impacts are evaluated in Section 3.3, <i>Air Quality</i>, of this Addendum EIR. Consistent with this measure, implementation of Mitigation Measures MM 4.3-3 and MM 4.3-7, of the certified EIR, would further reduce adverse air quality effects.</p>

Policies	Consistency Determination	Project Consistency
9. The use and development of park and ride facilities in outlying areas. 10. Other strategies that may be recommended by the local Air Pollution Control Districts.		
Measure J: The County should include PM10 control measures as conditions of approval for subdivision maps, site plans, and grading permits.	Consistent with implementation of Mitigation Measure MM 4.3-8, of the certified EIR.	Air quality impacts are evaluated in Section 3.3, <i>Air Quality</i> , of this Addendum EIR. As discussed in that section, implementation of Mitigation Measure MM 4.3-8, of the certified EIR, would further reduce PM10 emissions during construction and operation.
1.10.3 Archaeological, Paleontological, Cultural, and Historical Preservation		
Policy 25: The County will promote the preservation of cultural and historic resources that provide ties with the past and constitute a heritage value to residents and visitors.	Consistent with implementation of Mitigation Measures MM 4.5-1 and MM 4.5-4 through MM 4.5-7, of the certified EIR and with revised Mitigation Measures MM 4.5-2 and MM 4.5-3.	Cultural resource impacts are evaluated in Section 3.5, <i>Cultural Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy with mitigation measures to promote the preservation of cultural and historic resources where necessary.
Measure K: Coordinate with the California State University, Bakersfield's Archaeology Inventory Center.	Consistent.	Cultural resource impacts are evaluated in Section 3.5, <i>Cultural Resources</i> , of this Addendum EIR. Consistent with this measure, a records search was conducted for the proposed modified project at California State University Bakersfield.
Measure L: The County shall address archaeological and historical resources for discretionary projects in accordance with CEQA.	Consistent with implementation of Mitigation Measures MM 4.5-1 and MM 4.5-4 through MM 4.5-7, of the certified EIR, and with revised Mitigation Measures MM 4.5-2 and MM 4.5-3.	Cultural resource impacts are evaluated in Section 3.5, <i>Cultural Resources</i> , of this Addendum EIR. Consistent with this measure, impacts to archaeological and historical resources are evaluated in accordance with CEQA.
Measure M: In areas of known paleontological resources, the County should address the preservation of these resources where feasible.	Consistent with implementation of Mitigation Measures MM 4.5-4 through MM 4.5-6, of the certified EIR.	Cultural resource impacts are evaluated in Section 3.5, <i>Cultural Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this measure and includes Mitigation Measures MM 4.5-4 through 4.5-6, of the certified EIR, which would reduce potential impacts to known paleontological resources, where feasible.
Measure N: The County shall develop a list of Native American organizations and individuals who desire to be notified of proposed discretionary projects. This	Consistent with implementation of Mitigation Measures MM 4.5-1 of the certified EIR, and revised Mitigation Measures MM 4.5-2 and MM 4.5-3	Tribal Cultural resource impacts are evaluated in Section 3.16, <i>Tribal Cultural Resources</i> . Consistent with this measure, notification regarding the proposed modified project would be accomplished in accordance with the established procedures for discretionary projects and CEQA documents.

Policies	Consistency Determination	Project Consistency
notification will be accomplished through the established procedures for discretionary projects and CEQA documents.		
Measure O: On a project-specific basis, the County Planning Department shall evaluate the necessity for the involvement of a qualified Native American monitor for grading or other construction activities on discretionary projects that are subject to a CEQA document.	Consistent with implementation of revised Mitigation Measure MM 4.5-2.	Cultural resource impacts are evaluated in Section 3.5, <i>Cultural Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this measure and includes revised Mitigation Measure MM 4.5-2 which would require the services of a qualified Native American monitor to be retained full-time during ground-disturbing activities.
1.10.5 Threatened and Endangered Species		
Policy 27: Threatened or endangered plant and wildlife species should be protected in accordance with State and federal laws.	Consistent with implementation of Mitigation Measures MM 4.4-1 through MM 4.4-16, of the certified EIR.	Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy and reduce potential impacts with mitigation. Additionally, the proposed modified project would be developed and operated in accordance with all local, State and federal laws pertaining to the preservation of sensitive species.
Policy 28: The County should work closely with State and federal agencies to assure that discretionary projects avoid or minimize impacts to fish, wildlife, and botanical resources.	Consistent with implementation of revised Mitigation Measures MM 4.4-1 and revised MM 4.4-6, as well as implementation of MM 4.4-2 through MM 4.4-5 and MM 4.4-7 through MM 4.4-15 of the certified EIR.	Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy and reduce potential impacts with mitigation. As part of the biological resources evaluation and habitat assessment conducted for the proposed modified project, relevant State and federal agencies were contacted to ensure that appropriate information about the proposed project site were being gathered. Specifically, the NOP/IS for the certified EIR was sent to State and federal agencies requesting their input on the biological resource evaluation. Similarly, the certified EIR was also circulated to these agencies, and staff will have the opportunity to comment on the biological resources evaluation presented on this Addendum EIR. Therefore, the County is complying with this policy for the proposed modified project.
Policy 29: The County will seek cooperative efforts with local, State, and Federal agencies to protect listed threatened and endangered plant and wildlife species through the use of conservation plans and other methods promoting management and conservation of habitat lands.	Consistent with implementation of Mitigation Measures MM 4.4-3 through MM 4.4-5, of the certified EIR and revised Mitigation Measure MM 4.4-6.	Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. Consistent with this policy, the proposed modified project was determined to not conflict with the provisions of habitat conservation plans, natural community conservation plans, or other approved local, regional, or State habitat conservation plans. Additionally, implementation of Mitigation Measures MM 4.4-3 through MM 4.4-5, of the certified EIR, and revised Mitigation Measure MM 4.4-6 would further

Policies	Consistency Determination	Project Consistency
Policy 30. The County will promote public awareness of endangered species laws to help educate property owners and the development community of local, State, and Federal programs concerning endangered species conservation issues.		increase cooperative efforts with local, State, and federal agencies to support threatened and endangered plant and wildlife.
Policy 31: Under the provisions of CEQA, the County, as lead agency, will solicit comments from the CDFW and the USFWS when an environmental document (Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report) is prepared.	Consistent with implementation of revised Mitigation Measure MM 4.4-1 and revised MM 4.4-6, as well as implementation of MM 4.4-2 through MM 4.4-5 and MM 4.4-7 through MM 4.4-15, of the certified EIR.	See 1.10.5, <i>Threatened and Endangered Species</i> , Policy 28, above.
Policy 32: Riparian areas will be managed in accordance with the USACE and the CDFW rules and regulations to enhance the drainage, flood control, biological, recreational, and other beneficial uses while acknowledging existing land use patterns.	Consistent with implementation of Mitigation Measures MM 4.4-15, of the certified EIR.	As discussed in the biological resources evaluation and habitat assessment conducted for the proposed modified project, in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR, no ephemeral drainages were identified and delineated within the proposed project boundary.
Measure Q: Discretionary projects shall consider effects to biological resources as required by CEQA.	Consistent.	Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. Consistent with this measure, the evaluation of impacts to biological resources was performed in accordance with CEQA.
Measure R: Consult and consider the comments from responsible and trustee wildlife agencies when reviewing a discretionary project subject to CEQA.	Consistent with implementation of Mitigation Measures MM 4.4-8, MM 4.4-9, MM 4.4-10, MM 4.4-12, MM 4.4-13, and MM 4.4-15, of the certified EIR and revised Mitigation Measures MM 4.4-1 and MM 4.4-6.	Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. Consistent with this measure, Mitigation Measures MM 4.4-8, MM 4.4-9, MM 4.4-10, MM 4.4-12, MM 4.4-13, and MM 4.4-15, of the certified EIR, and revised Measures MM 4.4-1, MM 4.4-6 require consultation with CDFW. The County has and will respond to all comments from reviewing agencies during the CEQA process.
Measure S: Pursue the development and implementation of conservation programs with State and federal wildlife agencies for property owners	Consistent with implementation of Mitigation Measure MM 4.4-10, of the certified EIR.	Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. Consistent with this measure, Mitigation Measure MM 4.4-10, of the certified EIR, would incorporate conservation strategies for burrowing owls in accordance with State and federal wildlife agency programs and policies.

Policies	Consistency Determination	Project Consistency
desiring streamlined endangered species mitigation programs.		
1.10.6 Surface Water and Groundwater		
Policy 34: Ensure that water quality standards are met for existing users and future development.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	Water quality impacts are evaluated in Section 3.10, <i>Hydrology and Water Quality</i> . Consistent with this policy, the proposed modified project would implement best management practices during construction to avoid impacts to water quality. The proposed modified project would also comply with a Hazardous Materials Business Plan to reduce mixing of pollutants with stormwater onsite, thereby maintaining the integrity of the Antelope Valley watershed.
Policy 40: Encourage utilization of community water system rather than the reliance on individual wells	Consistent.	Section 3.17, <i>Utilities and Service Systems</i> , discusses water required during construction of the proposed modified project. Consistent with this policy, water needed for construction, operation, and decommissioning activities is expected to be trucked from an offsite water purveyor and/or pumped from a potential onsite well if trucked water is determined to be infeasible.
Policy 41: Review development proposals to ensure adequate water is available to accommodate projected growth.	Consistent.	See 1.10.6, <i>Surface Water and Groundwater</i> ; Policy 40, above.
Policy 43: Drainage shall conform to the Kern County Development Standards and the Grading Ordinance.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	Drainage plans and associated impacts are discussed in Section 3.10, <i>Hydrology and Water Quality</i> . Consistent with this policy, final project design would be required to conform to the Kern County Development Standards and Grading Ordinance. This would be confirmed during final plot plan review by the Kern County Planning and Natural Resources Department.
Policy 44: Discretionary projects shall analyze watershed impacts and mitigate for construction-related and urban pollutants, as well as alterations of flow patterns and introduction of impervious surfaces as required by the California Environmental Quality Act, to prevent the degradation of the watershed to the extent practical.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	Please refer to Section 3.10, <i>Hydrology and Water Quality</i> , for a complete discussion potential watershed impacts resulting from the proposed modified project.
Measure Y: Promote efficient water use by utilizing measures such as: (i) Requiring water-conserving design	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	Section 3.10, <i>Hydrology and Water Quality</i> , discusses water demand, water supply, and associated mitigation measures to reduce project water use and

Policies	Consistency Determination	Project Consistency
and equipment in new construction; (ii) Encouraging water-conserving landscaping and irrigation methods; and (iii) Encouraging the retrofiting of existing development with water conserving devices.		impacts in addition to implementation of Mitigation Measure MM 4.10-1, of the certified EIR.
1.10.7 Light and Glare		
Policy 47: Ensure that light and glare from discretionary new development projects are minimized in rural as well as urban areas.	Consistent with implementation of Mitigation Measures MM 4.1-4 through MM 4.1-5, of the certified EIR and Mitigation Measure MM 4.1-6.	Aesthetic impacts are evaluated in Section 3.1, <i>Aesthetics</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy and reduce potential impacts through implementation of mitigation measures.
Policy 48: Encourage the use of low-glare lighting to minimize nighttime glare effects on neighboring properties.	Consistent with implementation of Mitigation Measures MM 4.1-5 and MM 4.1-5, of the certified EIR and Mitigation Measure MM 4.1-6.	See 1.10.7, <i>Light and Glare</i> , Policy 47, above.
Measure AA: The County shall utilize CEQA <i>Guidelines</i> and the provisions of the Zoning Ordinance to minimize the impacts of light and glare on adjacent properties and in rural undeveloped areas.	Consistent with implementation of Mitigation Measures MM 4.1-5 and MM 4.1-5, of the certified EIR and Mitigation Measure MM 4.1-6.	Aesthetic impacts are evaluated in Section 3.1, <i>Aesthetics</i> , of this Addendum EIR. Consistent with this measure, implementation of Mitigation Measures MM 4.1-3 through MM 4.1-5, of the certified EIR, would further reduce impacts related to light and glare, in accordance with CEQA guidelines.
Measure FF: Work with Caltrans in implementation of the Scenic Highway Corridor designation for various highways as described in the Circulation Element and protect viewsheds with the use of the SC (Scenic Corridor Combining) District.	Consistent.	Scenic highways are discussed in Section 3.1, <i>Aesthetics</i> . As discussed in this section, there are no Designated State Scenic Highways within Kern County near the proposed modified project site.
Chapter 2 Circulation Element		
2.1 Introduction		
Goal 5: Maintain a minimum [level of service] LOS D for all roads throughout the County.	Consistent.	Traffic impacts are evaluated in Section 3.15, <i>Traffic and Transportation</i> , of this Addendum EIR. Consistent with this goal, the proposed modified project would maintain a minimum LOS C for all roads throughout the County.

Policies	Consistency Determination	Project Consistency
2.3.3 Highway Plan		
Goal 5: Maintain a minimum LOS D.	Consistent.	Traffic impacts are evaluated in Section 3.15, <i>Traffic and Transportation</i> , of this Addendum EIR. Consistent with this goal, the proposed modified project would maintain a minimum LOS C for all roads throughout the County.
Policy 1: Development of roads within the County shall be in accordance with the Circulation Diagram Map. The charted roads are usually on section and midsection lines. This is because the road centerline can be determined by an existing survey.	Consistent.	Section 3.15, <i>Traffic and Transportation</i> , of this Addendum EIR provides a discussion of County circulation consistency. Consistent with this policy, all road improvements would be completed per Caltrans and/or County code and regulations. If access roads need to be built along lines other than those on the circulation diagram map, the project proponent would negotiate necessary easements to allow this, in according with the County.
Policy 3: This plan's road-width standards are listed below. These standards do not include State highway widths that would require additional right-of-way for rail transit, bike lanes, and other modes of transportation. Kern County shall consider these modifications on a case-by-case basis. <ul style="list-style-type: none"> • Expressway [Four Travel Lanes] Minimum 110-foot right-of-way; • Arterial [Major Highway] Minimum 110-foot right-of-way; • Collector [Secondary Highway] Minimum 90-foot right-of-way; • Commercial-Industrial Street Minimum 60-foot right-of-way; and • Local Street [Select Local Road] Minimum 60-foot right-of-way. 	Consistent.	Traffic impacts are evaluated in Section 3.15, <i>Traffic and Transportation</i> , of this Addendum EIR. Consistent with this measure, the proposed modified project would be in compliance with the road network policies and would implement the Kern County Development Standards as they relate to road standards and planning requirements.
Measure A: The Kern County Planning and Community	Consistent.	See 2.3.3, <i>Highway Plan</i> , Policy 3, of the Kern County General Plan, above.

Policies	Consistency Determination	Project Consistency
Development Department shall carry out the road network policies by using the Kern County Land Division Ordinance and Zoning Ordinance, which implements the Kern County Development Standards that includes road standards related to urban and rural planning requirements. These ordinances also regulate access points. The Kern County Planning and Community Department can help developers and property owners in identifying where planned circulation is to occur.		
2.3.4 Future Growth		
Policy 2: The County should monitor development applications as they relate to traffic estimates developed for this plan. Mitigation is required if development causes affected roadways to fall below LOS D. Utilization of the California Environmental Quality Act (CEQA) process would help identify alternatives to or mitigation for such developments. Mitigation could involve amending the Land Use, Open Space, and Conservation Element to establish jobs/housing balance if projected trips in any traffic zone exceed trips identified for this Circulation Element. Mitigation could involve exactions to build offsite transportation facilities. These enhancements would reduce traffic congestion to an acceptable level.	Consistent.	Traffic impacts are evaluated in Section 3.15, <i>Traffic and Transportation</i> , of this Addendum EIR. Consistent with this policy, the proposed modified project would maintain a minimum LOS C for all roads throughout the County. Additionally, implementation of Mitigation Measure MM 4.15-1 would require the preparation of a Construction Traffic Control Plan to be reviewed and approved by Kern County and Caltrans, which would further reduce impacts to traffic and transportation.
Policy 4: As a condition of private development approval, developers shall build roads needed to access the	Consistent.	See 2.3.3, <i>Highway Plan</i> , Policy 1, above.

Policies	Consistency Determination	Project Consistency
existing road network. Developers shall build these roads to County standards unless improvements along State routes are necessary then roads shall be built to California Department of Transportation (Caltrans) standards. Developers shall locate these roads (width to be determined by the Circulation Plan) along centerlines shown on the circulation diagram map unless otherwise authorized by an approved Specific Plan Line. Developers may build local roads along lines other than those on the circulation diagram map. Developers would negotiate necessary easements to allow this.		
Policy 5: When there is a legal lot of record, improvement of access to county, city or State roads will require funding by sources other than the County. Funding could be by starting a local benefit assessment district or, depending on the size of a project, direct development impact fees.	Consistent.	Consistent with this policy, the project proponent would fund improvements to driveways that provide access to any County, city, or State roads.
Policy 6: The County may accept a developer's road into the County's maintained road system. This is at Kern County's discretion. Acceptance would occur after the developer follows the above requirements. Roads are included in the County road maintenance system through approval by the Board of Supervisors.	Consistent.	The proposed modified project would not develop a public road. However, consistent with this policy, the project proponent would be required to negotiate approval with the County where the proposed private access driveways intersect public right-of-way.
Measure C: Project development shall comply with the requirements of the Kern County Zoning Ordinance, Land Division Ordinance, and Development Standards.	Consistent.	Traffic impacts are evaluated in Section 3.15, <i>Traffic and Transportation</i> , of this Addendum EIR. Consistent with this policy, the proposed modified project would comply with the requirements of the Kern County Zoning Ordinance, Land Division Ordinance, and Development Standards.

Policies	Consistency Determination	Project Consistency
2.5.1 Trucks and Highways		
Goal 1: Provide for Kern County's heavy truck transportation in the safest way possible.	Consistent with implementation of Mitigation Measure MM 4.15-1, of the certified EIR.	Traffic impacts are evaluated in Section 3.15, <i>Traffic and Transportation</i> , of this Addendum EIR. Consistent with this policy, the proposed modified project is located in the portion of Kern County under the jurisdiction of Caltrans District 9. The project construction will be in accordance with Caltrans regulations, which set maximum load limits for trucks and safety requirements for oversized vehicles that operate on highways.
Goal 2: Reduce potential overweight trucks.	Consistent.	See 2.5.1, <i>Trucks and Highways</i> , Goal 1, above.
Goal 3: Use State Highway System improvements to prevent truck traffic in neighborhoods.	Consistent.	See 2.5.1, <i>Trucks and Highways</i> , Goal 1, above.
Policy 1: Caltrans should be made aware of the heavy truck activity on Kern County's roads.	Consistent.	See 2.5.1, <i>Trucks and Highways</i> , Goal 1, above.
Policy 2: Start a program that monitors truck traffic operations.	Consistent with implementation of Mitigation Measure MM 4.15-1, of the certified EIR.	Traffic impacts are evaluated in Section 3.15, <i>Traffic and Transportation</i> , of this Addendum EIR. Consistent with this policy, the proposed modified project will prepare and submit a Construction Traffic Control Plan to Kern County Public Works Department-Development Review and the California Department of Transportation offices for District 9 for approval.
Policy 3: Promote a monitoring program of truck lane pavement condition.	Consistent with implementation of Mitigation Measure MM 4.15-1, of the certified EIR.	See 2.5.1, <i>Trucks and Highways</i> , Policy 2, above.
Measure A: Caltrans should further detail the need for improvement of pavement conditions on the State Highway System. This would encourage Caltrans implementation of the above Policies.	Consistent.	See 2.5.1, <i>Trucks and Highways</i> , Goal 1, above.

