

5.7 Land Use

This section presents an evaluation of the Amended Project's consistency with local plans and regulations, and with existing land uses and land use designations of surrounding properties. The land use study area includes land within a one-mile radius of the Project plant site, well pads, and borrow site, and within a 0.5-mile-wide corridor centered along the associated injection pipeline routes. Because the transmission lines to connect the Project to the regional grid have already been licensed and no changes are proposed as part of the Amended Project, transmission line land use is not addressed.

5.7.1 Summary of Differences between the Amended Project and Original SSU6

There are no major changes to the affected land use environment from the original project; the site vicinity still includes primarily agricultural and geothermal land uses and the nearby Sonny Bono Salton Sea National Wildlife Refuge (Refuge). Minor changes in the configuration of the Amended Project from the original project (e.g., relocation of the injection well pads and pipelines and the addition of the borrow site) do not result in any changes to the types of existing land uses or land use plans and zoning affected.

Changes in the Amended Project result in only minor changes to land use impacts. Compared to the original project, the Amended Project has a slightly larger permanent footprint (213 acres versus 186 acres) and will convert a slightly larger amount of Prime Farmland or Farmland of Statewide Importance to nonagricultural uses (190 acres versus 167 acres [excluding 4.4 acres impacted by transmission lines]). However, the Amended Project will impact fewer acres of Prime Farmland (81 acres versus 97 acres [excluding 2 acres impacted by transmission lines]).

Approximately half of the borrow site lies on Prime Farmland. The borrow site will be backfilled with soil from the plant site, and thus no permanent impact to Prime Farmland would result from the soil borrow activities. As was the case for the original SSU6 project, the Amended Project is consistent with County zoning and land use planning requirements, and impacts would be less than significant.

5.7.2 LORS Compliance

Applicable LORS specifically pertaining to land use and as they relate to the Amended Project are summarized in Table 5.7-1 and described below.

Table 5.7-1 LORS Applicable to Land Use

LORS	Applicability	Where Discussed in AP
Federal:		
None applicable		--

Table 5.7-1 LORS Applicable to Land Use

LORS	Applicability	Where Discussed in AP
State:		
California Public Resources Code Section 25500 et seq.	Gives the California Energy Commission (CEC) the authority to certify proposed power facility sites, to supersede local land use regulations, and to be the lead agency for California Environmental Quality Act of 1970 (CEQA) documents.	Section 5.7.2
California Code of Regulations(CCR), Title 20, Sections 1701 et seq., 1752, and Appendix B	Establishes CEC procedures, documentation, and required environmental and other findings for siting electrical energy generating facilities.	Section 5.7.2
Cal. Pub. Res. Code Section 5523(a); 20 CCR Sections 1752, 1752.5, 2300-2309, and Chapter 2, Subchapter 5, Appendix B, Parts (1)(3) and (4)	Evaluate compatibility of the Project with relevant land use plans.	Section 5.7.4
California State Planning Law, Government Code Sections 65300 through 65302	Requires each city and county to adopt a comprehensive general plan for the physical development of the county or city. Imperial County has adopted a General Plan.	Section 5.7.4
Williamson Act, Government Code Sections 51200 through 51298	Creates an arrangement whereby private landowners contract with counties and cities to voluntarily restrict land to agricultural and open-space uses.	Section 5.7.3
Local:		
Imperial County General Plan Land Use Element	<p>Agricultural Standards: Establish that no land shall be removed from the Agriculture category except for annexation to a city, where needed for use by a public agency, or for geothermal purposes.</p> <p>Industrial Development Standards: Geothermal plants may be permitted with a Conditional Use Permit (CUP) subject to zoning and environmental review.</p> <p>Recreation/Open Space Standards: Permissible uses include areas designated for the managed production of natural resources.</p>	Sections 5.7.4
Imperial County General Plan, Geothermal/Alternative Energy and Transmission Element	Requires application and review of CUPs and related land use requests to assure that geothermal development, including location, size, design, and operating characteristics will be compatible with and not materially detrimental to adjacent uses, residents, farm operations, or natural resources.	Section 5.7.4

Table 5.7-1 LORS Applicable to Land Use

LORS	Applicability	Where Discussed in AP
Imperial County Land Use Ordinance, Title 9, Division 1, Chapter 6, Section 90106.00; Title 9, Division 2, Chapter 3, Section 90203.01; Title 9, Division 5, Chapter 9, Section 90509.06; Title 9, Division 5, Chapter 16, Section 90509.10	Establishes that construction below the minus 220-foot contour is prohibited without a permit. Establishes yard setback and landscaping requirements for the A-3 zone.	Section 5.7.4
Title 9, Division 16, Chapter 4, Section 91604.00	Requires Development Permit before construction or development begins within any area of special flood hazards (including lands around the Salton Sea and lying at or below the minus 220-foot elevation contour).	Section 5.7.4
Imperial County Land Use Ordinance, Title 9, Division 5, Chapter 16, Section 90516.07	Buildings and structures in the M-2 zone shall not exceed six stories or 80 feet in height. Unless specifically waived by the Approving Authority, where legally permissible, the following minimum distances shall be observed in siting a well: Outer Boundary of Parcel: 100 feet; Permanent Public Waterway: 50 feet; Public Roads: 100 feet; Residence: 300 feet; School: 1,320 feet; Hospital: 1,320 feet; Any Other Permanent Structure/ Development: 300 feet.	Section 5.7.4
Title 9, Division 17, Chapter 11, Section 91702.00, 91702.01 and 91702.02	All geothermal drilling sites, including test facilities and ponds, shall be as small as possible and in no case larger than five acres on farmable land. Exceptions may be considered on a well-by-well basis. Addresses geothermal drilling standards including topics such as signage, fencing, parking, lighting, etc. These standards include requirements for grading, permanent foundations, buildings, structures, and other construction work.	Section 5.7.4

5.7.2.1 Federal LORS

There are no Federal land use LORS that apply to the Amended Project.

5.7.2.2 State LORS

California Public Resources Code Section 25523(a); 20 CCR Sections 1752, 1752.5, 2300 - 2309, and Chapter 2, Subchapter 5, Appendix B, Part (I) (3) and (4)

These regulations require that the Applicant evaluate the compatibility of the proposed project with relevant land use plans. The administering agency for the above is the CEC. This requirement is met in accordance with Section 5.7.2.3, below.

California State Planning Law, Government Code Sections 65300 through 65302

These regulations require each county and city to prepare and adopt a comprehensive general plan for the physical development of the county or city. The general plan shall contain seven elements including a land use element. The administering agency for these state requirements, as they pertain to the Project, is Imperial County. The County Land Use Ordinance specifies that geothermal projects shall comply with requirements and regulations of Imperial Irrigation District (IID) (per Section 91702.00, et seq.).

The Williamson Act, Government Code Sections 51200 through 51298

The Williamson Act was passed by the California Legislature in 1965 to preserve agricultural and open space lands by discouraging premature and unnecessary conversion to urban uses. The Act creates an arrangement whereby private landowners contract with counties and cities to voluntarily restrict land to agricultural and open-space uses. Portions of Injection Well Pad OB-1 and OB-2 and their associated pipelines are located on parcels currently under Williamson Act contracts.

