

# **Arica and Victory Pass Solar Projects**

# Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting

Date: October 2, 2020

To: Responsible/Trustee Agencies and Interested Parties

From: California Department of Fish and Wildlife

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Arica and Victory

Pass Solar Projects and Notice of Public Scoping Meetings

NOP Public Review Period: October 5 to November 4, 2020

#### **Public Scoping Meeting:**

Date: October 21, 2020

Location:

https://zoom.us/j/99603454559

Meeting ID: 996 0345 4559

Phone: (669) 900-9128

Meeting ID: 996 0345 4559

Time:

5:00 p.m. URL available for viewing meeting materials and exhibits. URL will be provided in chat with language on slide/in slide footer directing attendees to the chat box.

Meeting time: 5:30-7:30 p.m.

# A. Introduction

In accordance with Section 15063 of the California Environmental Quality Act (CEQA) Guidelines, the California Department of Fish and Wildlife (CDFW), as the CEQA lead agency, will prepare a Draft Environmental Impact Report (EIR) for the Arica and Victory Pass Solar Projects (Projects). Arica Solar, LLC and Victory Pass I, LLC (Applicants) are proposing the Projects on land administered by the Bureau of Land Management (BLM) within a Development Focus Area (DFA), areas identified as appropriate for renewable energy under the BLM California Desert Conservation Area Plan as amended by the Desert Renewable Energy and Conservation Plan (DRECP). The applicants will need to obtain a Lake and Streamed Alteration Agreement (LSAA) and an Incidental Take Permit (ITP) under the California Endangered Species Act (CESA) from the CDFW. CDFW's need to contemplate an ITP and LSAA triggers the need to comply

with CEQA. Therefore, CDFW, as the lead agency under California law, will prepare a Draft and Final EIR to comply with CEQA. Separately, the BLM will prepare an Environmental Assessment (EA) to comply with NEPA to respond to the Applicants' request for a right-of-way on federal land.

As required by CEQA, this NOP is being sent to the Office of Planning and Research, responsible and trustee agencies and interested members of the public who submitted a request for such notices. The purpose of the NOP is to inform recipients that CDFW is beginning preparation of an EIR for the proposed Projects and to solicit comments concerning the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed Projects. Information that will be most useful at this time would be descriptions of the significant environmental issues and reasonable alternatives and mitigation measures you would like to see explored in the Draft EIR.

This NOP includes background information on the projects and the project locations (Section B), a description of the proposed project (Section C), a summary of potential project impacts (Section D), time and information on the virtual public scoping meeting (Section E), information on how to provide comments to CDFW (Section F), and where documents are available for public review (Section G).

In accordance with CEQA Guidelines Section 15082(b), there will be a 30-day comment period for this NOP, beginning on October 5, 2020 and ending on November 4, 2020. CDFW welcomes agency and public input during the public review period. In the event that no response or well-justified request for additional time is received from any responsible, federal, or trustee agency by the end of the review period, CDFW may presume that such agencies have no response.

# B. Background and Project Location

# **B.1** Background

The Applicants propose to develop and construct a 265-megawatt (MW) and a 200 MW, respectively, alternative current (AC) solar photovoltaic (PV) energy generating and battery storage project.

These Projects would be located adjacent to each other on BLM-administered federal lands, approximately 2,000 acres for Arica, and 1,800 acres for Victory Pass. For purposes of CEQA, the Arica and Victory Pass Projects will be reviewed under one document. These Projects are located within the California Desert Conservation Area (CDCA) planning area. The proposed Projects are also located within a Solar Energy Zone (SEZ) and within a DRECP Development Focus Area (DFA).

The Projects sites are currently vacant. The proposed Projects represent an increase in land use, but help California reach its goals in renewable energy, as well as comply with the BLM energy strategy to improve management of energy resources.

# **B.2** Project Location

The Projects are located in unincorporated eastern Riverside County, approximately 50 miles east of Indio, CA, approximately 40 miles west of Blythe, CA and 70 miles north of the California-Mexico border. Access to the site would be from State Route 177, approximately 8 miles from the proposed access gate. The Projects' legal descriptions are as follows:

<b>Legal Description</b>		
Project Component	Township / Range	Sections
Arica Solar Field (2,000 acres)	T. 5 S., R. 16 E	<ul> <li>Sec. 13, SW1/4</li> <li>Sec. 14, Of the NE 1/4: NW1/4 1/4, SE 1/4 1/4, and SW 1/4 1/4, the entire SE1/4</li> <li>Sec. 23, NE1/4, SW1/4, and SE1/4, of the NW1/4: NW 1/4 1/4, NE1/4 1/4, and SE1/4 1/4</li> <li>Sec. 24</li> </ul>
	T. 5 S., R. 17 E	■ Sec. 19, NW1/4, SW1/4
Victory Pass Solar Field (1,800 acres)	T. 5 S., R. 16 E	<ul> <li>Sec. 22, SW1/4, SE1/2</li> <li>Sec. 25, NW1/4, SW1/4</li> <li>Sec. 26</li> <li>Sec. 27, NE1/4, E1/2NW1/4, E1/2SW1/4, SE1/4</li> <li>Sec. 34, N1/2NE1/4</li> <li>Sec. 35, N1/2NE1/4, N1/2, NW1/4</li> </ul>
Shared Gen-Tie Line	T. 5 S., R. 16 E	• Crosses: Sec. 26, 27, 28, and 33
Shared Access Road —	T. 5 S., R. 15 E	<ul><li>Sec. 13, NE1/4SW1/4, and N1/2SE1/4</li></ul>
	T. 5 S., R. 16 E	<ul> <li>Sec. 18, N1/2SW1/4, and NW1/4SE1/4</li> <li>Sec. 19, NE1/4NE1/4</li> <li>Sec. 20, N1/4</li> </ul>

The Projects sites consists of approximately 3,800 combined acres of BLM-administered land within the Riverside East SEZ and within a DRECP DFA (see Figure 1).

The proposed Projects sites are surrounded primarily by BLM-managed lands with some private parcels also located in the vicinity. South of the I-10, the gen-tie line will cross the Chuckwalla Area of Critical Environmental Concern and the Chuckwalla Special Recreation Management Area. The gen-tie will remain almost entirely within a BLM-designated utility corridor, including south of the I-10. Joshua Tree National Park, the Desert Lily Preserve ACEC and the Palen-Ford ACEC are less than 5 miles away from the Projects.

The Victory Pass site is crossed by the existing Southern California Edison (SCE) 115 kV transmission line, and the Red Bluff Substation is located south west of the Projects. The Red Bluff Substation connects the SCE 500 kV system (Devers-Palo Verde line and Colorado River-Devers line) with the 230 kV lines of local solar generators. Other existing, under construction, and approved solar projects located nearby are Desert Sunlight Solar Farm, Desert Harvest Solar Project, Palen Solar Project, and Athos Solar Project, which also connect to the Red Bluff Substation. Designated critical habitat for desert tortoise is located south of the Project sites.

# C. Project Description

The Projects consist of utility-scale solar PV and energy storage projects. A 3.2-mile-long, shared 230 kV gen-tie line interconnects the shared switchyard with the SCE Red Bluff Substation. Arica would generate up to 265 MW and Victory Pass would generate 200 MW using PV technology and would include up to 200 MW each of integrated battery energy storage capacity.

The proposed Projects are comprised of the following components/facilities:

- Solar PV Panels and Mounting Systems: the solar facility would include a type of solar PV system to be selected at the time of procurement. The PV panels will be self-contained units designed to withstand exposure for 35 years. Module mounting systems that may be installed include either fixed-tilt or tracking technology, depending on the PV modules ultimately selected. Modules would be arranged next to each other in long strings called rows and supported by steel piles.
- Inverters, Transformers, and Electrical Collection System: The Projects would be designed and laid out primarily in increments which would include an inverter equipment area and transformers. Panels would be electrically connected into panel strings using wiring secured to the panel racking system. Underground cables would be installed to convey the direct current (DC) electricity from the panels to inverters to convert the DC to alternating current (AC) electricity.
- Project Substations and Gen-Tie Line: Two on-site substations (owned and operated by Arica Solar) will be constructed in the southwestern and southeastern portion of the Arica Solar site. One substation would be built at the Victory Pass site. These substations will connect with an adjacent switchyard on the Victory Pass Project site. Each of these substations is anticipated to be approximately 300 by 300 feet with poles up to 90 feet in height. The gen-tie line will run 2 miles west then turn south for one mile to reach the SCE Red Bluff Substation.
- Operations and Maintenance (O&M) Facility: The O&M facility, will be located near the substation and will be monitored by onsite O&M personnel or remotely. The O&M facility may consist of offices, a restroom, and a storage area. A septic system and leach field will be located at the O&M facility and will serve the Project's sanitary wastewater treatment needs.

Other features/components of the proposed facility include an optional battery for 200 MW of electricity, a meteorological data collection system, and telecommunications facilities.

Access to the sites would be via State Route 177 to the off-highway vehicle (OHV) route DC379 route. This route has been used and improved by the Athos and Palen Solar Projects. Multiple points of ingress/egress would be provided to the site and accessed by site personnel via locked gates. Security fencing would be installed along the perimeter of the proposed Project sites and motion-sensitive, directional security lights would be installed to provide adequate illumination around the substation areas, and at gates. Other security measures including infrared security cameras will be installed.