Policies	Consistency Determination	Project Consistency
2.5.4 Transportation of Hazardous Materials		
Goal 1: Reduce risk to public health from transportation of hazardous materials.	Consistent.	Section 3.9, <i>Hazards and Hazardous Materials</i> , of this Addendum EIR provides a discussion of Hazardous Materials Transportation and existing regulatory requirements of the California Vehicle Code that pertain to transport of hazardous materials and wastes. Consistent with this policy, the proposed modified project would not pose a significant risk to public health from transportation of hazardous materials with implementation of Mitigation Measure MM 4.9-1, of the certified EIR, which requires the preparation of a Hazardous Materials Business Plan that would describe proper handling, storage, transport, and disposal techniques and methods to be used to avoid spills and minimize impacts in the event of a spill, would ensure that all handling, storage, and disposal of hazardous materials would be conducted in accordance with proven practices to minimize exposure to maintenance workers and/or the public.
Policy 1: The commercial transportation of hazardous material, identification and designation of appropriate shipping routes will be in conformance with the adopted Kern County and Incorporated Cities Hazardous Waste Management Plan.	Consistent.	Section 3.9, <i>Hazards and Hazardous Materials</i> , of this Addendum EIR provides a discussion of construction and compliance with applicable regulations including the Kern County and Incorporated Cities Hazardous Waste Management Plan
Policy 2: Kern County and affected cities should reduce use of County-maintained roads and city-maintained streets for transportation of hazardous materials.	Consistent with implementation of Mitigation Measure MM 4.15-1, of the certified EIR.	The proposed modified project would not interfere or prohibit the County's and affected cities ability to meet this policy. Mitigation Measure MM 4.9-1, of the certified EIR, which requires the preparation of a Hazardous Materials Business Plan that would describe proper handling, storage, transport, and disposal techniques and methods to be used to avoid spills and minimize impacts in the event of a spill, would ensure that all handling, storage, and disposal of hazardous materials would be conducted in accordance with proven practices to minimize exposure to maintenance workers and/or the public.
Measure A: Roads and highways utilized for commercial shipping of hazardous waste destined for disposal will be designated as such pursuant to Vehicle Code Sections 31303 et seq. Permit applications shall identify commercial shipping	Consistent.	See 2.5.4, <i>Transportation of Hazardous Materials</i> , Goal 1, above.

Policies	Consistency Determination	Project Consistency
routes they propose to utilize for particular waste streams.		
Kern County General Plan Chapter 3, Noise Element		
3.3 Sensitive Noise Areas		
Goal 1: Ensure that residents of Kern County are protected from excessive noise and that moderate levels of noise are maintained.	Consistent with implementation of Mitigation Measures MM 4.13-1 through MM 4.13-3, of the certified EIR.	Noise impacts, sensitive receptors and County thresholds are evaluated in Section 4.13, <i>Noise</i> , of this Addendum EIR. As discussed in that section, the proposed modified project would cause significant impacts to the nearest sensitive receptors during construction; however, these noise impacts would be temporary and partially reduced by Mitigation Measures MM 4.13-1 and MM 4.13-2, of the certified EIR, which would require distanced staging, muffles and baffles for construction equipment, a Noise Disturbance coordinator, noticing and scheduling, and temporary construction fences and noise blankets to be set up prior to the commencement of construction activities. The proposed modified project's operational noise level would be similar to or less than the ambient noise levels measured at the offsite receptors. When averaged and weighted over a 24-hour period, the project's operational noise level would be lower than the County's 65 dBA Ldn exterior noise standard for residential uses. Additionally, implementation of Mitigation Measure 4.13-2, of the certified EIR, would require adequate noise shielding for the proposed project's onsite transformers and inverters such that the existing ambient noise level at the nearest offsite residential structure would not be exceeded by more than 5 dBA, if needed. Thus, with implementation of Mitigation Measures MM 4.13-1 and MM 4.13-2, of the certified EIR, the proposed modified project would maintain consistency with this goal.
Goal 2: Protect the economic base of Kern County by preventing the encroachment of incompatible land uses near known noise producing roadways, industries, railroads, airports, oil and gas extraction, and other sources.	Consistent.	This section of the Addendum EIR discusses the land uses proposed by the proposed modified project. As discussed in this section, the proposed modified project would be consistent with existing land use designations of the project site.
Policy 1: Review discretionary industrial, commercial, or other noise-generating land use projects for compatibility with nearby noise-sensitive land uses.	Consistent.	The proposed modified project would be consistent with the project site's designated land use. See <i>Chapter 3, Noise Element</i> , Goal 1, above.

Policies	Consistency Determination	Project Consistency
Policy 2: Require noise level criteria applied to all categories of land uses to be consistent with the recommendations of the California Division of Occupational Safety and Health.	Consistent.	See <i>Chapter 3, Noise Element</i> , Goal 1, above.
Policy 3: Encourage vegetation and landscaping along roadways and adjacent to other noise sources in order to increase absorption of noise	Consistent.	See 3, <i>Noise Element</i> , Goal 1, above. Noise-sensitive land uses are evaluated in Section 3.13, <i>Noise</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy.
Policy 4: Utilize good land use planning principles to reduce conflicts related to noise emissions.	Consistent.	See <i>Chapter 3, Noise Element</i> , Goal 1, above.
Policy 7: Employ the best available methods of noise control.	Consistent with implementation of Mitigation Measures MM 4.13-1 and MM 4.13-2, of the certified EIR.	See <i>Chapter 3, Noise Element</i> , Goal 1, above.
Measure A: Utilize zoning regulations to assist in achieving noise-compatible land use patterns.	Consistent.	This section of the Addendum EIR discusses the land uses proposed by the proposed modified project. As discussed in this section, the proposed modified project would be consistent with existing land use and zoning designations of the project site.
Measure C: Review discretionary development plans, programs and proposals, including those initiated by both the public and private sectors, to ascertain and ensure their conformance to the policies outlined in this element.	Consistent.	Consistent with this measure, the proposed modified project will be reviewed for conformance with the policies outlined in this element.
Measure F: Require proposed commercial and industrial uses or operations to be designed or arranged so that they will not subject residential or other noise sensitive land uses to exterior noise levels in excess of 65 dB Ldn and interior noise levels in excess of 45 dB Ldn.	Consistent with implementation of Mitigation Measures MM 4.13-1 and MM 4.13-2, of the certified EIR.	See 3, <i>Noise Element</i> , Goal 1 and Measure A, of the Kern County General Plan.
Measure G: At the time of any discretionary approval, such as a	Consistent.	Noise impacts, sensitive receptors and County thresholds are evaluated in Section 4.13, <i>Noise</i> , of this Addendum EIR. As discussed in that section, a noise

Policies	Consistency Determination	Project Consistency
<p>request for a General Plan Amendment, zone change or subdivision, the developer may be required to submit an acoustical report indicating the means by which the developer proposes to comply with the noise standards. The acoustical report shall:</p> <ul style="list-style-type: none"> a) Be the responsibility of the applicant. b) Be prepared by a qualified acoustical consultant experienced in the fields of environmental noise assessment and architectural acoustics. c) Be subject to the review and approval of the Kern County Planning Department and the Environmental Health Services Department. All recommendations therein shall be complied with prior to final approval of the project. 		<p>memorandum discussing and assessing the acoustical and noise impacts of the modified project implementation was utilized as the basis for environmental analysis. Therefore, the proposed modified project would be consistent with this measure.</p>
<p>Measure I: Noise analyses shall include recommended mitigation, if required, and shall:</p> <ul style="list-style-type: none"> a) Include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions. b) Include estimated noise levels, in terms of CNEL, for existing and projected future (10 – 20 years hence) conditions, with a comparison made to the adopted policies of the Noise Element. c) Include recommendations for appropriate mitigation to achieve 	<p>Consistent with implementation of Mitigation Measures MM 4.13-1 and MM 4.13-2, of the certified EIR.</p>	<p>See <i>Chapter 3, Noise Element</i>, Measure G, above.</p>

Policies	Consistency Determination	Project Consistency
<p>compliance with the adopted policies and standards of the Noise Element.</p> <p>d) Include estimates of noise exposure after the prescribed mitigation measures have been implemented. If compliance with the adopted standards and policies of the Noise Element will not be achieved, a rationale for acceptance of the project must be provided.</p>		
Measure J: Develop implementation procedures to ensure that requirements imposed pursuant to the findings of an acoustical analysis are conducted as part of the project permitting process.	Consistent.	See <i>Chapter 3, Noise Element</i> , Measure G, above.
Kern County General Plan Chapter 4, Safety Element		
Goal 1: Minimize injuries and loss of life and reduce property damage.	Consistent.	Consistent with this goal, the proposed modified project would be required to comply with adopted safety regulations, such as the Fire Code, and related policies in the General Plan.
Policy 1: Require discretionary projects to assess impacts on emergency services and facilities.	Consistent with implementation of revised Mitigation Measure MM 4.14-2.	Impacts on emergency services and facilities are discussed in Section 3.14, <i>Public Services</i> , of this Addendum EIR.
Policy 3: The County will encourage the promotion of fire prevention methods to reduce service protection costs and costs to taxpayers.	Consistent with implementation of Mitigation Measures MM 4.14-1, of the certified EIR and revised Mitigation Measure MM 4.14-2.	See <i>Chapter 4, Safety Element</i> , Policy 1, above.
Policy 4: Ensure that new development of properties have sufficient access for emergency vehicles and for the evacuation of residents.	Consistent with implementation Mitigation Measure MM 4.15-1, of the certified EIR.	The proposed modified project would include the development of access roads for fire equipment and emergency services at the site, which would be maintained throughout both construction and operation of the proposed project. Mitigation Measure MM 4.15-1, of the certified EIR, would require the approval of a Construction Traffic Control Plan, encroachments and or other necessary permits by Caltrans and/or the Kern County Public Works Department. The project proponent would develop and implement a fire safety plan for use during construction and operation. As detailed in Section 3.15, <i>Traffic and Transportation</i> , the proposed modified project would

Policies	Consistency Determination	Project Consistency
		include the development of access roads for adequate egress/ingress to the site in event of an emergency.
Policy 6: All discretionary projects shall comply with the adopted fire code and the requirements of the fire department.	Consistent.	Consistent with this policy, the proposed modified project would be required to comply with the adopted Fire Code and the requirements of the Kern County Fire Department.
Measure A: Require that all development comply with the requirements of the Kern County Fire Department or other appropriate agency regarding access, fire flows, and fire protection facilities.	Consistent.	Consistent with this measure, Section 3.14, <i>Public Services</i> , states the proposed modified project would be required to comply with adopted safety regulations, such as the Fire Code, and related policies in the General Plan.
4.2 General Policies and Implementation Measures, Which Apply to More Than One Safety Constraint		
Measure F: The adopted multi-jurisdictional Kern County, California Multi-Hazard Mitigation Plan, as approved by the Federal Emergency Management Agency, shall be used as a source document for preparation of environmental documents pursuant to the California Environmental Quality Act (CEQA), evaluation of project proposals, formulation of potential mitigation, and identification of specific actions that could, if implemented, mitigate impacts from future disasters and other threats to public safety.	Consistent.	Consistent with this measure, Section 3.9, <i>Hazards and Hazardous Materials</i> , of this Addendum EIR, includes a discussion of the Kern County, Multi-Hazard Mitigation Plan, and utilizes the document as guidance for potential mitigation measures pursuant to CEQA.
4.3 Seismically Induced Surface Rupture, Ground Shaking, and Ground Failure		
Policy 1: The County shall require development for human occupancy to be placed in a location away from an active earthquake fault in order to minimize safety concerns.	Consistent.	Consistent with this policy, the proposed modified project would not include development for human occupancy, and would not be located near an active earthquake fault.
Measure B: Require geological and soils engineering investigations in identifying significant geologic	Consistent with implementation of Mitigation Measure MM 4.7-1, of the certified EIR.	Consistent with this measure, Section 3.7, <i>Geology and Soils</i> , references the project-specific preliminary geotechnical evaluation prepared for the proposed modified project and the inclusion of Mitigation Measure MM 4.7-

Policies	Consistency Determination	Project Consistency
hazard areas in accordance with the Kern County Code of Building Regulations.		1, of the certified EIR, which requires compliance with the recommendations of the preliminary geotechnical evaluation.
Measure C: The fault zones designated in the Kern County Seismic Hazard Atlas should be considered significant geologic hazard areas. Proper precautions should be instituted to reduce seismic hazard, whenever possible in accordance with State and County regulations.	Consistent with implementation of Mitigation Measure MM 4.7-1, of the certified EIR.	See 4.3, <i>Seismically Induced Surface Rupture, Ground Shaking, and Ground Failure</i> , Measure B, of the Kern County General Plan.
4.5 Landslides, Subsidence, Seiche, and Liquefaction		
Policy 1: Determine the liquefaction potential at sites in areas of shallow groundwater (Map Code 2.3) prior to discretionary development and determine specific mitigation to be incorporated into the foundation design, as necessary, to prevent or reduce damage from liquefaction in an earthquake.	Consistent.	Impacts related to liquefaction hazards are evaluated in Section 3.7, <i>Geology and Soils</i> , of this Addendum EIR. Consistent with this goal, implementation of Mitigation Measure MM 4.7-1, of the certified EIR, would require adherence to the recommendations from the Preliminary Geotechnical Evaluation Report and would ensure site stability, and site soil stability, to the maximum extent possible.
Policy 3: Reduce potential for exposure of residential, commercial, and industrial development to hazards of landslide, land subsidence, liquefaction, and erosion.	Consistent.	See 4.5, <i>Landslides, Subsidence, Seiche, and Liquefaction</i> , Policy 1, of the Kern County General Plan.
4.6 Wildland and Urban Fire		
Policy 1: Require discretionary project to assess impacts on emergency services and facilities.	Consistent with implementation of Mitigation Measure MM 4.14-1 of the certified EIR and revised Mitigation Measure MM 4.14-2.	Consistent with this policy, impacts on emergency services and facilities are discussed and evaluated in Section 3.14, <i>Public Services</i> , of this Addendum EIR. The project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy exclusion provision on property taxes that the county would otherwise receive for services and facilities.
Policy 3: The County will encourage the promotion of fire prevention	Consistent with implementation of Mitigation Measure MM 4.14-1 of the certified EIR.	The project would not interfere or prohibit the County's ability to meet this policy. Mitigation MM 4.14-1 of the certified EIR requires the proponent to

Policies	Consistency Determination	Project Consistency
methods to reduce service protection costs and costs to taxpayers.		develop a fire safety plan for use during construction and operational activities. All onsite employees would be trained on fire safety and how to respond to onsite fires should they occur.
Policy 4: Ensure that new development of properties have sufficient access for emergency vehicles and for the evacuation of residents.	Consisted with implementation of Mitigation Measure MM 4.15-1 of the certified EIR.	Section 3.15, <i>Transportation and Traffic</i> , of this Addendum EIR includes Mitigation Measure MM 4.15-1 of the certified EIR that would require the approval of a Construction Traffic Control Plan, encroachments and/or other necessary permits by CalTrans and/or the Kern County Roads Department. The project proponent would develop and implement a fire safety plan for use during construction and operation.
Policy 6: All discretionary projects shall comply with the adopted Fire Code and the requirements of the Fire Department.	Consisted with implementation of Mitigation Measure MM 4.14-1 of the certified EIR.	Consistent with this policy, the project would be required to comply with the adopted Fire Code and the requirements of the Kern County Fire Department.
Measure A: Require that all development comply with the requirements of the Kern County Fire Department or other appropriate agency regarding access, fire flows, and fire protection facilities.	Consisted with implementation of Mitigation Measure MM 4.14-1 of the certified EIR and revised Mitigation Measure MM 4.14-2.	Consistent with this measure, the proposed project would implement Mitigation MM 4.14-1 of the certified EIR which would require preparation and implementation of a fire safety plan to ensure the provision of appropriate access. The project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy exclusion provision on property taxes that the county would otherwise receive for services and facilities.
4.9 Hazardous Materials		
Measure A: Facilities used to manufacture, store, and use of hazardous materials shall comply with the Uniform Fire Code, with requirements for siting or design to prevent onsite hazards from affecting surrounding communities in the event of inundation.	Consistent with implementation of Mitigation Measure MM 4.14-1, of the certified EIR.	Consistent with this policy, the proposed modified project would be required to comply with the adopted Fire Code and the requirements of the Kern County Fire Department.
Kern County General Plan Chapter 5, Energy Element		
5.4.5 Solar Energy Development		
Policy 1: The County shall encourage domestic and commercial solar energy uses to conserve fossil fuels and improve air quality.	Consistent.	Consistent with this policy, the proposed modified project would develop solar PV facilities capable to generate 30 MW of solar energy and offset an equivalent amount of fossil fuel-generated electrical power in the valley region of Kern County, on previously disturbed land. Operation of the proposed modified project would improve air quality within the County and

Policies	Consistency Determination	Project Consistency
		assist the County in meeting attainment goals. See Section 3.3, <i>Air Quality</i> , and Section 3.8, <i>Greenhouse Gas Emissions</i> , of this Addendum EIR.
Policy 3: The County should permit solar energy development in the desert and valley planning regions that does not pose significant environmental or public health and safety hazards.	Consistent.	Consistent with this policy, the proposed modified project proposes the development of a solar PV power generation facility in the desert region of Kern County. Final review of the project's mitigation measures implementation by the Kern County Planning and Natural Resources Department, as well as adherence to all applicable local, State and federal regulations, would ensure that the proposed modified project would not pose significant environmental or public health and safety hazards.
Policy 8: The County should work closely with local, State, and federal agencies to assure that energy projects (both discretionary and ministerial) avoid or minimize direct impacts to fish, wildlife, and botanical resources, wherever practical.	Consistent with implementation of Mitigation Measures MM 4.4-2 through MM 4.4-5 and MM 4.4-7 through MM 4.4-16, of the certified EIR and revised Mitigation Measures MM 4.4-1 and MM 4.4-6.	Consistent with this policy, the proposed modified project proposes the development of a PV power generation facility in the Western Antelope Valley region of Kern County. The land surrounding the proposed modified project is mostly undeveloped land or scattered residential development and renewable energy projects (solar and wind). As discussed in Section 3.4, <i>Biological Resources</i> , project-level impacts to biological resources could be reduced to less-than-significant levels with implementation of mitigation.
Policy 10: The County should require acoustical analysis for energy project proposals that might impact sensitive and highly-sensitive uses in accordance with the Noise Element of the General Plan.	Consistent.	See <i>Chapter 3, Noise Element</i> , Measure G, above.
5.4.7 Transmission Lines		
Goal 1: To encourage the safe and orderly development of transmission lines to access Kern County's electrical resources along routes, which minimize potential adverse environmental effects.	Consistent.	Consistent with this policy, the proposed modified project would involve development of a PV facility that would connect into an existing transmission corridor thus minimizing the distance of new transmission lines. Final review of the project mitigation measures compliance by the Kern County Planning and Natural Resources Department, as well as adherence to all applicable local, State and federal regulations, would ensure that the proposed modified project, including transmission lines, would not pose significant environmental or public health and safety hazards.
Policy 5: The County should discourage the siting of above-ground transmission lines in visually sensitive areas.	Consistent.	See <i>5.4.7, Transmission Lines</i> , Goal 1, above. Further, aesthetic impacts are evaluated in 3.1, <i>Aesthetics</i> , of this Addendum EIR.

