

BERT CRANE SOLAR FACILITY

3,588 kW NEM Solar PV Project
6205 South Bert Crane Rd., Atwater, CA 95301
Initial Study/Proposed Negative Declaration

Project Sponsor:

Engie
500 12th Street, Ste 300
Oakland, CA 94607

Lead Agency:

City of Atwater
750 Bellevue Road
Atwater, CA 95301

Prepared by:



September 2020



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Project Information

Project Overview

1. **Project title:** Bert Crane Solar Facility

2. **Lead agency name and address:** City of Atwater
750 Bellevue Road
Atwater, CA 95301

3. **Contact person and phone number:** Greg Thompson
City of Atwater
750 Bellevue Rd
Atwater, Ca 95301
(209) 357-6370

4. **Project location:** The project site is located southeast of the City of Atwater Wastewater Treatment Plant (WWTP) facility at 6205 S Bert Crane Road, Atwater, CA 95301 (APN: 056-200-021 and 056-200-026). A portion of the project site is on a non-contiguous portion of property that is owned by the City of Atwater and is located within city limits approximately five miles southeast of the nearest city boundary and approximately 1.5 miles south of State Route 140 (Figure 1, Regional Location). A small portion of the site (APN 056-200-021) is owned by the City of Atwater but is outside City limits (Figure 2, Project Location and Figure 3, Assessor's Map).

5. **Project sponsor's name and address:** Engie
500 12th Street, Ste 300
Oakland, CA 94607
(415) 685-0432
Robert Kroner, Project Manager

6. **General Plan designation:** Unclassified – The project site is located on an isolated island of the City of Atwater. The subject parcels are currently “unclassified,” meaning there is no identified General Plan land use designation assigned to the property. The property is planned Agricultural in the County of Merced General Plan.
7. **Zoning:** Unclassified – The project site is located on an isolated island of the City of Atwater. The subject parcels are currently “unclassified,” meaning there is no identified zoning classification assigned to the property. A portion of the site is within the county of Merced and does not have a designated zone district (per County GIS map).
8. **Description of project:** The project proposes the construction of two single-axis tracking solar photovoltaic ground-mount systems proposed by Engie (i.e., Bert Crane Solar Facility) to be located on the existing WWTP facility (Figure 2, Project Location). These systems will be comprised of one 1.860 MW Net Energy Metering (NEM) solar array and one 1.728 MW Renewable Energy Bill-Credit Transfer (RES-BCT) array. The NEM Solar array’s physical boundary will occupy 7.27 acres of land whereas the RES-BCT solar array will occupy 6.27 acres of the property (Figures 4a and 4b, Solar Facility Layout). The NEM solar system will offset energy consumption and electrical bills at the City of Atwater WWTP. The RES-BCT solar array will be directly connected to the Pacific Gas and Electric grid where the City of Atwater’s buildings located around the city will have their bills and energy consumption be virtually offset by the energy produced from this array. Neither arrays will modify the way in which stormwater flows into or away from the property. The solar modules will also be raised to a height of three (3) feet out of the deepest expected standing water depth for a typical-100-year storm (Figures 5a and 5b, System Elevations). Figure 6 shows a previously installed system that is similar to the proposed Bert Crane Solar Facility.

9. Surrounding land uses and setting:

The project site is located on a portion of the Bert Crane WWTP facility site and is surrounded by agricultural uses (Figure 7 Project Vicinity). The project site overlies two City-owned parcels (APN: 056-200-021 and 056-200-026). According to the Merced County General Plan, the project site is bounded by unincorporated land designated for Agricultural (A) land uses and zoned General Agricultural (A-1) to the north, east, and south. Bert Crane Road and more land designed/zoned A/A-1 to the west. The project site has been historically used by the City for public facilities (i.e., landfill, sludge disposal) since the 1950s. Currently, the project site includes the Bert Crane WWTP facility, a solar facility, and radio-controlled aircraft airport (Figure 8, Site Plan and Figure 9, Aerial Photograph).
10. Other public agencies whose approval is required:

Regional Water Quality Control Board, City of Atwater, County of Merced.
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1? If so, has consultation begun?

The State requires lead agencies to consider the potential effects of proposed projects and consult with California Native American tribes during the local planning process for the purpose of protecting Traditional Tribal Cultural Resources through the California Environmental Quality Act (CEQA) Guidelines. Pursuant to PRC Section 21080.3.1, the lead agency shall begin consultation with the California Native American tribe that is traditionally and culturally affiliated with the geographical area of the proposed project. Such significant cultural resources are either sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe which is either on or eligible for inclusion in the California Historic Register or local historic register, or, the lead agency, at its discretion, and support by substantial evidence, choose to treat the resources as a Tribal Cultural Resources (PRC Section 21074(a)(1-2)). According to the most recent census data, California is home to 109 currently recognized Indian tribes. Tribes in California currently have nearly 100 separate reservations or Rancherias.

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

Currently, no Tribes have requested to be notified pursuant to Assembly Bill 52 (AB 52). However, notices were sent on August 17, 2020 to three tribes within the region that were identified in previous studies (North Valley Yokuts Tribe, Southern Sierra Miwuk Nation and Amah Mutsun Tribal Band). No responses have been received to date; however, consultation is still ongoing and ends on September 15, 2020.

Figure 1. Regional Location Map.