# D. Potential Environmental Effects

The EIR will evaluate potential environmental effects of the proposed Projects. The EIR will identify reasonable alternatives, compare the environmental impacts of the alternatives to those of the proposed Projects, and propose mitigation to avoid and/or reduce impacts deemed potentially significant.

Potential issues and impacts to the existing environment to be analyzed in the EIR include the following environmental topics.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology / Soils
- Greenhouse Gas Emissions

- Hazards & Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Mineral Resources
- Noise
- Population / Housing

Notice of Preparation – Notice of Public Scoping Meeting Arica and Victory Pass Solar Projects

■ Recreation

■ Wildfire

■ Transportation / Traffic

■ Energy

■ Tribal Cultural Resources

■ Mandatory Findings of Significance

■ Utilities / Service Systems

The EIR will also address the cumulative environmental consequences of the proposed Projects in combination with other closely related past, present, and reasonably foreseeable probable future projects in the area. This will serve to satisfy CEQA requirements regarding regional cumulative effect concerns. Pursuant to CEQA Guidelines Section 15063(a), CDFW has elected to proceed directly to the preparation of a Draft EIR rather than preparing an Initial Study.

In compliance with CEQA Guidelines Section 15126.6, the EIR will describe and evaluate the comparative merits of a reasonable range of alternatives to the proposed Projects. The EIR will also identity any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The EIR will provide an analysis of the No Project Alternative and will also identify the environmentally superior alternative. The alternatives to be analyzed in the EIR will be developed during the environmental review process and will consider input received during public scoping.

# E. Public Scoping Meeting

CDFW will hold one virtual public scoping meeting (to be hosted by BLM for NEPA scoping purposes) to inform interested parties about the proposed Projects, and how to provide written comments on the scope and connect of the EIR, and to provide agencies and the public with an opportunity to ask questions about the Projects. The meeting dates, locations, and times are as follows:

Date: October 21, 2020

Location:

https://zoom.us/j/99603454559

Meeting ID: 996 0345 4559

Phone: (669) 900-9128

Meeting ID: 996 0345 4559

Time:

5:00 p.m. URL available for viewing meeting materials and exhibits. URL will be provided in chat with language on slide/in slide footer directing attendees to the chat box.

Meeting time: 5:30-7:30 p.m.

For more information, please contact Magdalena Rodriguez via email at magdalena.rodriguez@wildlife.ca.gov or phone at 909.844.2520.

Everyone is encouraged to attend a meeting to express their concerns about the proposed Projects and to offer suggestions regarding the projects, including alternatives.

# F. Providing Comments

At this time, CDFW is soliciting comments on the NOP regarding your views on how the Projects may affect the environment. This information will be considered when preparing the Draft EIR's discussion of environmental topics, significant effects, mitigation measures, and alternatives. Because of time limits mandated by state law, comments should be provided no later than 5:00 p.m. on November 4, 2020 (30-day comment period).

You may submit comments in a variety of ways: (1) by U.S. mail, (2) by electronic mail (email), or (3) by attending a virtual public scoping meeting and submitting written comments at that time. Comments provided by email should include "Arica and Victory Pass Solar Projects NOP Scoping Comments" in the subject line, and the name and physical address of the commenter should be contained in the body of the email.

Please send all comments to:

#### **California Department of Fish and Wildlife**

Attention: Magdalena Rodriguez, Project Manager 3602 Inland Empire Boulevard, Suite C220, Ontario, California 91764