Policies	Consistency Determination	Project Consistency
WILLOW SPRINGS SPECIFIC PLAN		
Land Use Element		
Policy 2: Encourage only those industries that do not significantly increase air pollution levels.	Consistent with implementation of Mitigation Measures MM 4.3-1 through MM 4.3-8, of the certified EIR.	Consistent with this policy, the proposed modified project would implement Mitigation Measures MM 4.3-1 through MM 4.3-8, of the certified EIR, which would reduce impacts to air quality to the extent feasible. The proposed modified project would be in compliance with all applicable Eastern Kern County Air Pollution Control District, rules and regulations. Additionally, the proposed modified project would be designed and constructed in accordance with energy conservation practices, such as those found in the Building Energy Efficiency Standards, and all State and local laws. See Sections 3.3, <i>Air Quality</i> , 3.6, <i>Energy</i> , and 3.8, <i>Greenhouse Gas Emissions</i> , of this Addendum EIR.
Policy 5: Encourage the maintenance of visual aesthetics in all new construction	Consistent with implementation of Mitigation Measures MM 4.1-1 through MM 4.1-5, of the certified EIR and Mitigation Measure MM 4.1-6.	Visual impacts are evaluated in Section 3.1, <i>Aesthetics</i> , of this Addendum EIR. Consistent with this policy, the proposed modified project would prepare a Maintenance, Trash Abatement, and Pest Management Program that will be submitted to the Kern County Planning and Natural Resources Department. Additionally, the project proponent/operator shall implement color treatment to blend in with the colors found in the natural landscape as well as maintain natural vegetation within the proposed project boundary. The proposed modified project cannot reduce impacts to less than significant even with required mitigation. Appropriate findings under CEQA would be required to be made by the decision makers in order to approve the project despite the significant and unavoidable cumulative impacts on aesthetics.
Policy 6: Require developers to clean up any identified hazardous waste sites prior to submittal of any land division or development project.	Consistent with implementation of Mitigation Measure MM 4.9-1, of the certified EIR.	Section 4.9, <i>Hazards and Hazardous Materials</i> , of this Addendum EIR provides a discussion of hazardous materials. Consistent with this policy, the project would implement Mitigation Measure MM 4.9-1, of the certified EIR, which requires the preparation of a Hazardous Materials Business Plan that would describe proper handling, storage, transport, and disposal techniques and methods to be used to avoid spills and minimize impacts in the event of a spill, would ensure that all handling, storage, and disposal of hazardous materials would be conducted in accordance with proven practices to minimize exposure to maintenance workers and/or the public.
Policy 8: New and/or existing developments shall comply with the Kern County Zoning Ordinance and this Specific Plan. Where conflicts appear, the more restrictive requirements shall prevail.	Consistent with implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2, of the certified EIR.	Consistent with this policy, the proposed modified project would comply with the requirements of the Kern County Zoning Ordinance as evaluated in various sections of this Addendum EIR including, Section 3.3, <i>Air Quality</i> and Section 3.15, <i>Transportation</i> . Additionally, this section of the Addendum EIR discusses the land uses proposed by the proposed modified project. As

Policies	Consistency Determination	Project Consistency
		discussed in this section, the proposed modified project would be consistent with the Kern County Zoning Ordinance and the Willow Springs Specific Plan.
Policy 10: Require that construction sites be provided with a soil retardant measure approved by the County of Kern (Department of Planning and Development Services and the Environmental Health Services Department) to reduce fugitive dust or blowing sand.	Consistent with implementation of Mitigation Measures MM 4.3-1 through MM 4.3-6, of the certified EIR.	Air quality and GHG impacts are evaluated in Sections 3.3, <i>Air Quality</i> , and 3.8, <i>Greenhouse Gas Emissions</i> , of this Addendum EIR. Consistent with this policy, the proposed modified project would implement Mitigation Measures MM 4.3-1 through MM 4.3-6, of the certified EIR, which would further reduce fugitive dust emissions during construction and operation in compliance with the County of Kern. Air quality mitigation measures include diesel emission-reduction measures during construction, fugitive dust control measures, and Valley Fever exposure minimization measures.
Policy 11: Retain vegetation until actual construction begins.	Consistent with implementation of Mitigation Measures MM 4.4-2 through MM 4.4-5 and MM 4.4-7 through MM 4.4-15, of the certified EIR and revised Mitigation Measures MM 4.4-1 and MM 4.4-6.	Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy and reduce potential impacts to vegetation with mitigation. Additionally, the proposed modified project would be developed and operated in accordance with all local, state and federal laws pertaining to the preservation of sensitive species.
Resource		
Goal 3: Encourage retention of productive agricultural and dormant mineral resources by imposing a restriction on allowing urban type land uses on nearby adjacent lands.	Consistent	Upon approval of the proposed zone change, the project site would be located on land that is zoned as A (Exclusive Agriculture), and implementation of the proposed modified project would prevent livestock grazing on the site. Other uses besides agriculture, including solar energy generation and storage, are permitted within the A District with the approval of a CUP. The project would not involve additional change in the existing environment besides those described in this Addendum EIR. Direct disturbance related to the proposed modified project would be approximately 158 acres. Additionally, as discussed in this Addendum EIR, the project site is not located within the bounds of a mineral resource area. The proposed modified project site is not located in areas of agricultural use or in areas containing petroleum, or mineral resources. Therefore, the proposed modified project would be consistent with this goal.
Policy 1: Provide a method encouraging the preservation of agricultural land.	Consistent	As discussed in Section 3.2, <i>Agriculture and Forestry Resources</i> , of this Addendum EIR, the project site is not designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. Therefore, the proposed modified project would be consistent with this policy.
Policy 2: Initial development within the Update area shall, when possible, be directed towards previously	Consistent.	Consistent with this policy, the proposed modified project proposes the development of solar PV power generation and storage facilities in the desert region of Kern County. Final review of the proposed modified project by the

Policies	Consistency Determination	Project Consistency
impacted areas (i.e., agricultural fields).		Kern County Planning and Natural Resources Department requires consideration and approval of Conditional Use Permits as well as other discretionary actions that ensure compliance with all policies as well as adherence to all applicable local, state and federal regulations.
Policy 3: To ensure compliance with applicable State and federal laws and to protect the biological resources present in the Specific Plan area.	Consistent	Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy and reduce potential impacts with mitigation. Additionally, the proposed modified project would be developed and operated in accordance with all local, state and federal laws pertaining to the preservation of sensitive species.
Measure 15: Where possible, project development within the Specific Plan Update area shall be designed to avoid displacement of destruction of Joshua tree habitat, to the satisfaction of the Kern County Agricultural Commissioner's Office. Areas adjacent to the woodland shall have a 50-foot setback from the Joshua tree plants. Within that setback, a native plant cover should be restored to natural habitat values to serve as a bugger, if such plant cover is not present.	Consistent with implementation of Mitigation Measures MM 4.4-2 through MM 4.4-5 and MM 4.4-7 through MM 4.4-15, of the certified EIR and revised Mitigation Measures MM 4.4-1 and MM 4.4-6.	Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this measure and reduce potential impacts with mitigation. As discussed in Section 3.4, the proposed modified project has somewhat different biological characteristics that the approved project. Unlike the approved project, the proposed modified project does not contain Joshua trees, Lemmon's jewelflower and Clokey's cryptantha. However, significant impacts could occur to plant species including the alkali mariposa lily and recurved larkspur on the proposed project site. However, these impacts would be mitigated to a level of less than significant through the implementation of Mitigation Measures MM 4.4-2 through MM 4.4-5 and MM 4.4-7 through MM 4.4-15, of the certified EIR and revised Mitigation Measures MM 4.4-1 and MM 4.4-6.
Measure 16: A Joshua Tree Preservation and Transportation Plan shall be developed by the applicants for each parcel where Joshua trees are located on site. The plan shall be submitted to the Kern County Agricultural Commissioner's office for review and approval to grading permit issuance	Consistent.	See Resources, Measure 15, above. Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR.
Measure 23: A Joshua Tree Preservation and/or Transplantation Plan shall be developed by applicants of discretionary projects for each parcel where Joshua trees are located on site. The plan shall be submitted to	Consistent with implementation of Mitigation Measures MM 4.4-2 through MM 4.4-5 and MM 4.4-7 through MM 4.4-15, of the certified EIR and revised Mitigation Measures MM 4.4-1 and MM 4.4-6.	See Resources, Measure 15, above. Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR.

Policies	Consistency Determination	Project Consistency
the Kern County Agricultural Commissioner for review and approval prior to grading permit issuance.		
Measure 24: Prior to issuance of any grading permits for individual projects, individual project applicants shall consult with the Regional Water Quality Control Board, State Department of Fish and Game and/or U.S. Fish and Wildlife Service, and the Army Corps of Engineers to identify potentially required permits. Compliance with this measure will be confirmed through the submittal of a letter (in conjunction with submittal of grading permit applications) to the County demonstrating compliance with the above-mentioned agencies	Consistent.	Section 4.10, <i>Hydrology and Water Quality</i> , of this Addendum EIR, discusses required compliance with Kern County's NPDES Applicability legislation, which requires projects to comply with the State Water Resources Control Board's Construction General Permit. Additionally, Biological Resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy and reduce potential impacts with mitigation. As part of the biological resources evaluation and habitat assessment conducted for the proposed modified project, relevant state and federal agencies were contacted to ensure that appropriate information about the proposed project site were being gathered.
Measure 25: Prior to issuance of grading permits, individual project applicants shall obtain appropriate permits as determined necessary by the Regional Water Quality Control Board, U.S. Fish and Wildlife Service, State Department of Fish and Game, and Army Corps of Engineers	Consistent.	See Resources, Measure 25, above. Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR and compliance with the State Water Resources Control Board is discussed in Section 4.10, <i>Hydrology and Water Quality</i> , of this Addendum EIR
Air Quality		
Goal 1: Imposition of appropriate mitigation measures to reduce where practical to do so, the effect short-term and long-term projects have on the area which involve grading activities, erosion controls, revegetation of disturbed sites, and provisions to introduce into the plan area a competitive job market to reduce travel times	Consistent.	Air quality and GHG impacts are evaluated in Sections 3.3, <i>Air Quality</i> , and 4.8, <i>Greenhouse Gas Emissions</i> , of this Addendum EIR. Consistent with this policy, the proposed modified project would implement Mitigation Measures MM 4.3-1 through MM 4.3-3, which would reduce impacts to air quality to the extent feasible. Air quality mitigation measures include diesel emission-reduction measures during construction, fugitive dust control measures, and Valley Fever exposure minimization measures.

Policies	Consistency Determination	Project Consistency
Policy 1: Compliance with the Mitigation/Implementation Measures and enactment of an approved Air Quality Attainment Plan	Consistent with implementation of Mitigation Measures MM 4.3-1 through MM 4.3-8, of the certified EIR.	Air quality impacts are evaluated in Section 3.3, <i>Air Quality</i> , of this Addendum EIR. Consistent with this policy, the proposed modified project would implement Mitigation Measures MM 4.3-1 through MM 4.3-8, of the certified EIR, which would reduce impacts to air quality to the extent feasible. The proposed modified project would be in compliance with all applicable Eastern Kern County Air Pollution Control District, rules and regulations
Measure 1: To mitigate potential dust generation impacts, the Willow Springs Specific Plan Update project shall comply with applicable County regulations (to the satisfaction of the Kern County Air Pollution Control District), which require specific dust control measures.	Consistent with implementation of Mitigation Measure MM 4.3-1, of the certified EIR.	The proposed modified project would implement Mitigation Measures MM 4.3-1, of the certified EIR, which would require the implementation of a Fugitive Dust Control Plan prior to the issuance of grading or building permits in order to control fugitive PM emissions during construction. See Section 4.3, <i>Air Quality</i> , of this Addendum EIR.
Measure 2: During construction, all grading activities shall be ceased during periods of high winds (i.e., greater than 30 miles per hour [mph]). To assure compliance with this measure, grading activities are subject to periodic inspections by County staff.	Consistent.	The proposed modified project would adhere to Chapter 17.28 of the Kern County Code, which regulates grading within the County. Specifically, the proposed modified project would adhere to Section 17.28.180 (Grading Inspection), which requires that grading operations must be inspected by the building official.
Measure 3: Construction equipment shall be fitted with the most modern emission control devices and be kept in proper tune. Motors out of proper tune can result in emissions that vastly exceed recommended standards	Consistent with implementation of Mitigation Measure MM 4.3-1 through MM 4.3-3, of the certified EIR.	The project would implement Mitigation Measure MM 4.3-1 through MM 4.3-3, of the certified EIR, which is intended to limit diesel emission reductions during construction. Mitigation Measure MM 4.3-3, of the certified EIR, would require that off-road equipment engines over 50 horsepower be equipped with EPA Tier 2 or higher engines if locally available. Mitigation Measure MM 4.3-3, of the certified EIR, also outlines other specific measures to ensure that all equipment is used efficiently, such as reducing idling time and maintain all equipment in accordance with the manufacturer's specifications. See Section 4.3, <i>Air Quality</i> , of this Addendum EIR.
Measure 4: The project applicants shall, to the extent feasible, implement applicable control measures contained in the Attainment Plan in effect at the time of adoption of this Specific Plan, by the Air Pollution Control District in 1991. (See Environmental Impact	Consistent with implementation of Mitigation Measures MM 4.3-1 through MM 4.3-3, of the certified EIR.	See Air Quality, Policy 1, above. Further, air quality impacts are evaluated in Section 4.3, <i>Air Quality</i> , of this Addendum EIR.

Policies	Consistency Determination	Project Consistency
Report Air Quality for additional recommended mitigation measures, page 162.).		
Measure 7: All phases of the Willow Springs Specific Plan Update project shall comply with applicable rules and regulations of the Kern County Air Pollution Control District.	Consistent.	The proposed modified project would implement Mitigation Measures MM 4.3-1, of the certified EIR, which would require the implementation of a Fugitive Dust Control Plan prior to the issuance of grading or building permits in order to control fugitive PM emissions during construction. See Section 4.3, <i>Air Quality</i> , of this Addendum EIR.
Biological Resources		
Policy 1: Where possible, development shall be designated to avoid displacement of sensitive species.	Consistent with implementation of Mitigation Measures MM 4.4-2 through MM 4.4-5 and MM 4.4-7 through MM 4.4-15, of the certified EIR and revised Mitigation Measures MM 4.4-1 and MM 4.4-6.	Biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy and reduce potential impacts with mitigation. Additionally, the proposed modified project would be developed and operated in accordance with all local, state and federal laws pertaining to the preservation of sensitive species.
Policy 2: Focused surveys shall be conducted by a County approved biologist to establish the presence or absence of sensitive species.	Consistent.	As discussed in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR, reconnaissance-level surveys were conducted at the proposed project site for multiple species.
Policy 3: Initial development within the area covered under the Willow Springs Specific Plan, when possible, will be directed towards previously impacted areas.	Consistent with implementation of Mitigation Measure MM 4.4-8, of the certified EIR.	As discussed in Section 4.4, <i>Biological Resources</i> , of this Addendum EIR, during construction, operations and maintenance, and decommissioning, the project proponent/operator and/or contractor(s) shall implement the general avoidance and protective measures, which includes containing vehicle traffic within the planned impact area or in previously disturbed areas.
Cultural Resources		
Goal 1: To preserve cultural resources contained on sensitive sites located within the Willow Springs Specific Plan area.	Consistent with implementation of Mitigation Measures MM 4.5-1 and MM 4.5-4, of the certified EIR, and resvised Mitigation Measures MM 4.5-2 and MM 4.5-3.	Cultural resource impacts are evaluated in Section 4.5, <i>Cultural Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this goal and includes Mitigation Measures MM 4.5-1 and MM 4.5-4, of the certified EIR, and revised MM 4.5-2 and MM 4.5-3 to promote the preservation of cultural and historic resources where necessary.
Policy 1: Archaeological investigations shall be required of specific properties proposed for	Consistent with implementation of revised Mitigation Measures Mitigation Measures MM 4.5-2 and MM 4.5-3..	See Cultural Resources, Policy 1, above. Further, impacts to cultural resources are evaluated in Section 4.5, <i>Cultural Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy.

Policies	Consistency Determination	Project Consistency
development. These sites are identified in the Environmental Impact Report under Cultural Resources – Literature and Records Search, page 77, and are listed as: CA-KER-2819, 2820, 2821; CA-KER-522, 1969, 2592, 2593, 2599, 2595 and 2714; CA-KER-129, 273, 298, 302, 303. (Record on file Southern San Joaquin Valley Information Center in Bakersfield – California State University of Bakersfield.		
Policy 15: Require cultural resources report for those areas with high probability for prehistoric activity prior to issuance of any grading permits.	Consistent with implementation of Mitigation Measures MM 4.5-2 and MM 4.5-3, of the certified EIR.	Cultural resource impacts are evaluated in Section 4.5, <i>Cultural Resources</i> , of this Addendum EIR. Consistent with this policy, cultural resources reports would be prepared as outlined in of Mitigation Measures MM 4.5-2 and MM 4.5-3, of the certified EIR. Additionally, copies of reports will be provided to the Kern County Planning and Natural Resources Department and to the Southern San Joaquin Valley Information Center at California State University, Bakersfield.
Seismic Safety and Safety Element		
Goal 7: Minimize damage to public facilities and utilities, such as water and gas mains, electric, telephone, and sewer lines, streets, and bridges located in areas of special flood hazard.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	As described in Section 4.10, <i>Hydrology and Water Quality</i> , of this Addendum EIR, the southerly half of the propose modified project site is located within the 100-year floodplain and is classified as having a 1 percent annual chance of flooding. Further, the proposed modified project would be developed in accordance with the General Plan, Floodplain Management Ordinance and Mitigation Measure MM 4.10-1, of the certified EIR. Therefore, the proposed modified project would be consistent with this goal.
Goal 9: Comply with the requirements of the National Flood Insurance Program Regulations, Parts 59 and 60 of Title 44 of the Code of Federal Regulations.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	See Seismic Safety and Safety Element, Goal 7, of the Willow Springs Specific Plan, above.
Goal 15: To protect community residents from undue hazards and costs associated with road maintenance, slope instability, improper drainage, and inadequate sewage treatment.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	See 1.9, Resources, Policy 11, of the Kern County General Plan, above.

Policies	Consistency Determination	Project Consistency
Policy 1: New development within the 100-year floodplain shall be regulated in accordance with the Floodplain Management Section of the Department of Planning and Development Services according to the Flood Damage Prevention Ordinance, the Kern Land Division Ordinance, and the Kern County Zoning Ordinance as may be amended from time to time.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	As described in Section 4.10, <i>Hydrology and Water Quality</i> , of this Addendum EIR, the southerly half of the propose modified project site is located within the 100-year floodplain and is classified as having a 1 percent annual chance of flooding. Further, the proposed modified project would be developed in accordance with the General Plan, Floodplain Management Ordinance and Mitigation Measure MM 4.10-1 of the certified EIR. Therefore, the proposed modified project would be consistent with this measure.
Policy 7: Compliance with site-specific issues, goals, policies, and implementation measures contained in the Seismic/Safety Element of the Kern County General Plan.	Consistent.	See Chapter 4, Safety Element, of the Kern County General Plan, above.
Policy 9: All new construction in the plan area shall comply with Chapter 23 of the Uniform Building Code (UBC), which includes building pad and foundation design standards for structures in UBC Seismic Zone IV.	Consistent.	Construction of the proposed modified project would be subject to all applicable ordinances of the Kern County Building Code (Chapter 17.08) and Chapter 23 of the International Building Code (which replaced the UBC). Compliance with this policy would be ensured upon final review by the Kern County Public Works Department.
Measure 3: Areas within the 100-year floodplain shall be zoned with the appropriate FPP, FP, or FPS designation.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	See Seismic Safety and Safety Element, Goal 7, of the Willow Springs Specific Plan, above.
Measure 4: New development within the 100-year floodplain shall be regulated in accordance with the Flood Damage Prevention Ordinance and the Kern County Zoning Ordinance as they may be amended from time to time.	Consistent with implementation of Mitigation Measures MM 4.9-1 and MM 4.10-1, of the certified EIR.	Water quality impacts are evaluated in Section 4.10, <i>Hydrology and Water Quality</i> , of this Addendum EIR. Consistent with this policy, the proposed modified project would implement best management practices during construction to avoid impacts to water quality. The proposed modified project would also implement a Hazardous Materials Business Plan to reduce mixing of pollutants with stormwater onsite, thereby maintaining the integrity of the watershed.
Measure 24: In order to combat the stormwater pollution created by the various land uses the following source control mitigation measures are required:	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	See Seismic Safety and Safety Element, Goal 7, of the Willow Springs Specific Plan, above.

