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Review of Environmental Impact Report for the Rancho Viejo Solar Project in Santa Fe County, New Mexico

December 4, 2024



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1. INTRODUCTION

Glorieta Geoscience (GGI), A Division of GZA GeoEnvironmental, Inc. was retained by Santa Fe County (County) to conduct a third-party review (Review) of an Environmental Impact Report (EIR) submitted by Rancho Viejo Solar, LLC for technical accuracy and for compliance with the Santa Fe County Sustainable Land Development Code (SLDC) Chapter 6.3.: *Environmental Impact Report (EIR)*. The proposed development is a solar array facility that includes a battery energy storage system (BESS), a substation, a generation tie-in line, water tank, access roads, and an operations building on approximately 724 acres of land in Santa Fe County 3 miles south of Santa Fe City limits, and 4.2 miles east of La Cienega. The development is known as the Rancho Viejo Solar Project (Project, Development), and is proposed to provide New Mexico with additional renewable energy sources and help the state to achieve its goals for cutting fossil-based energy.

The EIR was submitted to the County in July 2024 and summarizes the technical characteristics of the Project, as well as expected impacts to the local environment, and extensive measures that will be taken to mitigate these impacts. This Review summarizes the EIR's compliance with each requirement stated in SLDC Chapter 6.3. noting any deficiencies in the assessment (Table 1).

In addition, this Review assesses the technical accuracy of the EIR. To the best of GGI's ability and specialized knowledge, we evaluated the accuracy of the EIR's assessment of impacts to environmental resources, and claims presented in the EIR that impacts would be significant or insignificant.

2. COMPLIANCE WITH SLDC CHAPTER 6.3.

Table 1 provides an in-depth review of each requirement of SLDC Ch 6.3. The table breaks down each requirement of SLDC Ch 6.3., where the requirement was addressed in the EIR, if the requirement was sufficiently addressed by the EIR, and additional explanations if necessary. Any deficiencies in full compliance with SLDC Chapter 6.3. are identified, along with a brief explanation as to how such deficiencies should be addressed to satisfy each requirement.

3. TECHNICAL ACCURACY ASSESSMENT

In addition to compliance with SLDC Chapter 6.3., GGI evaluated the EIR for technical accuracy, which included the following:

- Identifying deficiencies in the EIR's assessment of anticipated impacts to environmental resources
- Identifying areas where additional explanation is needed to understand potential impacts to environmental resources
- Verifying that the assessment of significant vs. insignificant impacts is accurate based on the information provided

Below are items within the EIR which GGI identified as deficient, in need of clarification, and/or inaccurate. These items include additional deficiencies that are not addressed in Table 1 and should be addressed to ensure technical accuracy.

3.1. Water Use: Section 2.1.2.4 of EIR

The EIR states the estimated water use throughout the 12-month construction period will be 100-150 acre-feet. The provided water sources are as follows: “Santa Fe County bulk water station commercial pipe water; Ranchland Utility Company Class A reclaimed water; Santa Fe County reclaimed water; or any other legally permitted commercial water sales” (SWCA 2024a) and are proposed to be delivered by water truck only. The development also proposes to have one 30,000-gallon water tank on site throughout the duration of the Project’s operational life.

It is GGI’s opinion that more information is necessary to evaluate the potential impacts of water hauling for the project. 100-150 acre-feet is equivalent to 32.6-48.9 million gallons (MG) of water. The report states that working construction hours will be from 7AM to 7PM, meaning that water hauling would occur each day during this 12-hour window. Although not specified in the EIR, if 4,000 gallon water trucks are utilized, and 10,400-15,600 gallons are required each hour, the construction will require between 2-4 water trucks each hour. This magnitude of water hauling requires a much more in-depth analysis of traffic and air quality impacts resulting from the water truck traffic.