Section 51238 of the Act states that the board or council may find the construction of utilities as compatible uses. "Facilities as compatible uses. (a) (1) Notwithstanding any determination of compatible uses by the county or city pursuant to this article, unless the board or council after notice and hearing makes a finding to the contrary, the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve."

5.7.2.3 Local LORS

Imperial County General Plan

The Imperial County General Plan contains an evaluation of existing conditions and provides long-term goals and policies to guide growth and development. The General Plan is implemented by the County through its Land Use Ordinance, Subdivision Ordinance, specific plans, growth management policies, planned development districts, code enforcement, environmental review procedures, and building and housing codes.

Land Use Element Compatibility

The Land Use Element (Imperial County, 2008) designates the general distribution, location, and extent (including standards for population density and building intensity) of the uses of land for housing, business, industry, agriculture, open space, public facilities, and other categories of public and private uses. The

primary purpose of the Land Use Element is to identify the goals, policies, and standards of the General Plan that will guide the physical growth of Imperial County, including the public facilities necessary to support such growth.

The following General Plan land use standards, goals, and objectives apply to the plant site.

Agricultural Standard. This standard prohibits land to be removed from the Agriculture category except for annexation to a city, where needed for use by a public agency, or for geothermal purposes. The plant facility and portions of the ancillary facilities are within lands designated as Agriculture (see Figure 5.7-1). Because the proposed Project's primary objective is to generate geothermal power, the requirements of this standard would be met.

Industrial Development Standard. This standard states that geothermal plants may be permitted with a CUP subject to zoning and environmental review. The CEC Conditions of Certification (COC) will incorporate County land use requirements. However, the County also intends to issue a CUP or amend the existing CUP that was issued by the County for the original SSU6 project (and amended in 2005).

Goals and Objectives

- Commercial Agriculture. "Goal 1: Preserve commercial agriculture as a prime economic force."
- Economic Growth. "Goal 2: Diversify employment and economic opportunities in the County while preserving agricultural activity." This goal and associated objectives are discussed in Section 5.11, Socioeconomics.
- Regional Vision. "Goal 3: Achieve balanced economic and residential growth while preserving the unique natural, scenic, and agricultural resources of Imperial County."
 - "Objective 3.4: Protect/improve the aesthetics of Imperial County and its communities." Refer to Section 5.15, Visual Resources, for information regarding the potential Project-related visual impacts.
- Public Facilities. "Goal 8: Coordinate local land use planning activities among all local jurisdictions and state and Federal agencies."
 - "Objective 8.8: Ensure that the siting of future facilities for the transmission of electricity, gas, and telecommunications is compatible with the environment and County regulation." The Amended Project would meet this objective through the CEC Amendment Petition review process, by complying with CEC Conditions that incorporate County land use requirements, and by County issuance of a CUP/CUP amendment.
- Protection of Environmental Resources. "Goal 9: Identify and preserve significant natural, cultural, and community character resources and the County's air and water quality."
 - "Objective 9.1: Preserve as open space those lands containing watersheds, aquifer recharge areas, floodplains, important natural resources, sensitive vegetation, wildlife habitats, historic and prehistoric sites, or lands that are subject to seismic hazards and establish compatible minimum lot sizes." Land Use Ordinance Section 90106.00, et seq., requires a written permit for construction below the minus 220 foot contour along any portion of the Salton Sea. The proposed power plant site would be at 228 feet below sea level with an 8-foot berm surrounding the plant site, and has been designed to meet the encroachment permit requirements. In addition, Land Use Ordinance Section 91604.00, et seq., requires a Development Permit for Project construction within any area

of special flood hazard. The Amended Project would meet the Development Permit requirements by compliance with CEC conditions that incorporate County requirements, and by County permitting actions themselves. Amended Project impacts and mitigation measures for biological and cultural resources, community character, air and water quality, seismic hazards, etc. are addressed in the various environmental topical discussions in the Amendment Petition (Section 5.2, Air Quality; Section 5.3, Biological Resources; etc.).

“Objective 9.2: Reduce risk and damage from flood hazards by appropriate regulations.” Mitigation measure Land Use-1 addresses the potential flood hazards. These potential hazards are discussed further in Section 5.17, Water Resources.

“Objective 9.6: Incorporate the strategies of the Imperial County Air Quality Attainment Plan in land use planning decisions.” Refer to Section 5.2, Air Quality, for a discussion of potential Project impacts to air quality.

“Objective 9.7: Implement a review procedure for land use planning and discretionary project review that includes the Imperial County Air Pollution Control District (ICAPCD).” Review of the Amended Project by the ICAPCD will occur through the Determination of Compliance process, which is the equivalent of an air quality permit under the CEC licensing/ Amendment Petition process (see Section 5.2, Air Quality).

Geothermal Element Compatibility

The purpose of the Geothermal/Alternative Energy and Transmission Element is to provide the latest information about local geothermal resources, current development technology, and County, State, and Federal policy regarding the exploration, development, and transmission of geothermal energy. This element was last amended in 2006. The Geothermal/Alternative Energy and Transmission Element is an optional element of the Imperial County General Plan as permitted by Section 65303 of the California Government Code. The element provides a framework for review and approval of geothermal projects in the County.

The General Plan Geothermal Element provides standards for the development of geothermal facilities, which are described below. While local land use permits often are not required for power plant projects because the CEC incorporates local requirements in the CEC COC, Imperial County did issue a CUP for the original SSU6 project. The County amended the CUP in 2005 when the SSU6 project was modified (and amended by the CEC) from a 185 MW to a 215 MW project. It is expected that the CEC conditions for the Amended Project will also incorporate County requirements and concerns, and that the County will also issue a new CUP or modify the current CUP for the Amended Project.

The relevant Geothermal Element programs, policies, and standards are as follows.

Geothermal Implementation Standards (Land Use). “Land use standards include requirements for application and review of CUPs and related land use requests to assure that geothermal development is conducted in a manner which assures that the location, size, design, and operating characteristics will be compatible with and not materially detrimental to adjacent uses, residents, farm operations, or natural resources.

“General and specific standards include preservation of agricultural operations by minimizing surface land usage for geothermal exploration and facilities, and by avoiding disruption to existing irrigation and drainage

patterns; maintaining adequate setbacks from property lines, streets, and in particular, noise sensitive land uses such as residences, schools, and hospitals; avoiding nuisance and unsightly conditions with appropriate limits on hours of operations, light control, and adequate fencing and landscaping; and establishing proper procedures for system shutdown and site abandonment.”

Imperial County Land Use Ordinance

The current zoning for areas that would be affected by the Amended Project and its associated facilities has been identified in this section. The Project is in substantial conformity with the Land Use Ordinance as the Project site lies within the County's Geothermal Overlay Zone (GOZ). Applicable regulations from the Land Use Ordinance are included in Table 5.7-1.

Title 9, Division 1, Chapter 6, Section 90106.00. Construction Below the Minus 220 Foot Contour Prohibited Without a Permit. The proposed Project would be located at 228 feet below sea level. However, the entire site would be protected from flooding by a berm surrounding the site with a top height of 225 feet below sea level to provide flood protection in accordance with County flood control requirements. The berm would be 10 feet wide at the top, with a 42-foot base. Therefore, the proposed Project would comply with this requirement as indicated in mitigation measure Land -1.