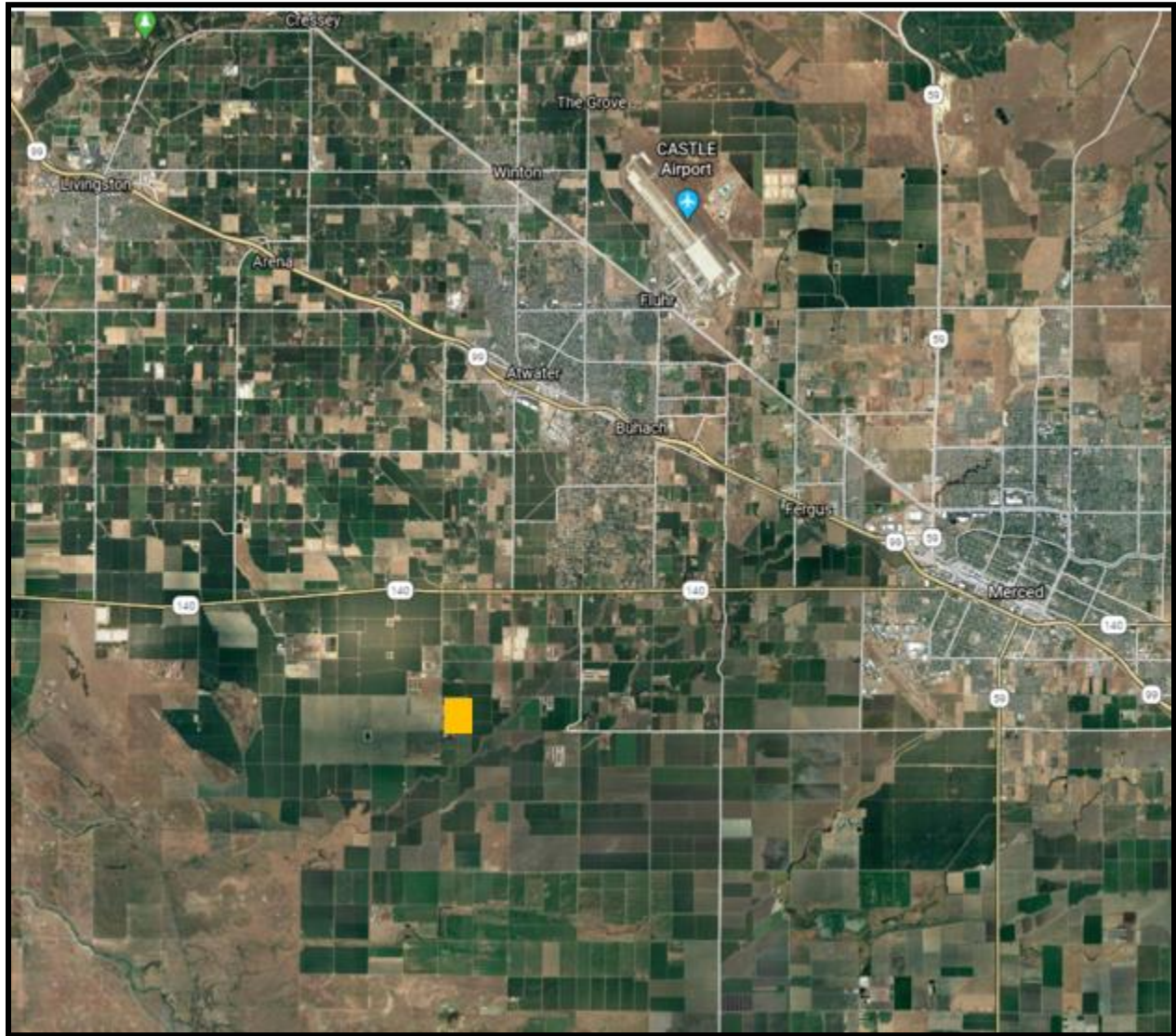


Figure 2. Project Location



Legend




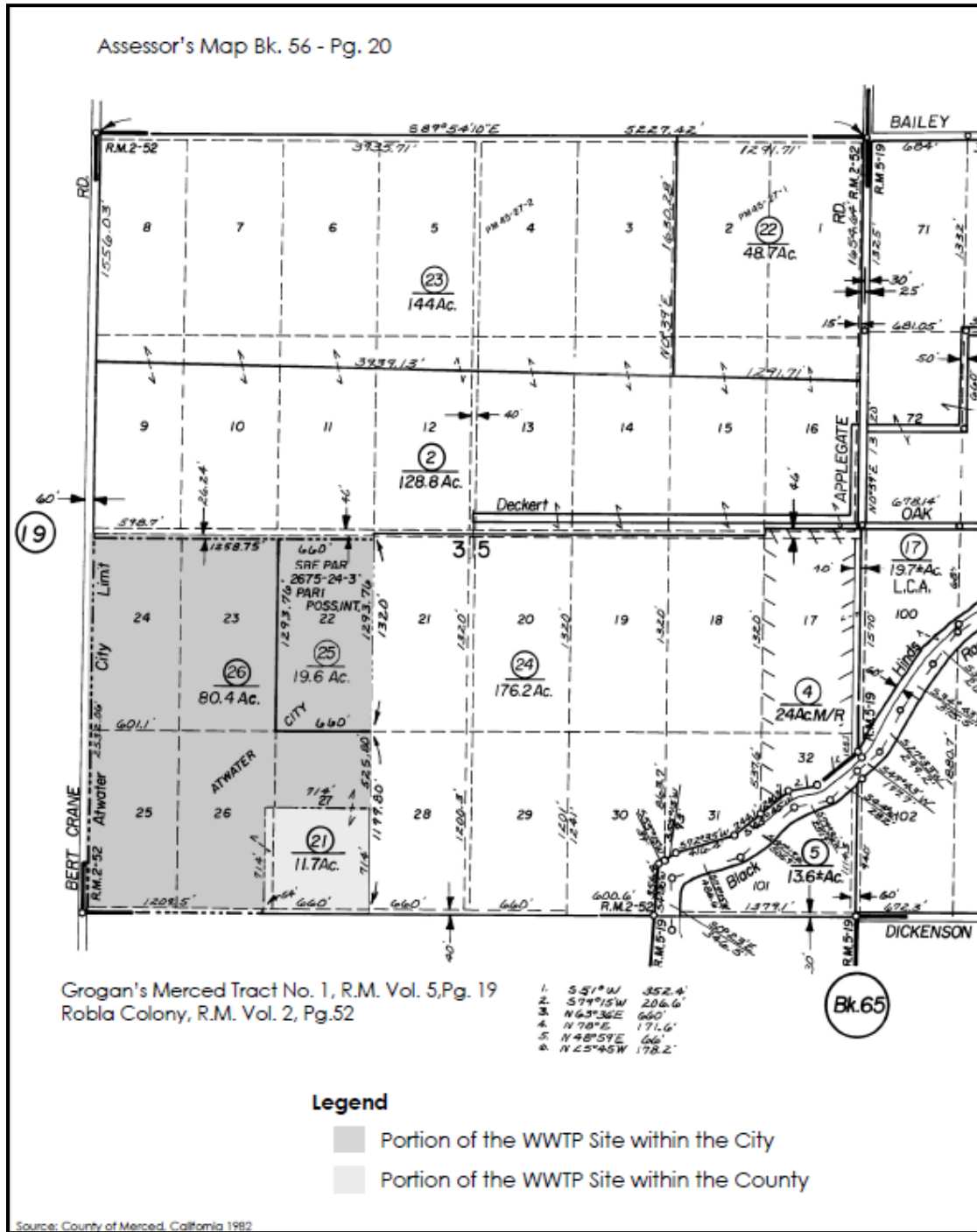
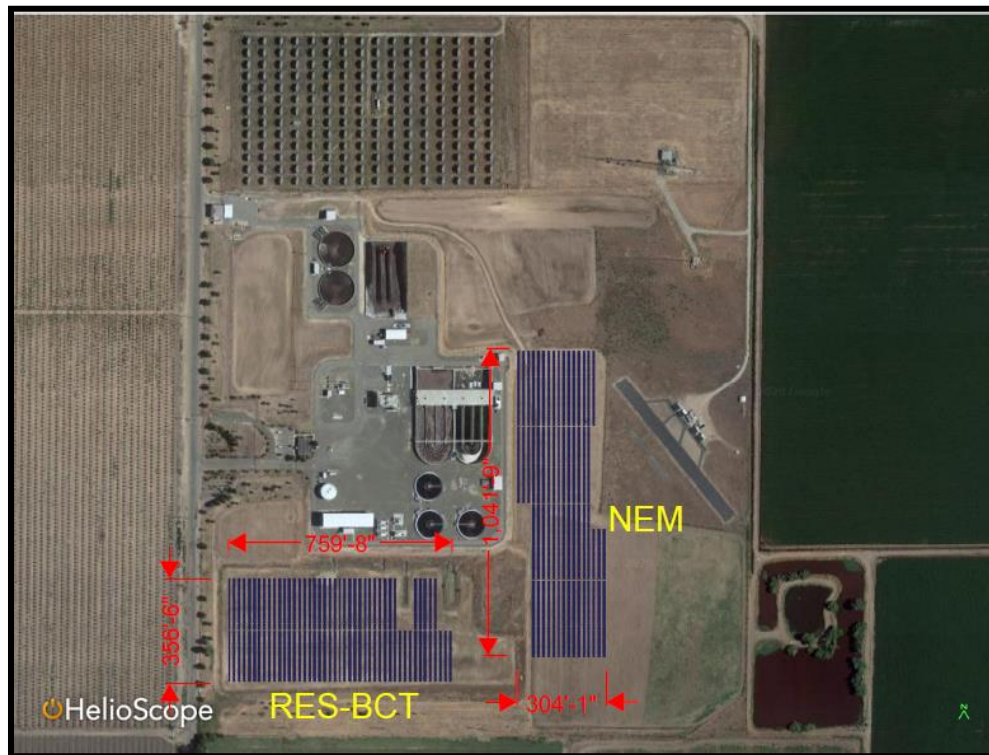
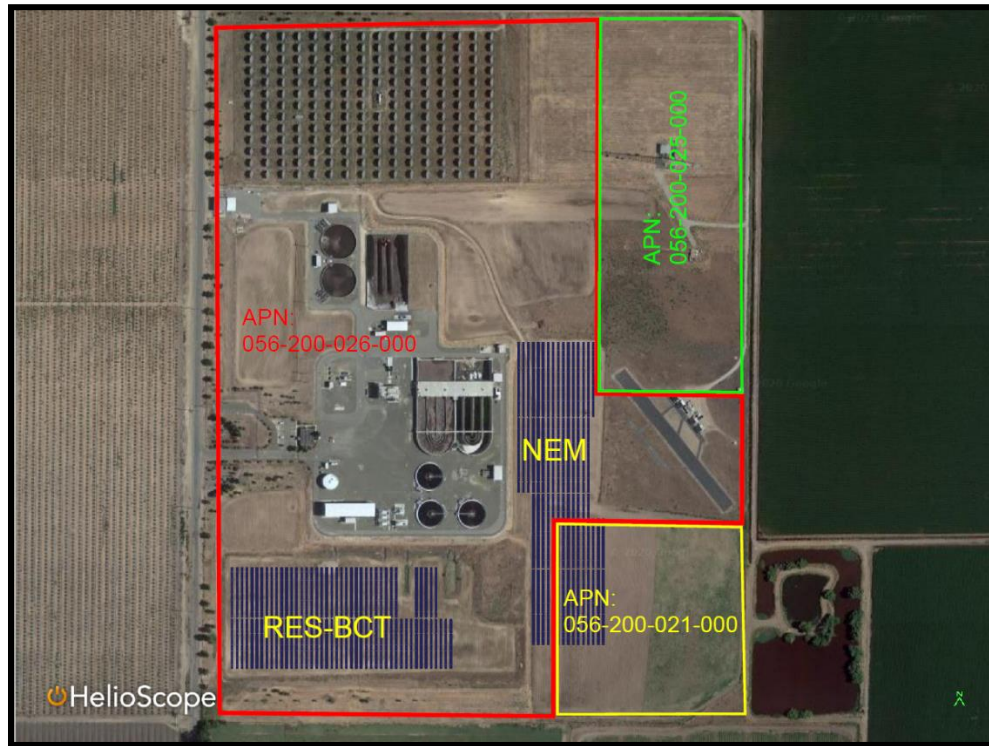
-  Project Site
-  Bert Crane WWTP Site
-  Atwater City Limit



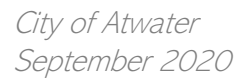
Figure 3. Assessor's Map



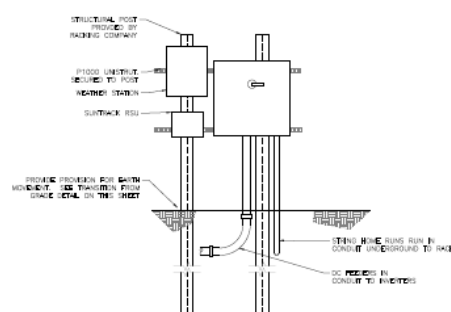
Figures 4a and 4b. Facility Layout



Source: Engie Services, 2020

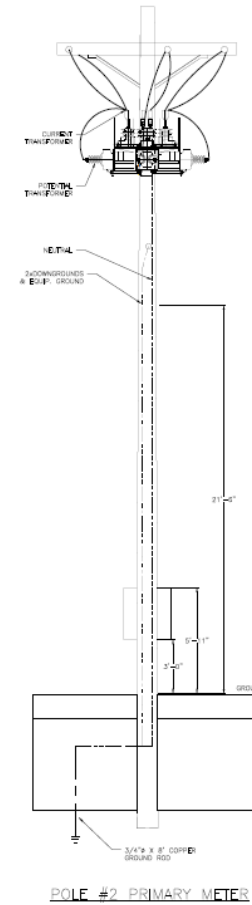
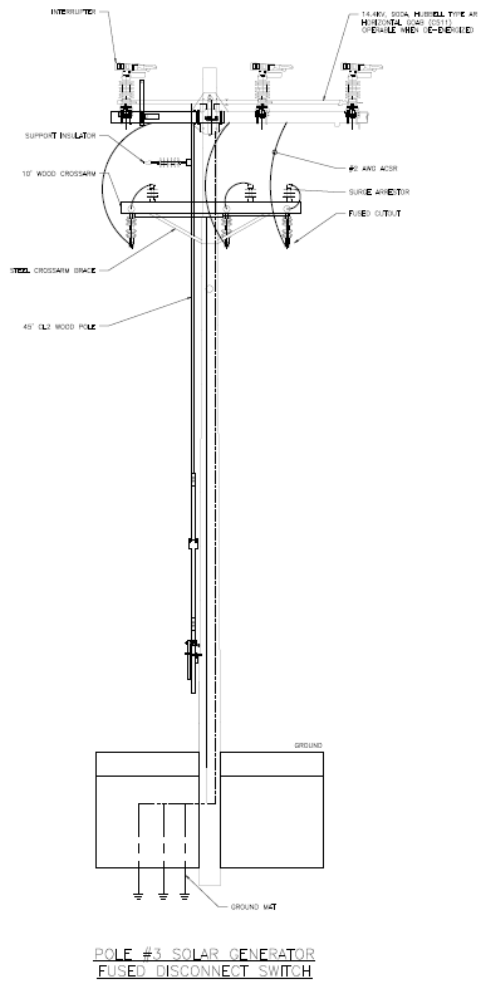
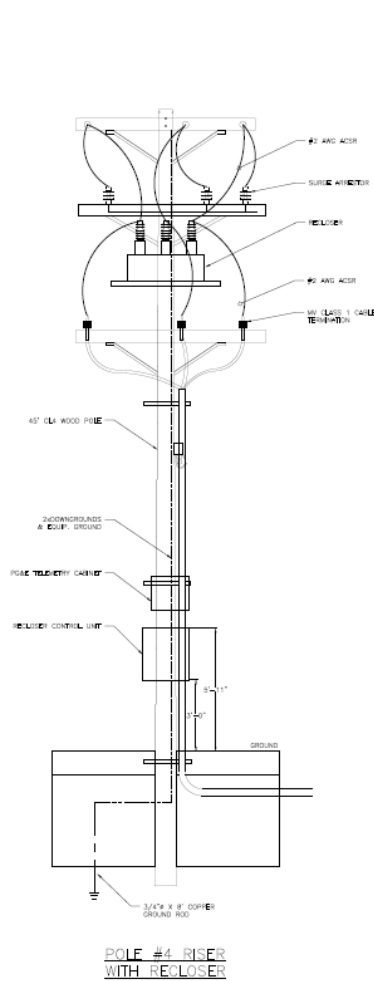


