Appendix B

Scoping Summary Memo,
including Notice of Preparation

PUBLIC SCOPING REPORT

Easley Renewable Energy Project

Prepared for

Riverside County

Submitted by

Aspen environmental group

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ACRONYMS

BESS	Battery Energy Storage System
BLM	Bureau of Land Management
CAISO	California Independent System Operator
CDFW	California Department of Fish and Wildlife
CEESP	California Energy Efficiency Strategic Plan
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CHRIS	California Historical Research Information System
CMA	Conservation Management Action
COPD	Chronic Obstructive Pulmonary Disease
CNDDB	California Natural Diversity Database
CUP	Conditional Use Permit
CURE	California Unions for Reliable Energy
DFA	Development Focus Area
DRECP	Desert Renewable Energy Conservation Plan
EIR	Environmental Impact Report
EMF	Electromagnetic Fields
ESA	Endangered Species Act
ITP	Incidental Take Permit
LTDR	Lake Tamarisk Desert Report
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NOD	Notice of Determination
NOP	Notice of Preparation
OHV	Off Highway Vehicle
PEIR	Program Environmental Impact Report
ROD	Record of Decision
SCAG	Southern California Association of Governments
SCE	Southern California Edison
USFWS	United States Fish and Wildlife Service

1. OVERVIEW OF CEQA SCOPING PROCESS

The environmental review of the Intersect Power (IP) Easley Renewable Energy Project (Project) is being conducted by two lead agencies: United States Department of Interior, Bureau of Land Management (BLM) as the federal lead agency under the National Environmental Policy Act (NEPA; 42 U.S.C. section 4321 et seq) and County of Riverside as the State lead agency under the California Environmental Quality Act (CEQA) (Public Resources Code section 21000 et seq.). These two agencies are holding separate scoping periods. This report discusses the scoping process that was conducted for the County of Riverside. The County held a 30-day public scoping period consistent with CEQA requirements that provided an opportunity for the public and agencies to provide comments on the environmental review of the Project.

This scoping report documents the CEQA scoping process and summarizes the scoping comments received for the Project. Specifically, this report describes the scoping events and activities, and summarizes the oral and written comments submitted in response to the public release of the County of Riverside's Notice of Preparation (NOP). This report provides the range of issues and alternatives provided in the public comments that will be considered in the preparation of the Environmental Impact Report (EIR). The lead agency will use the comments received during the scoping period to:

1. Identify key issues to focus the analysis in the environmental document.
2. Identify reasonable alternatives to the Project.
3. Analyze environmental impacts of the Project and alternatives.
4. Identify ways to avoid or reduce environmental impacts.

1.1. Introduction

IP Easley, LLC a subsidiary of Intersect Power LLC, (Applicant) is seeking a minimum 40-year Conditional Use Permit (CUP), to construct, operate, and decommission the Easley Renewable Energy Project, a utility-scale solar photovoltaic (PV) electrical generating and storage facility and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid. The County of Riverside will prepare an Environmental Impact Report (EIR) for the Project.

The Project would be located in Riverside County, north of Interstate 10 (I-10) and approximately 2 miles north of Desert Center, CA. The Project consists of 24 parcels on private land (~990 acres), and 13 parcels on BLM-administered lands (~2,745 acres). The proposed Project would generate and store up to 650 megawatts (MW) of renewable electricity via arrays of solar photovoltaic (PV) panels, battery energy storage system (BESS), and appurtenant facilities.

The 500 kilovolt (kV) generation tie (gen-tie) transmission line would transmit the solar power generated from an onsite substation just west of Rice Road/State Route (SR) 177, to interconnect into the regional transmission grid approximately 6.7 miles to the east-southeast.

Public lands within the Project solar application area include lands designated as Development Focus Area (DFA) by the Desert Renewable Energy Conservation Plan (DRECP) and associated Record of Decision (ROD), and thus, have been targeted for renewable energy development. The proposed Project is partially located on federal land under management of the BLM, who are the lead agency under the National Environmental Policy Act (NEPA).