Title 9, Division 2, Chapter 3, Section 90203.01 – Conditional Use Permit Defined. This section also states that a Major CUP (CUP-3) is a permit for a project for which the total developed value is greater than \$1,000,000. The proposed Project would be located within a GOZ that would require a CUP for geothermal development.

Title 9, Division 16, Chapter 4, Section 91604.00 – Establishment of Development Permit. A Development Permit shall be obtained before construction or development begins within any area of special flood hazards (including lands around the Salton Sea and lying at or below the minus 220-foot elevation contour) or areas of mudslide (i.e., mudflow) established in Section 91603.01. Application for a Development Permit shall be made on forms furnished by the Floodplain Administrator and may include, but not be limited to, plans in duplicate drawn to scale showing the nature, location, dimensions, and elevations of the area in question; existing or proposed structures, fill, storage of materials, drainage facilities; and the location of the foregoing.

Section 91604.00 identifies the requirements for submittal of an application for a Development Permit for construction or development within special flood hazard areas. Section 91605.06 establishes that areas of special flood hazard are areas designated as floodways. This section requires that a registered engineer must demonstrate that placed fill will not increase flood levels during an occurrence of base flood levels. The administering agency for the above authority is the Imperial County Planning and Development Services Department, Floodplain Administrator.

Although the plant site is set back from the southern perimeter of the Salton Sea, this application assumes that the County may determine that this standard would apply to the plant site. Proposed drainage facilities for storm water runoff and flood overland flow would be submitted for review and approval during the CEC review process.

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Title 9, Division 5, Chapter 9, Sections 90509.06, 90509.10, 90516.07, 91701.01, 91702.01, and 91702.02.

A-3 Zone – Heavy Agriculture Setback. The plant site, zoned A-3-G, is the only component of the Amended Project that includes buildings that must meet set back requirements per Imperial County Land Use Ordinance Section 90509.06. Setbacks are established in this section of the Ordinance for the front, side, and rear yards of all buildings. The Project would be developed consistent with the County's GOZ, which provides development standards for such facilities (Land Use Ordinance Section 91701.00, et seq.). The plant site has been designed to incorporate these setback requirements.

A-3 Zone – Heavy Agriculture Landscaping. Landscape requirements for the A-3 zone are contained in Section 90509.10, which specifies that landscape requirements shall be the same as for the M-1 zone (excluding crop and tree farming). The M-1 zone requirement further cites Section 90302.03, which contains the following standards for industrial/manufacturing uses:

- A. Minimum of ten percent of the developed lot area shall be landscaped.
- B. Along any interior property line abutting a residentially zoned lot, parcel or area, trees shall be planted at least every 25 feet in either individual planters or a maintained median planting area.
- C. Along any interior property line abutting commercially zoned lots, parcels or areas, trees shall be planted at least every 50 feet.
- D. Within each planter or landscaped area, an irrigation system and live landscaping shall be provided and maintained.
- E. Planters or landscaped areas shall be provided within off-street parking areas at a minimum of five percent of the total parking area.
- F. Ornamental or landscaping rock and gravel areas, artificial turf, or other areas covered with other artificial materials shall be considered hard surface area but may be credited toward the minimum ten percent landscaping requirement.

The Applicant would consult with the County and provide the necessary information to enable the County to review the Project during the CEC review process and prior to construction. Furthermore, implementation of mitigation measure Land Use-1 would enable the County to review Project design criteria prior to construction.

M-2 Zone – Medium Industrial Height Limit. Buildings and structures in the M-2 zone shall not exceed six stories or 80 feet high, as required in Land Use Ordinance Section 90516.07. The Project would be developed consistent with the County's GOZ, which provides development standards for such facilities in Land Use Ordinance Sections 91701.01, 91702.01, and 91702.02.

Title 9, Division 17, Chapter 11, Section 91702.00. Geothermal Specific Standards. The following standards found in Land Use Ordinance Section 91702.00 would apply to the Project:

- A. All geothermal drilling and production sites shall try to protect the fragile ecological balance of the wetlands and surrounding desert by assuring that natural resources will be considered in their location. Consideration shall be given to intermittent noise levels that may affect wildlife.

- B. Every site shall be designed to retain the maximum amount of usable agricultural land and the site shall not interfere with the irrigation and drainage pattern, and shall comply with requirements and regulations of IID. Drill sites shall be constructed adjacent to existing roads in so far as possible. Well density shall be justified and in accordance with good reservoir engineering practices.
- C. Unless specifically waived by the Approving Authority, where legally permissible, the following minimum distances shall be observed in siting a well:
- | | |
|---|------------|
| Outer Boundary of Parcel | 100 feet |
| Permanent Public Waterway | 50 feet |
| Public Roads | 100 feet |
| Residence | 300 feet |
| School | 1,320 feet |
| Hospital | 1,320 feet |
| Any Other Permanent Structure/Development | 300 feet |
- D. Developer shall mitigate any problems/negative effects whenever they arise.
- E. Production facilities shall, where possible, be located in centralized areas to serve the maximum number of wells. These shall include, but are not limited to, power plants, extraction plants, and separators.
- F. All electric transmission lines shall be constructed within existing rights-of-way (ROW) whenever possible. When planning transmission lines adjacent to public roads, discussions with the responsible road agency shall be held to minimize impacts on existing and future road needs. Power lines outside the project site are under the jurisdiction of the IID.
- G. All permanent sumps, brine ponds, waste holding ponds, and any other pond, shall be designed and constructed to meet sound engineering standards and the regulations and requirements of the Regional Water Quality Control Board. Such sumps and ponds shall be designed and constructed under the supervision of a civil engineer registered in California.

The Project has been designed to comply with the standards of Section 91702.00. The proposed production wells have been spread out and well courses defined so as to mitigate the risk of interference with other production wells. The proposed production and injection well sites would not be larger than five acres and would comply with the applicable minimum distances in siting a well, and the proposed production facility would be located in a centralized location to most effectively serve the planned number of wells. Additional information is contained in Section 2.0, Project Description.

Title 9, Division 17, Chapter 11, Section 91702.01 Geothermal Drilling Standards. Land Use Ordinance Section 91702.01 describes design standards for geothermal drilling sites. These standards include signage, lighting, parking, etc. The Project has been designed in conformance with these requirements.

Title 9, Division 17, Chapter 11, Section 91702.02 Geothermal Production Standards. Land Use Ordinance Section 91702.02 describes production standards applicable to geothermal projects. These standards include requirements for grading, permanent foundations, buildings, structures, and other construction work. The Project has been designed in conformance with these requirements.

5.7.2.4 Involved Agencies

Table 5.7-2 lists local agency contacts for the Amended Project.

Table 5.7-2 Agencies and Contacts

Agency Contact	Phone/E-mail	Permit/issue
Jurg Heuberger, Director Imperial County Planning & Development Services Dept. 801 Main Street El Centro, CA 92243	(760) 482-4310 jurgheuberger@imperialcounty.net	Grading Permit, Building Permit, and Certificate of Occupancy; CUP; Development Permit for special flood hazard area
Gary Wyatt, Chairman Imperial County Bd. of Supervisors 940 Main St. El Centro, CA 92243	(760) 482-4613 garywyatt@imperialcounty.net	Approval of use of Williamson Act lands for non-agricultural purposes.