During GGI’s Project site investigation on November 15, 2024, a fire hydrant was identified at the intersection of the access road and NM Highway 14. If this hydrant is expected to be the sole source of water for Project construction, additional analysis of the impacts of water hauling will not be necessary, and this method should be clearly described in the EIR. It is GGI’s opinion that utilizing the fire hydrant would have much less impact on the local environment than the magnitude of water hauling as currently proposed.

In addition, the EIR does not address a water budget for the entire decommissioning process. The EIR should address the expected amount of water needed for the decommissioning process, potential impacts of this water use on the environment, and mitigation measures to be taken during the decommissioning process.

3.2. Hazardous Wastes and Spill Prevention Protocol: EIR Section 3.6.3

The EIR describes spill prevention measures that will be taken by construction staff to mitigate construction impacts related to hazardous wastes. The EIR states that “the quantities and concentrations of these hazardous substances are not expected to reach regulated levels” (SWCA 2024a, Section 2.1.2.6). It is GGI’s opinion that an explanation should be added to this statement confirming that should hazardous wastes generated reach regulatory levels, Rancho Viejo Solar, LLC will acquire the necessary permits to comply with state and federal hazardous waste regulations.

3.3. Visual Resources: EIR Section 3.15

The visual analysis includes a ‘viewshed analysis’ which utilizes Geographic Information Systems (GIS) to model which surrounding areas are visible when standing at a specific point. To analyze visual impacts to surrounding communities, the viewshed analysis was conducted using several ‘viewshed analysis points’ within the Project area boundary, assuming that someone was standing at each point and looking out across the landscape from a height of 6 feet. Figure 3.14. shows all areas that are visible from a combination of all ‘viewshed analysis points’ assuming a height of 6 feet above the ground.

It is GGI's opinion that this viewshed analysis methodology does not accurately represent post-construction conditions. The viewshed analysis should account for actual expected heights of constructed works in the facility (as follows): fence posts are expected to be no taller than 8 feet in height, solar panels will reach a maximum height of 8 feet, and the generation tie-in line expected to be 50-70 feet in height. The viewshed analysis should modify the inputs to utilize the different structure heights for each respective point in the Project area. For example, the viewshed analysis should be conducted so that the viewshed analysis points along the generation tie-in corridor are assumed to be 50-70 feet in height, as opposed to 6 feet in height. This will more clearly represent where construction will be visible to surrounding communities and major arterial roadways.

It is worth noting that the simulation analysis conducted and represented in the *Rancho Viejo Solar Project Visual Impact Assessment Technical Report* (SWCA, 2024b) does provide a thorough analysis of visual impacts as seen from 9 'key observation points'. These points accurately represent visual impacts to the most-impacted neighboring communities, and from State Highway 14. It is GGI's opinion that the *Rancho Viejo Solar Project Visual Impact Assessment Technical Report* (SWCA, 2024b), should be referenced in or appended to the EIR to fulfill technical accuracy.

3.4. Biological Assessment

The EIR addresses the presence of adult burrowing owls in the prairie dog colony in the southwest corner of the project site. Construction activities will avoid this colony and burrowing owl habitat entirely. GGI observed additional prairie dog colonies that were not represented in the EIR during our site visit on November 15, 2024. However, it is GGI's opinion that the mitigation measures described in the EIR to reduce potential impacts to both prairie dogs and burrowing owl species are sufficient.

3.5. Evaluation of Significant and Insignificant Impacts on the Environment

The EIR evaluates the development's impacts on 17 different environmental resources: air, biological, cultural, historic, archaeological, religious, geological, paleontological, soil, geographic, health and safety, land use, minerals and mining, noise, socioeconomic, roads, water, and visual resources.

For each of these environmental resources, a series of mitigation measures were described which will be implemented to mitigate potential impacts on the environment during the construction, operation, and decommissioning of the development. The EIR describes impacts to all resources as "less than significant" if mitigation measures are implemented. It is GGI's opinion that if all mitigation measures are implemented correctly, and if the fire hydrant is used to supply water for construction, operation, and decommissioning of the development, impacts to each environmental resource will be less than significant.