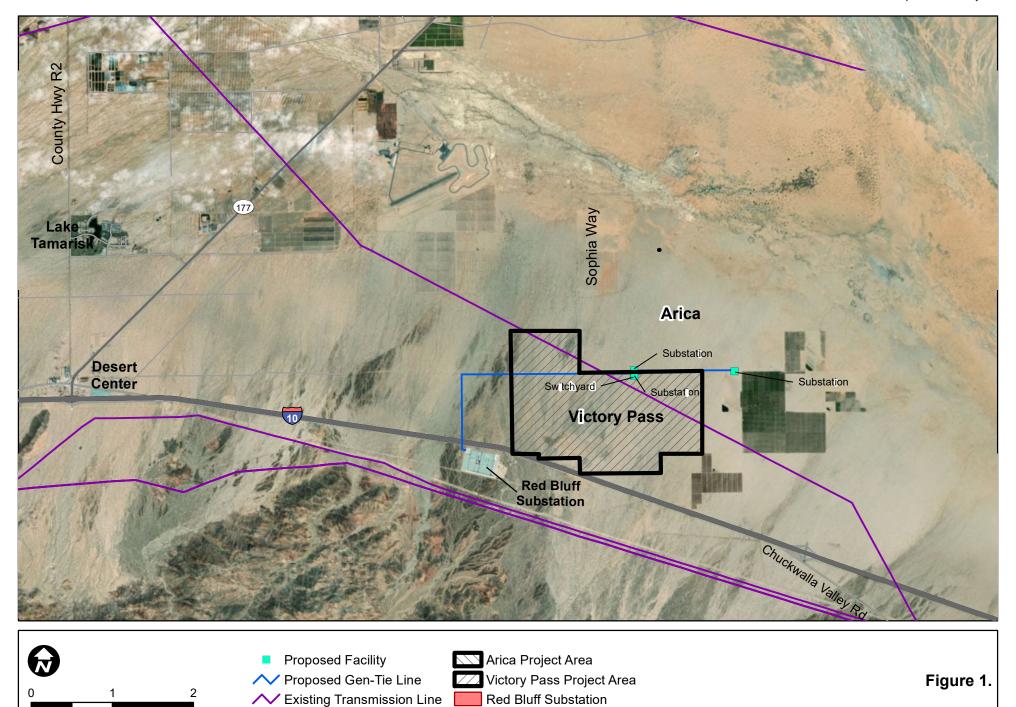
OR via email: magdalena.rodriguez@wildlife.ca.gov

(subject line: "RE Arica and Victory Pass Solar Projects NOP Scoping Comments")

#### G. Location of Documents Available for Public Review

The NOP and all public review documents for this project will be available for review online at <a href="https://www.wildlife.ca.gov/Notices">https://www.wildlife.ca.gov/Notices</a>

**Proposed Projects** 



Scale in Miles

# **Attachment 1**

# California Environmental Quality Act Environmental Checklist

Following are the questions included in Appendix G of the California Environmental Quality Act (CEQA) Guidelines Environmental Checklist Form (California Code of Regulations, Section 15000 et seq.). These are issues that may be evaluated in an Environmental Impact Report (EIR), if they are determined to be relevant to the project. This list is provided only to provide the reader with a general idea of the environmental topics that could be considered for the proposed project.

## I. Aesthetics (Visual Resources)

Would the project:

- Have a substantial adverse effect on a scenic vista?
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- 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?
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

#### II. Agriculture and Forestry Resources

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

Would the project:

- 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?
- Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?
- Result in the loss of forest land or conversion of forest land to non-forest use?
- 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?

## III. Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

- Conflict with or obstruct implementation of the applicable air quality plan?
- 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?
- Expose sensitive receptors to substantial pollutant concentrations?
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

### IV. Biological Resources

Would the project:

- 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 U.S. Fish and Wildlife Service?
- 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 Wildlife or U.S. Fish and Wildlife Service?
- 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?
- 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?
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

## V. Cultural and Paleontological Resources

Would the project:

- Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- Disturb any human remains, including those interred outside of dedicated cemeteries?

#### VI. Energy

Would the project:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

### VII. Geology and Soils

Would the project:

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

- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
- Strong seismic ground shaking?
- o Seismic-related ground failure, including liquefaction?
- o Landslides?
- Result in substantial soil erosion or the loss of topsoil?
- Be located on geologic units 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?
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?\*
- 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?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

#### VIII. Greenhouse Gas Emissions

Would the project:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

## IX. Hazards/Hazardous Materials, Wildland Fire Ecology

Would the project:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- 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?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- 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 or excessive noise for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

# X. Hydrology and Water Quality

Would the project:

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

- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- 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:
  - o result in substantial erosion or siltation on- or off-site;
  - substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
  - create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
  - o impede or redirect flood flows?
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

## XI. Land Use and Planning (Lands and Realty)

Would the project:

- Physically divide an established community?
- 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?

#### XII. Mineral Resources

Would the project:

- 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?
- 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?

#### XIII. Noise

Would the project result in:

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

# XIV. Population and Housing (Socioeconomics and Environmental Justice)

Would the project:

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

#### XV. Public Services

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

- Fire protection?
- Police protection?
- Schools?
- Parks?
- Other public facilities?

#### XVI. Recreation

- Would the project 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?
- 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?

## XVII. Transportation and Traffic (Transportation and Public Access)

Would the project:

- Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Result in inadequate emergency access?

#### **XVIII. Tribal Cultural Resources**

- Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
  - 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 §5020.1(k), or
  - 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 §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

## XIX. Utilities and Services Systems

Would the project:

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

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

#### XX. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- Substantially impair an adopted emergency response plan or emergency evacuation plan?
- 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?
- 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?
- 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?
- 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 a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- 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.)
- Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

## XXI. Mandatory Findings of Significance

- 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?
- 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.)
- Does the project have environmental effects which will cause substantial adverse effects on human beings, either directlyor indirectly?