Policies	Consistency Determination	Project Consistency
<p>a) Periodic cleaning (i.e., street sweeping) of paved areas to remove small particle size sediments with absorbed pollutants caused by uses of the area.</p> <p>b) Utilize established Best Management Practices (BMPs) for small on-site control of urban runoff water quality. These measures include infiltration trenches, infiltration basins, water quality inlets, vegetative biofilter, grass swales, and porous pavement.</p>		
<p>Goal 3: To restrict, if possible, any further and/or unnecessary drawdown of the water table within the plan area.</p>	Consistent.	Public utility impacts are evaluated in Section 3.17, <i>Utilities and Service Systems</i> , of this Addendum EIR. As described therein, the project site is located within the Antelope Valley Groundwater Basin which has undergone adjudication, which restricts unnecessary drawdown of the basin water table. The adjudication process for the Antelope Valley Groundwater Basin was completed in 2015 which established a safe yield of 110,000 AFY. Because the amount of the water required for the proposed modified project would be minimal and would be obtained from an existing source with existing water rights, impacts related to water supply would be less than significant. Thus, the proposed modified project would be consistent with this goal.
<p>Policy 2: In evaluating a development application, Kern County will consider both its physical and fiscal impact on the local school district and other public facilities. If it is found that the district or facilities involved will, as a result, require additional facilities or incur costs requiring additional local revenues, the development project will be required as a condition of approval to contribute funds to the district for the costs directly attributable to the project.</p>	Consistent.	See Public Facilities Element, Goal 4, above. Further, public service impacts are evaluated in Section 4.14, <i>Public Services</i> , of this Addendum EIR.
<p>Policy 4: New development will be required to pay its proportional share of the local costs of</p>	Consistent with implementation of revised Mitigation Measure MM 4.14-2.	Impacts to public services are evaluated in Section 3.14, Public Services, of this EIR. Consistent with this policy, the project would implement revised Mitigation Measure MM 4.14-2 to provide a Cumulative Impact Charge (CIC)

Policies	Consistency Determination	Project Consistency
infrastructure improvements required to service such development		to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy exclusion provision on property taxes that the county would otherwise receive for services and facilities.
Policy 5: Operation of any solid waste facility shall comply with standards provided by the Kern County Solid Waste Management Plan.	Consistent with implementation of Mitigation Measure MM 4.17-1, of the certified EIR.	Consistent with this policy, the proposed modified project would develop a solar PV power generating facility that would not operate a solid waste facility. As discussed in Section 3.17, <i>Utilities and Service Systems</i> , of this Addendum EIR, the proposed modified project would be served by Kern County Waste Management and would comply with construction waste diversion requirements implemented by the County. Additionally, implementation of Mitigation Measure MM 4.17-1, of the certified EIR, would ensure compliance with waste diversion and recycling requirements by requiring recycling during construction, operation, and decommissioning of the proposed modified project.
Measure 6: The siting and establishment of solid waste transfer stations, landfills, recycling center, and cleanup programs shall be in accordance with Kern County's Solid Waste Management Plan.	Consistent with implementation of Mitigation Measure MM 4.17-1, of the certified EIR.	See Public Facilities Element, Policy 5, above. Further, utility and service systems impacts are evaluated in Section 3.17, <i>Utilities and Service Systems</i> , of this Addendum EIR
Measure 10: New development shall contribute its pro rata share for circulation improvements, school impact fees, park land dedications/fees, and possible biota impact fees. As additional impact fees are adopted, they shall be incorporated into the Specific Plan text.	Consistent with implementation of revised Mitigation Measure MM 4.14-2.	Consistent with this policy, the project proponent would fund improvements to on-site driveways that provide access to County, city, or State roads. The project would implement revised Mitigation Measure MM 4.14-2 which would require the project to provide a Cumulative Impact Charge (CIC) to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise receive for services and facilities. The project would also implement Mitigation Measures MM 4.14-3 and MM 4.14-4, if the project is sold to a city, county, or utility company with assessed taxes that total less than \$3,000 per megawatt per year, then that entity shall pay the taxes plus the amount necessary to equal the equivalent of \$3,000 per megawatt. The amount shall be paid for all years of operation.
Measure 11: The school district, along with the developer, shall provide Kern County with an alternative funding method, should an alternative be submitted with an impending development.	Consistent.	See Public Facilities Element, Goal 4, above. Further, public service impacts are evaluated in Section 3.14, <i>Public Services</i> , of this Addendum EIR.

Policies	Consistency Determination	Project Consistency
<p>Measure 21: The projects shall comply with all applicable Kern County code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.</p>	<p>Consistent with implementation of Mitigation Measure MM 4.14-1, of the certified EIR.</p>	<p>Consistent with this policy, the proposed modified project would be required to comply with the County adopted Fire Code and the requirements of the Kern County Fire Department applicable for construction, access, water mains, fire flows, and fire hydrant.</p>
<p>Measure 24: Consideration shall be given to implementation of the following measure to reduce the impacts associated with solid waste generation:</p> <p>a) Compacting refuse would substantially reduce the number of refuse hauling trips and allow for more effective and sanitary disposal.</p> <p>b) Each project applicant shall comply with guidelines set forth by Kern County in accordance with AB 939 which mandates recycling programs for each jurisdiction in California and shall agree to be subject to universal collection for one- to four-unit residential projects and commercial.</p> <p>c) Where feasible, a community recycling center should be implemented to provide convenient recycling opportunities.</p> <p>d) Studies shall be conducted by Kern County prior to issuance of building permits, to determine a feasible location for an alternate landfill upon reaching capacity at Mojave-Rosamond concurrent with development approvals. County should initiate studies to site alternative landfill.</p> <p>e) Each project applicant shall comply with guidelines set forth by</p>	<p>Consistent with implementation of Mitigation Measure MM 4.17-1, of the certified EIR.</p>	<p>Public utility impacts are evaluated in Section 3.17, <i>Utilities and Service Systems</i>, of this Addendum EIR. As described therein, the proposed modified project would be required to comply with all federal, State, and local statutes and regulations related to the handling and disposal of solid waste. Additionally, the proposed modified project would not generate a significant amount of waste that would exceed the capacity of local landfill. With the implementation of Mitigation Measure MM 4.17-1, of the certified EIR, a recycling coordinator would ensure the separation and proper disposal of recyclable materials and solid waste during construction and operation, resulting in less than significant impact to solid waste providers.</p>

Policies	Consistency Determination	Project Consistency
Kern County in accordance with AB 939 which mandates recycling programs for each jurisdiction in California and shall agree to be subject to universal collection for one- to four-unit residential projects and commercial.		
Measure 25: The applicants are subject to school assessment fees pursuant to AB 2926.	Consistent.	See Public Facilities Element, Goal 4, above. Further, public service impacts are evaluated in Section 3.14, <i>Public Services</i> , of this Addendum EIR.
Residential		
Policy 4: Encourage the maintenance of natural vegetation until actual construction begins.	Consistent with implementation of Mitigation Measures MM 4.4-2 through MM 4.4-5 and MM 4.4-7 through MM 4.4-15, of the certified EIR and revised Mitigation Measures MM 4.4-1 and MM 4.4-6.	See Land Use Element, Policy 11, above. Further, biological resource impacts are evaluated in Section 3.4, <i>Biological Resources</i> , of this Addendum EIR. This Addendum EIR serves to comply with this policy and reduce potential impacts to vegetation with mitigation. Additionally, the proposed modified project would be developed and operated in accordance with all local, state and federal laws pertaining to the preservation of sensitive species.
Policy 8: Require cultural resources report for those areas with a high probability for prehistoric activity	Consistent with implementation of revised Mitigation Measures MM 4.5-2 and MM 4.5-3.	See Cultural Resources, Policy 15, above. Cultural resource impacts are evaluated in Section 3.5, <i>Cultural Resources</i> , of this Addendum EIR.
Noise Element		
Goal 2: To minimize disruption to the quality of life resulting from excessive noise.	Consistent.	Noise impacts, sensitive receptors and County noise thresholds are evaluated in Section 3.13, <i>Noise</i> , of this Addendum EIR. As discussed in that section, the proposed modified project would minimize disruption and noise impacts to sensitive receptors. Thus, the proposed modified project would be consistent with this goal.
Goal 3: To maintain reasonable noise level standards, consistent with the Kern County Noise Element	Consistent	This section of the Addendum EIR discusses the land uses proposed by the proposed modified project. As discussed in this section, the proposed modified project would be consistent with the Kern County Noise Element.
Policy 1: Noise emissions from new development will be controlled and off-site levels limited to the standards of the Kern County General Plan Noise Element.	Consistent	See Noise Element, Goal 2 and Goal 3, above. The proposed modified project would be consistent with the Kern County General Plan Noise Element.
Policy 3: Land uses will be categorized in the following manner,	Consistent.	See Noise Element, Goal 2 and Goal 3, above. The proposed modified project would be consistent with the Kern County General Plan Noise Element.

Policies	Consistency Determination	Project Consistency
<p>and the noise level standards adopted in accordance with the Kern County Noise Element:</p> <ul style="list-style-type: none"> • Sensitive Land Uses. Noise level does not affect the successful operation of these particular activities. A wide variety of uses can be included in this category, including public utilities, transportation systems, and other noise-related uses. • Moderately Sensitive Land Uses. Some degree of noise control must be present if these activities are to be successfully carried out. Included here are general business and recreational uses. • Sensitive Uses. Lack of noise control will severely impact these uses, reducing the quality of life. This category primarily contains residential uses. • Highly Sensitive Uses. A high degree of noise control is necessary for the successful operation of the 		<p>Consistent with this policy, the proposed modified project will prepare an acoustical analysis in accordance with the requirements of Chapter 3, Noise Element, Measure G, of the Kern County General Plan.</p>
<p>Measure 2: The implementation measures of the Kern County Noise Element are hereby adopted by reference.</p>	<p>Consistent.</p>	<p>This section of the Addendum EIR discusses the land uses proposed by the project. As discussed in this section, the proposed modified project would be consistent with existing land use and zoning designations of the proposed project site. The proposed modified project would be consistent with implementation measures of the Kern County Noise Element.</p>
Circulation Element		
<p>Goal 5: To maintain public safety within the plan area by providing a more direct and efficient circulation system for law enforcement and fire protection vehicles.</p>	<p>Consistent with implementation of Mitigation Measure MM 4.15-1, of the certified EIR.</p>	<p>Section 3.15, <i>Transportation</i>, of this Addendum EIR, provides a discussion of circulation and preparation of a Traffic Control Plan. The proposed modified project would include internal service roads. Consistent with this goal, all road improvements would be completed per Caltrans and/or County code and regulations. Additionally, Mitigation Measure MM 4.15-1, of the certified EIR, states that the Traffic Control Plan would ensure access for emergency vehicles to the proposed project site.</p>

Policies	Consistency Determination	Project Consistency
Goal 7: To provide an adequate circulation system which will support the proposed land uses.	Consistent with implementation of Mitigation Measure MM 4.15-1, of the certified EIR.	See Circulation Element, Goal 5, above. Further, transportation and circulation impacts are evaluated in Section 3.15, <i>Transportation</i> , of this Addendum EIR.
Policy 7: Require the widening of impacted roadways to handle increased traffic generated by new development.	Consistent with implementation of Mitigation Measure MM 4.15-1, of the certified EIR.	Traffic impacts are evaluated in Section 3.15, <i>Transportation</i> , of this Addendum EIR. The increased project-related traffic would not cause a significant increase in congestion and/or significantly worsen the existing service levels at intersections on area roads, therefore not necessitating the widening of roadways. Additionally, implementation of Mitigation Measure MM 4.15-1, of the certified EIR, would require the preparation of a Construction Traffic Control Plan to be reviewed and approved by Kern County and Caltrans, which would further reduce impacts to traffic and transportation.
Policy 8: Encourage resourceful air quality improvement and reduction methods.	Consistent with implementation of Mitigation Measure MM 4.3-3, of the certified EIR.	See Section 3.3, <i>Air Quality</i> , of this Addendum EIR. The proposed modified project would implement Mitigation Measure MM 4.3-1, of the certified EIR, which encourages resourceful air quality improvement and reduction methods. Mitigation Measure MM 4.3-3 would require that off-road equipment engines over 50 horsepower be equipped with EPA Tier 2 or higher engines if locally available. Mitigation Measure MM 4.3-3 also outlines other specific measures to ensure that all equipment is used efficiently, such as reducing idling time and maintain all equipment in accordance with the manufacturer's specifications.
Measure 9: A traffic study in accordance with the requirements of Kern County and CalTrans, as appropriate, shall be submitted for all discretionary projects. Study shall demonstrate consistency with the Willow Springs Specific Plan.	Consistent with implementation of Mitigation Measure MM 4.15-1, of the certified EIR.	Traffic impacts are evaluated in Section 4.15, <i>Transportation</i> , of this Addendum EIR. Consistent with this measure, implementation of Mitigation Measure MM 4.15-1, of the certified EIR, would require the preparation of a Construction Traffic Control Plan to be reviewed and approved by Kern County and Caltrans, which would further reduce impacts to traffic and transportation.
Measure 13: The Traffic Impact Fee Program implements Mitigation Measure 10 of the Willow Springs Final Environmental Impact Report (EIR).	Consistent.	Consistent with this measure, the project proponent would fund improvements to on-site driveways that provide access to County, city, or State roads.
Water Quality and Availability		
Goal 1: To ensure that new developments are provided with an adequate water supply and	Consistent.	Water and wastewater impacts are evaluated in Section 3.10, <i>Hydrology and Water Quality</i> , and Section 4.17, <i>Utilities and Service Systems</i> , of this Addendum EIR. The proposed project would not require water supply lines or septic systems, the proposed modified project would generate a very

Policies	Consistency Determination	Project Consistency
wastewater disposal/treatment facilities.		insubstantial volume of wastewater. Wastewater produced during construction would be collected in portable toilet facilities and disposed of at an approved facility. During operation, no permanent onsite staff would be required, and the proposed modified project would not require water it wastewater disposal systems. The water supply for the project during construction and operations would be supplied by trucking in water from RMR Water trucks, from a well located on Backus Road at about 97 th Street West.
Policy 1: Water supply method and wastewater disposal/treatment facility shall be as required by Kern County	Consistent.	See Water Quality and Availability, Goal 1, of the Willow Springs Specific Plan, above.
Policy 2: Separate environmental documentation shall be required for the methods of water supply and wastewater disposal/treatment selected.	Consistent.	See Water Quality and Availability, Goal 1, of the Willow Springs Specific Plan, above.
Measure 4: The individual project applicants shall adhere to the following guidelines as established by the Department of Water Resources for flood damage prevention: -The slope and foundation designs for all structures shall be based on detailed soils and engineering studies.	Consistent with implementation of Mitigation Measure MM 4.10-1, of the certified EIR.	As discussed in Section 3.10, <i>Hydrology and Water Quality</i> , of this Addendum EIR, the proposed modified project would be required to adhere to the Kern County Development Standards and Kern County Code of Building Regulations which require site drainage plans that include development standards designed to protect water quality. Specifically, the project proponent would be required to prepare and submit a drainage plan to the Kern County Public Works Department, for approval of post-construction structural and nonstructural BMPs that could include LID features such as drainage swales for collection of runoff prior to offsite discharge. Routine structural BMPs are intended to address water quality impacts related to drainage that are inherent in development. As discussed in Section 3.10, <i>Hydrology and Water Quality</i> , of this Addendum EIR, the proposed project would likely require one or more retention basins to meet County drainage requirement. Consistent with this policy, the proposed modified project would require the submission of a drainage plan to the County for review and would implement Mitigation Measure MM 4.10-1, of the certified EIR, which requires a final hydrologic study and drainage plan designed to evaluate and minimize potential increases in runoff from the proposed project site.
Goal 9: Fire flow provisions and on-site fire protection standards (i.e., sprinklers/water storage) shall be in compliance with minimum standards	Consistent with implementation of Mitigation Measures MM 4.14-1, of the certified EIR.	Consistent with this measure, the proposed modified project would implement Mitigation Measure MM 4.14-1, of the certified EIR, which would require preparation and implementation of a fire safety plan to ensure the provision of appropriate access.

Policies	Consistency Determination	Project Consistency
provided by the Kern County Fire Department.		

3.11.2 - IMPACT ANALYSIS

Project Impacts

As in the certified EIR analysis, this Addendum evaluates the potential for the proposed modified project to result in new or substantially more severe significant impacts to land use and planning in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

- (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?*

The certified EIR analyzed whether the approved project would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. The approved project required the approval of the following: CUP 37 Map 214, CUP 38 Map 214, CUP 39 Map 214 and CUP 41 Map 214 to allow for the construction and operation of a utility scale solar facility on A zoned land. As analyzed in the certified EIR, the approved project is consistent with the County's various land use plans, policies, and regulations.

The proposed modified project includes:

- (a) Amendment to the Land Use, Open Space and Conservation Element of the Willow Springs Specific Plan from the existing 5.3/4.4 (Residential, Maximum 10 Units/Net Acre / Comprehensive Planning Area) to 5.3 (Residential, Maximum 10 Units/Net Acre) (SPA 8, Map 231-21);
- (b) Amendment to the Circulation Element of the Willow Springs Specific Plan to eliminate future road reservations along the N/S midsection line of Sec 21 T9N R13W, SBB&M; within the project site (SPA 9, Map 231-21);
- (c) changes in zone classification from the existing OS (Open Space) and E 2½ RS FPS (Estate - 2½ acres - Residential Suburban Combining, Floodplain Secondary Combining) zone districts to the A FPS (Exclusive Agriculture – Floodplain Secondary Combining) Districts (ZCC 5, Map 231-21);
- (d) a Conditional Use Permit to allow for the construction and operation of a solar facility and associated infrastructure, including energy storage in the A Zone District pursuant to Chapter 19.12.030.G of the Kern County Zoning Ordinance (CUP 5, Map 231-21); and
- (e) Conditional Use Permit to allow for a communication tower in the A Zoning District pursuant to Chapter 19.12.030.F of the Kern County Zoning Ordinance (CUP 6, Map 231-21).

The modified project includes an amendment to the Circulation Element of the Willow Springs Specific Plan to eliminate future road reservations along the N/S midsection line of Sec 21 T9N R13W, SBB&M within the subject project parcels. This would allow solar panels to be placed throughout the site, and no setbacks from the midsection line of future road reservations would be required. However, the proposed amendment would not affect property owner access to any other surrounding properties. The amendment would also not impact traffic flow or reduce the level of effective transportation movement.

With approval of these actions, the proposed modified project would also be consistent with the County's land use plans, policies, and regulations. There is no change in these circumstances concerning the proposed modified project.

As noted in **Table 3.11-1**, the proposed modified project is consistent with the KCGP as well as the WSSP. There are no changes proposed by the proposed modified project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the modified project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described land use and planning impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such land use and planning impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

The certified EIR stated that anticipated impacts of the approved project in conjunction with cumulative development in the area of the approved project would increase urbanization and result in the loss of open space and agricultural lands. However, as the certified EIR also explained, the approved project would be consistent with the goals and policies of the Kern County General Plan and, with approval of all discretionary actions, would be a permitted use that would not conflict with the land use designation or zoning classification of the sites. Similarly, as noted in **Table 3.11-1**, the proposed modified project would be consistent with the goals and policies of the Kern County General Plan and the Willow Springs Specific Plan,

and, with approval of all discretionary actions, would be a permitted use that would not conflict with the land use designation or zoning classification of the modified project sites. Thus, like the approved project, the proposed modified project would not result in a cumulatively considerable impact regarding land use. The cumulative projects analyzed in the certified EIR remain the same.

The certified EIR concluded that the approved project, when combined with impacts of past, present, and reasonably foreseeable PV solar facilities, if abandoned, might affect the health, safety, and welfare of the citizens of the County. Unlike other facilities that, once constructed, can be retrofitted, and utilized for another specific use, PV solar facilities have little opportunity for other uses should the site not be in operation. The potential for the cumulative effects caused by the abandonment of multiple solar facilities in Kern County could result in impacts on surrounding land uses should it be determined that these facilities are no longer viable commercial operations. Therefore, Mitigation Measure MM 4.11-1 related to the decommissioning of solar facilities has been included to establish safeguards to ensure the maintenance of the health, safety, and welfare of the citizens of the County. The certified EIR concluded that with implementation of Mitigation Measure MM 4.11-1, cumulative land use impacts would be less than significant. The proposed modified project, which is similar in all material respects to the approved project, would also be subject to Mitigation Measure MM 4.11-1. For these reasons, the proposed project modification does not create new or substantially more severe cumulative impacts than those disclosed in the certified EIR and would be mitigated to the maximum extent practicable by the incorporation of all feasible and applicable mitigation measures.

With respect to the above-described land use and planning evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described land use and planning impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such land use and planning impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively ***less than significant***.

3.12 - Mineral Resources

This section evaluates whether the impacts of the proposed modified project on mineral resources require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section was prepared in part using information from the certified EIR, available public data, and a Phase 1 Environmental Site Assessment completed for the modified project, located in Appendix D (Insight Environmental Consultants, 2020).

3.12.1 - SETTING

The certified EIR discussed the existing conditions related to mineral resources in the study area and described the environmental setting for mineral resources to the approved project. It also assessed the regulatory setting at the federal, State, and local levels. With respect to mineral resources, the proposed modified project would not result in any changes to the setting considered in the certified EIR.