5.7.2.5 Permits Required and Permit Schedule

As previously mentioned, the CEC is the lead agency and permitting authority for the proposed Project; therefore, directly applying for applicable discretionary State and local permits typically is not required. However, because the CEC takes into consideration the State and local agency regulations and requirements, the CEC requires the Applicant to demonstrate that the proposed Project complies with them. Moreover, Imperial County intends to apply its CUP application and review process to the Amended Project. The County has not yet decided whether to amend the existing CUP for the SSU6 project or to issue a new CUP (Cabanilla, 2008). Required permits are summarized in Table 5.7-3.

Table 5.7-3 Required Permits

Permit	Agency	Schedule
Grading and Building Permits, CUP, Development Permit for special flood hazard area)	Imperial County Planning Department	Prior to construction

5.7.3 Affected Environment

The Project site, along with major jurisdictional boundaries, is shown in Figure 5.7-1. Governmental jurisdictions within the potentially affected land use environment include unincorporated Imperial County. The Refuge is within and adjacent to the southern portion of the Salton Sea, north of the proposed Project's plant site. The Refuge is located on land it owns or manages through surface leases from the IID.

5.7.3.1 Regional Setting

The Amended Project site is in Imperial County, approximately 1,000 feet southeast of the Salton Sea and east of Obsidian Butte. The town of Calipatria is approximately six miles southeast of the Project site, Niland is approximately 7.5 miles to the northeast, and Westmorland is approximately 15 miles to the south. The United States/Mexico border is approximately 35 miles to the south.

Imperial County is the governmental entity with jurisdiction within the Project study area. Imperial County covers an area of 4,597 square miles (2,942,080 acres). Approximately 20 percent of the land is irrigated for agricultural purposes. Most agricultural lands are within the central area known as the Imperial Valley, with additional acreage in Bard Valley and Pal Verde Valley in the southeast and northeast corners of the County, respectively. The seat of Imperial County government is in the City of El Centro. Other cities within the County are Brawley, Calexico, Imperial, Holtville, Calipatria, and Westmorland.

The United States Geological Survey (USGS) has designated nine Known Geothermal Resource Areas (KGRAs) within Imperial County. Table 5.7-4 lists the nine KGRAs identified throughout the County, which total 347,941 acres or nearly 12 percent of the total county land area (Imperial County, 2006). As shown in Figure 5.7-2, the Project site is within the Salton Sea KGRA, which is the largest KGRA in the County and is designated for exploration and development of geothermal resources by the County's Geothermal/Alternative Energy and Transmission Element (Geothermal Element) (Imperial County, 1996).

Table 5.7-4 Known Geothermal Resource Areas and Geothermal Overlay Zones in Imperial County

KGRA	Acreage of KGRA	Acreage of GOZ ¹
Salton Sea	102,887	111,444
North Brawley	28,885	14,000
South Brawley	12,640	15,000
East Brawley	70,211	---
Heber	58,568	7,000
East Mesa	38,365	---
Westmorland	3,200	---
Glamis	25,505	---
Dunes	7,680	---
Total	347,941	147,444
¹ . GOZ: Geothermal Overlay Zone is the area where geothermal production is conditionally permitted in Imperial County.		

The Geothermal Element was adopted by the Imperial County Board of Supervisors in 1977, with the most recent update adopted in October 2006. Consistent with State law, the Geothermal Element has been incorporated into the County's General Plan. The purpose of the Geothermal Element is to "provide a comprehensive document that contains the latest knowledge about the resource, workable development technology legal requirements, policy (county, State, and Federal), and implementation measures" (Imperial County, 1996).

The County regulates the use of land for geothermal purposes through zoning and local land use permits. To facilitate and manage geothermal resources, County zoning codes provide an overlay zone designation of "G," the Geothermal Overlay Zone, to indicate that geothermal production is conditionally permitted through a CUP within that general zone. Approximately 147,444 acres, or five percent, of the total Imperial County acreage is within a GOZ (Imperial County, 2006).

5.7.3.2 Project Site

The existing land use and zoning information for the Project study area (within a one-mile radius of the plant site, well pads, and borrow area, and within a 0.5-mile-wide corridor centered along the pipelines, per CEC guidelines) is shown in Figure 5.7-1 and Figure 5.7-2.

The entire Project area is in unincorporated Imperial County. The Amended Project plant site is located within the block bounded by McKendry Road on the north, Boyle Road on the east, Severe Road on the west, and Grubbel Road on the south. The Project site is approximately seven miles west of State Highway 111 and 10 miles north of SR 86. The proposed Project site is in the southwest quarter of Section 33, Township 11 South, Range 13 East on the Obsidian Butte USGS Quadrangle Map. The plant would be constructed on a 160-acre parcel (Assessor's Parcel Number 020-110-08).

Existing land uses within one mile of the Project site include agriculture, open space, industrial, and residential (Figure 5.7-1). Table 5.7-5 lists the general plan designation and zoning information for the Project components.

Table 5.7-5 Lane Use and Zoning Designations within the Project Study Area

Project Component	Jurisdiction	General Plan Land Use Designation	Zoning Designation
Plant site, including all three production well pads and associated pipelines	County of Imperial	Agriculture	Heavy Agriculture, Geothermal Overlay (A-3-G)
Injection Well Pads	County of Imperial	Agriculture	Heavy Agriculture, Geothermal Overlay (A-3-G) Medium Industrial Area, Geothermal Overlay (M-2-G)
Injection Pipelines	County of Imperial	Agriculture Industrial	Heavy Agriculture, Geothermal Overlay (A-3-G) Medium Industrial, Geothermal Overlay (M-2-G)
Borrow Site	County of Imperial	Agriculture Industrial	Heavy Agriculture, Geothermal Overlay (A-3-G)

The plant site is designated Agriculture, and is also designated for geothermal exploration and development in the Geothermal Element of the General Plan. The plant site is currently in agriculture production. The General Plan Agriculture category is intended to preserve lands for agricultural production and related industries. The County Land Use Element states that where this designation is applied, agriculture shall be promoted as the principal and dominant use to which all other uses shall be subordinate. The plant site is zoned as Heavy Agriculture (A-3-G) and is within the GOZ. The A-3 zone identifies areas, typically 40 acres or larger, that are suitable for agricultural use. Sections 91701.00, et seq., of the Imperial County Land Use Ordinance contain the GOZ, which permits by right minor geothermal wells and, by CUP, allows major and intermediate geothermal projects, geothermal test facilities, and major geothermal exploratory wells (Imperial County, 1998). Despite the General Plan's emphasis on agricultural production for lands designated as Agriculture, the General Plan specifically allows geothermal projects, energy generation

facilities, and temporary construction yard and offices in the A-3-G zone with a CUP (see Land Use Ordinance Section 90509.02). For geothermal projects, CUPs are also referred to as “geothermal permits” (Imperial County, 1996).

Material and equipment staging areas would be required during the construction period. An area of approximately 9.0 acres on the eastern portion of the plant site is devoted to equipment and materials laydown, storage, construction equipment parking, small fabrication areas, and office trailers. An approximately 1.5-acre area for construction employee vehicle parking is planned in that area. This parking area may be fenced during the construction period.