GGI's detailed review of the EIR's compliance with SLDC 6.3. is presented in Table 1 below.

4. REFERENCES

SWCA Environmental Consultants (2024a). Environmental Impact Report for the Rancho Viejo Solar Project in Santa Fe County, New Mexico. Unpublished consultant report for Rancho Viejo Solar, LLC.

SWCA Environmental Consultants (2024b). Rancho Viejo Solar Project Visual Impact Assessment Technical Report. Unpublished consultant report for Rancho Viejo Solar, LLC.

DRAFT SUBJECT TO REVISION

Table 1. Assessment of Rancho Viejo Solar EIR Compliance with SLDC Ch 6.3

Code	Topic	EIR Location	Requirement Satisfied?	Explanation
Summary				
6.3.3. Summary.	Does the EIR contain a summary of the proposed actions and their consequences?	ES-1	Yes	The EIR satisfies this requirement.
	Is the language of the summary as clear and simple as reasonably practical?	ES-1	Yes	The EIR satisfies this requirement.
6.3.3.1.	Does the summary identify each significant adverse effect and impact with proposed mitigation measures and alternatives that would reduce or avoid that effect or impact?	ES-1	Yes	Impacts summary sufficiently describes potential and expected impacts to each resource category. All impacts are defined as “less than significant” throughout the summary and Ch 3 of the report.
6.3.3.2.	Does the summary identify areas of potential controversy identified in the pre- application TAC meeting?	ES-1	Yes	The Executive Summary states that the TAC letter with these issues in Appendix A. There were no items of potential controversy listed in the TAC letter.
6.3.3.3.	Does the summary identify issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects?	ES-1	Yes	The summary does identify issues to be resolved. It mentions the ‘no action’ alternative and discusses the actions that went into avoiding impacts to certain environmental resources. No significant effects are expected according to the EIR.
Description of the Development, Local Environment and Baseline Conditions				
6.3.4. Project Description.	Does the description of the project contain the following information in a manner that does not supply extensive detail beyond that needed for evaluation and review of the environmental impact? :	1-1	See below	See 6.3.4.1 Below
6.3.4.1.	Does the description of the project contain precise location and boundaries of the proposed development project, such location and boundaries shown on a detailed topographical map? Does the description of the project contain the location of the project on a regional map?	1-2, 1-3	No	The regional map appears to be on a topo base, but no elevations are shown/legible and the contour lines are too difficult to see. A detailed topographic map is needed.
6.3.4.2.	Does the description of the project contain a statement of the objectives sought by the proposed development project? The statement of objectives should include the underlying purpose of the project.	1-1	Yes	The EIR satisfies this requirement.
6.3.4.3.	A general description of the project’s technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities.	Ch 2 Ch 3	Yes	Technical characteristics are described thoroughly in Ch 2. Environmental characteristics are described thoroughly in Ch 3. Economic characteristics are not specifically described in the EIR, but SLDC Table 6-1 states that Fiscal Impact Assessment is on an ‘as needed’ basis for this project.