The proposed modified project is located in a similar geographic area as the approved project; therefore, potential impacts to mineral resources are similar to those previously identified in the certified EIR.

3.12.2 - IMPACT ANALYSIS

Project Impacts

As in the certified EIR analysis, this Addendum evaluates the potential for the proposed modified project to result in new or substantially more severe significant impacts to mineral resources in relation to the following questions as stated in the Kern County CEQA Checklist:

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?*

The certified EIR analyzed whether the approved project would 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. The certified EIR stated that the approved project is not located on lands designated as Mineral Resource Zones (MRZ) by the State, nor is it within a California Geological Energy Management Division (CalGEM) designated oil/gas production field. The approved site is not designated as land that contains mineral resources and/or allows mineral resource extraction. Additionally, installations of the solar panels on the approved project site would not impede access to mineral resources or potential mineral operations in adjacent areas.

The proposed modified project is not located in a designated MRZ, nor is it within a CalGEM oil/gas field and does not have a mineral resources land use designation. Therefore, the proposed modified project does not preclude the exploration of mineral resources and does

not result in the loss of availability of a known mineral resource. The proposed modified project would not result in the loss of availability of a known mineral resource than was considered in the certified EIR. Development of these facilities would not result in any new or substantially more adverse significant impacts related to loss of availability of a known mineral resource than was considered in the certified EIR.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described mineral resources impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such mineral resources impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(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?*

The certified EIR analyzed whether the approved project would result in the loss of availability of locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. The certified EIR states that although mineral resources could not be mined within the approved project site during project operations, the approved project would not preclude mineral resource recovery within surrounding areas.

In addition, the certified EIR found that the approved project site is not within an MRZ or on lands designated for mineral resources by a land use plan. Additionally, access to any potential mineral resources would not be permanently lost or impacted, and as such, the approved project would not result in significant impact. Therefore, the certified EIR found that the approved project would have no impact.

The proposed modified project would not result in the loss of availability of a locally important mineral resource recovery site and would not result in any new or substantially

more adverse impacts related to loss of availability of a known mineral resource than was considered in the certified EIR. Therefore, the proposed modified project would not result in the loss of availability of a locally important mineral resource recovery site and does not change the finding in the certified EIR that of no impact.

There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described mineral resources impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such mineral resources impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *no impact*.

CUMULATIVE IMPACTS

The certified EIR determined that impacts of the proposed modified project, when combined with the impacts of past, present, and reasonably foreseeable projects, would not create a substantial adverse effect related to mineral resources. Cumulative impacts to mineral resources would occur if the cumulative projects would result in the loss of oil or aggregate mineral resources. The proposed project modification is not on land designated 8.4 by the Kern County General Plan and would not result in any impacts to mineral resources. As such, the proposed modified project would not contribute to a cumulative mineral resources impact.

With respect to the above-described land use and planning evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described mineral resource impact evaluation standards. No new information of substantial importance, which

was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such mineral resources impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.13 - Noise

This section evaluates whether the impacts of the proposed modified project on noise require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section was prepared in part using information from the certified EIR and a Noise Memorandum completed for the modified project, which can be found in Appendix I (QK, 2018).

The lead agency determined that the approved project would not result in significant impacts to some of these environmental issue areas; these issue areas were scoped out of the certified EIR. It was determined that the approved project would not:

- (d) For a project located within the Kern County Airport Land Use Compatibility Plan, expose people residing or working in the project area to excessive noise levels?*

As discussed in the certified EIR, the approved project is not located within the sphere of influence of an airport, as identified in the Kern County ALUCP. The closest airport/airstrip is the Rosamond Skypark located approximately 9 miles to the southeast of the project site. The approved project is located entirely outside the airport's land use plan area. Given this distance of the nearest public airport/public use airport from the project site, the approved project is not expected to expose individuals working in the project area to excessive noise levels resulting from any airports located within the ALUCP and no impacts would result.

Additionally, the certified EIR determined that the approved project site is not located within two miles of any private airport or private airstrip. Therefore, the approved project would not expose people residing or working in the project area to excessive noise levels, and no impact would result. The modified project would exhibit comparable characteristics related to exposing people residing or working in the project area to excessive noise levels. The closest airport is the Rosamond Skypark located about 6.7-miles to the southwest of the proposed project site. Therefore, no additional analysis is warranted.

3.13.1 - SETTING

The certified EIR provided an evaluation of the potential noise impacts that would be caused by implementation of the project. The discussion starts with an overview of regulation that is normally applicable to the noise environmental factor, followed by a description of the physical setting of both the site and surrounding lands. There are no changes in such circumstances affecting the proposed modified project.

The proposed modified project is located in a similar area as the approved project; therefore, potential impacts to noise are similar to those previously identified in the certified EIR.

The proposed modified project site is subject to the provisions of the Willow Springs Specific Plan (WSSP), which contains goals, policies, and standards that are compatible with those in the Kern County General Plan, but are unique to the specific needs of the Willow Springs Area. The WSSP limits operational nighttime and daytime noise levels to 45 dBA L50 and 55 dBA L50, respectively for sensitive land uses, which includes residential uses.

Additionally, the average-daily noise levels for sensitive land uses are limited to 65 dBA Ldn/CNEL. Construction activities would be conducted consistent with Kern County Ordinance Section 8.36.020 regarding hours of construction or as approved by Kern County.

3.13.2 - IMPACT ANALYSIS

Project Impacts

As in the certified EIR analysis, this Addendum evaluates the potential for the proposed modified project to result in new or substantially more severe significant impacts to noise in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

- (a) *Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?*

The certified EIR analyzed whether the approved project would result in the generation of substantial temporary or permanent noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The analysis concluded that the approved project, would not expose persons to or generation of noise levels more than established standards during operation or create a substantial increase in ambient noise levels at the nearest offsite sensitive receptor, and impacts were found to be less than significant with implementation of Mitigation Measures MM 4.13-1 through MM 4.13-3.

The propose modified project would generate noise during construction using construction equipment, such as a crane, excavator, grader, roller, scraper, tractor/loader/backhoe, and trencher. It is estimated that such equipment would generate sound levels between 80 and 85 dBA at 50 feet, as shown on **Table 3.13-1**. The Kern County Noise Control Ordinance regulates construction-related noise by limiting the hours of construction activity for projects located within 1,000 feet of an occupied residential dwelling. Specifically, the Ordinance limits noise from construction activities to the hours of 6:00 a.m. to 9:00 p.m. on weekdays and 8:00 a.m. to 9:00 p.m. on weekends for persons with average hearing faculties or capacity to a distance of 150 feet from the site. There are three residences within a 1,000-foot buffer, with an abandoned structure located 323 feet to the northwest, and two occupied residences located 934 feet to the northwest and 989 feet to the southwest of construction activity capable of generating noise levels in excess of 65 dBA. No other sensitive types of noise receptors are found within the 1,000-foot buffer. The project proponent would limit construction activities during the 14-month construction period to between 7:00 a.m. and 6:00 p.m. on Monday through Friday. Construction within 1,000 feet of a residential dwelling would occur in compliance with the Kern County Noise Ordinance (QK, 2018).

**Table 3.13-1
Estimated Construction Equipment Sound Levels at 50 Feet**

Construction Equipment	Estimated Sound Level (dBA) at 50 Feet
Crane	85
Excavator	85
Grader	85
Roller	85
Scraper	85
Tractor/Loader/Backhoe	80
Trencher	85

Source: (QK, 2018)

Additionally, the proposed modified project operation would not generate appreciable noise. The hum of electrical generation from the facility would generate noise levels of 48 dBA at 40 feet and would be “quiet” to “just audible” to the human ear. The modified project operation would not cause the ambient noise level measured at the property line of affected uses to increase by 3 dBA, to a level at or within the “normally unacceptable” or cause any 5 dBA or greater noise increase. The Kern County General Plan provides maximum noise standards of 65 dBA Ldn at the exterior of a residence. Converting 48 dBA at 40 feet to the County day/night weighted dBA Ldn standard would produce a sound level of 53 dBA Ldn. This would be much lower than the 65 dBA Ldn County standard. Therefore, the proposed modified project would not expose persons to or generation of noise levels more than established standards during operation and impacts would be less than significant (QK, 2018).

The proposed project modification as described above, would not result in increased generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the modified project and does not change the findings in the certified EIR that impacts are less than significant, with incorporation of Mitigation Measure MM 4.13-1 through MM 4.13-3.

With respect to the above-described noise evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described noise impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such noise impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(b) Result in generation of excessive groundborne vibration or groundborne noise levels?

The certified EIR analyzed whether the approved project would result in the generation of excessive groundborne vibration or groundborne noise levels. The analysis concluded that the approved project would not result in generation of excessive groundborne vibration or groundborne noise levels from construction activities, and impacts were found to be less than significant.

Some groundborne vibration and groundborne noise would originate from earth movement and other construction activities during the construction phase of the proposed modified project. There are a few residences that are located within 1,000 feet of modified project construction. Construction would be temporary and only occur near these residences at the closest point for no more than a few days (likely 5 days maximum) and during daylight hours. Additionally, the vibrations for pile driving, the construction activity with greatest vibration generation, attenuate within 300 feet (Kim and Lee 1999). There are three residences within a 1,000-foot buffer, with an abandoned structure located 323 feet to the northwest, and two occupied residences located 934 feet to the northwest and 989 feet to the southwest of construction activity utilizing equipment capable of creating groundbourne vibration (QK, 2018). **Table 3.13-2** shows the distance from construction activities to the closest residence in each direction, anticipated sound levels at the residences because of construction, and anticipated human response at the residences to construction-related noise.

Table 3.13-2
Nearest Residence's Distances from Project Construction in Each Direction

Direction ¹	Distance from Construction Activity	Anticipated Sound Level (dBA) at Residence ²	Human Response
Northwest	323	62.5-70.0	Comfortable to telephone use difficult
Northwest	934	<55.0	Quiet
Southwest	989	<55.0	Quiet

Source: (QK, 2018)

¹See Figure 2

²Estimated based on construction equipment with sound level of 85 dBA at 50 feet and distance of residence from Project construction

The County of Kern does not have adopted vibration level thresholds. However, the California Department of Transportation (Caltrans) use certain criteria for determining impacts to structures and human annoyance. These thresholds measure the Peak Particle Value (PPV). The maximum PPV for continuous/frequent intermittent sources, used by Caltrans, for older residential structures is 0.30 PPV and 0.10 PPV for “strongly perceptible” (QK, 2018).

As noted above, pile driving is the construction activity that generates the highest levels of vibration. Pile driving and other project activities will not occur closer than 323 feet from the nearest sensitive receptor (the distance between the proposed modified project site and the nearest residence). Other construction activities are less intensive than pile driving and would have lower PPV. Therefore, vibration levels from pile driving are considered worst case for the solar facility construction. Caltrans vibration guidance provides the following equation to calculate PPV at sensitive receptors, such as residences:

$$\text{PPV Impact Pile Driver} = \text{PPV}_{\text{Ref}} (25/D)^n \text{ (in/sec)}$$

Where:

$\text{PPV}_{\text{Ref}} = 0.65 \text{ in/sec}$ for a reference pile driver at 25 ft.

D = distance from pile driver to the receiver in ft.

n = 1.1 is a value related to the vibration attenuation rate through ground

Using the referenced formula and an assumed 1,212 ft-lb rated energy for the impact pile driver, the calculated PPV at the nearest residence (323 feet) would be 0.06 PPV, which according to the Caltrans guidance would not damage buildings and would be less than strongly perceptible. Therefore, groundborne vibration from construction activities would be less than significant (QK, 2018).

With respect to the above-described noise impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described noise impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such noise impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (c) *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.*

The certified EIR analyzed whether the approved project would result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. The analysis concluded that the approved project, would not result in a substantial permanent increase in ambient noise levels in the project vicinity, and impacts were found to be less than significant.

Construction of the proposed modified project would not result in a substantial permanent increase in ambient noise levels in the modified project vicinity above levels existing without the modified project. Thus, impacts after accounting for the proposed modified project would remain less than significant.

Once constructed, the proposed modified project would not permanently increase ambient noise levels above the baseline condition because a solar facility makes no appreciable noise. There would be the hum of electrical equipment and cooling fans, but this would be like existing electrical facilities in the modified project area. The hum of electrical generation from the facility would generate noise levels of 48 dBA at 40 feet and would be “quiet” to “just audible” to the human ear. Since the nearest sensitive receptor is located more than 323 feet from the project boundary, proposed modified project operation would not cause the ambient noise level measured at the property line of affected uses to increase by 5 dBA or greater noise increase. The Kern County General Plan and the Willow Springs Specific Plan provides maximum noise standards of 65 dBA Ldn at the exterior of a residence. Converting 48 dBA at 40 feet to the County day/night weighted dBA Ldn standard would produce a sound level of 53 dBA Ldn. This would be much lower than the 65 dBA Ldn County standard. Therefore, the proposed modified project would not result in a substantial permanent increase in ambient noise levels in the modified project vicinity above levels existing without the proposed modified project, and impacts are less than significant (QK, 2018).

Activities associated with a potential decommissioning of the project would result in similar or lower noise levels than those that would be experienced under the loudest phases of construction. Therefore, decommissioning activity noise levels could result in disturbances of noise sensitive receptors in the project vicinity similar to those during the loudest construction phases if activities are not restricted to daytime hours. Therefore, to reduce any potential noise impact to off-site sensitive receptors, the proposed modified project proponent would comply Mitigation Measure MM 4.13-1 through MM 4.13-3 from the certified EIR. As with the approved project, the modified project would thus have less-than-significant impacts.

With respect to the above-described noise impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described noise impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such noise impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

CUMULATIVE IMPACTS

The certified EIR determined that impacts of the approved project, when combined with the impacts of past, present, and reasonably foreseeable project, would not result in a cumulatively considerable contribution to noise impacts in the area.

Due to the localized nature of noise impacts, cumulative impacts would be largely limited to areas within the general vicinity (i.e. within approximately 1,000 feet) of the proposed modified project site. Construction activities associated with other projects in proximity to the proposed modified project site could occur at the same time as the proposed project. Of the cumulative projects located within the 6-mile radius of the proposed modified project site, there are no projects located within 1 mile of the modified project site. As a result, construction of the proposed project would not result in a cumulatively considerable contribution to noise impacts at residences located within approximately 1,000 feet of the project site. At receptor locations further than 1,000 feet from the project site, project-generated construction noise would diminish to near ambient levels and would not result in a cumulatively considerable contribution to construction noise levels associated with other construction projects. Therefore, when considered with other past, present, and reasonably foreseeable future projects, the proposed modified project would not result in a cumulatively considerable contribution to construction noise impacts.

Cumulative construction may also result in the exposure of people to or the generation of excessive groundborne vibration. The same receptor as identified for construction noise would be the closest to be impacted by all projects with respect to construction related vibration as well. Due to these distances, and the rapid attenuation of groundborne vibration, the proposed modified project and the nearest related project are not in close enough proximity to this sensitive receptor such that it would be exposed to substantial groundborne vibration levels. Construction of the gen-tie line, and decommissioning activities would result in similar noise and vibration levels identified for the construction of the proposed project. Therefore, cumulative impact in terms of groundborne vibration would remain less than significant.

As a result, the proposed modified project would not create more severe cumulative impacts on noise than those disclosed in the certified EIR and would be mitigated to the maximum extent practicable by the incorporation of Mitigation Measure MM 4.13-1 through MM 4.13-3 of the certified EIR.

With respect to the above-described noise planning evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described noise impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such noise impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.14 - Public Services

This section evaluates whether the impacts of the proposed modified project on public services require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section was prepared in part using information from the certified EIR.

The lead agency determined that the approved project would not result in significant impacts to some of the following environmental issue areas; these issue areas were scoped out of the certified EIR. It was determined that the approved project would not have a significant adverse effect on the following public services:

- (iii) Schools*
- (iv) Parks*
- (v) Other Public Facilities*

As discussed in the certified EIR, the approved project would require an average of 200 daily workers and a peak workforce of 300 workers during the 12 to 14-month construction period. It is expected that most of these workers would live in the region and commute to the approved project site. Therefore, it is not expected that a substantial temporary increase in population would occur that would adversely affect local school populations, park facilities, or local public facilities, such as post office, courthouse, and library services. However, further discussion on the topic of parks and other public facilities has been provided for clarification purposes, under Impact *(a)*, below.

3.14.1 - SETTING

The public services section of the certified EIR describes the affected environment and regulatory setting pertaining to fire and law enforcement protection, the impacts on fire and police protection that would result from implementation of the proposed project, and the mitigation measures to reduce these impacts. Like the approved project, the proposed modified project is served by the Kern County Sheriff's office and Kern County Fire Department.

With respect to public services, the proposed modified project would not result in any changes to the setting considered in the certified EIR but adds the following to the environmental setting.

The Kern County Fiscal Year 2020-21 Recommended Budget shows on-going deficiencies in funding for staffing, training, and equipment, for fire and law enforcement protection, as well as a \$60 million backlog for capital equipment costs for the Fire Department. While the adopted Budget provides a transfer from the General Fund reserves to prioritize fire protection and law enforcement, the County Administrative Office (CAO) report confirms this is not sustainable. Additionally, the Fiscal Year 2020-21 Recommended Budget shows on-going deficiencies in funding libraries and parks with closings and lack of maintenance for facilities (Kern County, 2020a).

The Kern County Parks and Recreation Department manages an extensive system of large regional parks designed to serve the entire countywide population, and small neighborhood and community parks intended primarily to meet the recreational needs of nearby residents in unincorporated communities. Kern County Parks & Recreation manages 8 regional parks, 40 neighborhood parks, and 25 public buildings, supervises three golf courses and landscapes 76 county buildings (Kern County, 2020b).

Other public facilities include library facilities, post office facilities, and courthouses. The Kern County Library has 24 branches and 2 mobile libraries, which serve 850,000 residents within the County, including incorporated municipalities (Kern County, 2020c). Additionally, there are currently 37 post offices that serve the County (United States Postal Service [USPS], 2020). Furthermore, there are currently 12 facilities serving the Superior Court of California in Kern County (Superior Court of California, 2020).

The proposed modified project would not result in any changes to the regulatory setting considered in the certified EIR, but adds the following:

California State Legislature Active Solar Energy Exclusion

The State of California has provided reduced property taxes for the solar industry. No other industry has this type of property tax reduction outside a local government providing a specific incentive of a development project.

The California Franchise Tax Board's website outlines that the property tax incentive for the installation of an active solar energy system is in the form of a new construction exclusion, which is not an exemption. The installation of a qualifying solar energy system will not result in either an increase or a decrease in the assessment of the existing property. The California Franchise Tax Board's website states: *"Generally, when something of value is physically added to real property, the addition is assessed at current market value and this value is added to the existing base year value of the real property. When an active solar energy system is installed, it is not assessed, meaning that the existing assessment will not increase"* (California State Board of Equalization, 2020).

The value of the underlying land with some improvements, such as operations and maintenance buildings and battery storage, are assessed, but the solar panels and majority of equipment are not. Effective June 20, 2014, the sunset date for the active solar energy system new construction exclusion was extended through the 2023-24 fiscal year; however, the statute is now scheduled to sunset on January 1, 2025. The Kern County Assessor has calculated that the estimated lost annual revenue to the County General Fund from the existing large-scale commercial scale solar projects already built is \$19,924,000 (Kern County, 2020); they currently pay \$1,511,000.

This revenue is only the funding that would normally go to the General Fund to pay for public services and facilities that maintain quality of life for communities and residents in unincorporated Kern County. The Kern County 2020-2021 Recommended Budget details the General Fund, which funds many County operations, as totaling \$883.1 million, a decrease of

\$76.5 million, or 7.97% from the 2019-2020 budget. The 2019-2020 budget was the end of a four-year fiscal emergency with a deficit of over \$40 million.

With respect to the above-described public services information, this is not new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such public service impacts evaluation has been identified.