The proposed injection well pads (INJ OB-1, INJ OB-2, and INJ OB-3) will be located on land designated as Agriculture. Injection well pads OB-1 and OB-3 are located south and east of the plant site, respectively, and are zoned as Heavy Agriculture/GOZ (A-3-G). These lands are currently in agriculture production. INJ OB-2, located approximately 0.5 mile to the southeast of the plant site is located in a 160-acre parcel zoned Medium Industrial (M-2-G). This parcel contains an existing automotive parts manufacturing facility in the southwest portion of the parcel. The M-2 zone designates areas for wholesale commercial, storage, trucking, manufacturing and fabrication, research and development, and similar medium-intensity processing facilities. The borrow site is designated as Agriculture and Industrial and zoned A-3-G. The County Land Use Element indicates that the industrial designation addresses light, medium, and heavy industrial uses and the heavy industry category specifically include electrical generating facilities.

Each proposed production well pad (comprised of three production wells) will be located within the plant site and will have a dedicated aboveground 2507 alloy pipeline to the resource production facility associated with its corresponding power plant. Construction staging and laydown areas for production and injection well pipelines will be within the proposed pipeline ROW and at the proposed plant site staging area. Existing land uses within 0.5 mile of the production and injection well pipelines are agricultural, open space/recreational, and industrial. The open space area is the only sensitive receptor within 0.5 mile of the pipelines.

The study area contains lands designated as agricultural, geothermal, and open space/recreational. Land uses nearby include the following:

- North: The Refuge is located immediately north of the Project site. Additionally, a residence and office associated with the Refuge are approximately 4,000 feet northeast of the Project site. The nearest portion of the Salton Sea shoreline is approximately 300 feet north of the northwest corner of the Project site. In addition, the Red Hill Marina County Park is approximately two miles northeast of the Project site.
- East: Agricultural land and an existing geothermal facility.
- South: Agricultural land.
- West: Vacant land, which includes Obsidian Butte.

County General Plan land use designations are Agriculture to the northeast, east, south, and west of the Project site. These Agriculture-designated areas are zoned Heavy Agriculture (A-3), which includes the GOZ (i.e., A-3-G). Recreation/Open Space is designated to the north and west of the plant site and along the shoreline of the Salton Sea to the southwest (see Figure 5.7-1). Recreation/Open Space is applied to lands intended to be used for preservation of natural resources; areas for the recharge of groundwater basins; rivers and lakes that are important as wildlife habitat and for the enjoyment of recreational sport

fishing; areas for the conservation and managed production of mineral resources; and areas for the preservation of outstanding scenic, historic, and cultural values. These areas are zoned Open Space/Recreational (S-1), which also includes the GOZ (S-1-G). The S-1 zone is applied to areas recognized for unique open space and recreational character.

5.7.3.3 Agriculture and Prime Farmland

The majority of the Project is located on or near irrigated agricultural land. There are two major agricultural distribution canals near the plant site that supply water to subsurface irrigation systems. Vale Lateral 5 is adjacent to the west, and Vale Lateral 4A is adjacent to the east of the plant site. Vegetable crops that have been or could be grown at the plant site include carrots, wheat, broccoli, lettuce, asparagus, cantaloupes and other melons, cauliflower, onions, cabbage, sweet corn, and tomatoes. Field crops that have, or could be grown at the plant site include Bermuda grass, sugar beets, alfalfa, Sudan grass, and field corn.

Based on data from the California Department of Conservation (CDOC) (CDOC, 2006), portions of the Amended Project plant site, adjacent construction parking and laydown areas, and injection well pads and associated pipelines are located on areas designated as Prime Farmland or Farmland of Statewide Importance. Acreages for farmland which will be permanently impacted by the Project are provided in Section 5.7.4.3, Impacts to Agricultural Resources.

Portions of Injection Well Pad OB-1 and OB-2 and their associated pipelines are located on land currently under Williamson Act contract, which restricts the land to agricultural, open-space, and other specified uses. Two parcels are under contract: 020110029000 (Preserve 2 Contract 2000-005) and 020110031000 (Preserve 2 Contract 2000-002). Acreages for farmland within these parcels that will be permanently impacted by the Project are discussed below in Section 5.7.4.3 Impacts to Agricultural Resources.

5.7.3.4 Summary of Recent Actions of the Imperial County Planning Department

Imperial County adopted a comprehensive update of all Elements of the County General Plan in 1993 and has adopted subsequent updates of individual Elements since. Elements that are particularly relevant to the Project are Land Use (most recently updated in 2008), Geothermal (2006), and Agricultural (1996). Additionally, a new Parks and Recreation Element was added to the County General Plan in January 2008. The County Land Use Ordinance was comprehensively updated in 1998. Based on a review of the County's zoning actions since 1998, there have been no major zone changes in the Project area. In general, the zoning and land use activities within the County have been subdivisions and annexation of land, and very few of these activities have occurred in the Project area due to its remote location and non-urban setting.

5.7.4 Environmental Impacts

The following sections discuss the effects of Project construction and operation on the land use and land use resources of the Project study area. The following relevant criteria are identified in Appendix G of the CEQA Guidelines.

Would the project:

- a) Physically divide an established community?
- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigation of an environmental effect?
- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Other issues that are related to land use are addressed in Sections 5.2, Air Quality; 5.13, Traffic and Transportation; 5.8, Noise; and 5.15; Visual Resources. Temporary and permanent acreage impacts for the Project components are listed in Table 2.3 of Section 2.0, Project Description.

5.7.4.1 Construction

Plant Site

Construction activities would include all work on the plant site; installation and connection of offsite utilities, pipelines, and transmission lines; switchyard; and plant startup. Sequential activities for onsite and offsite work include site preparation; foundation construction; erection of major equipment and structures, installation of piping, electrical and control systems, and startup/testing. Overall, construction activities would result in short-term land use impacts. However, because the Project is compatible with existing geothermal uses, is located within the GOZ, and the construction activities would be temporary, construction-related land use impacts would be less than significant.

Well Pads, Pipelines and Borrow Site

Construction of the three production well pads (OB-1, OB-2, and OB-3) would occur on the plant site within an agricultural (A-3-G) zone. Injection well pads OB-1 and OB-3 would also be constructed within an A-3-G zone; and injection well pad OB-2 would be constructed in a medium industrial (M-2-G) zone. The construction of these well pads is a conditionally permitted use within the GOZ. Consequently, there would be no land use impacts related to well pad construction. The pipeline routes are within areas zoned for agriculture and manufacturing; construction impacts would be localized, minor, and temporary. The borrow site is within an area designated for agriculture and industry; construction impacts will be temporary as the borrow site will be returned to its preexisting condition.

5.7.4.2 Operation Impacts

The Project involves the development of a geothermal power generation facility in an area zoned for geothermal uses (A-3-G). Thus, the proposed use of the site is consistent with land use plans, and is compatible with adjacent uses as evidenced by the development pattern of existing geothermal sites in the area.

The Project is in an isolated non-urban area that primarily consists of agricultural fields. Therefore, the Project would not result in the physical division of an established community. The siting of the Amended Project in the proposed location is appropriate because the site is adjacent to, and in close proximity to other existing geothermal plants, and is within the GOZ. Facility operations and maintenance are not expected to

5.7 Land Use

affect the continued viability of surrounding agricultural land uses. All operation and maintenance activities would occur within the plant site and well pad areas and, therefore, no offsite land use impacts would be expected. Operation and maintenance of the well pads are conditionally permitted activities within the geothermal overlay zone.