Code	Topic	EIR Location	Requirement Satisfied?	Explanation
6.3.5. Environmental Setting	Does the EIR include a description of the physical environmental conditions in the vicinity of the project as they exist at the time the environmental analysis is commenced, from the County, area, community, regional, and state perspectives?	Ch 3	Yes	The EIR satisfies this requirement.
Environmental Effects				
6.3.6. Significant Environmental Effects	Does the EIR demonstrate that the significant environmental effects and impacts of the proposed project were adequately investigated and discussed?	Ch 3	Yes	Significance is defined in the EIR here: "An impact would be considered significant if there were a regional or population-level impact and/or the affected resource would not fully recover, even after the impacting agent is gone and remedial or mitigating action is taken." The EIR states there will be no significant impacts to the environment based on the definition provided in the report.
	Does the EIR demonstrate the significant adverse effects or impacts of the project in the full environmental context?	Ch 3	Yes	The EIR states that no proposed impacts are expected to be significant. They use the full environmental context to show this.
	Has a geotechnical investigation and report been completed for the project?	Ch 3	Yes	Geotechnical report is included in Appendix D.
	Does the EIR identify and focus on the significant environmental effects of the proposed development project?	Ch 3	Yes	The EIR states no effects are expected to be significant, however other impacts considered 'less than significant' are identified and focused on in the report.
	Are direct and indirect significant effects and impacts of the project on the environment clearly identified and described, giving due consideration to both the short term and long-term effects and impacts?	Ch 3	Yes	Significance has been defined once in the EIR. Direct and indirect impacts are described throughout the report, along with short- and long-term duration status.
	Does the discussion include relevant specifics of the area, the resources involved, physical changes and alterations to soil conditions, water, environmentally sensitive lands and ecological systems, changes induced in the human use of the land, health and safety problems caused by physical changes, and other aspects of the resource base such as historical, cultural and archaeological resources, scenic vistas?	Ch 3	Yes	The EIR satisfies this requirement.
6.3.7. Significant Environmental Effects Which Cannot be avoided	Does the EIR describe significant adverse effects and impacts, including those which can be mitigated but not reduced to a level of insignificance?	Ch 3	Yes	None of the environmental impacts were listed as "significant". All impacts were discussed in a manner that describes their ability to be mitigated.

Code	Topic	EIR Location	Requirement Satisfied?	Explanation
	Where there are effects and impacts that cannot be alleviated without an alternative design, does the EIR describe their implications and the reasons why the development project is being proposed?	Ch 3	Yes	Discussions of locations that were avoided to prevent impacts to visual, archaeological, biological, and wetland resources were included in the EIR. The final design and mitigation measures are presented as not having significant impacts, so these are not discussed.
6.3.8. Significant Irreversible Environmental Changes	Does the EIR evaluate irretrievable commitments of resources?	Ch 3	Yes	The EIR states 'no irretrievable commitments of resources are anticipated' for all resources evaluated. In many places throughout the report, it is stated after discussing that mitigation measures will make impacts 'less than significant', which alone does not satisfy this requirement. When discussed in regards to the decommissioning process, the EIR satisfies the requirement- the decommissioned project will be restored to pre-development conditions, meaning that there will be no irretrievable commitments of resources after the decommissioning process is complete.
6.3.9. Other Adverse Effects.	Does the EIR discuss other characteristics of the project which may significantly affect the environment, either individually or cumulatively? The EIR shall discuss the characteristics of the project which may decrease the area's suitability for other uses, such as mixed use, industrial, residential, commercial, historical, cultural, archaeological, environmental, public and non-profit facilities, eco-tourism or scenic uses.	Ch 3	Yes	No elements of the development are expected to have significant impacts on the environment as long as mitigation measures are successfully implemented. The EIR does not discuss decreasing the area's suitability for other uses, because the decommissioning process will return the project site to its pre-development state if done correctly. The decommissioning bond will ensure that the decommissioning process is carried out properly.
6.3.10. Mitigation Measures.				
6.3.10.1.	Does the EIR identify mitigation measures for each significant environmental effect identified in the EIR, such as the following? <ul style="list-style-type: none"> › inefficient and unnecessary consumption of water and energy; › degradation of environmentally sensitive lands; sprawl; and noise, vibration, excessive lighting, odors or other impacts 	Ch 3	Partially	The water resource plan for the first year (construction) fails to address the inefficiencies and impacts of traffic on the surrounding communities and the environment. Water trucking to satisfy water volume needs would require 10,400-15,600 gallons (2-4 4,000-gal water trucks) each hour assuming 12-hour workdays, and 261 working days per year. This will contribute significantly to traffic, noise, and will increase GHG emissions associated with the project. If the fire hydrant will be utilized at the access road point on NM 14, this will reduce the potential impacts associated with hauling.