3.14.2 - IMPACT ANALYSIS

Modified Project Impacts

As in the EIR analysis, this Addendum evaluates the potential for the proposed modified project to result in new or substantially more adverse significant impacts to public services in relation to the following questions as stated in the Kern County CEQA Checklist:

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 to other performance objectives for any of the public services:*
 - (i) Fire protection*
 - (ii) Law enforcement protection*
 - (iv) Parks*
 - (v) Other Public Facilities*

The certified EIR states that impacts to fire protection would be reduced to less-than-significant levels with the implementation of a fire safety plan which included use of spark arrestors, use of trucks on cleared roadways, posting of fire rules, flammable material clearance, fire safety training, and equipment restrictions (Mitigation Measure MM 4.14-1). The certified EIR states that impacts to fire and police protection would be reduced to less-than-significant levels with payment of an impact fee and additional taxes at a rate of \$29.59 per 1,000 square feet of solar covered ground for the facility operation and related on-site structures for the project (Mitigation Measure MM 4.14-2). However, the County has since reviewed the contribution of commercial-scale solar projects through established property tax revenues to fully document the projects contribution to all government services and facilities that provide for stability in communities and prevent decline of the communities' physical neighborhoods. As a result, Mitigation Measure 4.14-2 has been revised as demonstrated below, and separated into three separate measures for ease monitoring compliance.

The proposed modified project is also obliged to comply with these mitigation measures, as revised, which would require the project operator to pay a Kern County Cumulative Impact Charge (CIC) annually to provide funding for the county budget for services that are not funded due to the State of California Active Solar Energy Exclusion provision on property taxes that the county would otherwise receive for services and facilities thereby supporting a prosperous economy and assuring the provision of adequate public services and facilities. In addition, if the project is sold to a city, county, or utility company with assessed taxes that total less than \$3,000 per megawatt per year, then that entity shall pay the taxes plus the amount necessary to equal the equivalent of \$3,000 per megawatt. The amount shall be paid for all years of operation, through implementation of Mitigation Measure MM 4.14-3. Through implementation of Mitigation Measure MM 4.14-4, The project proponent/operator shall work with the County to determine how the use of sales and use taxes from construction of the project can be maximized. With implementation of Mitigation Measures MM 4.14-1 through MM 4.14-4, any potential operational impacts on public services would be reduced. The proposed modified project would not result in any new or substantially more adverse fire and law enforcement protection impact than was considered in the certified EIR.

The proposed modified project would require an average of 70 daily workers and a peak workforce of 150 workers during the 8 - 10-month construction period. The presence of construction workers at the modified project site would be temporary, through the duration of the approximate 8 - 10-month construction period. These construction workers would likely come from an existing local and/or regional construction labor force and would not likely relocate their households as a consequence of working on the project. Therefore, the short-term increased employment of construction workers on the project site would not result in a notable increase in the residential population of the area surrounding the project site. Accordingly, there would not be a corresponding demand or use of the local schools, parks, or public facilities. Therefore, project construction workers would not increase demand for local schools, parks, or public facilities such that substantial physical deterioration of such facilities would occur, nor would project construction require the construction or expansion of recreational facilities which might have an adverse effect on the environment, nor result in substantial adverse physical impacts associated with the construction of new or physically altered facilities in order to maintain acceptable service ratios. Impacts during construction would be less than significant.

Operation of the proposed modified project would not require full-time workers onsite. Employees would intermittently visit the project site for routine inspection, maintenance, and repair of solar arrays and accessory components. Two to five employees would be onsite intermittently to perform maintenance duties. These employees would likely come from an existing local and/or regional labor force and would not likely relocate their households as a consequence of working on the project. Even if the maintenance employees were hired from out of the area and had to relocate to Kern County, the resulting addition of potential families to this area would not result in a substantial increase in the number of users at local schools, parks, or public facilities. Therefore, staff required during operation would not increase demand for local schools, parks, or public facilities such that substantial physical

deterioration of such facilities would occur, nor would project construction require the construction or expansion of recreational facilities which might have an adverse effect on the environment, nor result in substantial adverse physical impacts associated with the construction of new or physically altered facilities in order to maintain acceptable service ratios. Impacts during construction would be less than significant.

Unlike other businesses in California, large scale solar has an exclusion from property taxes on their equipment. This property tax exclusion results in the project not providing the revenue needed to provide services and facilities for both the project and the communities that prevent decline of the physical neighborhoods in unincorporated Kern County. This is a direct impact from the project structure and the land if built with another type of land use would produce property tax revenue to provide necessary services and facilities and prevent physical decline of homes and businesses due to vacancy and inability for response for all services, including code enforcement to law enforcement, fire, roads and health and safety issues such as elderly care and child protection services. The cumulative impacts of this active solar tax exclusion over the life of the over 36,000 acres of projects has resulted in a loss to the General Fund over the last 10 years of over \$103 million and deepened the ongoing fiscal emergency of the county. Public policies in the Kern County General Plan and Inyokern Specific Plan require development to address economic deficiencies in public services and facilities costs. Further the cumulative impacts of all the projects in addition to this project on various resources including aesthetics, air and biological resources have contributed to changing the visual and community character of the unincorporated communities and caused decline due to using land for a use that does not provide normal property tax revenue.

Revised Mitigation Measure MM 4.14-2 provides a CIC calculated on net acreage that excludes assessable structures and permanent improvements (Operation and Maintenance Building and Energy Storage) and legally unbuildable land (recorded easements). The charge factor was calculated based on the fair share under the Government Code that the project would have paid if the Tax Exclusion was not present. The amount the project should pay is calculated as \$550 per net acre annual charge. This is in addition to the normal property tax revenue legally assessed on the property as the fair share that is provided to the Kern County General fund. With implementation of revised Mitigation Measures MM 4.14-2 through MM 4.14-4, the project impacts on public services and facilities and contribution to decline of communities is less than significant.

The proposed modified project footprint as well as the surrounding vicinity are within the Kern Fire Hazard Severity Zone Non-Wildland/Non-Urban classification, and within a low fire threat zone (CAL Fire, 2020). Development of these facilities would not result in any new or substantially more adverse significant impacts related to fire and police protection than was considered in the certified EIR.

The revisions as shown below in underline/~~strikeout~~ to revised Mitigation Measure MM 4.14-2 through MM 4.14-4 do not reflect new information or substantial changes with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of previously of

impacts related to the above-described public services impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such public services impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

MM 4.14-2 (revised): ~~The project proponent/operator shall implement the following mitigation steps at the project site:~~

- ~~a) For facility operation, the project proponent/operator shall pay for impacts to countywide public protection, sheriff patrol and investigative services, and fire services at a rate of \$29.59 per 1,000 square feet of panel-covered ground for the facility operations and related onsite structures for the entire covered area of the project. The total amount shall be divided by 20 and paid on a yearly basis. Any operations that continues past 20 years will pay the same yearly fee. If completed in phases, the annual amount shall be based on the square footage of ground covered by April 30 of each year. The amount shall be paid to the Kern County Auditor/Controller by April 30 of each calendar year for each and every year of operation. Copies of payments made shall be submitted to the Kern County Planning and Natural Resources Department.~~

The following Cumulative Impact Charge (CIC) shall be implemented as an annual payment due every year for the life of the project or as a lump sum payment for multiple years until the project is decommissioned and the Conditional Use Permit is voided.

a. Submittal of Building Permit

1. Any building permit submitted shall be accompanied by a map and legal description of the entire approved Conditional Use Permit area.
2. The map shall calculate the CIC net acreage as follows:
 - A. Total gross acreage of the approved Conditional Use Permit.
 - B. Total acres for Operations and Maintenance building and permanent accessory improvements.
 - C. Total acres for Energy Storage structure and permanent accessory improvements.
 - D. Total acres of recorded easements.
3. Formula: Net Acreage = (2)(A) minus the sum of [(2)(B) + (2)(C) + (2)(D)].

4. Temporary storage areas or non-permanent commercial coaches or cargo containers for construction or operations are not eligible for inclusion under (2)(B) or (2)(C), above.
5. All areas of buildings, accessory improvements, and easement used in the calculations shall be shown on the submitted Map.
- b. Calculation and Payment of Cumulative Impact Charge (CIC)
 1. A payment of \$550 per net acre shall be paid annually for all acres in the approved Conditional Use Permit regardless of phased implementation of building permits, the total number of building permits, or type of building permit issued.
 2. The first payment is due upon issuance of the first building permit. If it is not paid within 30 days after issuance of the first building permit, all such permits shall be suspended until the fee is paid in full.
 3. Annual payments are due every year on the date of the first building permit issuance.
 4. Payments shall be made to the Planning and Natural Resources Department for transfer directly to the County Administrative Office (CAO) Fiscal Division and labeled Cumulative Impact Charge (CIC) with the project name, location, and APNs.
 5. Any acres denoted for an operation and maintenance building or energy storage that is not built, cannot be used for solar panels unless payment is provided for the Cumulative Impact Charge (CIC).
 6. An advance payment option for a lump sum of all payment years, 5 or more years, or a reduction in each years payment for 5 or more years, may be requested by submittal of a written request to the Planning and Natural Resources Department with details of the offer no later than 60 days before the yearly payment is due. A 10% discount in the lump sum amount will be applied if the advance payment option is accepted by the County Administrative Office (CAO) Fiscal Division by written response.

MM 4.14-3 (resvised): ~~b)-~~ Written verification of ownership of the proposed project shall be submitted to the Kern County Planning and Natural Resources Department by April 15 of each calendar year. If the project is sold to a city, county, or utility company that pays assessed taxes that total ~~equal less than \$1,000~~ **\$3,000** per megawatt per year, then ~~they shall pay those taxes plus the amount necessary to~~

equal the equivalent of \$1,000 per megawatt. The amount shall be paid for all years of operation. The fee shall be paid to the Kern County Auditor/Controller by April 30 of each calendar year a Supplemental Cumulative Impact Charge (SCIC) shall be paid for the difference annually up to \$3,000 per megawatt. The SCIC payments shall be made annually directly to the County Administrative Office (CAO) Fiscal Division and labeled "Supplemental Cumulative Impact Charge (SCIC)" with the project name and phase number.

MM 4.14-4 (revised): ~~e) The project proponent/operator shall work with the County staff to determine how the use receipt of sales and use taxes from related to the construction of the project can be maximized. This process shall include, but is not necessarily limited to, the project proponent/operator: obtaining a street address within the unincorporated portion of Kern County for acquisition, purchasing, and billing purposes and, registering this address with the State Board of Equalization; using this address for acquisition, purchasing and billing purposes associated with the proposed project.~~ As an alternative to the aforementioned process, the project proponent/operator may make arrangements with Kern County for a guaranteed single payment that is equivalent to the amount of sales and use taxes that would have otherwise been received (less any sales and use taxes actually paid); with the amount of the single payment to be determined via a formula approved by Kern County. The project proponent/operator shall allow the County to use this sales tax information publicly for reporting purposes.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

Significant cumulative impacts on public services would occur if the public agencies were overburdened and unable to provide adequate services, thereby resulting in significant combined impacts related to the development of new facilities. Because the approved project would not induce population growth in the area, implementation would not result in the need to construct new, or physically alter or expand, existing sheriff's office and fire protection services. In addition, it would not impede the effective operation of these services. Incorporation of the Mitigation Measure MM 4.14-1 and revised Mitigation Measure MM 4.14-2 would reduce approved project impacts to a less-than-significant level. In addition, the application of similar mitigation at each of the proposed solar projects in Kern County would reduce cumulative impacts to a less-than-significant level. Therefore, approved project impacts on public services would not be cumulatively considerable.

For these reasons, the proposed project modification does not create new or substantially more severe cumulative impacts than those disclosed in the certified EIR and would be mitigated to the maximum extent practicable by the incorporation of all feasible and applicable mitigation measures. Revised Mitigation Measure MM 4.14-2 through MM 4.14-4

requires the project proponent to pay a Cumulative Impact Charge (CIC) and sales tax from construction of the project to reduce significant impacts all public services provided by the Kern County General Fund (including fire and law enforcement services). Implementation of revised Mitigation Measures MM 4.14-2 through MM 4.14-4 would also prevent the decline of services in unincorporated communities that result in physical impacts on neighborhoods. Such cumulative impacts include increase in vandalism on public spaces such as parks, lack of maintenance of roads and park facilities, abandoned vehicles and buildings, trash abandonment on private property and lack of funding for code enforcement of regulations for public health and safety, lack of services for homeless prevention programs, as well as lack of services and facilities for elder, adolescent, and child health safety services and general mental health facilities. With payment of the required mitigation charge as assessed by the Kern County Planning and Natural Resources Department for transfer to the Kern County General Fund, impacts from the modified project's cumulative contribution to decline of services would be appropriately mitigated. Cumulative projects remain the same as those analyzed in the certified EIR.

With respect to the above-described public services evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described public services impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such public services impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new mitigation measures are required beyond those included in the previously certified EIR, as revised.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.15 - Transportation

This section evaluates whether the impacts of the proposed modified project on traffic require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section was prepared in part using information from the certified EIR and a Traffic Evaluation Letter completed for the modified project, which can be found in Appendix J (Ruettgers and Schuler, 2020). The analysis of the proposed modified project will also include an analysis of Vehicle Miles Traveled (VMT), per the 2020 CEQA guidelines.

The lead agency determined that the approved project would not result in significant impacts to some of the following environmental issue areas; these issue areas were scoped out of the certified EIR. It was determined that the approved project would not:

- (a) *Conflict with an applicable congestion management program, including, level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways. Specifically, would implementation of the project cause the level of service (LOS) for roadways and/or intersections to decline below the following thresholds or further degrade already degraded segment(s):*
 - *Metropolitan Bakersfield General Plan LOS "C".*

As discussed in the certified EIR, the approved project is not located in or near the metropolitan Bakersfield area. Nor is the proposed modified project, and no additional analysis is warranted.

3.15.1 - SETTING

The certified EIR discussed the existing conditions related to transportation and traffic in the study area and described the environmental setting for the approved project. The certified EIR analyzed public transit, roads and highways, and airports in the area. It also assessed the regulatory setting at the federal, State, and local levels. The modified project is located in an unincorporated, southeastern portion of Kern County, approximately 5.25 miles west of State Route 14 (SR-14) on the south side of Rosamond Boulevard midway between of 70th Street and 80th Street. Transportation in the surrounding area is dominated by automobile traffic. With respect to transportation and traffic, the proposed modified project would not result in any changes to the setting considered in the certified EIR, as both projects have similar area characteristics.

3.15.2 - IMPACT ANALYSIS

Project Impacts

As in the certified EIR analysis, this Addendum chapter evaluates the potential for the proposed modified project to result in new or substantially more severe significant impacts to traffic in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

- (a) *Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

Construction traffic for the proposed modified project would consist of worker passenger vehicles and heavy trucks delivering parts, equipment and materials to the proposed modified project site. It is anticipated that construction activities would take place primarily during daylight hours, Monday through Friday. Construction traffic would access the project site from Rosamond Boulevard. Construction of the proposed modified project is estimated to take approximately eight to ten months to complete and would involve an average daily workforce of approximately 70 construction personnel. The daily workforce is anticipated to increase to approximately 150 personnel during the peak of project construction which is expected to occur over a period of a few weeks. Trip generation estimates for the project construction phase are shown in **Table 3.15-1** and **Table 3.15-2** (Ruettgers and Schuler, 2020).

Table 3.15-1
Trip Generation
Construction Phase: Non-Peak Period

Trip Type	Vehicle Type	Variable	ADT	AM Peak Hour		PM Peak Hour	
			Daily Trips	% Split Trips	% Split Trips	% Split Trips	% Split Trips
Worker	Passenger	70	105	50	0	0	50
		Workers		21	0	0	21
Delivery	Heavy Truck	2	6	25	0	0	25
		Deliveries		2	0	0	2
TOTAL			111	23	0	0	23

Source: Appendix J (Ruettgers and Schuler, 2020)

Table 3.15-2
Trip Generation
Construction Phase: Peak Period

Trip Type	Vehicle Type	Variable	ADT	AM Peak Hour		PM Peak Hour	
			Daily Trips	% Split Trips	% Split Trips	% Split Trips	% Split Trips
Worker	Passenger	150	225	50	0	0	50
		Workers		45	0	0	45
Delivery	Heavy Truck	7	21	25	0	0	25
		Deliveries		5	0	0	5
TOTAL			246	50	0	0	50

Source: Appendix J (Ruettgers and Schuler, 2020)

It is anticipated that workers would commute from local communities, including Rosamond, Lancaster, Palmdale and Mojave, or stay at hotels located in these communities, during both peak and non-peak construction periods. The Federal Highway Administration (FHWA) average light vehicle occupancy rate of 1.67 was applied to worker trips to account for carpooling of construction personnel. In addition, it was assumed that 50 percent of the daily workforce would enter and exit the project site during the AM and PM peak hours, respectively. It was also assumed that 25 percent of the workforce would exit and return to the project site during the workday (Ruetters and Schuler, 2020).

The number of daily deliveries made during peak and non-peak construction periods was estimated based on assumptions regarding parts, equipment and materials needed for project construction. Following *Highway Capacity Manual* guidelines, the daily volume of heavy trucks was converted to a passenger-car equivalent volume by applying a factor of 1.5. This conversion accounts for the effective reduction in free-flow speed caused by the presence of heavy trucks in the traffic flow. It was also assumed that 25 percent of the heavy trucks would enter and exit the project site during AM and PM peak hours, respectively (Ruetters and Schuler, 2020).

The modified project includes an amendment to the Circulation Element of the Willow Springs Specific Plan to eliminate future road reservations along the N/S midsection line of Sec 21 T9N R13W, SBB&M within the subject project parcels. This would allow solar panels to be placed throughout the site, and no setbacks from midsection line future road reservations would be required. However, the proposed amendment would not affect property owner access to any other surrounding properties. The amendment would also not impact traffic flow or reduce the level of effective transportation movement.

Based on the analysis presented, similar to the approved project, the modified project would be consistent with the Kern County General Plan and Willow Springs Specific Plan Circulation Element, as well as countywide, State and regional transportation plans. Construction and decommissioning activities will generate an increase in traffic for a short period of time. Implementation of approved MM 4.15-1, which requires among other things the development of a traffic control plan, encroachment permits, etc. and revised MM 4.15-2, which requires staggering construction-related trips during peak AM and PM hours, impact of the modified project would be less than significant related to performance of the circulation system.

Operation and Maintenance Phase

Upon completion, the proposed solar facility would be operated and monitored remotely 24 hours a day, seven days a week. The facility's regular maintenance program would be conducted on site primarily during daylight hours.

It is anticipated that seasonal washing of the PV panels would generate the greatest volume of project traffic during the operation and maintenance phase. Panel washing would occur up to four times a year and take approximately ten days to complete. It is expected that

maintenance workers would commute from local communities. Trip generation estimates for panel washing are shown in **Table 3.15-3**.

Table 3.15-3
Trip Generation
Operation and Maintenance Phase: Panel Washing

Trip Type	Vehicle Type	Variable	ADT	AM Peak Hour		PM Peak Hour	
			Daily Trips	IN % Split Trips	OUT % Split Trips	IN % Split Trips	OUT % Split Trips
Worker	Passenger	3	8	100	0	0	100
		Workers		3	0	0	3
Delivery	Water Truck	3	9	25	0	0	25
		Deliveries		2	0	0	2
TOTAL			17	5	0	0	5

Source: Appendix J (Ruetters and Schuler, 2020)

It is estimated that the washing of PV panels would require a maximum daily workforce of 2-5. A carpool rate was not applied to worker trips given the relatively low number of maintenance personnel. In addition, it was assumed that all workers would enter and exit the project site during the AM and PM peak hours, respectively. It was also assumed that 25 percent of the workers would exit and return to the project site during the workday (Ruetters and Schuler, 2020).

Similarly, it is estimated that three heavy trucks would deliver water to the project site every day. A passenger-car equivalent factor of 1.5 was applied to the water truck trips. It was also assumed that 25 percent of the water trucks would enter and exit the project site during AM and PM peak hours, respectively (Ruetters and Schuler, 2020).

Operational traffic generated by the proposed modified project is minimal, and would be consistent with applicable local, State and regional transportation plans. With implementation of approved MM 4.15-1 and revised MM 4.15-2, impacts of the modified project would be less than significant related to performance of the circulation system.