5.7.4.3 Impacts to Agricultural Resources

Appendix G of CEQA identifies the following criteria for determining significance of impacts to agriculture and Prime Farmland:

- Does the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural uses?
- Does the project conflict with existing zoning for agricultural use or a Williamson Act contract?
- Does the project involve other changes in the existing environment that, because of their location or nature, could result in conversion of farmland to nonagricultural use?

The Amended Project would take approximately 81.4 acres of Prime Farmland and 108.3 acres of Farmland of Statewide Importance out of production over the life of the project (Table 5.7-6). Thus, 189.7 acres of Prime Farmland and Farmland of Statewide Importance will be converted to geothermal use. All project components - plant site, injection well pads and pipelines, and the borrow site - currently exist on areas with Prime Farmland and Farmland of Statewide Importance. However, the borrow site will be a temporary impact to agricultural resources. Topsoil removed from the plant site will be segregated and stockpiled at a site located adjacent to the west of the proposed borrow site discussed above. After the necessary fill material has been procured from the borrow site, the stockpiled topsoil will be used to backfill the borrow site, which will return the borrow site to conditions approximating those currently present. There are approximately 500,000 acres in agriculture production in Imperial County. The Project will affect a small fraction of one percent of the total acreage in production.

Table 5.7-6 Prime Farmland and Farmland of Statewide Importance Impacted by Amended Project

Project Component	Prime Farmland (acres)	Farmland of Statewide Importance (acres)	Williamson Act Contract Lands (acres)
Plant Site	40.2	100.1	0.0
Offsite Well Pads	14.1	0.0	9.4
Offsite Pipeline ROW ¹	27.1	8.2	11.1
Total	81.4	108.3	20.5

Notes:
¹: Assumes a 100-foot ROW plus 10 percent for expansion joints for total ROW of 110 feet.
Source: DWR 2002

Portions of injection well pads OB-1 and OB-2 and their associated pipelines are located on parcels currently under Williamson Act contract (Parcel 020110029000 [Preserve 2 Contract 2000-005] and 020110031000 [Preserve 2 Contract 2000-002]). As shown in Table 5.7-6, well pads OB-1 and OB-2 and

their associated pipelines will remove from agricultural use on these parcels 9.4 acres and 11.1 acres, respectively, of the 398.39 acres of farmland subject to Williamson Act contract on the parcels.

These uses are compatible with the Williamson Act. As discussed elsewhere in this section, Imperial County has adopted a Geothermal Element, including a Geothermal Overlay Zone (GOZ), in its General Plan to promote geothermal energy development in the County. The Geothermal Element and GOZ apply to lands, such as those the OB-1 and OB-2 well pads and pipelines will affect, that are zoned for agricultural uses and that are under Williamson Act contract. As such, the Geothermal Element and GOZ represent the County's determination that certain facilities associated with geothermal development are compatible with the Williamson Act's objectives.

Consistent with this determination, Imperial County has specifically concluded that geothermal well pads and pipelines are compatible uses on lands under Williamson Act contract, provided that (1) agricultural operations on the parcels affected by the well pads and pipelines remain "viable," and (2) the well pads and pipelines are designed to minimize their impact to those agricultural operations. According to the County, an agricultural operation remains "viable" after well pads and/or pipelines are constructed provided that (1) agricultural production can continue on at least 80 percent of the agricultural field subject to the contract, and (2) the agricultural operation is greater than 10 acres (see Appendix D).

The Amended Project satisfies these criteria. First, as indicated above and in Table 5.7-6, the OB-1 and OB-2 well pads will occupy 9.4 acres, and the associated pipelines 11.1 acres, of the 398.39 acres subject to Williamson Act contract. This means that the Amended Project will affect only 20.5 acres, or 5 percent, of the contracted lands; 95 percent of these lands will remain in agricultural production. Second, even when considered separately, each parcel will easily clear the 80 percent and 10-acre thresholds. Parcel 020110031000, which will contain the OB-1 well pad and part of its associated pipeline, is 320.12 acres, and Parcel 020110029000, which will contain the OB-2 well pad and a very small part of its pipeline, is 78.27 acres. Third, both of the well pads and pipelines have been designed and located so as to minimize their impact on these parcels' agricultural operations. In particular, the well pads and pipelines have been situated as close to the plant site, and as close to the parcels' perimeters, as possible.

Finally, the Williamson Act itself underscores that well pads OB-1 and OB-2 and their associated pipelines are compatible uses. The County has specifically determined that geothermal well pads and pipelines are compatible uses provided they meet the criteria discussed above, and the Williamson Act contracts for the lands at issue here do not contain any provisions that suggest otherwise.

In light of these factors—the County's efforts to promote geothermal development alongside agriculture; the County's determination that geothermal well pads and pipelines are compatible uses; the minimal impacts on agricultural operations from the OB-1 and OB-2 well pads and pipelines; and the Williamson Act's presumption that "electric facilities" are compatible with the Act's objectives—the Amended Project complies with the Williamson Act.

The Project is consistent with County zoning and planning requirements related to agricultural lands. The Project will not involve other changes in the environment that would result in further conversion of farmland and would not result in indirect impacts to agricultural lands. Additionally, for the original SSU6 project, a California Agricultural Land Evaluation and Site Assessment Model was conducted, and it concluded that there would be no significant impacts to agricultural resources. Thus, the Amended Project would not represent a significant impact to agricultural resources.

5.7.5 Cumulative Impacts

No significant impacts to land use would occur during construction, operation, and/or maintenance of the Amended Project when considered cumulatively with other projects. The Project area is designated for the development of geothermal electrical power production by the County's Geothermal/Alternative Energy and Transmission Element. Additionally, the Project area is zoned for agricultural uses and within a GOZ to permit and regulate geothermal facilities. The Project is consistent with the requirements of the Imperial County General Plan and zoning standards, which provide general and specific standards to avoid or substantially lessen potential project-level and cumulative impacts. The proposed CHAR geothermal project site is located approximately 3.4 miles from the Amended Project plant site; there also are other geothermal projects under development in Imperial County (e.g., Ormat projects in north of Brawley). Each of these projects would comply separately with County land use planning and zoning requirements.

5.7.5.1 Mitigation Measures

Land use mitigation measures are embodied in the CEC's Conditions of Certification (COC) for the original project. These COC have been adopted and modified by the Applicant to make them appropriate for the Amended Project in the following section.

5.7.6 Conditions of Certification

The Commission Decision on the original SSU6 project contained COCs for land use. Proposed deletions are shown in ~~strike through~~; additions and revisions are shown in *italics*. The Applicant recommends deletion of LAND-4; the COC is not necessary because the construction laydown area will now be on the plant site rather than a separate adjacent parcel as was the case for the original project. LAND-8 should be deleted as it relates to a previous Minor Amendment to the CUP that is not relevant to the Amended Project.

LAND-1 The project owner shall comply with the minimum design and performance standards for the "A-3-G" Zone set forth in the Imperial County Land Use Ordinance.

Verification: At least 30 days prior to the start of construction, the project owner shall submit written documentation, including evidence of review by the Imperial County Planning/Building Department, that the project meets the above standards.

LAND-2 The project owner shall comply with the parking standards established by the Imperial County Land Use Ordinance (Title 9, Division 4).

Verification: At least 30 days prior to start of construction, the project owner shall submit to the CPM written documentation, including evidence of review by Imperial County Planning/Building Department, that the project conforms to all applicable parking standards.