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3 DC COMBINER 5 ELEVATION
SCALE: 1/2" = 1'-0"





POLE ELEVATION DETAILS

POLE ELEVATION DETAILS

Source: Engie Services, 2020

Figure 6. Previously Installed System Photos for Reference Only



Source: Engie Services, 2020

Please note: This system is not located in Atwater.

Figure 7. Project Vicinity Map

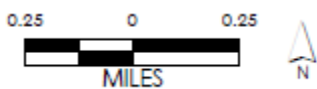


Figure 8. Site Plan



Figure 9. Aerial Photo – Existing Conditions



Environmental Factors Potentially Affected

The Environmental Checklist is the analysis portion of this Mitigated Negative Declaration (MND). This section provides an evaluation of the potential environmental impacts of the project. The CEQA Guidelines require evaluation of the 18 environmental issues analyzed in this section, as well as the Mandatory Findings of Significance. The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages. No boxes have been marked because no areas were determined to have a potentially significant impact.

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

Determination (To be Completed by the Lead Agency)

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT (EIR) is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An EIR is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Signature

Date

Evaluation of Environmental Impacts

1. For purposes of this Initial Study, the following answers have the corresponding meanings:
 - a. "No Impact" means the subsequent project will not cause any additional significant effect related to the threshold under consideration which was not previously examined in the MEIR.
 - b. "Less Than Significant Impact" means there is an impact related to the threshold under consideration that was not previously examined in the MEIR, but that impact is less than significant;
 - c. "Less Than Significant with Mitigation Incorporation" means there is a potentially significant impact related to the threshold under consideration that was not previously examined in the MEIR, however, with the mitigation incorporated into the project, the impact is less than significant.
 - d. "Potentially Significant Impact" means there is an additional potentially significant effect related to the threshold under consideration that was not previously examined in the MEIR.
2. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
3. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
4. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

5. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from, "Earlier Analyses," as described in (6) below, may be cross-referenced).
6. Earlier analyses may be used where, pursuant to the tiering, program EIR, MEIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in the MEIR or another earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
7. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
8. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
9. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
10. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS

Evaluation

Except as provided in Public Resources Code Section 21099, would the project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?			X	
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c)	In non-urbanized areas, substantially degrade the existing visual character or quality public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Discussion

The subject site is in a sparsely developed agricultural area, southwest of the urbanized area of the City of Atwater. The project site is located on the City's existing wastewater treatment facility (i.e., Bert Crane WWTP). Agricultural uses dominate the visual character of the project area. The project site is in a sparsely developed agricultural area on Bert Crane Road, which is a two-lane rural road. The undeveloped portions of the project site, including the former landfill site, are mostly covered with ruderal vegetation. Visible structures in the project area include existing ground mounted solar, structures associated with the wastewater treatment facility (tanks, etc.), a 120-foot cell phone transmission tower, and a service antenna.

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

Less than significant impact. A scenic vista is a viewpoint that provides a distant view of highly valued natural or man-made landscape features for the benefit of the general public. Typical scenic vistas are locations where views of rivers, hillsides, and open space areas can be obtained as well as locations where valued urban landscape features can be viewed in the distance. The City of Atwater General Plan identifies scenic corridors in the Open Space and Conservation Element. These scenic corridors identified are as follows:

- Atwater Boulevard
- First Street
- Bellevue Road
- Shaffer Road
- Winton Way
- Broadway from Winton Way to First Street
- Buhach Road
- Third Street
- Part of Grove Avenue
- All entrances to the City

The subject site is not located near any of these scenic corridors. In addition to this, there are no viewpoints in the vicinity of the subject site that provide a view of highly valued natural or man-made landscape features for the benefit of the general public. Finally, as required through the Conditional Use Permit Process, perimeter screening landscaping will be provided. Some screening trees already exist along the east side of Bert Crane Road, partially screening that facility from view.

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

No Impact. The project site is not within the vicinity of a State designated scenic highway. Highway 140 is over a mile and a half from the subject site and is the area running through this portion of Merced County is not considered a scenic highway.

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

Less Than Significant Impact. Although the subject site is in a non-urbanized area, there are no public views in the vicinity. In addition to this, even if there were public views in the area, the project is proposing structures that are low to the ground and will be screened from adjacent property by crops, existing structures, and perimeter landscaping.

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

Less Than Significant Impact. The project does not propose any new lighting and thus the project will not create a new source of substantial light.

Regarding glare, the solar modules proposed for the project are constructed to be non-reflective to absorb as much sunlight as possible in order to produce the greatest amount of electricity. In addition to this, according to the U.S. Department of Energy, modern photovoltaic panels reflect as little as two percent of incoming sunlight, about the same as water and less than soil or even wood shingles. Thus, the proposed project will not create a substantial source of substantial glare which would negatively impact views in the area.

Mitigation Measures

None Required.

II. AGRICULTURE AND FORESTRY RESOURCES

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

Discussion

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Less than Significant Impact. According to the California Important Farmland Finder Map prepared by the California Department of Conservation, the areas where the new ground mounted solar will be installed (subject site) is located on land that is designated as *Farmland of Local Importance* (Figure 10). It is not located on *Prime Farmland*, *Unique Farmland*, or *Farmland of Statewide Performance* and thus the development of the subject site will result in a less than significant impact in terms of converting prime farmland to a non-agricultural use.

- b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

No Impact. The subject site is currently not under Williamson Act contract.

- 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))?

No Impact. The subject site is not zoned for nor located within an area that is considered forest land or timberland and thus does not conflict with such zoning.

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

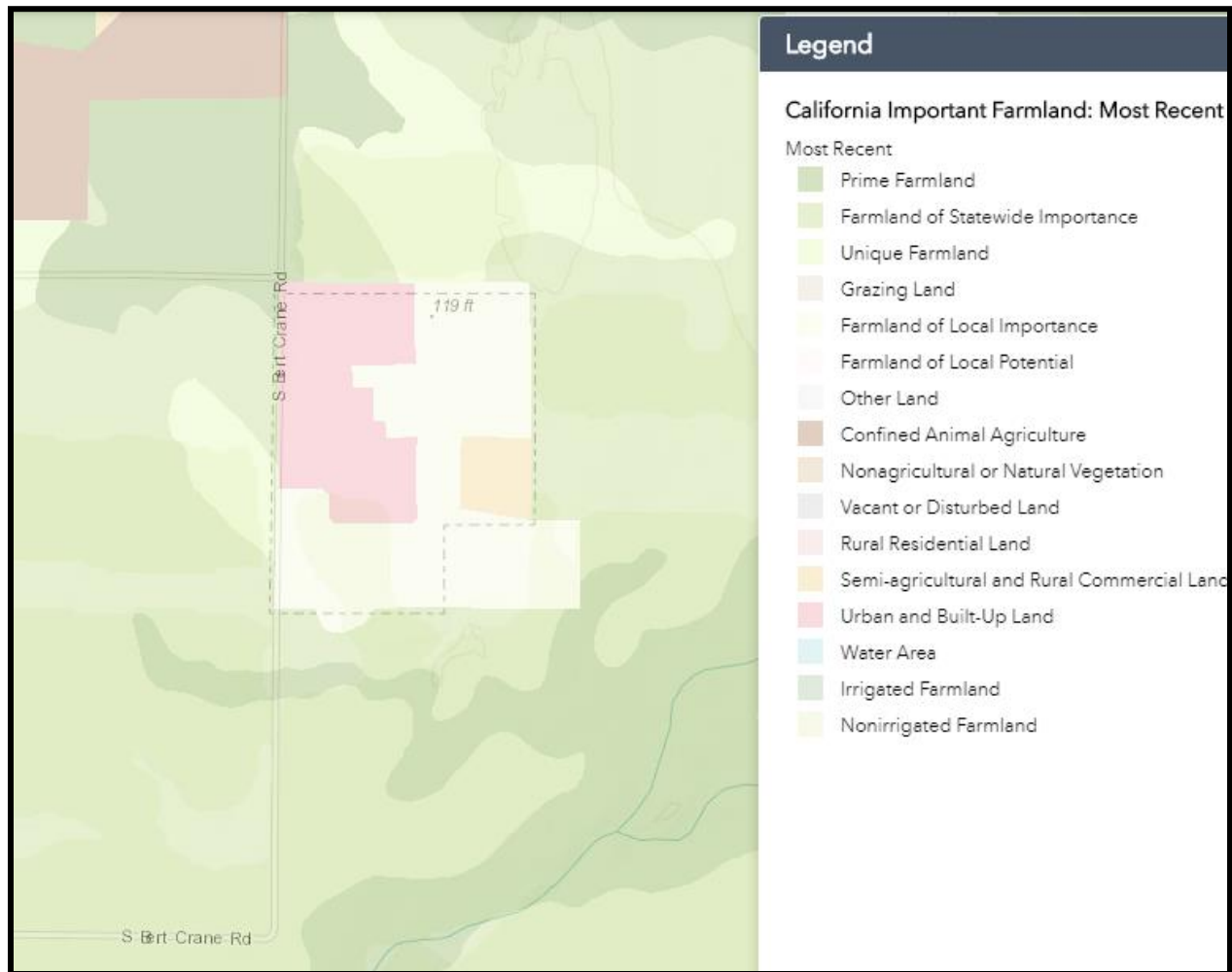
No Impact. The project area is currently vacant with very few trees and is not considered forest land, thus the proposed project will not result in the loss of forest land or conversion of forest land to non-forest land.