1.2. Summary of CEQA Scoping Process

The CEQA scoping process provides government agencies, Tribal agencies, organizations, and members of the public the opportunity to identify environmental issues and alternatives for consideration in the EIR. The scoping process and results are an initial step in the environmental review process.

As required by Section 15082 of the CEQA Guidelines (14 CCR 15000 et seq.), the County of Riverside issued an NOP on November 14, 2022, that summarized the Project, stated the County's intention to prepare an EIR, and requested comments from interested parties. Appendix A includes the NOP for the Project. The NOP was mailed to approximately 80 contacts and emailed to approximately 40 contacts on the Project distribution list. Of the NOPs that were distributed, 10 notices were distributed to Native American tribes. The NOP was filed with the State Clearinghouse and the County Clerk, and posted on the County of Riverside's webpage:

https://planning.rctlma.org/Home/Planning-Notices/NOP-for-CUP220021-DA2200016

During the comment period, the County held one public scoping meeting on Monday December 5, 2022. Newspaper notices were published two times each, on November 16 and November 30, 2022, in the Desert Sun and in the Press Enterprise announcing the NOP and the public scoping meeting. The NOP also included information regarding this scoping meeting.

The public scoping meeting was held in-person and virtually, at the Riverside County Planning Department. Remote participation was made available through the online web-based platform, Zoom. This meeting took place from 1:30pm to 3:00pm. The EIR contractor provided a presentation explaining the Project, CEQA process, the County's role throughout this process, and public participation opportunities (Appendix C). The meeting was attended by approximately 20 people.

The 30-day comment period began on November 14, 2022 and ended on January 6, 2023. The comment period was extended to account for delays in the project mailing and the holiday season. In total, 46 different entities submitted comment letters: 4 from federal, state, and local agencies; 3 from organizations and businesses; 1 from the Native American Heritage Commission; and 38 from individuals (see Table 1-1). These letters have been included in this scoping report in Appendix D. The comments identified in these letters and the comments presented at the scoping meeting will be considered in the drafting of the EIR.

1.3. Agencies, Organizations, and Persons Providing Scoping Comments

Federal, state, and local agencies; a tribal agency; organizations; and members of the public provided oral and written comments during the scoping period. Table 1-1 presents the agencies, tribal agency, organizations, and individuals that provided written comments during the scoping process in chronological order as well as the individuals that presented oral comments at the scoping meeting.

Table 1-1. Comments Received During Public Scoping Period

Commenter	Date
Agencies	
Southern California Association of Governments	12/12/23
US Fish and Wildlife Service	12/15/23
California Department of Fish and Wildlife	12/15/23
Metropolitan Water District of Southern California	12/14/23
Organizations and Businesses	
California Unions for Reliable Energy	11/16/22
Sempra Utilities	12/19/22
Lake Tamarisk Desert Resort (LTDR)	1/5/23
Tribal Agency	
Native American Heritage Commission	11/14/22

Commenter	Date
Individuals	
Steve and Vickie Jones	12/4/22
Robert Stiver	12/4/22
Vicki Bucklin 1	12/1/22
Vicki Bucklin 2	12/2/22
Cynthia Green	12/5/22
Georgia Beckwith	1/4/23
June McArthur	1/4/23
Tim LeForge	1/4/23
Leann Kingsley	1/4/23
Robert Stiver #2	1/4/23
Jim and Janice Baker	1/4/23
Ken Stamp	1/4/23
Lester Beatty	1/5/23
Mable Beatty	1/5/23
Julie Anderson	1/5/23
John Wilmoth	1/5/23
Lori Carney	1/19/23
Vicki Bucklin #3	11/27/23
Sharon Dilley	12/7/23
Bruce McArthur	12/31/23
Brian Hagman	12/31/23
Linda Armstrong	1/1/23
Peter Longman	1/1/23
Frankie Nobert	1/1/23
Kathy Schofield	1/1/23
Candace and Ross Ryding	1/2/23
Bob and Judy Walston	1/2/23
Nancy Ray	1/2/23
Barry Reid	1/2/23
Robert C. Mitchell	1/2/23
Ron Simmons	1/2/23
Gary and Debbie Lundberg	1/2/23
Lee Petersen	1/2/23
Kenneth Jacks	1/3/23
Wally and Carolyn White	1/3/23
Debra Westcott	1/4/23
William and Leanna Kingsley	1/4/23
Patti Cockcroft	1/4/23