LAND-3 The project owner shall ensure that any signs erected (either permanent or for construction only) comply with the outdoor advertising regulations established by the Imperial County Land Use Ordinance (Title 9, Division 4).

Verification: At least 30 days prior to start of construction, the project owner shall submit to the CPM written documentation, including evidence of review by Imperial County, that all erected signs will conform to the Land Use Ordinance.

~~**LAND-4** The project owner shall provide the descriptions of the final lay down/staging areas identified for construction of the project to the Director of the Imperial County Planning/Building Department for review and comment and to the CPM for review and approval. The description shall include:~~

- ~~(a) Assessor's Parcel numbers;~~
- ~~(b) addresses;~~
- ~~(c) land use designations;~~
- ~~(d) zoning;~~
- ~~(e) site plan showing dimensions;~~
- ~~(f) owner's name and address (if leased); and,~~
- ~~(g) duration of lease (if leased); and, if a discretionary permit was required, copies of all discretionary and/or administrative permits necessary for site use as lay down/staging areas.~~

~~**Verification:** The project owner shall provide the specified documents at least 30 days prior to the start of any ground disturbance activities.~~

LAND-5 The project owner shall provide to the CPM for approval a site plan with dimensions showing the locations of the proposed buildings and structures in compliance with the minimum yard area requirements (setbacks) from the property line as stipulated in the Imperial County Land Use Ordinance.

Verification: Thirty (30) days prior to the start of construction, the project owner shall submit a site plan showing that the project conforms to all applicable yard area requirements as set forth in the Imperial County Land Use Ordinance.

LAND-6 The SSU6 project owner shall mitigate for the loss of 446 81.4 acres at a one-to-one ratio for the conversion to a non-agricultural use, of prime farmland as classified by the California Department of Conservation for the construction of the power generation facility.

Verification: The project owner will provide a mitigation fee payment (payment to be determined) to an Imperial County agricultural land trust, or a statewide agricultural land trust, within 30 days following the construction start, as set forth in a prepared Farmlands Mitigation Agreement. The project owner shall provide in the Monthly Compliance Reports a discussion of any land and/or easements purchased in the preceding month by the trust with the mitigation fee money provided, and the provisions to guarantee that the land managed by the trust will be farmed in perpetuity. This discussion must include the schedule for purchasing 446 81.4 acres of prime farmland and/or easements within five years of start of construction as compensation for the 446 81.4 acres of prime farmland to be converted by the Project.

LAND-7 Applies to transmission lines; because the Amended Project does not propose changes to the already-licensed transmission lines, they are not included in the Amendment Petition.

5.7 Land Use

~~**LAND-8** The project owner shall comply with Imperial County's Minor Modification to the Conditional Use Permit requirements for the additional 20 acres not covered by the CUP that was approved by Imperial County.~~

~~**Verification:** At least 30 days prior to start of construction, the project owner shall submit to the CPM, written documentation, including evidence of review and approval by Imperial County that the project conforms to all requirements of the Minor Modification to the CUP.~~

5.7.7 References

Cabanilla, Richard, 2008. Geothermal Planner, Imperial County Planning Department, telephone communication with Jerry McLees (EDAW). December.

California Department of Conservation (CDOC), 2006. Farmland Mapping and Monitoring Program 2006 GIS data. Accessed online at <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/2006/> on November 15.

CH2M Hill. 2002. IID Water Conservation and Transfer Project/ Draft Habitat Conservation Plan, Draft EIR/EIS, January.

Imperial County, 2008. General Plan. Land Use Element. Adopted January 29.

Imperial County, 2006. General Plan. Geothermal/Alternative Energy and Transmission Element. Adopted October 17.

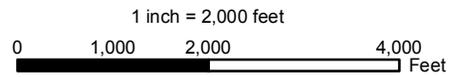
Imperial County, 1998. Land Use Ordinance. Adopted November 24.

Imperial County, 1996. General Plan. Agricultural Element. Adopted November 19.



Legend

- Plant Site
- Land Use Study Area Boundary
- Proposed Pipeline
- Borrow Site
- Proposed Well Pad



Amended SSU6 Project

**Figure 5.7-1
Existing Land Use**

Mapsheet 1 of 2



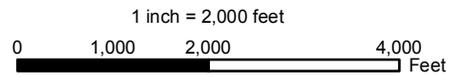
AECOM

Project: 12676-001
Date: February 2009



Legend

- Plant Site
- Land Use Study Area Boundary
- Proposed Pipeline
- Borrow Site
- Proposed Well Pad