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

No Impact. The proposed project is located within the existing boundaries of the City of Atwater Wastewater Treatment Facility and the land is not currently farmed.

Because of the nature of this facility, this use is intended to be located away from urban uses. A solar facility does not add amenities or features that would entice urban development to the area and thus will not result in the conversion of farmland to non-agricultural uses. In addition, the subject site is not located on nor is it surrounded by forest land or forest uses.

Figure 10. Farmland Mapping and Monitoring Program Lands, California, 2020



Source: California Department of Conservation, California Important Farmland Finder, accessed on August 6, 2020.

Mitigation Measures

None Required.

III. AIR QUALITY

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan (e.g., by having potential emissions of regulated criterion pollutants which exceed the San Joaquin Valley Air Pollution Control Districts (SJVAPCD) adopted thresholds for these pollutants)?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?				X
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				X

Discussion

- a) Conflict with or obstruct implementation of the applicable air quality plan (e.g., by having potential emissions of regulated criterion pollutants which exceed the San Joaquin Valley Air Pollution Control Districts (SJVAPCD) adopted thresholds for these pollutants)?

Less than Significant Impact. The San Joaquin Valley Air Pollution Control District (SJVAPCD) outlines its significant thresholds in the Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI). The primary pollutants of concern during project construction and operation are ROG, NO_x, CO, PM₁₀ and PM_{2.5}. The SJVAPCD GAMAQI adopted in 2015 contains thresholds for ROG, NO_x, CO, PM₁₀, and PM_{2.5}. Figure 11 below shows these thresholds and the project totals in relation to these thresholds (in tons per year). As shown, the project is below all significant thresholds and thus the project impacts are less than significant.

Figure 11. ROG, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} Thresholds

Emission Source (Tons Per Year)	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Construction, Mitigated	0.2398	2.3482	1.9664	0.3412	0.2150
Operational, Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000
Project Total	0.2398	2.3482	1.9664	0.3412	0.2150
Significance threshold	10	10	100	15	15
Exceed threshold—significant impact?	No	No	No	No	No

Source: CalEEMod, Version 2016.3.2, ran on August 27, 2020.

The operation of the solar facility would not result in the emission of any criteria air pollutants or toxic air contaminants. The only operational emissions would be generated from mobile sources associated with a worker vehicle visiting the facility to check the panels and a water truck to wash off the panels as dust and dirt accumulates. The panels would likely require more frequently cleaning during the non-rainy season as rain would naturally wash dirt from the panels during the rainy season. Generally, the panels would only need to be cleaned an average of approximately once every two months. Therefore, this analysis was based on one worker vehicle. The construction related emissions are also identified in the project total above.

- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less than significant. To result in a less than significant impact, the following criteria must be true:

1. *Regional analysis: emissions of nonattainment pollutants must be below the District's regional significance thresholds. This is an approach recommended by the District in its GAMAQI.* As discussed above in section a, the project was determined to be below the District's regional significance thresholds.
2. *The project must be consistent with current air quality attainment plans including control measures and regulations. This is an approach consistent with Section 15130(b) of the CEQA Guidelines.* This item was discussed in the previous section and the project was determined to be consistent.
3. *Cumulative health impacts: the project must result in less than significant cumulative health effects from the nonattainment pollutants.* The Air Basin is in non-attainment for ozone, PM₁₀, and PM_{2.5}, which means that certain pollutants' exposure levels are often higher than the normal air quality requirements. The air quality standards have been set to protect public health, particularly the health of vulnerable people. Therefore, if the concentration of those contaminants exceeds the norm, some susceptible individuals in the population are likely to experience health effects. Concentration of the pollutant in the air, the length of time exposed and the individual's reaction are factors that affect the extent and nature of the health effects. The regional construction and operational emission analysis show that the project does not surpass the substantial thresholds of the SJVAPCD and that the project is compliant with the Air Quality Attainment Plan applicable. Therefore, the project would not result in significant cumulative health impacts.

- c) Expose sensitive receptors to substantial pollutant concentrations?

No Impact. There are no sensitive receptors in the vicinity of the project area and the proposed project will not result in substantial pollutant concentrations as evidenced in section a above.

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

No Impact. The project proposes a ground mounted solar facility, which is not a land use type that would or could result in odorous or other unusual emission types that would adversely impact a substantial number of people.

Mitigation Measures

None Required.

IV. BIOLOGICAL RESOURCES

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				X
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?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X

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

- 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 or the U.S. Fish and Wildlife Service?

Less than Significant Impact. Although the project site contains potential denning and nesting habitat for San Joaquin kit fox and burrowing owls (which are State and/or Federally Listed Endangered and Threatened Animals of California), as a condition of the Mitigation Monitoring and Reporting Plan (MMRP) adopted by the City of Atwater for the Wastewater Treatment Plant, a wetland delineation was conducted on September 30, 2010 and pre-construction surveys for San Joaquin kit fox and burrowing owl were conducted at the Bert Crane WWTP site on April 24, 2009, and January 19, 2010. The studies identified no burrowing owls nor potentially occupied burrows within 500 feet of the WWTP construction area. One potential den was observed within the project site in a hillside of the former landfill; however, scat found near the entrance of the den was too large for a San Joaquin kit fox and appeared more consistent with that of coyote or red fox. Additional pre-construction surveys for San Joaquin kit fox were conducted north of the project site at the Peck Drain outfall site on October 25, 2011 (see Initial Study/Proposed Mitigated Negative Declaration dated April 2012 prepared for the Bert Crane Solar Facility for details). In addition to this, on February 29, 2012, PMC (the firm that prepared the above mentioned IS/MND) conducted a reconnaissance survey to confirm previous report findings. Although a small portion of the project area was not included in the survey areas, it is within the overall project site (there are no fences, landscaping, or other site features between the two areas) and thus, the possibility of finding a kit fox den or owl burrows in this small area are minimal.

Based on these multiple surveys completed over different points in time, it can be concluded that the subject site does not contain habitat for a protected species and thus the project will not 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 or the U.S. Fish and Wildlife Service.

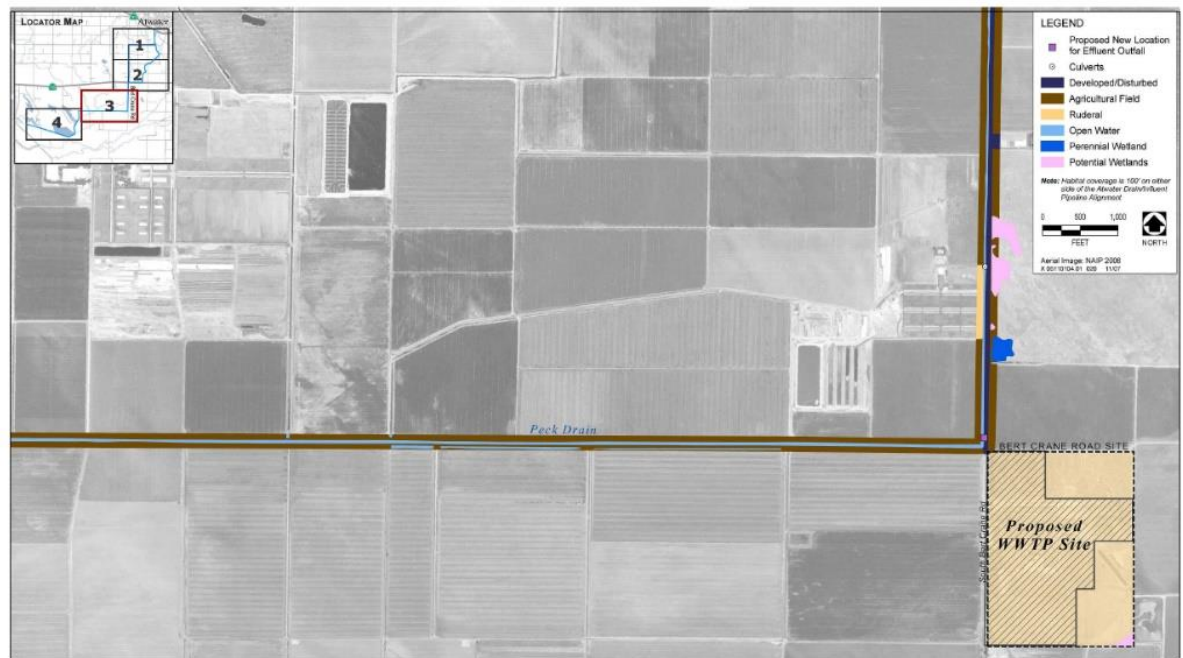
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

No Impact. The project site has been graded and disked over time. The project site does not contain any wetlands, riparian, or sensitive natural communities. Therefore, the proposed project would have no impact on these resources.

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

No Impact. Based on the analysis conducted by EDAW biologists for the Atwater Wastewater Treatment Plant (WWTP) Improvement Project EIR in 2007, there are no wetlands or waters of the U.S. or waters of the State present within the Study Area. A depiction of the habitat types in the project area is depicted below in Figure 12. There is one potential wetland on the southeast corner of the WWTP. The proposed solar project, although located on this parcel, is not located on the vicinity of this potential wetland and thus there is no impact.