Commenter	Date
Individuals who presented oral comments at scoping meeting	
Mark Goddard	12/5/22
John Wilmoth	12/5/22
Kathy	12/5/22
Peggy Davis	12/5/22
Robert Stiver	12/5/22
Tim LeForge	12/5/22
Kim Fraser	12/5/22
Don Sned	12/5/22
Vicki Bucklin	12/5/22
Bob Mitchell	12/5/22
Theresa Pierce	12/5/22
Cynthia Walker	12/5/22

1.4. Scoping Report Organization

This scoping report summarizes the comments and issues identified during the scoping period. The Lead Agency will review and consider all of the scoping comments received in preparing the EIR for the Project.

- **Section 2** provides a summary of the Project.
- **Section 3** provides a summary of all written and oral comments received and issues raised during the Project's scoping period.
- **Section 4** provides a summary of future steps in the planning process and indicates opportunities for public participation in the environmental review process.
- **Appendices** that follow Section 4 include the NOP, newspaper ad, scoping presentation, and scoping comment summary and letters.

2. SUMMARY OF THE PROPOSED PROJECT

As noted earlier, IP Easley, LLC has filed applications with the County of Riverside for the Easley Renewable Energy Project. The Project consists of utility-scale solar PV and BESS facility. A 500 kV gen-tie line interconnects the project via the Oberon Substation, to the Southern California Edison (SCE) Red Bluff Substation. The Project would generate up to 650 MW using PV technology and would include up to 650 MW of integrated battery energy storage capacity.

The proposed Project is comprised of the following components/facilities:

- **Solar PV Panels and Mounting Systems:** the solar facility would include thin-film PV panels, crystalline silicon panels, or any other commercially available PV technology. The proposed panel mounting system will depend on the PV panels ultimately selected but is expected to be single-axis trackers with a portrait module orientation. Either mono-facial or bi-facial modules could be used, and modules would either be mounted as single panels or stacked two high.
- **Inverters, Transformers, and Electrical Collection System:** The Project would be designed and laid out primarily in increments, which would include an inverter equipment area and transformers. Panels would be electrically connected into panel strings using wiring secured to the panel racking system. Underground cables would be installed to convey the direct current (DC) electricity from the panels to inverters to convert the DC to alternating current (AC) electricity.
- **Onsite Substation Yard and Gen-Tie Line:** The Project would include at least one, and up to 2 onsite substation yards. Each substation and associated equipment would require 25 acres within the project site. Electrical transformers, switchgear, and related substation facilities would transform 34.5 kV medium-voltage power from the project's delivery system to the 500 kV gen-tie system. A 6.7-mile 500 kV gen-tie line would mainly traverse across the approved Oberon Renewable Energy Project site and connect into an approved substation that is under construction on the Oberon site, an adjacent solar and energy storage facility owned by Intersect Power.
- **Operations and Maintenance (O&M) Facility:** The O&M facility would be constructed at the Project site and would house project security, employee offices, and parts storage. The O&M building would be constructed on a concrete foundation, approximately 3,000 square-feet and would be approximately 15 feet at its tallest point. A 12 kV electrical distribution line would supply electricity to the O&M building and substation via a new overhead or underground 12 kV distribution line from the existing SCE distribution system adjacent to the solar facility site.

Other features/components of the proposed facility include a battery system for 650 MW of electricity storage, a meteorological data collection system, and telecommunications facilities.

Access to the site would be via State Route 177/Rice Road and surrounding County roads. The Project's onsite roadway system would include a perimeter road surrounding the solar panels within the development fencelines, access roads, and internal roads.