Code	Topic	EIR Location	Requirement Satisfied?	Explanation
6.3.10.2.	Where several measures are available to mitigate an effect or impact, does the EIR discuss each measure and the basis for selecting a particular measure identified?	Ch 3	Yes	All measures discussed are ones being proposed to mitigate impacts.
	Does the EIR identify the formulation of mitigation measures at the first discretionary approval? Under no circumstances shall the formulation of mitigation measures be deferred until the ministerial development process.	Ch 3	Yes	The EIR satisfies this requirement.
	Do recommended measures specify performance standards which would mitigate the significant effect of the project?	Ch 3	Yes	The EIR states the SWPPP will outline performance standards for two of the resources being mitigated.
	Do recommended measures specify which may be accomplished in more than one specified way?	Ch 3	Yes	All mitigation measures discussed are ones planned to be taken by the applicant during development and closure/post closure.
6.3.10.3.	Does the EIR discuss energy conservation measures, as well as other appropriate mitigation measures, when relevant?	Ch 3	Yes	The EIR satisfies this requirement.
6.3.10.4.	Does the EIR discuss the adverse effects and impacts of mitigation measure when the mitigation measure would cause one or more significant effects and impacts in addition to those that would be caused by the project as proposed?	Ch 3	Yes	No mitigation measures are presented in a way that would cause additional impact to the environment if properly implemented. If the mitigation measures are not expected to cause more significant impacts, they do not need to be discussed in this context.
6.3.10.5.	Are the mitigation measures described in the EIR fully enforceable through conditions or a voluntary development agreement?	Ch 3	Yes	The EIR satisfies this requirement.
6.3.10.6. Were all of the following considered and discussed in the draft EIR:	1. preservation in place is the preferred manner of mitigating impacts to historic, cultural or archaeological sites. Preservation in place maintains the relationship between artifacts and the historical, cultural, and archaeological context. Preservation shall also avoid conflict with religious or cultural values of Indian communities associated with the site;	Ch 3	Yes	This is satisfied by the description provided in the text and the four letters from the SHPO (state historic preservation officer). The cultural sites will be avoided completely for construction and left in place. No religious resources will be impacted.
	2. preservation in place may be accomplished by, but is not limited to, planning construction to avoid all historical, cultural or archaeological sites; and incorporation of sites within parks, green-space, or other open space;	Ch 3	Yes	The EIR satisfies this requirement.

Code	Topic	EIR Location	Requirement Satisfied?	Explanation
	3. when data recovery through excavation is the only feasible mitigation, a data recovery plan which makes provision for adequately recovering the scientifically consequential information from and about the historical, cultural, or archaeological resource, shall be prepared and adopted prior to any excavation being undertaken. If an artifact must be removed during project excavation or testing, storage of such artifact, under proper supervision, may be an appropriate mitigation; and	Ch 3	Yes	Excavation is not necessary as the two cultural sites will be avoided by at least 100 ft from the construction zone. All other artifacts were determined ineligible.
	4. data recovery shall not be required for an historical, cultural or archaeological resource if the appropriate entity determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource, provided that the determination is documented in the draft EIR.	Ch 3	Yes	The EIR satisfies this requirement.
6.3.11. Consideration and Discussion of Alternatives to the Proposed Project				
6.3.11.1. Alternatives to the Proposed Project.	Does the EIR describe a range of reasonable alternatives to the project, or to the location, which would feasibly attain some of the basic objectives of the project but would avoid or substantially lessen the significant and adverse impacts or effects of the project?	Ch 2	Yes	The alternatives discussed are ones that would have a greater impact on the environment than the project as proposed. The project as proposed is the least significant alternative.
	Does the EIR evaluate the comparative merits of the alternatives, even if those alternatives would impede the attainment of the project objectives or would be more costly?	Ch 2	No	Merits of the proposed alternatives are not discussed, only reasons why the alternatives were not chosen.
6.3.11.2. Evaluation of alternatives.	Does the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project?	Ch 2	No	The only information provided about alternatives is why they were not chosen.
6.3.11.3. Selection of a range of reasonable alternatives.	Does the EIR briefly describe the rationale for selecting the alternatives discussed?	Ch 2	No	No, the EIR does not explain why the alternatives were selected, but rather why the alternatives were not selected in place of the project as proposed.
	Does the EIR also identify any alternatives that were considered but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the determination?	Ch 2	Yes	The EIR satisfies this requirement.