Figure 12. Habitat Types in the Project Area, City of Atwater, CA, 2007



Atwater Wastewater Treatment Plant Improvement Project
City of Atwater

3.6-11

EDAW
Biological Resources

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

No Impact. As mentioned above, the project site has been farmed, graded and disked over time and is thus disturbed and does not provide appropriate habitat for any special status species. In addition to this, based on studies and surveys previously prepared for the subject site, the site does not support native vegetation which could provide for native species or migratory species.

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

No Impact. The City's Code of Ordinances (Chapter 12.32) identifies the City's tree policies. The project site contains no trees; therefore, the proposed project would have 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?

No Impact. The Arena Plains Unit of the Merced National Wildlife Refuge (NWR) is located approximately 4 miles west of the project site. The Merced NWR was established in 1951 under the Lea Act to attract wintering waterfowl from adjacent farmland where their foraging was causing crop damage. The Merced NWR is part of the San Luis NWR Complex and encompasses 10,262 acres of wetlands, native grasslands, vernal pools, and riparian areas. In addition to managing natural habitats, the Merced NWR contains approximately 300 acres of cultivated corn and winter wheat crops and over 500 acres of irrigated pasture for wildlife (USFWS 2009).

Due to the nature of the proposed project and the distance from the conservation area, it is unlikely that the proposed project would conflict with the provisions of the Comprehensive Conservation Plan. Since there is no currently adopted conservation plan, the proposed project would have no impact.

Mitigation Measures

None Required.

V. CULTURAL RESOURCES

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				X
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

Discussion

Original occupation of the San Joaquin Valley occurred over 11,000 years ago. At the time of European contact, the area was occupied by the Northern Valley Yokuts. Spanish missionary expeditions explored the area in the early 1800s, but no settlements were founded. American settlers appeared with the stagecoach in the 1850s and began growing wheat and raising cattle. By the 1870s, the extension of the Central Pacific Railroad encouraged development, and the agricultural base began to diversify. The community of Atwater grew and eventually incorporated in 1922. In 1941, Castle Air Force Base was constructed and later became the home of the Strategic Air Command 93rd Bombardment Wing.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No Impact. During the review process for the WWTP, a records search of the California Historical Resources Information System at the Central California Information Center (CCIC) was conducted for the project site, which included a review of sites listed in the National Register of Historic Places (NRHP), California Historical Landmarks, and other government-designated cultural resources site, as well as maps and files of the findings of previous cultural resource surveys conducted in the area. Based on the findings of these studies, there are no federal or state designated historical places identified in the vicinity of the project site. There is a small portion of property on the southeast portion of the subject site that was not included in these studies, however the review

of these documents included property in the vicinity. In addition to this, this area does not contain any structures or potential historic resources. Thus, the proposed project does have the potential to cause a substantial adverse change in the significance of a historical resource.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

No Impact. Merced County occupies an archeologically and historically rich part of the San Joaquin Valley. The Central Valley basin was formed during the Jurassic period. Most of the region is covered with alluvium that was deposited within the last 1.8 million years. This alluvium is composed of siltstone, claystone, and sandstone sedimentary deposits carried by water. Areas containing archaeological or historic cultural resources are often located near natural water bodies and on elevated grounds. However, only a small fraction of Merced County has been surveyed for archaeological or historic cultural resources.

The project site is located on a portion of the Modesto Formation, which consists of a series of alluvial fans that date from 9,000 to 73,000 year before present. Remains of land mammals have been found in the region in alluvial deposits associated with the Modesto Formation. Portions of the project site have been previously disturbed during the operation of the former landfill and development of the radio-controlled aircraft airstrip, which includes a storage building and shaded areas as well as an asphalt airstrip. No archaeological and/or cultural resources were recorded during these previous site-disturbing activities.

As mentioned above, during the review process for the WWTP, a records search of the California Historical Resources Information System at the Central California Information Center (CCIC) was conducted for the project site, which included a review of sites listed in the National Register of Historic Places (NRHP), California Historical Landmarks, and other government-designated cultural resources site, as well as maps and files of the findings of previous cultural resource surveys conducted in the area. In addition, field surveys were conducted on the project site in December 2006 to search for undiscovered cultural and archaeological resources. According to the WWTP EIR, the records search identified one prehistoric occupation and burial site located approximately one-half mile northeast of the project site, and no cultural materials were observed on the project site during the field surveys. Due to the archaeological sensitivity of the area, the Native American Heritage Commission (NAHC) and Native American groups were contacted to determine the potential for Native American cultural resources to be present on the project site. A search of the Sacred Lands files did not indicate the presence of Native American cultural resources or sensitive areas, and the NAHC submitted a comment letter describing the process for adequately assessing and mitigating project-related impacts on Native American resources upon discovery (WWTP EIR).

According to the WWTP EIR, published geological and paleontological literature was reviewed, a database search at the University of California Museum of Paleontology (UCMP) was conducted in November 2007, and field reconnaissance surveys were conducted in December 2006 and October 2007 to document the presence of any unrecorded fossil sites. According to the WWTP EIR, the results of paleontological records search at UCMP and reconnaissance field surveys indicated that there are no fossil remains located at the project site. Based on the findings of these studies, there are no archeological resources identified in the vicinity of the project site. There is a small portion of property on the southeast portion of the subject site that was not included in these studies, however the review of these documents included property in the vicinity. Thus, the proposed project does have the potential to cause a substantial adverse change in the significance of a cultural resource.

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

Less Than Significant Impact. There are no known human remains on the subject site. As indicated within Section XVII, Tribal Cultural Resources, of this initial study, tribal consultation has occurred for the proposed project in compliance with AB 52 requirements. Currently, no Tribes have requested to be notified pursuant to Assembly Bill 52 (AB 52). However, notices were sent on August 17, 2020 to three (3) tribes within the region that were identified in previous studies (i.e., North Valley Yokuts Tribe, Southern Sierra Miwuk Nation and Amah Mutsun Tribal Band). No responses have been received to date; however, consultation is still ongoing and ends on September 15, 2020.

Mitigation Measures

None Required.

VI. ENERGY

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Discussion

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

Less Than Significant Impact. Appendix F of the State CEQA Guidelines requires consideration of the potentially significant energy use of a project. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usage. Per Appendix F of the CEQA Guidelines, the means to achieve the goal of conserving energy includes decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. A project would be considered “wasteful, inefficient, and unnecessary” if it were to violate state and federal energy standards or result in significant impacts in regards to project energy requirements, energy inefficiencies, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity or conflict or create an inconsistency with applicable plan, policy, or regulation.

The proposed project would not result in wasteful or inefficient consumption of energy resources given that the project proposes the development and construction of solar structures, which are intended to create energy. Since the project itself will produce much more energy than it consumes, it can be concluded that the project will not result in the inefficient, wasteful, or unnecessary consumption of energy during operation or construction.

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

Less Than Significant Impact. The proposed project would be required to implement and be consistent with existing energy design standards at the local and state level, including be required to comply with Title 24 (if applicable). In addition, the proposed project complies with several policies contained in the Atwater General Plan as described below.

GOAL CO-7. Manage and efficiently use energy resources available to the City.

Policy CO-7.1. Encourage the incorporation of energy conservation features into new development, such as high-density development, bikeways and pedestrian paths, proper solar orientation, and transit routes and facilities.

The proposed project complies with the goal and policy above given that the project is proposing an energy generating use on currently vacant property owned by the City.

For these reasons, it can be concluded that the project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Mitigation Measures

None Required.

VII. GEOLOGY AND SOILS

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Directly or Indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			X	
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii. Strong seismic ground shaking?			X	
iii. Seismic-related ground failure, including liquefaction?			X	
iv. Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	

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?				X
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?				X
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

Overview

A detailed description of the regional setting is provided in the *Geotechnical Investigation Report – Proposed Atwater Wastewater Treatment Plant, Bert Crane Site, Atwater, California* prepared by Kleinfelder in July 2008. Descriptions are incorporated in the discussion below.

Soils and Geology Characteristics

The proposed project site is relatively flat with stable, native soils ranging from silty sand at the surface to sandy silt, sandy clay, and clayey sand to poorly graded sand depth, with an estimated groundwater depth of 20 to 30 feet below the ground surface (Kleinfelder, 2008). The natural earth material dates from the Holocene Age (Kleinfelder, 2008). The native soils on the project site are as follows: Delhi sand, 3 to 8 percent slopes, MLRA 17 (DfB); Hilmar loamy sand, 0 to 3 percent slopes (HgA); and Lewis loam, moderately saline-alkali, 0 to 1 percent slopes (LmA) (Natural Resources Conservation Service, Soil Survey, 2020). These soils have a low to moderate shrink-well potential (Kleinfelder, 2008). Each soil series is defined below (USDA-NRCS, Official Soil Series Descriptions, 2020).

- **DfB:** These soils consist of very deep, somewhat excessively drained soils, have very low runoff, and have rapid permeability.
- **HgA:** These soils consist of primarily loamy sand, are somewhat poorly drained, have slow runoff, and are rapidly (surface) or slowly (IIC horizon) permeable.
- **LmA:** These soils consist of moderately deep to a duripan, moderately well drained soils, very high runoff, with slow permeability.

Seismic Activity

The project site is not located within an Alquist-Priolo earthquake fault zone. The California Geological Survey (CGS) Earthquake Hazard Zone Application identifies no active faults or areas evaluated for liquefaction and landslides within the project site or its vicinity. The closest mapped

faults are approximately 20 miles to the northeast in the Sierra Nevada Range (i.e., the Bear Mountain Fault) and approximately 30 miles to the southwest in the Diablo/Coastal Range (i.e., the San Joaquin, O’Neill, and Ortigalita Faults). The Ortigalita Fault is the nearest fault within the Alquist-Priolo earthquake fault zone; the fault has not been historically active.

Historically, there has been low historic seismic activity in the vicinity of the proposed project (Kleinfelder, 2008). However, the proposed project site could be affected by ground shaking from the nearby faults, which in turn could generate horizontal ground acceleration. The U.S. Geological Survey 2016 forecast for ground shaking intensity from natural and induced earthquakes indicates a level VI modified Mercalli intensity for the Atwater region, or “shaking strong, felt by all, minor damage.” The City of Atwater adopted the California Building Code (CBC), Title 24, 2019 edition, which is tailored specifically to building regulations to address seismic hazards. The proposed project would be required to comply with such regulations and standards.