Amended SSU6 Project

Figure 5.7-1
Existing Land Use

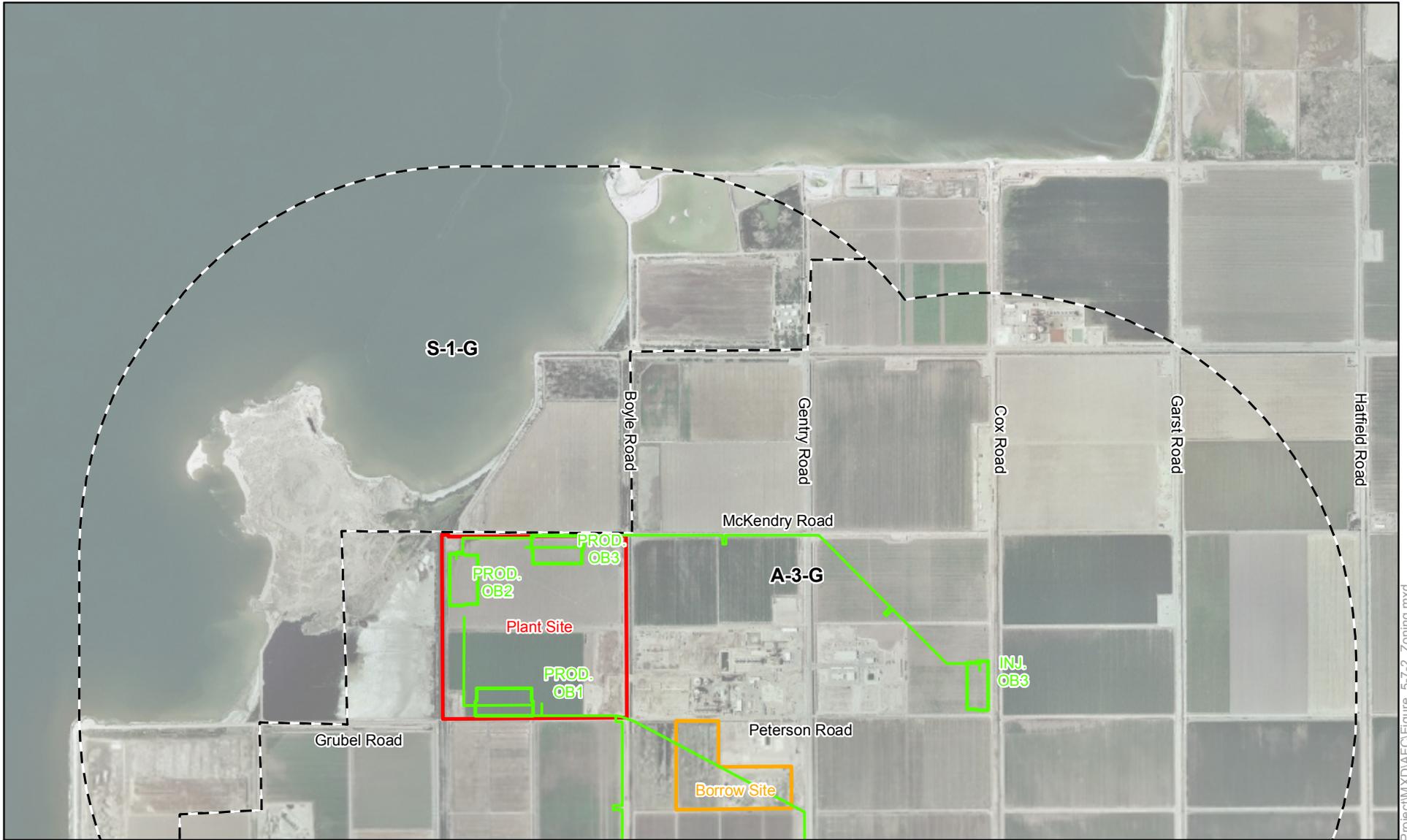
Mapsheet 2 of 2



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See Mapsheet 2 of 2

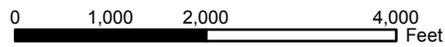
Legend

- Plant Site
- Borrow Site
- Proposed Pipeline
- Proposed Well Pad
- Zoning Boundary

Zoning Types

- S-1-G Open Space/Recreation-Geothermal
- A-3-G Agricultural, Heavy-Geothermal
- M-2-G Medium Industrial-Geothermal

1 inch = 2,000 feet



Amended SSU6 Project

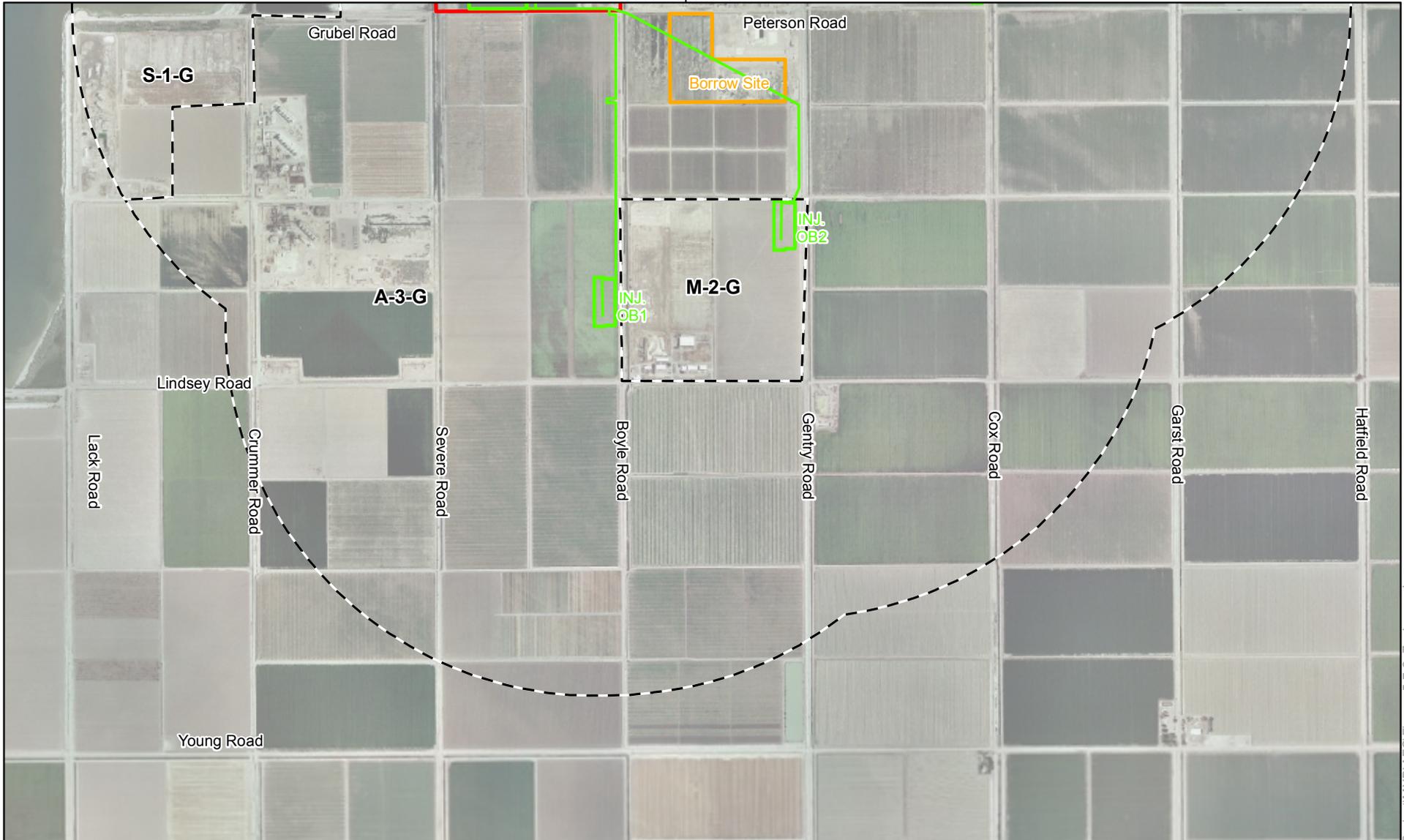
**Figure 5.7-2
Existing Zoning**

Mapsheet 1 of 2



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Project: 12676-001
Date: February 2009



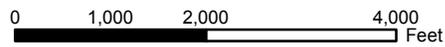
Legend

- Plant Site
- Borrow Site
- Proposed Pipeline
- Proposed Well Pad
- Zoning Boundary

Zoning Types

- S-1-G Open Space/Recreation-Geothermal
- A-3-G Agricultural, Heavy-Geothermal
- M-2-G Medium Industrial-Geothermal

1 inch = 2,000 feet



Amended SSU6 Project

**Figure 5.7-2
Existing Zoning**

Mapsheet 2 of 2



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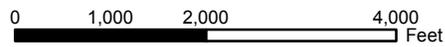


See Mapsheet 2 of 2

Legend

- | | | |
|-------------------|--------------------------------------|---------------------|
| Plant Site | Urban and Built-up Land (D) | Unique Farmland (U) |
| Borrow Site | Farmland of Local Importance (L) | Water (W) |
| Proposed Pipeline | Prime Farmland (P) | Other Land (X) |
| Proposed Well Pad | Farmland of Statewide Importance (S) | |

1 inch = 2,000 feet



Amended SSU6 Project

**Figure 5.7-3
Farmland**

Mapsheet 1 of 2



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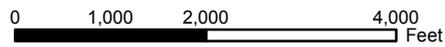
Project: 12676-001
Date: February 2009



Legend

- Plant Site
- Borrow Site
- Proposed Pipeline
- Proposed Well Pad
- Urban and Built-up Land (D)
- Farmland of Local Importance (L)
- Prime Farmland (P)
- Farmland of Statewide Importance (S)
- Unique Farmland (U)
- Water (W)
- Other Land (X)

1 inch = 2,000 feet



Amended SSU6 Project

**Figure 5.7-3
Farmland**

Mapsheet 2 of 2



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Project: 12676-001
Date: February 2009