With respect to the above-described traffic impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described traffic impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such described traffic impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would

not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

MM 4.15-2 (revised): The project shall implement a plan to improve the AM peak-hour delay and PM peak-hour delay along State Route 14 and Rosamond Boulevard, Backus Road and Tehachapi Willow Springs Road to an acceptable LOS A or B. This would be achieved by staggering construction traffic arrival and departure schedules to reduce construction-related trips during the AM and PM peak hours. No more than 50 vehicles shall arrive at the project site between the hours of 7:00 a.m. and 9:00 a.m., and the remaining vehicles shall enter the site in the hours either prior to or after the peak hours of 7:00 a.m. and 9:00 a.m. No more than 50 vehicles shall leave the project site between the hours of 4:00 p.m. and 6:00 p.m., and the remaining vehicles shall exit the site in the hours either prior to or after the peak hours of 4:00 p.m. and 6:00 p.m.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(b) *Conflict with an applicable congestion management program, including, but not limited to, level of service (LOS) standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

(ii) *Kern County General Plan LOS "D"*

The new CEQA Guidelines Section 15064.3, subdivision (b) was adopted in December 2018 by the California Natural Resources Agency. These revisions to the CEQA Guidelines criteria for determining the significance of transportation impacts are primarily focused on projects within transit priority areas and shifts the focus from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses. Vehicle miles traveled, or VMT, is a measure of the total number of miles driven to or from a development and is sometimes expressed as an average per trip or per person.

An evaluation of vehicles miles traveled (VMT) was conducted based on applicable California Environmental Quality Act (CEQA) Guidelines. The VMT evaluation included both project construction and project operation and maintenance.

Guidelines for assessing project VMT as part of a transportation impact analysis under CEQA are contained in the State of California, Office of Planning and Research's "Technical Advisory on Evaluating Transportation Impacts in CEQA," dated December 2018. This advisory includes methodology recommendations for analyzing project VMT, including the following regarding vehicle type (page 4) (Ruettgers and Schuler, 2020).

Vehicle Types. Proposed (CEQA Guideline) Section 15064.3, subdivision (a), states, “For the purposes of this section, ‘vehicle miles traveled’ refers to the amount and distance of automobile travel attributable to a project.” Here, the term “automobile” refers to on-road passenger vehicles, specifically cars and light trucks.

The Technical Advisory also contains screening thresholds for identifying whether a land use project should be expected to result in a less-than-significant transportation impact under CEQA. One such threshold pertains to project size. According to the Advisory, a project that generates fewer than 110 trips per day may be assumed not to cause a significant transportation impact (Ruettgers and Schuler, 2020).

As shown in the **Tables 3.15-1** and **3.15-3**, the number of daily passenger vehicle trips generated during the non-peak period and the Operation and Maintenance phase of the proposed modified project (105 and 8, respectively) satisfies the small project screening threshold. Therefore, the project is expected to have a less-than-significant transportation impact during these phases (Ruettgers and Schuler, 2020).

While, as shown in the table above, the number of daily passenger vehicle trips generated during the peak of project construction (225) does not meet the small project screening threshold, the duration of peak construction activities would be limited to a few weeks. Therefore, the proposed modified project is not expected to result in a long-term or permanent significant transportation impact under CEQA during the peak of project construction (Ruettgers and Schuler, 2020).

With respect to the above-described traffic impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described traffic impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such described traffic impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (c) *Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

As previously mentioned, the closest airport is the Rosamond Skypark located about 6.7-miles to the southeast of the project. Additionally, the project site is located entirely outside the airport's land use plan area. Therefore, the proposed modified project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

MITIGATION MEASURES

No new mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of **no impact**.

- (d) *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Similar to the certified EIR, the proposed modified project would require the delivery of heavy construction equipment and PV solar components using roadways, some of which may require transport by oversize vehicles. Heavy equipment associated with these components would not be hauled to/from the site daily, but rather would be hauled in and out on an as needed basis. Nevertheless, the use of oversize vehicles during construction can create a hazard to the public by limiting motorist views on roadways and by the obstruction of space, which is considered a potentially significant impact.

Like the approved project, the proposed modified project would not include a design feature or utilize vehicles with incompatible uses that would create a hazard on the roadways surrounding the project site. The need for and number of escorts, California Highway Patrol escorts, as well as the timing of transport, would be at the discretion of Caltrans and Kern County, and would be detailed in respective oversize load permits. Thus, potential impacts would be reduced to a less-than-significant level. While impacts would be less than significant, Mitigation Measure MM 4.15-1 of the certified EIR, requires that all oversize vehicles used on public roadways during construction obtain required permits and obtain approval of a Construction Traffic Control Plan, as well as identify anticipated construction delivery times and vehicle travel routes in advance to minimize construction traffic during AM and PM peak hours. This would ensure that construction-related oversize vehicle loads are in compliance with applicable California Vehicle Code sections and California Street and

Highway Codes applicable to licensing, size, weight, load, and roadway encroachment of construction vehicles, and therefore would not increase hazards due to incompatible uses.

With respect to the above-described traffic impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described traffic impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such described traffic impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(e) Result in inadequate emergency access?

Similar to the certified EIR, the proposed modified project site is located in a rural area with a primary access road (Rosamond Boulevard) allowing adequate egress/ingress to the site in the event of an emergency. Additionally, as part of the modified project, additional access roadways (external and internal to the site) would be constructed at various locations along several adjacent local private and public roadways. Therefore, the development of the proposed modified project would not physically interfere with emergency vehicle access or personnel evacuation from the site.

The proposed modified project would comply with all local development standards related to site access, as well as implement Mitigation Measure MM 4.15-1 of the certified EIR, which requires the preparation of a Construction Traffic Control Plan that considers access for emergency vehicles to the proposed modified project site. Therefore, there is no change in the severity of this previously identified impact.

With respect to the above-described traffic impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition,

no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described traffic impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such described traffic impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (f) *Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?*

Similar to the approved project, operations of the proposed modified project would not require any permanent onsite employees for maintenance and monitoring activities. Maintenance personnel are expected to visit the modified project site several times per year for routine maintenance but would likely be drawn from the local labor force and would commute from permanent residences to the project during those times. Due to the rural nature of the project area, bicycle traffic is limited. The proposed modified project is not located along an existing bus route and few bus stops exist on the roadways likely to be used during construction and operation. The proposed modified project would not house residents or employees and therefore would not have characteristics that could influence alternative means of transportation. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*

CUMULATIVE IMPACTS

The certified EIR concluded that the approved project when combined with the impacts of past, present, and reasonably foreseeable projects would not create a substantial adverse effect related to changes in the transportation system, or traffic generation, during construction or operations. The proposed modified project does not result in an increase in traffic beyond what was analyzed in the certified EIR. Implementation of Mitigation Measure MM 4.15-1 would reduce the impact of heavy truck trips to less than-significant levels. Revised MM 4.15-2 requires staggering construction-related trips during peak AM and PM hours, impact of the modified project would be less than significant related to traffic flow and travel flow. Therefore, the proposed modified project does not create new or substantially more severe cumulative impacts to transportation and traffic than those disclosed in the certified EIR and impacts would remain less than significant as stated in the certified EIR

With respect to the above-described traffic impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described traffic impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such described traffic impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new mitigation measures are required beyond those included in the previously certified EIR, as revised.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.16 - Tribal Cultural Resources

This section evaluates whether the impacts of the proposed modified project on tribal cultural resources requires a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section was prepared in part using information from the certified EIR, a Phase I (ASM Affiliates, 2018) and Phase II Survey Cultural Resources Survey (ASM Affiliates, 2020) completed for the modified project, and a Paleontological Resource Assessment (Department of PaleoServices, 2018) completed for the modified project which can be found in Appendix D and H.

3.16.1 - SETTING

The certified EIR includes an overview of regulation that is normally applicable to tribal cultural resources, followed by a description of the physical setting of both the site and surrounding lands. An analysis is then provided to determine whether the impact(s) would be less than significant, significant with mitigation, or significant and unavoidable. There are no changes in such circumstances affecting the proposed modified project.

The proposed modified project site was surveyed and ten cultural resources (six sites and four isolates) were identified during the survey. The sites were given the temporary designations GETTY-SITE-1, GETTY-SITE-2, GETTY-SITE-3, GETTY-SITE-4, GETTY-SITE-5, and GETTY-SITE-6; and the isolates were given the temporary designations GETTY-ISO-1, GETTY-ISO-2, GETTY-ISO-3, and GETTY-ISO-4. All six sites are sparse prehistoric lithic scatters, and all four isolates are prehistoric lithic flakes. Site and isolate are presented on Appendix D of this report. Conditions at all cultural resources were virtually the same. Vegetation and the soil matrix within the study area, and thus at the cultural resources, is homogenous at the sites and consists of seasonal introduced grasses, shadscale, winter fat, and hopsage.

3.16.2 - IMPACT ANALYSIS

Project Impacts

As in the certified EIR analysis, this Addendum evaluates the potential for the proposed modified project to result in new or substantially more severe significant impacts to tribal cultural resources in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

(a)(i) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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 – listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

The Lead Agency contacted the applicable tribal groups in accordance with Senate Bill (SB) 18 and Assembly Bill (AB) 52 regarding the approved project. No tribal group requested participation in the consultation process. While no tribal cultural resources have been identified within or immediately adjacent to the approved project site, nonetheless the potential exists for tribal cultural resources to be encountered. Implementation of Mitigation Measures MM 4.5-1 through MM 4.5-4 would reduce impacts to a less than significant level.

The Lead Agency sent consultation notification to applicable Native American tribes in accordance with Senate Bill (SB) 18 and Assembly Bill (AB) 52 on February 19, 2021, regarding the proposed modified project. To date no responses have been received. Mitigation Measures MM 4.5-2 and MM 4.5-3 have been revised to reflect the proposed modified project, and the avoidance of cultural resources found on that site. However, as noted in Section 3.5, Cultural Resources, the modified project intends to avoid the known cultural resources on the site, similarly to the approved project. The revised mitigation clarifies the site-specific nature of the mitigation of the modified project. As revised, implementation of Mitigation Measures MM 4.5-2 and MM 4.5-3, along with Mitigation Measure MM 4.5-1, MM 4.5-4 and MM 4.5-5 would reduce impacts to tribal cultural resources to less than significant levels.

The proposed modified project therefore does not change the finding in the certified EIR of less than significant impacts. There are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described cultural resource impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such cultural resource impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new mitigation measures are required beyond those included in the previously certified EIR, as revised.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

(a)(ii) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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 – 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe?

See Response 4.16 a(i) above. No tribal cultural resources have been identified within or immediately adjacent to the proposed modified project site, nonetheless the potential exists for tribal cultural resources to be encountered. As revised, implementation of Mitigation Measure MM 4.5-2 and MM 4.5-3, along with MM 4.5-1 and MM 4.5-4 and MM 4.5-5 of the certified EIR, would reduce impacts to tribal cultural resources to less than significant levels.

With respect to the above-described tribal cultural resources evaluation standards, there are no changes proposed by the Project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the Project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described traffic impact evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such described traffic impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new mitigation measures are required beyond those included in the previously certified EIR, as revised.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

Excavation and other development activities associated with the proposed modified project in conjunction with other projects in the area, as identified in the approved project cumulative project list, could contribute to the progressive loss of archaeological and historic resources. However, avoidance of known cultural resources and the implementation of Mitigation Measure MM 4.5-1 through MM 4.5-5, as revised, would mitigate the modified project's potential to disturb any cultural resources and human remains, including those interred outside of formal cemeteries. Therefore, the modified project does not change the

certified EIR's conclusion that the project would not have a cumulatively considerable contribution to impacts to tribal cultural resources.

Decommissioning activities for the project also have the potential to contribute to cumulatively significant impacts on cultural resources, though to a lesser extent than construction of the project since any archeological or paleontological resources would most likely be identified during construction. With implementation of applicable regulatory requirements and Mitigation Measures MM 4.5-1 through MM 4.5-5, as revised, the proposed modified project, together with the approved project, would not have a cumulatively considerable contribution to impacts to archaeological resources from decommissioning activities.

With respect to the above-described Tribal Cultural Resources evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described Tribal Cultural Resources evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such Tribal Cultural Resources impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new mitigation measures are required beyond those included in the previously certified EIR, as revised.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.17 - Utilities and Service Systems

This section evaluates whether the impacts of the proposed modified project on utilities and service systems require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section was prepared in part using information from the certified EIR, a Water Supply Assessment (Quad Knopf, Inc, 2020c) and a Will Serve letter (RMR Water Trucks, 2020) prepared for the proposed modified project, which can be found in Appendix G.

The lead agency determined that the approved project would not result in significant impacts to some of the following environmental issue areas; these issue areas were scoped out of the certified EIR. It was determined that the approved project would not:

Exceed wastewater treatment requirements of the applicable regional water quality control board. The proposed modified project would generate a very insubstantial volume of wastewater. Wastewater produced during construction would be collected in portable toilet facilities and disposed of at an approved facility. During operation, no permanent onsite staff would be required, and the proposed modified project would not require water or wastewater disposal systems. Water for panel washing would be brought in by trucks. Therefore, minimal wastewater would be generated, and the project would not exceed wastewater treatment requirements of the Lahontan RWQCB. Therefore, no further analysis is warranted.

3.17.1 - SETTING

This section discusses the affected environment and regulatory setting pertaining to water, wastewater treatment, storm drainage facilities, and waste facilities. With respect to Utilities and Service Systems, the proposed modified project would not result in any changes to the setting considered in the certified EIR and similar to the approved project, the proposed modified project would have a less-than-significant impact on utilities and services.

The proposed modified project is similar type of development as the approved project; therefore, potential impacts to utilities and service systems are similar to those previously identified in the certified EIR.

3.17.2 - IMPACT ANALYSIS

Project Impacts

As in the certified EIR analysis, this Addendum evaluates the potential for the proposed modified project to result in new or substantially more severe significant impacts to tribal cultural resources in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

- (a) *Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

The certified EIR analyzed whether the approved project would require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. The approved project concluded that impacts to new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities is less than significant with incorporation of Mitigation Measure MM 4.10-1 of the certified EIR.

Construction

The proposed modified project would require an estimated 50 acre-feet of water during construction activities for dust control and site preparation(Quad Knopf, Inc, 2020c). Like the approved project, the proposed modified project would meet its construction water demands by trucking in water from an existing off-site provider and bottled drinking water will be provided for construction crews. As a result, it would not require or result in the relocation or construction of new water facilities. Impacts would remain less than significant.

Like the approved project, the proposed modified project would generate minimal wastewater, which would be contained in portable toilets and disposed of at an existing, approved, off-site disposal site. As a result, it would not require or result in the relocation or construction of wastewater treatment facilities. Impacts would remain less than significant.

Like the approved project site, the proposed modified project area is currently drained by natural drainage channels and sheet flow and does not rely on constructed stormwater drainages. The existing pattern and concentration of runoff could potentially be altered by project activities, such as the grading of access roads; however, the amount of runoff across the proposed modified project site would not be substantially altered. Just like the approved project, the proposed modified project will comply with the National Pollutant Discharge Elimination System General Construction Permit requirements by designing and submitting a site-specific Storm Water Pollution Prevention Plan to minimize the discharge of wastewater during construction and a Water Quality Management Plan that include best management practices for runoff control.

Therefore, the proposed modified project is not expected to exceed the capacity of existing storm water drainage systems or require or result in relocation or construction of new or expanded stormwater drainage facilities. Impacts would remain less than significant.

No natural gas pipelines are located on the proposed modified project site, nor would natural gas be required for project construction. Therefore, relocation or construction of new or expanded natural gas facilities would not be required and impacts would remain less than significant.

No existing telecommunication facilities are located on-site. As at the approved project, during construction of the proposed modified project, cellular or satellite communication technology may be used for both internet and telephone systems, which would not require construction of new telecommunication facilities. Impacts would thus remain less than significant.

Like the approved project, the proposed modified project would require telecommunications facilities to meet the communication requirements for interconnecting with the SCE station and to support project operations during monitoring. Fiber optic communication lines would follow the electrical collector system. The communication lines will link each solar inverter module to the O&M building, which would house the supervisory control and data acquisition (SCADA) system. Since construction of the fiber optic communication lines and land line systems would occur on vacant land and follow the electrical collector system construction of these facilities would not result in additional environmental impacts, and relocation of telecommunication facilities would not be required. Therefore, impacts would remain less than significant.

Operation

As the approved project, the panel surfaces at the proposed modified project will be washed seasonally to increase average optical transmittance. Panel washing at the proposed modified project is expected to take 10 days per wash, up to four times per year or a total of 40 days per year to complete. Thus, long-term operational water demand is anticipated to be approximately 978,000 gallons per year or 3.0-acre feet per year for the total modified project(Quad Knopf, Inc, 2020c). Water for panel washing is expected to be trucked in by RMR Water Trucks (RMR Water Trucks, 2020), from a water well located on Backus Road at about 97th Street West. As a result, the proposed modified project would not require or result in the relocation or construction of new water facilities. Impacts would remain less than significant.

Given that there are no permanent employees onsite or permanent water generating facilities, wastewater would not be generated during operation. Therefore, the proposed modified project would not require new water or wastewater treatment facilities to be constructed and operational impacts would remain less than significant.

Like the approved project, the proposed modified project is designed such that storm water would remain on-site and infiltration would occur similar to existing conditions. The modified project site is similarly undeveloped, relatively flat, and covered with soils that allow for storm water percolation. The impervious surfaces required for the inverters and other infrastructure would be minimized as much as possible and no project component would concentrate runoff and exceed the capacity of existing on-site drainages and percolation. Changes in impervious area would be limited to solar panel columns and substations. Solar panels do not measurably increase impervious area since they are mounted on small columns and allow percolation of runoff from each panel to occur in pervious areas effectively the same size as the panel. Any runoff produced follows its natural flow once in the pervious area. Since the impervious surfaces would be surrounded by

undeveloped land, runoff from the inverters and other infrastructure would percolate to the surrounding pervious area and mainly follow its natural flow. However, with implementation of Mitigation Measure MM 4.10-1, in Section 4.10, *Hydrology and Water Quality*, a drainage plan would be developed that would include measures to offset increases in stormwater runoff caused by the project. During the operational phase, the modified project site would not regularly discharge stormwater that would require the construction of storm water drainage infrastructure. The proposed modified project is not expected to exceed the capacity of existing storm water drainage systems in the area. Therefore, relocation or construction of new or expanded stormwater drainage facilities off-site would not be required during operation. Impacts would remain less than significant with implementation of Mitigation Measure MM 4.10-1.

Modified project operation would generate 30 additional MW of renewable electrical energy that would help to reduce or offset electricity on the state-wide utility grid. As the approved project, non-renewable resources would be consumed during operation and predominantly associated with worker commute trips and occasional panel washing activities. Like the approved project, the modified project would require minimal electric power for operation and maintenance, which would be provided by the on-site PV system. Therefore, relocation or construction of new or expanded electrical facilities would not be required during operation and impacts would remain less than significant.

No natural gas facilities would be required for operation of the proposed modified project. The proposed modified project includes a solar array and battery storage station that would not require heating from natural gas during operation. Therefore, operation of the project would not require the relocation or construction of new or expanded natural gas facilities and no impact would occur.

Like the approved project, the proposed modified project would require telecommunications facilities to meet the communication requirements for interconnecting with the SCE station and to support project operations during monitoring. During operation, the SCADA system would allow individual solar inverter modules and other project elements to be monitored and controlled in the O&M building from remote locations. Additional fiber optic lines required for the operational phase of the modified project would be located in proximity to the other telecommunication facilities and would not result in additional demand such that the construction of off-site facilities would be required. Therefore, impacts would remain less than significant.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (b) *Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?*

As previously mentioned in Section 3.10, *Hydrology and Water Quality*, the proposed modified project's construction water demand is estimated to be 50 AF during construction activities and approximately 2-3 AFY for the modified site. The water required during decommissioning has not been estimated but would be similar to construction and mainly required for dust suppression. Non-potable water required during construction, operation, and decommissioning would be provided by RMR Water Trucks from an existing well located on Backus Road with existing water rights (Quad Knopf, Inc, 2020c)

The proposed modified project site is located within the Antelope Valley Groundwater Basin; as described above, the adjudication process for the Antelope Valley Groundwater Basin was completed in 2015. The modified project's total 'average' water usage over SB 610's required projection period (twenty years) is (50 acre-feet/20 years + 3 acre-feet/year) 5.5 acre-feet per year (20-year total of 110 acre-feet). Such usage would constitute $[(5.5/35,365 \times 100)]$, 0.0156% of total Antelope Basin water usage each year, a less-than-significant amount (Quad Knopf, Inc, 2020c).