Landslides and liquefaction of the proposed project site are considered unlikely due to its relatively flat topography, soil types and stability, geologic age of the natural earth material, and the infrequent seismic activity of nearby faults (Kleinfelder, 2008). Such factors also minimize the potential for other geologic hazards such as subsidence, lateral spreading, or expansive soils. The only topographical change near the proposed project site is attributable to the former landfill, to the north of the site.

Discussion

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

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

No Impact. The proposed project would not cross nor be near an Alquist-Priolo earthquake fault zone. The closest known fault zones are the Sierra Nevada and Diablo/Coast Ranges located approximately 20 and 30 miles from the project site, respectively. Therefore, there would be **no impact** associated with ground rupture.

- ii. Strong seismic ground shaking?

Less than Significant Impact. Earthquakes on faults from the Sierra Nevada and Diablo/Coast Ranges would most likely generate ground motion of shaking. Any impact to the project site would be to the solar structures, as the project site is not located in a densely populated area nor will it result in the construction of structures in which people will be located. Therefore, there would be **less than significant impact** from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. The proposed project site area has infrequent and low historic seismic activity; there are no active faults or areas evaluated for liquefaction and landslides within the proposed project site or its vicinity. Additionally, landslides and liquefaction of the proposed project site are considered unlikely due to its relatively flat topography, soil types and stability, geologic age of the natural earth material, and the infrequent seismic activity of nearby faults. Therefore, impacts would be **less than significant**.

iv. Landslides?

No Impact. The topography of the proposed project site is relatively flat with stable, native soils, and the site is not susceptible to seismic activities, geologic instability, or landslides. Therefore, there would be **no impact**.

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

Less than Significant Impact. The proposed project site would occupy approximately 13.5 acres, which would not be graded during construction. Construction of the solar trackers would minimally disturb the soil surface; the post the post foundations would be drilled or vibrated in place while the counterweight foundations may require excavation if needed. Additionally, ground disturbance may occur in the staging and access areas. Because the proposed project consists of construction activities with soil disturbance or activities exposed to storm water, it would be subject to compliance with requirements set forth in the City of Atwater Stormwater Management and Discharge Control Ordinance and subsequent requirements of the State Water Resources Control Board (SWRCB).

Chapter 12.22 – Stormwater Management and Discharge Control Ordinance of the AMC requires that any person performing construction activities in the City shall prevent pollutants from entering the storm water conveyance system and comply with all applicable Federal, State, and local laws, ordinances or regulations, including but not limited to, the current California NPDES general permit for storm water discharges associated with construction activity (construction general permit). All construction projects, regardless of size, having soil disturbance or activities exposed to storm water must, at a minimum, implement best management practices (BMPs) for erosion and sediment controls, soil stabilization, dewatering, source controls, pollution prevention measures, and prohibited discharges. Implementation of the BMPs minimizes the potential for the proposed project to result in substantial soil erosion or loss of topsoil.

Furthermore, to comply with the California NPDES general permit, the project applicant shall submit a notice of intent to the SWRCB and the City of Atwater Public Works Department. Because the proposed project would disturb one (1) or more acres of soil it would be subject to the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ) and would need to develop a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer that includes best management practices

(BMPs) to be implemented during and post construction, consistent with the California Storm Water Quality Association Best Management Practice Handbooks or equivalent guidelines. Implementation of a SWPPP minimizes the potential for the proposed project to result in substantial soil erosion or loss of topsoil.

The proposed project, as conditioned by the City of Atwater Public Works Department and the SWRCB to prevent soil erosion risk from construction activities, would be considered a **less than significant impact** to soil and topsoil.

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less than Significant Impact. The entire solar facility system will weigh approximately 941,780 lbs with modules and would be installed with individual foundations at the project site. The proposed project site is relatively flat with stable, native soils and is in an area of infrequent and low historic seismic activity of nearby faults. Such factors minimize the potential for other geologic hazards such as landslides, lateral spreading, subsidence, liquefaction or collapse. The Geotechnical Investigation prepared by Kleinfelder concludes that the soil and geologic conditions of the project site and vicinity are geologically stable and are not expected to affect the area. Therefore, installation of the solar trackers on the stable, native soils is unlikely to become unstable and result in geologic hazards.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?

No Impact. The proposed project site is relatively flat with stable, native soils ranging from silty sand at the surface to sandy silt, sandy clay, and clayey sand to poorly graded sand depth, with an estimated groundwater depth of 20 to 30 feet below the ground surface (Kleinfelder, 2008). The natural earth material dates from the Holocene Age (Kleinfelder, 2008). The native soils on the project site include: DfB, HgA, and LmA. These soils have a low to moderate shrink-swell potential and are not considered to be expansive per Table 18-1-B of the Uniform Building Code. Therefore, there would be **no impact** associated with installation of the solar trackers over such native soils.

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

No Impact. The project will not involve the installation of a septic tank or alternative wastewater disposal system, nor will the project generate any wastewater. Therefore, there would be **no impact** associated with suitability for septic tanks or alternative wastewater disposal systems.

- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. As discussed in the Cultural Resources section above, there are no known paleontological resources or unique geological features known to the City of Atwater. Therefore, there is **no impact**.

Mitigation Measures

None Required.

VIII. GREENHOUSE GAS EMISSIONS

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

Discussion

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere from space, and a portion of the radiation is absorbed by the Earth's surface. The Earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation.

Naturally occurring greenhouse gases include water vapor (H₂O), carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and ozone (O₃). Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also GHGs, but they are, for the most part, solely a product of industrial activities. Although the direct greenhouse gases CO₂, CH₄, and N₂O occur naturally in the atmosphere, human activities have changed their atmospheric concentrations. From the pre-industrial era (i.e., ending about 1750) to 2011, concentrations of these three GHGs have increased globally by 40, 150, and 20 percent, respectively (Intergovernmental Panel on Climate Change [IPCC], 2013).

GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), ozone (O₃), water vapor, nitrous oxide (N₂O), and chlorofluorocarbons (CFCs).

The emissions from a single project will not cause global climate change, however, GHG emissions from multiple projects throughout the world could result in a cumulative impact with respect to global climate change. Therefore, the analysis of GHGs and climate change presented in this section is presented in terms of the proposed project's contribution to cumulative impacts and potential to result in cumulatively considerable impacts related to GHGs and climate change.

Cumulative impacts are the collective impacts of one or more past, present, and future projects that, when combined, result in adverse changes to the environment. In determining the significance of a proposed project's contribution to anticipated adverse future conditions, a lead agency should generally undertake a two-step analysis. The first question is whether the combined effects from both the proposed project and other projects would be cumulatively significant. If the agency answers this inquiry in the affirmative, the second question is whether "the proposed project's incremental effects are cumulatively considerable" and thus significant in and of themselves. The cumulative project list for this issue (climate change) comprises anthropogenic (i.e., human made) GHG emissions sources across the globe and no project alone would reasonably be expected to contribute to a noticeable incremental change to the global climate. However, legislation and executive orders on the subject of climate change in California have established a statewide context and process for developing an enforceable statewide cap on GHG emissions. Given the nature of environmental consequences from GHGs and global climate change, CEQA requires that lead agencies consider evaluating the cumulative impacts of GHGs. Small contributions to this cumulative impact (from which significant effects are occurring and are expected to worsen over time) may be potentially considerable and, therefore, significant.

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

Less than Significant Impact. The SJVAPCD provides guidance for addressing GHG emissions under CEQA. The SJVAPCD guidance regarding evaluating GHG significance notes that if a project complies with an adopted statewide, regional, or local plan for reduction or mitigation of GHG emissions, then impacts related to GHGs would be less than significant. Additionally, the SJVAPCD requires quantification of GHG emissions for all projects which the lead agency has determined that an EIR is required. Although an EIR is not required for the proposed project, the GHG emissions are quantified below.

The proposed project's short-term construction-related and long-term operational GHG emissions for buildout of the proposed project, were estimated using CalEEModTM (v.2016.3.2). CalEEMod is a statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify GHG emissions from land use projects. The model quantifies direct GHG emissions from construction and operation (including vehicle use), as well as indirect GHG emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Emissions are expressed in annual metric tons of CO₂ equivalent units of measure (i.e., MTCO₂e), based on the global warming potential of the individual pollutants.

Short-Term Construction GHG Emissions

Estimated increases in GHG emissions associated with construction of the proposed project are summarized in Figure 13 below.

Figure 13. Construction GHG Emissions (Unmitigated Metric Tons Per Year)

Year	Bio-CO ₂	NBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
2020	0.0000	296.6402	296.6402	0.0797	0.0000	298.6337
Maximum	0.0000	296.6402	296.6402	0.0797	0.0000	298.6337
Total						595.3536

Source: CalEEMod, Version 2016.3.2, ran on August 27, 2020.

As presented in Figure 13, maximum short-term annual construction emissions of GHG associated with development of the project are estimated to be 595.3536 MTCO₂e (2020). These construction GHG emissions are a one-time release. Cumulatively, these construction emissions would not generate a significant contribution to global climate change.

Long-Term Operational GHG Emissions

The long-term operational emissions estimate for buildout of the proposed project, incorporates the potential area source and vehicle emissions, and emissions associated with utility and water usage, and wastewater and solid waste generation. Estimated GHG emissions associated with the buildout of the proposed project is summarized in the table below. As shown in Figure 14, the annual GHG emissions associated with buildout of the proposed project would be -3.2723 MTCO₂e. The amount is negative because the project is producing solar energy, thus reducing overall greenhouse gas emissions.

Figure 14. Operational GHG Emissions 2021 (Metric Tons Per Year)

Category	Bio-CO ₂	NBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
Area	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Energy	0.0000	-1.6451	-1.6451	-0.0001	0.0000	-1.6516
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water	0.0000	0.0122	0.0122	0.0000	0.0000	0.0123
Total	0.0000	-1.6329	-1.6329	-0.0001	0.0000	-1.6393

Source: CalEEMod, Version 2016.3.2, ran on August 27, 2020.