Code	Topic	EIR Location	Requirement Satisfied?	Explanation
6.3.11.4. "No project" alternative	Was the specified alternative of "no project" evaluated along with its effects and impacts?	Ch 2 and Ch 3	Yes	There is a brief description in Ch 2 of the 'no project' alternative. In addition. There are sections labeled "No Action" under every single potentially impacted resource throughout Ch 3. Each of these together satisfies this requirement.
6.3.11.4	Does the description and analysis of a "no project" alternative allow a comparison of any adverse effects and impacts of the proposed project with effects and impacts if the project were not accomplished?	Ch 2, Ch 3	Yes	The EIR satisfies this requirement.
6.3.11.4	Is the "no project" alternative identical to the existing environmental setting analysis? If so, the "no project" alternative analysis is the baseline for determining whether the proposed project's environmental effects or impacts may be significant or adverse.	Ch 2	Yes	The 'no project' alternative is presented as identical to the existing environmental setting in Section 2.2.
6.3.11.4.1	1. Does the "no project" analysis discuss the existing conditions at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the development project were not approved, based on current plans and consistent with available infrastructure and community services? Is the environmentally preferred alternative the "no project" alternative, and does the draft EIR also identify an environmentally preferred alternative among the other alternatives?	Ch 2	Yes	The EIR frames the Proposed Project as the environmentally preferred alternative – the 'no action' focuses on the potential other types of future development being worse, and the other locations as more impactful to certain resources. SLDC states the following: "If the environmentally preferred alternative is the "no project" alternative, the draft EIR shall also identify an environmentally preferred alternative among the other alternatives." The EIR does discuss what would be reasonably likely to occur in the foreseeable future.
	Does the discussion of the "no project" alternative proceed as follows: The "no project" alternative is the circumstance under which the development project does not proceed. Does the discussion compare the environmental effects of the property remaining in its existing state against the environmental and adverse effects which would occur if the project were to be approved? If the consequence of disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other development project, was this discussed? Does the "no project" alternative mean "no build", i.e., where the existing environmental setting is maintained? If failure to proceed with the project will not result in preservation of existing environmental conditions, does the analysis identify the practical result of the project's non-approval?	Ch 2, Ch 3	Yes	Discussions of the No Project alternative are described in Ch 2 as well as throughout Ch 3 as they relate to each potentially affected resource. These descriptions compare the impacts of no development to the impacts of other potential developments. Other potential types of development projects are described in Section 2.2. The consequences of the development are described as follows: "the No Action Alternative could result in impacts to resources that would be similar and potentially greater in magnitude than the Proposed Action. Further, as Santa Fe County and the state of New Mexico both have goals related to renewable energy production, this Project would not contribute to those goals under the No Action Alternative."