The available information regarding the physical availability of groundwater at and near to the modified project site verifies that the groundwater aquifer and the well pumping history thereof are sufficient for both project construction and project operation. Antelope Valley Basin groundwater adjudication, and the surface water impact programs of Antelope Valley East Kern (AVEK), warrant a conclusion that the existing physical availability of groundwater at the project site will remain in effect for the project (Quad Knopf, Inc, 2020c).

Impacts related to water supply would remain less than significant.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*

- (c) *Result in a determination by the wastewater treatment provider that 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?*

Like the approved project, the proposed modified project is not expected to generate a significant amount of wastewater. The proposed modified project does not include construction of a septic system. As discussed in Section 2.2, *Modified Project Characteristics*, multiple portable toilets would be used during construction, and wastewater would be

trucked off-site for disposal by a licensed sewage disposal company for treatment at a licensed or government wastewater treatment facility.

Once operational, no daily employees would be present onsite. Therefore, wastewater generated would be negligible and would not exceed wastewater treatment capacity of the treatment provider. The proposed modified project modifications will not materially change the demand on the County's wastewater treatment provider. As a result, the modified project would not create a more severe impact on wastewater than the approved project analyzed in the certified EIR.

With respect to the above-described public utility evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described public utility evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such public utility impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (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?*

Waste generated during construction, operations, and decommissioning of the proposed modified project would be similar to the waste described in the certified EIR. Currently, the proposed modified project site contains no development and therefore, there would be no demolition or removal of large debris. The small amount of solid waste generated is not expected to exceed the capacity of local landfills as described in the certified EIR. Additionally, implementation of Mitigation Measure MM 4.17-1 of the certified EIR requires that a recycling coordinator ensures the separation and proper disposal of recycle materials

and solid waste during construction. As a result, the modified project would not create a more severe impact on solid waste than the approved project analyzed in the certified EIR.

With respect to the above-described public utility evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described public utility evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such public utility impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified Project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

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

The certified EIR analyzed whether the approved project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. The approved project concluded that impacts related to solid waste are less than significant with incorporation of Mitigation Measure MM 4.17-1 of the certified EIR.

The proposed modified project would generate solid waste during construction, operation, and decommissioning similar to that analyzed in the certified EIR. Common construction waste may include metals, masonry, plastic pipe, rocks, dirt, cardboard, or green waste related to land development. AB 341 requires Kern County to attain a waste diversion goals of 75 percent by 2020 through reduction, recycling, or composting. In addition, as part of compliance with CALGreen requirements, Kern County implements the following construction waste diversion requirements:

- Submittal of a Construction Waste Management Plan;
- Recycle and/or reuse a minimum 50 percent C&D waste; and

- Recycle or reuse 100 percent of tree stumps, rocks, and associated vegetation and soils resulting from land clearing.

Furthermore, the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires expanded or new development projects to incorporate storage areas for recycling bins into the project design. Implementation of Mitigation Measure MM 4.17-1 ensures compliance with waste diversion and recycling requirements by requiring recycling during construction, operation, and decommissioning of the project. The proposed modified project would be required to comply with all federal, state, and local statutes and regulations related to the handling and disposal of solid waste. Therefore, the proposed modified project as described, would be in compliance with federal, state, and local management and reduction statutes and regulations related to solid waste. As a result, the modified project would not create a new or more severe significant impact on public services than the approved project analyzed in the certified EIR.

With respect to the above-described public utility evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described public utility evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such public utility impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

The certified EIR concluded that the impacts of the approved project, when combined with the impacts of past, present, and reasonably foreseeable projects, would not create a cumulatively substantial adverse effect on Utilities and Service Systems. The above project specific impacts of the proposed modified project confirm that the modified project would not create a more severe impact on utilities and service systems than the approved project

analyzed in the certified EIR. Additionally, the proposed modified project would have to comply with Mitigation Measure MM 4.10-1 and MM4.17-1, which requires implementation of drainage plan and that debris and waste generated at the project site be recycled to the extent feasible. The proposed modified project would result in a beneficial impact on utility services and offset future stress on energy service providers as energy demand grows in Kern County and Southern California. Therefore, the contribution of the proposed modified project to cumulative impacts would not be greater than the approved project.

With respect to the above-described public utility evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described public utility evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such public utility impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of cumulatively *less than significant*.

3.18 - Wildfire

This section evaluates whether the impacts of the proposed modified project on wildfire risks require a subsequent EIR pursuant to CEQA Guidelines Section 15162. This section was prepared in part using information from the certified EIR, a Biological Analysis Report (Quad Knopf, Inc, 2020a) and the Hydrology Study (Quad Knopf, Inc, 2019) prepared for the proposed modified project.

The lead agency determined that the approved project would not result in significant impacts to some of the following environmental issue areas; these issue areas were scoped out of the certified EIR. It was determined that the approved project would not:

- (a) *Substantially impair and adopted emergency response plan or emergency evacuation plan.*

The proposed modified project site is located in an area with several alternative access roads allowing access to the modified project site in an event of an emergency. Access to the alternatives access roads would be maintained throughout construction, and appropriate detours would be provided in the event of potential road closures. No further analysis is warranted.

3.18.1 - SETTING

This section discusses the affected environment and regulatory setting pertaining to wildfire. With respect to Wildfire, the proposed modified project would not result in any changes to the setting considered in the certified EIR and similar to the approved project, the proposed modified project would have a less-than-significant impact on utilities and services.

The proposed modified project is located in a similar geographic area as the approved project; therefore, potential impacts to wildfire are similar to those previously identified in the certified EIR.

3.18.2 - IMPACT ANALYSIS

Project Impacts

As in the certified EIR analysis, this Addendum evaluates the potential for the proposed modified project to result in new or substantially more severe significant impacts to wildfire in relation to the following questions as stated in the Kern County CEQA Checklist:

Would the project:

- (b) *If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?*

According to the FHSZ Maps for the LRA in Kern County, the proposed modified project site, similar the approved project site, is located within a moderate fire zone, which is considered wildland with low fire frequency and relatively modest fire behavior; it is not in an area of high or very high fire hazard (CAL Fire, 2020). As noted in Section 3.4, *Biological Resources*, of this Addendum EIR, vegetation on the project site is regularly dispersed, and site preparation would remove additional vegetation and replace it with solar PV panels, which would reduce the risk of wildfire due to vegetation (fuel) onsite. The proposed modified project would include a minimum 20-foot perimeter roadway that would be clear around the site boundary, thereby creating a wildland interface buffer.

Like the approved project, the proposed modified project would install an energy storage facility and appurtenances that would provide energy storage capacity for the electric grid. The storage system would consist of battery banks housed in electrical enclosures and buried electrical conduit. The battery enclosures would have fire suppression equipment installed that would automatically suppress thermal emergencies. The energy storage technology has not been determined at this time, but could include any commercially available battery technology, including but not limited to lithium ion, lead acid, sodium sulfur, and sodium or nickel hydride.

Given the structure and characteristics of the proposed energy storage facility, it would be unlikely and difficult to burn; however, should the facility burn or become damaged by a fire, it would generate fumes and gases that are corrosive to any surrounding structures on the proposed modified project site. Dry chemicals, carbon dioxide, and foam are the preferred methods for extinguishing a fire involving batteries as water is not effective in extinguishing battery fires. Typically, Class D extinguishers are used for lithium-metal and other battery fires. The Kern County Fire Department, which would provide fire protection service to the proposed modified project site, would have the necessary tools to extinguish any fires generated on the modified project site. In additionally, the proposed modified project would implement Mitigation Measure MM 4.14-1, which requires the development and implementation of a Fire Safety Plan for use during construction, operation, and decommissioning of the project. Mitigation Measure MM 4.14-2 provides fees to pay for additional County fire protection services, which would further reduce the fire risks onsite.

Once constructed, the proposed modified project, like the approved project, would not require any permanent employees, and the proposed modified project site is not located adjacent to populated communities. In addition, the proposed modified project would not include the development of residential uses on the project site. Therefore, in the unlikely event of a wildfire, the modified project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Similarly, in the event that a wildfire impacted the project site, it is not expected that hazardous materials from the modified project would be released into the environment. The proposed modified project would not, 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 a wildfire. Impacts would remain less than significant with mitigation incorporated.

With respect to the above-described wildfire risk evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described wildfire risk evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such wildfire risk impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (c) *If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the Project 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?*

Like the approved project, the proposed modified proposed project would include the installation and maintenance of the following associated infrastructure: underground and above ground medium voltage collection systems, medium voltage inverters and step-up transformers, three onsite solar stations (including circuit breakers, switches, remote terminal units, telecommunication equipment, and main step-up transformer(s)), onsite switchyard(s), onsite access roads, perimeter security fencing, concrete pads, meteorological data collection systems, unmanned O&M buildings, energy storage facilities and associated appurtenances, telecommunication equipment, a 66-kV gen-tie route, and upgrades to the SCE system. Maintenance activities would be routine and would be conducted by onsite personnel.

Access roads and O&M roads would remain in place for ongoing operations and maintenance activities after construction is complete. All new roads would comply with development requirements for emergency access, and therefore, would not exacerbate fire risk.

Most fires in the desert are caused by lightning or vehicles. The associated infrastructure (which includes electrical distribution lines and internal/perimeter roads) would not be placed within a high fire hazard zone, and the vegetation would be cleared; therefore, the proposed modified project would not result in increased fire risks. Additionally, the project proponent/operator shall develop and implement a Fire Safety Plan that contains notification procedures and emergency fire precautions consistent with the 2016 California Fire Code and Kern County Fire Code for use during construction, operation and decommissioning, per implementation of Mitigation Measure MM 4.14-1 of the certified EIR. Implementation of this plan would ensure that potential impacts related to installation or maintenance of associated infrastructure is reduced and, thus, impacts would be less than significant.

With respect to the above-described wildfire risk evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described wildfire risk evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such wildfire risk impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

- (d) *If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the Project 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?*

See the response to Impact 4.18 (b), above. As at the approved project, topography across the proposed modified project site is relatively flat. Mitigation Measure MM 4.10-1 of the certified EIR, requires the preparation of a hydrologic study and final drainage plan, as well as a Stormwater Pollution Prevention Plan (SWPPP) as required by Mitigation Measure 4.10-2 of the certified EIR, which would include erosion and sediment-control best management

practices during construction, thereby reducing the potential of erosion and siltation during construction, and minimizing post-fire instability or changes in drainage.

The proposed modified project activities are not expected to substantially alter the ground surface such that new stormwater drainage facilities are needed. Once the proposed modified project is operational, stormwater would be retained onsite or conveyed offsite in a manner that would be consistent with the required drainage plan. Kern County requires development of a Drainage Plan with the site development grading permit, which will manage stormwater and reduce the risk for offsite impacts due to erosion and impacts on water quality. Design measures are intended to minimize or manage flow concentration and changes in flow depth or velocity so as to minimize erosion, sedimentation, and flooding on or off site. The amount of new impervious surface would be a small percentage of the proposed modified project area and would not substantially increase the rate or amount of surface runoff.

Like the approved project, while the proposed modified project would introduce new structures to the project site, the structures would not be placed in a highly flammable landscape. In addition, conditions for landslides are not present at the modified project site, which is characterized by relatively gradual inclines across the proposed modified project site. Therefore, the modified project would not 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. Impacts would be less than significant with mitigation from the certified EIR incorporated.

With respect to the above-described wildfire risk evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described wildfire risk evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such wildfire risk impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of *less than significant*.

CUMULATIVE IMPACTS

The certified EIR concluded that the impacts of the approved project, when combined with the impacts of past, present, and reasonably foreseeable projects, would contribute to the cumulatively considerable adverse effects on biological resources. However, as the above analysis demonstrates, the modified project's implementation will not create any new significant impacts or increase severity in such impacts. The proposed modified project is therefore, not increasing the severity of any contribution to cumulatively considerable adverse effects on biological resources.

Therefore, regarding the above-described wildfire impact evaluation standards, there are no changes proposed by the project modifications that involve new significant environmental effects or a substantial increase in the severity of previously identified effects. In addition, no substantial changes have occurred with respect to the circumstances under which the project is undertaken that involve new significant environmental effects or a substantial increase in the severity of impacts related to the above-described wildfire risk evaluation standards. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, relevant to such wildfire risk impact evaluation has been identified. Therefore, with respect to this criterion, the modified project would not result in any new significant impacts not already analyzed in the certified EIR, and the modified project would not increase the severity of a significant impact as previously identified and analyzed in the certified EIR.

MITIGATION MEASURES

No new or revised mitigation measures are required beyond those included in the previously certified EIR.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed modifications to the project do not change the finding in the certified EIR of significantly *significant and unavoidable*.

3.19 - Irreversible Impacts

Section 15126.2(c) of the CEQA Guidelines defines an irreversible impact as an impact that uses nonrenewable resources during the initial and continued phases of the approved project and the proposed modified project. Irreversible impacts can also result from damage caused by environmental accidents associated with the project. Additionally, irretrievable commitments of resources should be evaluated to ensure that such consumption is justified.

Similar to the approved project, build-out of the modified project would commit nonrenewable resources during project construction. During the modified project's operations, oil, gas, and other fossil fuels and nonrenewable resources would be consumed, primarily in the form of transportation fuel for project employees. Therefore, an irreversible commitment of nonrenewable resources would occur as a result of long-term project operations. However, assuming that those commitments occur in accordance with the adopted goals, policies, and implementation measures of the Kern County General Plan, Willow Springs Specific Plan and other local, State and regional Plans, as a matter of public policy, those commitments have been determined to be acceptable. The Kern County General Plan and Willow Springs Specific Plan ensures that any irreversible environmental changes associated with those commitments will be minimized related to the proposed modified project.

3.20 - Growth Inducement

The Kern County General Plan recognizes that certain forms of growth are beneficial, both economically and socially. Section 15126.2(d) of the CEQA Guidelines states the following regarding growth-inducing impacts: “A project is identified as growth-inducing if it “would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.”

Growth inducement can be a result of new development that requires an increase in employment levels, removes barriers to development, or provides resources that lead to secondary growth. With respect to employment, the approved project and the modified project would not induce substantial growth. Similar to the approved project, the modified project would not require any on-site staff; a full-time employee would remotely monitor the facility. Additional staff of two to five people would be required for routine panel washing onsite and would be expected to be hired from the local community. It is anticipated that the construction workforce would commute to the project site each day from local communities. Construction staff not drawn from the local labor pool would stay in nearby hotels.

Although the modified project would contribute to the energy supply, which supports growth, the development of power infrastructure is a response to increased market demand and in turn would not induce new growth. Kern County planning documents already permit and anticipate a certain level of growth in the Antelope Valley and in the State as a whole, along with attendant growth in energy demand. It is this anticipated growth that drives energy-production projects, not vice versa. The modified project would supply energy to accommodate and support existing demand and projected growth, but it would not foster any new growth. Therefore, any link between the project and growth in Kern County would be speculative.

In *Kerncrest Audubon Society v. Los Angeles Department of Water and Power*, the analysis of growth inducing effects contained in the EIR for the Pine Tree Wind Development Project was challenged. Plaintiffs argued that the discussion was too cursory to provide adequate information about how additional electricity generated by the project would sustain further growth in the Los Angeles area. The Court of Appeal held that the additional electricity that the project would produce was intended to meet the current forecast of growth in the Los Angeles area. As such, the wind development project would not cause growth, and so it was not reasonable to require a detailed analysis of growth-inducing impacts. In addition, EIRs for similar energy projects have contained similarly detailed analyses of growth-inducing impacts. Their conclusions that increasing the energy supply would not create growth has been upheld, because: (1) the additional energy would be used to ease the burdens of meeting existing energy demands within and beyond the area of the project; (2) the energy would be used to support already-projected growth; or (3) the factors affecting growth are so multifarious that any potential connection between additional energy production and growth would necessarily be too speculative and tenuous to merit extensive analysis. Thus, as has been upheld in the courts, this level of analysis provided in this addendum to the certified EIR is adequate to inform the public and decision makers of the growth-inducing impacts of the modified project.

CHAPTER 4 - LIST OF PREPARERS

4.1 - Lead Agency

Kern County Planning & Natural Resources Department

- Lorelei H. Oviatt, AICP – Director
- Craig M. Murphy – Assistant Director
- Katrina Slayton – Division Chief
- Terrance Smalls - Supervising Planner
- Randall Cates – Planner III

4.2 - Project Proponent

Gettysburg Solar Farm, LLC
Audrey Copeland, Project Development Director
909 Lake Carolyn Parkway Suite 260
Irving, TX 75039
Phone: (847) 274-5386

4.3 - Technical Assistance

QK

- Jaymie L. Brauer – Project Manager
- Carlos Rojas – Technical Writer

CHAPTER 5 - REFERENCES

- ASM Affiliates. (2018). *Phase I Cultural Resources Survey, Gettysburg Solar Project*.
- ASM Affiliates. (2020). *Phase II Test Excavations and Determination of Significance-Gettysburg Solar Project*.
- BSK. (2018). *Preliminary Geotechnical Evaluation Proposed Gettysburg Solar Project*.
- CA Department of Conservation. (2016,). *FMMP*. Retrieved from http://www.conservation.ca.gov/dlrp/Pages/qh_maps.aspx
- CAL Fire. (2020). *California State Geoportal*. Retrieved from California Fire Hazard Severity Zone Viewer.
- Cal Fire. (2020). *California Wildland Hazard Severity Zone Map Update*. Retrieved from Local Responsibility Area (LRA) Map: http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_statewide
- California Department of Conservation. (2018a). *FMMP- Important Farmland Categories*. Retrieved from <https://www.conservation.ca.gov/dlrp/lca>
- California State Board of Equalization. (2020). *Property Tax*. Retrieved from Active Solar Energy System Exclusion: <https://www.boe.ca.gov/proptaxes/active-solar-energy-system.htm>
- Department of PaleoServices. (2018). *Paleontological Resource Assessment- Gettysburg Solar Project*.
- Insight Environmental Consultants. (2020). *Phase I Environmental Site Assessment-Gettysburg Solar*.
- Kern County. (1992). *Willow Springs Specific Plan*.
- Kern County. (2009). *Kern County General Plan*.
- Kern County. (2020). *Zoning Ordinance*.
- Kern County. (2020a). *County Administrative Office*. Retrieved from County Budget: <https://www.kerncounty.com/home/showpublisheddocument?id=4797>
- Kern County. (2020b). *Parks and Recreation*. Retrieved from Learn About the County Parks Division: <https://www.kerncounty.com/government/parks/how-do-i/learn-about-the-county-parks-division>
- Kern County. (2020c). *Kern County Library*. Retrieved from About the Kern County Library: <https://www.kerncountylibrary.org/about-the-kern-county-library/>

- QK. (2018). *Noise Memorandum for the Gettysburg Solar Project*.
- Quad Knopf, Inc. (2019). *Preliminary Hydrology Study for the Gettysburg Solar Project*.
- Quad Knopf, Inc. (2020a). *Biological Analysis Report - Gettysburg Solar Project*.
- Quad Knopf, Inc. (2020b). *Gettysburg Solar Project- Energy Consumption Technical Memorandum*.
- Quad Knopf, Inc. (2020c). *Water Supply Assessment for the Gettysburg Solar Project*.
- RMR Water Trucks. (2020). Will Serve Letter.
- Ruettgers and Schuler. (2020). *Traffic Investigation and VMT Evaluation for the Proposed Gettysburg Solar Project*.
- Superior Court of California. (2020). *Superior Court of California- County of Kern*. Retrieved from Court Locations: https://www.kern.courts.ca.gov/general/court_locations
- Trinity Consultants. (2020). *Air Quality Impact Analysis for the Gettysburg Solar Project*.
- United States Postal Service [USPS]. (2020). *Postmaster Finder*. Retrieved from <https://webpmt.usps.gov/pmt007.cfm>