The maximum short-term annual construction emissions of GHG associated with development of the project are estimated to be 595.3536 MTCO₂e (2020). As stated previously, short-term construction GHG emissions are a one-time release of GHGs and are not expected to significantly contribute to global climate change over the lifetime of the proposed project. The annual operational GHG emissions associated with buildout of the proposed project would be -3.2723 MTCO₂e. Additionally, as discussed in more detail below, the project would be generally consistent with the applicable goals and policies related to greenhouse gas reduction measures.

Because of this, the proposed project will not occur at a scale or scope with potential to contribute substantially or cumulatively to the generation of greenhouse gas emissions.

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

No Impact. The proposed project would provide an alternative, renewable energy source, consistent with Policy AQ-1.2 of the 2030 Merced County General Plan Update (adopted in 2013) as well as Measure E-3, Renewable Portfolio Standard, of the AB 32 Climate Change Scoping Plan, which presents the goal that all investor-owned utility companies generate 33 percent of their energy demand from renewable sources.

Mitigation Measures

None Required.

IX. HAZARDOUS AND HAZARDOUS MATERIAL

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X

f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

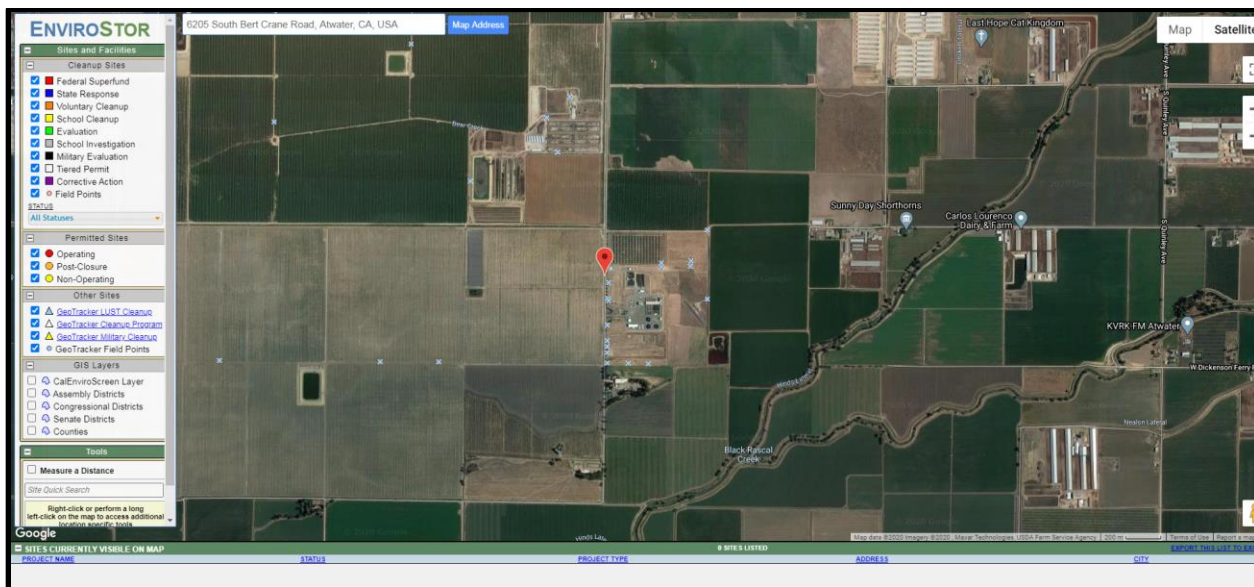
Discussion

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

No Impact. A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such agency. According to an Envirostor database search conducted by PCE on July 30, 2020, there are no listed hazardous sites in the vicinity of the project site, including Federal Superfund Sites (NPL), State Response Sites, Voluntary Cleanup Sites, School Cleanup Sites, Permitted – Operating Sites, Post-Closure Permitted Sites, Historical Non-Operating Sites, Corrective Action Sites, or Tiered Permit Sites (Figure 15).

In addition to this, the proposed project consists of the installation of solar equipment and will not involve any ongoing operations that would require routine transport, use or disposal of hazardous materials, therefore, there is no impact.

Figure 15. Envirostor Database Results, Atwater, CA, 2020



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

Less than Significant Impact. Given that the proposed project consists of the installation of solar equipment, there is no potential for the project to release hazardous materials into the environment during normal operation. Because the adjacent site was a former landfill, there is a potential for the release of hazardous materials in the ground during construction. However, a Phase I Environmental Assessment for the Atwater Wastewater Treatment Plant (WWTP) Biosolids Transfer Facility Located on APN 056-200-026 in Atwater, CA (Phase I EA) was performed by ENSR in 2006 as part of the review process for the WWTP. This Phase I EA identified historical uses of the WWTP site to include 18-acre closed, uncapped municipal landfill, and land that had been previously farmed and used for motorcycle racing. The landfill received nonhazardous solid waste from 1964 until 1972 and Group 3 (inert) wastes from 1972 to 1974. Wastes reportedly disposed of at the landfill included approximately 75,000 tons of municipal, community, industrial, and demolition and construction wastes. Between 1990 and 2001, the City graded, leveled, and farmed a portion of the WWTP site, not including the former landfill, which included subsurface application of biosolids generated at the existing WWTP. Another portion of the site was recently developed and used for motorcycle racing. While motor oil drips or leaks may have occurred; no evidence of staining was observed on the project site. For these reasons, the minimal ground disturbances that will be required for the construction of the solar structures will not 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.

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

No Impact. The project site is not located within one-quarter mile of an existing or proposed school and would not result in hazardous emissions; therefore, the proposed project would have no impact on schools.

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

Less than Significant Impact. According to an Envirostor database search conducted by PCE on July 30, 2020 and the Phase I EA referenced above, there are no listed hazardous sites in the vicinity of the project site. Although the project is partially located on a former landfill site that has been identified to be releasing elevated levels of nitrates and VOCs in the groundwater, the former landfill did not accept disposal of hazardous materials. The project site would be fenced and closed to the public. Since the only hazard associated with the former landfill site is leaching of nitrates and volatile organic compounds into the groundwater, workers would not be exposed to any safety hazards. Therefore, the proposed project would not create a significant hazard to the public or the environments.

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

No Impact. The closest airport is the Castle Airport located approximately seven miles northeast of the project site. According to the Merced County Airport Land Use Compatibility Plan (adopted in 2012), the project site is not located within the Castle Airport Influence Area boundary. In addition to this, the proposed project will not introduce new residents nor require employees on-site. Employees will only visit the site sporadically for maintenance. For these reasons, the project will not result in a safety or hazard for people working in the project area.

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

No Impact. The closest evacuation route is State Route 140, which is located approximately 1.50 miles north of the project site. The proposed project would have no impact on the ability to implement an emergency response plan or emergency evacuation plan.

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

Less than Significant Impact. According to the California Department of Forestry and Fire Protection (Cal Fire), the project site is located within a *Local Responsibility Area*, meaning that fire protection is the responsibility of the local jurisdiction. Given that the area in question is not considered a wildland and there are only domestic trees and irrigated ag land in the vicinity, and the project will not result in additional regular employees working on the site, the project's potential to expose people or structures to loss, injury or death involving wildland fires is less than significant.

Mitigation Measures

None Required.

X. HYDROLOGY AND WATER QUALITY

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				X
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
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:			X	
i. Result in a substantial erosion or siltation on- or off-site;			X	
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site:			X	
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial			X	

	additional sources of polluted runoff; or				
iv.	Impede or redirect flood flows?			X	
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Discussion

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

No Impact. The proposed project would not result in the generation of wastewater. Therefore, there would be no impact associated with waste discharge requirements or water quality.

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

Less than Significant Impact. Routine maintenance would require occasionally rinsing of the solar modules to remove dust and dirt. Deionized water is used to wash the modules, which is potable water is brought from off-site locations and treated to become deionized. The water would be trucked to the site and no groundwater would be procured onsite. The increased demand for trucked in water would not result in substantial depletion of groundwater supply. The only increase in impervious surface area would be associated with panel foundations, which are minimal. Therefore, the proposed project would not interfere with groundwater recharge or substantially deplete groundwater supplies, and this would be considered a less than significant impact.

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

i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. During the conditional use permit process, conditions and requirements of the Project pertaining to storm drain facilities will be provided and required which will address potential impacts. In addition, construction related to the development of the proposed project will involve ground preparation work for the proposed solar equipment. These activities may expose soils to natural elements, including rain and wind, which could result in erosion on the site. However, during construction the contractor would be required to employ appropriate sediment and erosion control as part of a Stormwater Pollution Prevention Plan (SWPPP) that is required in the California National Pollution Discharge Elimination System (NPDES). This is already required for projects of this type. Given that these are standard requirements and processes, these are not considered mitigation measures for the purposes of CEQA

ii. Substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?

Less Than Significant Impact. The surface of the module panels would capture and convey precipitation to flow onto the permeable ground between the rows. Runoff generated on the project site would continue to infiltrate into the ground or flow toward Black Rascal Creek or drainage ditches along South Bert Crane Road. Therefore, the amount of runoff generated on-site would be similar to existing conditions; therefore, the project will not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site.

iii. Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. The project is not proposing an impervious surface other than the small base of the solar equipment. Even so, as mentioned above, the surface of the module panels would capture and convey precipitation to flow onto the permeable ground between the rows. Runoff generated on the project site would continue to infiltrate into the ground or flow toward Black Rascal Creek or drainage ditches along South Bert Crane Road. In addition to this, the project will be routed and reviewed by the City of Atwater Floodplain Administrator (The Roads and Drainage section at the City) and the County of Merced to ensure the project will not exceed stormwater capacity and will condition the project accordingly. Thus, the proposed project would not create runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff.

iv. Impede or redirect flood flows?

Less Than Significant Impact. The proposed project will be designed to address and meet all requirements of the City of Atwater Floodplain Administrator and thus will not impede or redirect flood flows.

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

No Impact. There are no bodies of water near the site that would create a potential risk of hazards from seiche, tsunami or mudflow.

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

Less Than Significant Impact. The proposed Project will be in compliance with all water quality control plans and other hydrological requirements established by the City of Atwater.

Mitigation Measures

None Required.

XI. LAND USE PLANNING

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?				X
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?				X

Discussion

a) Physically divide an established community?