Code	Topic	EIR Location	Requirement Satisfied?	Explanation
6.3.11.5. Feasibility	<p>Were some or all the following considered when addressing the feasibility of alternatives:</p> <ul style="list-style-type: none"> • site suitability, • economic use and value viability, • availability of infrastructure, • jurisdictional boundaries (projects with a significant effect or impact should consider the county wide context), and • whether the applicant can reasonably acquire, control or otherwise have access to an alternative site in the common ownership? 	Ch 2	Partially	<p>Alternative locations for the gen-tie and BESS were not discussed in the EIR, but alternative locations for the solar array itself were discussed and avoided due to biological resources, potential impacts to the Turquoise Trail National Scenic Byway, cultural resources, visual resources, and jurisdictional wetland boundaries.</p> <p>Additional explanations relating to the feasibility of alternatives is necessary for the project beyond just alternative locations for parts of the development as discussed above.</p>
6.3.11.6. Alternative locations.	<p>Does the analysis identify whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location? Only locations that would avoid or substantially lessen any of the significant effects of the project should be included in the EIR.</p> <p>Does the EIR consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (this is something that should NOT be done)?</p>	Ch 2	Yes	<p>The analysis does not identify any impacts of the development as ‘significant’ but discusses that alternative locations of the proposed project would have impacted certain cultural, visual, biological, and other resources more than the project as proposed. The SLDC states that only locations which would avoid or substantially lessen any of the significant effects of the project should be included in the EIR, however the EIR states no “significant” impacts will be associated with the development.</p> <p>The EIR does not consider alternatives that are not reasonably ascertainable and whose implementation is remote and speculative.</p>
6.3.12. Organizations and Persons Consulted				
6.3.12. Organizations and Persons Consulted.	Does the EIR identify all federal, state, or local agencies, tribal governments, or other organizations or entities, and any interested persons consulted in preparing the draft?	Ch 5	Yes	The EIR satisfies this requirement.
6.3.13. Discussion of Cumulative Impacts				
6.3.13. Discussion of Cumulative Impacts.	Does the EIR discuss cumulative effects of a project? Does the discussion of cumulative effects and impacts reflect the severity of the effects and impacts and their likelihood of occurrence?	Ch 3	Yes	Cumulative impacts are summarized for every resource (Ch 3) within the cumulative impact analysis area (CIAA – 5-mile radius around project). Likelihood of impact is described, and severity is described (the EIR describes all as insignificant).
6.3.13.1.	Does the discussion focus on the cumulative effects and impacts to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative effect and impact?	Ch 3	Yes	The EIR satisfies this requirement.

Code	Topic	EIR Location	Requirement Satisfied?	Explanation
	Does the EIR discuss the following elements necessary to an adequate discussion of significant cumulative impacts: 1. a list of past, present, and probable future development projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the County (when determining whether to include a related development project, factors to consider should include, but are not limited to, the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue or when an impact is specialized, such as a particular air pollutant or mode of traffic);	Ch 3	Yes	The EIR satisfies this requirement.
	2. Does the EIR define the geographic scope of the area affected by the cumulative effect and impact and provide a reasonable explanation for the geographic scope utilized?	Ch 3	Yes	The geographic scope is defined as the cumulative impact analysis area (CIAA) which includes a 5-mile buffer around the proposed project and a reasonable explanation is provided.
	3. Does the EIR include a summary of the expected environmental effects to be produced by those projects with the specific reference to additional information stating where that information is available?	Ch 2	Yes	The expected environmental effects associated with other projects in conjunction with this project are mentioned briefly in each 'cumulative impacts' statement associated with each resource throughout Ch 3. Section 3.2 describes past, present, and probable future development projects citing sources for this information.
	4. A reasonable analysis of the cumulative impacts of the relevant projects? Does the draft EIR examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects or impacts?	Ch 3	Yes	The EIR and Rancho Viejo Solar, LLC specify their proposed actions to mitigate the development's contribution to cumulative impacts on the environment.
6.3.13.2.	Did the cumulative impact analysis use approved land use documents, including the SGMP and any applicable area, district or community plans? Was a pertinent discussion of cumulative effects and impacts, contained in one or more previously certified final EIR development projects and incorporated by reference?	Ch 3	Partially	Ch 3.2 references the SGMP and the Community College District (CCD) Plan. The EIR does not reference one or more EIRs in the vicinity.