No Impact. The project site has been historically used by the City for public facilities, including a former landfill, and a disposal site for sludge generated by the existing WWTP. The project site is adjacent to a former 18-acre closed landfill; communication towers with guy wires; a the WWTP; and an airstrip used for radio-controlled aircraft. The City leases the airstrip portion of the site to the Merced County Radio Control Club. The project is proposed on an island of City territory, and a portion of City owned property that is within the jurisdiction of the County of Merced. Given that the project site is located in a mostly rural area with no surrounding established community, the proposed project would not result in the division of the established community. For these reasons, the proposed project would have no impact on the established community or existing neighborhoods.

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

No Impact. The project is being proposed in compliance with the City of Atwater General Plan and Zoning ordinance. Compliance with all requirements will be verified through the conditional use permit process which is required for this project. There are no other land use plans applicable to this site that apply to the project area.

Mitigation Measures

None Required.

XII. MINERAL RESOURCES

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?				X
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?				X

Discussion

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

No Impact. The City of Atwater has not identified in its General Plan and is not known or inferred to be an area of significant mineral resources. The California Department of Conservation classifies mineral land resources by zones. Mineral land classification addresses the specific type of mineral deposits that are present in the project area. The Mineral Resource Zone (MRZ) map categorizes each area for classification and significance. A search of the California Department of Conservation, SMARA Mineral Land Classification, Mineral Resources Zone (MRZ) Map indicates a classification of MRZ-1 for the project areas. MRZ-1 indicates: "Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources." For the above noted reasons, the proposed project will not result in a loss of availability of availability of a known mineral resource that would be of value to the region and the residents of the state.

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

No Impact. The subject site is not delineated on a local general plan, specific plan or other land use plan as a locally important mineral resource recovery site; therefore, it will not result in the loss of availability of a locally-important mineral resource.

Mitigation Measures

None Required.

XIII. NOISE

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

Discussion

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

Less than Significant Impact. The only noise sensitive uses in the area are rural residential uses, the closest of which is one-quarter of a mile away. Given that the proposed project, a solar facility, is not a noise generating use, the only noise related impacts will occur during construction, and this noise will be minimal and most likely not audible to any residential uses. The City of Atwater has requirements for acceptable construction noise (times and levels). Since the proposed project will be required to follow the policies set forth in the City of Atwater General Plan and Chapter 8.44 of the AMC, this project will have a less than significant impact in regard to noise.

These are standard requirements that will be implemented during the conditional use permit and permitting process and are not considered mitigation measures.

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

Less than Significant Impact. The operation and maintenance of the proposed project would not result in long-term vibration. However, construction equipment used to install the solar facility may result in vibration. As indicated above, the impact can be considered less than significant given that the closest residential use is over a quarter of a mile away and the project will be required to comply with City of Atwater noise standards contained in both the General Plan and AMC.

c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The closest airport is the Castle Airport located approximately seven miles northeast of the project site. According to the Merced County Airport Land Use Compatibility Plan (adopted in 2012), the project site is not located within the Castle Airport Influence Area boundary. In addition to this, the proposed project will not introduce new residents nor require employees on-site. Employees will only visit the site sporadically for maintenance. For these reasons, the project will not expose people working in the project area to excessive noise levels.

Mitigation Measures

None Required.

XIV. POPULATION AND HOUSING

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Discussion

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

No Impact. The nature of the proposed project, construction of a solar facility, would not result in an increase in population. The project is not proposing a use that is not proposing new homes, nor will it result in additional infrastructure or amenities that would induce growth.

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

No Impact. The project is being constructed on property owned by the City of Atwater on a site already utilized for public purposes. No housing is being demolished and thus the project will not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Mitigation Measures

None Required.

XV. PUBLIC SERVICES

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				X
i. Fire protection?				X
ii. Police protection?				X
iii. Schools?				X
iv. Parks?				X
v. Other public facilities?				X

Discussion

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
- i. Fire protection?
 - ii. Police protection?

- iii. Schools?
- iv. Parks?
- v. Other public facilities?

No Impact. Due to the nature of the improvements, construction of a solar facility, the proposed project will not result in an increase in population. Therefore, there would be no increased demand for fire protection, police protection, schools, parks, and/or other public facilities that would result in the need for new or expanded government facilities. Therefore, the proposed project would have no impact on public services.

Mitigation Measures

None Required.

XVI. RECREATION

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Discussion

- a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. Because of the nature of the proposed project, a solar facility, there would be no increased demand for recreational services associated with the project. There are no permanent employees or residents that would result from the construction of this facility. Therefore, the proposed project would have no impact on the physical condition of existing recreational facilities.

- b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

No Impact. Given that the proposed project will not cause an increased need for recreational facilities (as described in section a above), the project will not require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. In addition to this, the project is not proposing additional recreational facilities, thus the project will have no impact in this regard.

Mitigation Measures

None Required.

XVII. TRANSPORTATION

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

Discussion

- a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. The proposed project may result in a minimal increase in vehicle trips during construction and operation. According to the project applicant, during construction no more than 20 worker vehicles will visit the site daily for a six-month period and 114 semi-trucks will deliver materials to the site once each over a two-month period. During ongoing operations, one water truck and one pickup truck may visit the site a maximum of once every other month to clean the panels or provide maintenance. The limited trips associated with the proposed project would not affect operations on the local roadways. Given that transportation impacts are minimal, the proposed project would not conflict with any applicable plan (including the RTP), ordinance, or policies establishing measures of effectiveness for the performance of the circulation system.

- b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. According to Section 15064.3, vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. The proposed project, by its nature, will not generate additional VMT. The proposed project will not result in additional residences or additional permanent employees. It will also not result in induced development. For these reasons, the proposed project can be found to be consistent with CEQA Guidelines Section 15064.3, subdivision (b).

- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. Because the proposed project is not proposing nor will it be required to construct any roadways or other off-site public improvements, nor does it propose to construct incompatible uses that would interfere with traffic circulation, it can be concluded that the proposed project will not substantially increase hazards due to a geometric design feature or incompatible uses.

- d) Result in inadequate emergency access?

No Impact. The proposed project, the installation of a solar facility, is not proposing to construct a use that could have the potential to impede emergency access and thus it can be concluded that the proposed project will not result in inadequate emergency access.

Mitigation Measures

None Required.

XVIII. TRIBAL CULTURAL RESOURCES

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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:			X	
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k), or,				X
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC section 5024.1. In applying the criteria set forth in subdivision (c) of PRC section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

Discussion

- a) Would the project 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:
 - i. 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).

No Impact. As discussed in the Cultural Resources section, the subject site does not contain any property or site features that are 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)

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 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.

Less Than Significant Impact. In accordance with Assembly Bill (AB) 52 potentially affected Tribes were formally notified of this Project and were given the opportunity to request consultation on the Project. The City provided letters to the listed Tribes, notifying them of the Project and requesting consultation, if desired. The City has not received any responses from the tribes contacted, to date. Therefore, there is a less than significant impact.

Mitigation Measures

None Required.

XIX. UTILITIES AND SERVICE SYSTEMS

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effect?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
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?				X
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X

Discussion

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact. Although the proposed project is located on an existing wastewater treatment facility site, the project itself will not result in the relocation of the facility because the facility will be located in an area that is currently vacant and not used and not planned to be used by the facility. Given that the project will not result in additional residential uses nor permanent employees, there is no potential that the project would result in the construction of new water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities.

- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

No Impact. Given that the project will not result in additional residential uses nor permanent employees and the only water used for the proposed project will be for occasional cleaning of the solar panels, the project will not result in insufficient water supplies.

- c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. Given that the project will not result in additional residential uses nor permanent employees and the only wastewater generated for the proposed project will be for occasional cleaning of the solar panels, the project will not result in insufficient wastewater capacity.

- 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?

No Impact. No solid waste will be generated by the proposed project.

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

No Impact. As mentioned above, no solid waste will be generated by the proposed project and thus the project will not conflict with any federal, state, and local management and reduction statutes and regulations related to solid waste.

Mitigation Measures

None Required.

XX. WILDFIRE – IF LOCATED IN OR NEAR STATE RESPONSIBILITY OR LANDS CLASSIFIED AS VERY HIGH FIRE HAZARD SEVERITY ZONES

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Discussion

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

Less Than Significant Impact. The proposed Project would be required to be comply with adopted emergency response plans. As such, any wildfire risk to the Project structures or people would be less than significant.

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

Less Than Significant Impact. The project area is flat and does not pose any factors that would or could exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

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

No Impact. The proposed Project is located in an area developed with rural and agricultural uses and thus will not require the installation or maintenance of facilities that may exacerbate fire risk or result in impacts to the environment.

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

No Impact. The Project site is located on land that is adjacent to roadways, agricultural lands and rural residential housing. Because of the developed nature of the area and the lack of slopes and lack of conditions that would increase wildfire risk, and because the proposed project is not adding people to the area, it can be determined that the proposed project will 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

Mitigation Measures

None Required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Evaluation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Discussion

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

Less than Significant Impact. The analyses of environmental issues contained in this Initial Study indicate that the proposed Project is not expected to have substantial impact on the environment or on any resources identified in the Initial Study. Standard requirements that will be implemented through the conditional use permit process have been incorporated in the Project to reduce all potentially significant impacts to less than significant.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less than Significant Impact. CEQA Guidelines Section 15064(i) states that a Lead Agency shall consider whether the cumulative impact of a project is significant and whether the effects of the project are cumulatively considerable. The assessment of the significance of the cumulative effects of a project must, therefore, be conducted in connection with the effects of past projects, other current projects, and probable future projects. Due to the nature of the Project and consistency with environmental policies, incremental contributions to impacts are considered less than cumulatively considerable. All Project related impacts were determined to be less than significant. The proposed Project would not contribute substantially to adverse cumulative conditions, or create any substantial indirect impacts (i.e., increase in population could lead to an increase need for housing, increase in traffic, air pollutants, etc.). As such, Project impacts are not considered to be cumulatively considerable given the insignificance of Project induced impacts. The impact is therefore less than significant.

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

Less than Significant Impact. The analyses of environmental issues contained in this Initial Study indicate that the Project is not expected to have substantial impact on human beings, either directly or indirectly. Standard requirements and conditions have been incorporated in the Project to reduce all potentially significant impacts to less than significant.