3. SUMMARY OF SCOPING COMMENTS

This section of the report summarizes the comments raised by agencies, a tribal agency, organizations, and members of the public during the scoping process. Oral comments were received during the scoping meeting in addition to the written comments received during the scoping process. Table 1-1 provides a list of commenters including federal, state, and local agencies as well as a tribal agency, organizations, and individuals who provided comments. A number of environmental concerns were raised during the scoping process that focused on the Project's potential effects to environmental resources and issue areas.

3.1. Project Description

Statement of Purpose and Need

The Metropolitan Water District of Southern California (Metropolitan) requested that the lead agency analyze and assess any potential impacts to Metropolitan's transmission system. Metropolitan also requests that the lead agency ensure that the California Independent System Operator (CAISO) includes Metropolitan as a Potentially Affected System for this proposed Project in accordance with the CAISO Tariff and Business Practice Manuals for the Generation Interconnection Procedures and be included in any related technical generation interconnection studies.

3.2. Human Environment Issues

Aesthetic/Visual Resources

Several individuals, as well as the Lake Tamarisk Desert Resort, have expressed concerns about the visual impacts of the Project, including the proximity of the solar panels to the community being an eyesore, reducing the quality of life for the residents, the light and glare reflecting off of solar panels, and the light pollution from the Project affecting dark skies and general visual impacts in Desert Center and Joshua Tree National Park. They also expressed concerns about the visual impacts of fencing, and the debris that gets caught in it. Commentors expressed concerns about the glare affecting pilots in the area.

Some commentors suggested down shading light fixtures, height restrictions for lighting, and using limited lighting on the Project. Other commentors recommended native plantings to soften the visual impacts of the panels.

Air Quality and Greenhouse Gas Emissions

Several commentors have expressed concerns about the increased risk for Valley Fever.

Several commentors expressed concerns about dust created from solar projects due to the ground disturbance and removal of vegetation. These commentors expressed concerns about dust accumulating on items in the community and on water in Lake Tamarisk. One commentor recommended including standards for regulating silica, looking at alternative designs, or using ground matting to reduce exposure to dust.

A commentor from the Lake Tamarisk Desert Resort (LTDR) expressed concerns about the production of the solar panels that would be used for the Project. The commentor stated that if the panels would be produced outside of the United States, the impact of foreign-produced solar panels should be incorporated into the carbon footprint of the Project.

Some commentors expressed concerns that climate change is causing more dry spells, and this impact will be exacerbated by the solar projects – both by using water and by increasing the temperature of the region.

Cultural Resources and Tribal Cultural Resources

The Native American Heritage Commission (NAHC) recommended early consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the Project, to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. The NAHC also recommends:

- Contacting the appropriate regional California Historical Research Information System (CHRIS) Center, for an archaeological records search;
- Contacting the NAHC for a Sacred Lands File search and a Native American Tribal Consultation List;
- Preparation of a professional report detailing the findings and recommendations of the records search and field survey, if an archaeological inventory survey is required;
- Lead agencies should include provisions for the identification and evaluation of inadvertently discovered archaeological resources in their mitigation and monitoring reporting program plan, because the lack of subsurface evidence of archaeological resources does not preclude their subsurface existence;
- Monitoring all ground-disturbing activities by a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources; and
- Lead agencies should include in their mitigation and monitoring reporting program plans previsions for the disposition of recovered cultural items and for inadvertently discovered Native American remains.

Several commentors from the LTDR expressed concerns about the General Patton Desert Training Center historical area and are concerned about impacts to the artifacts in the area. One commentor, a resident of the LTDR, stated that the Project seems to conflict with the BLM objectives of preserving features at historically significant sites, such as the General Patton training area.

Existing or Planned Land Uses

Metropolitan expressed concerns about the Project, as it will be constructed adjacent to Metropolitan rights-of-way (ROWs). They stated that they must be allowed to maintain their ROWs and retain unobstructed access to its facilities in order to maintain and repair the system. Metropolitan requested that any design plans for any activity in the area of Metropolitan's ROWs or facilities be submitted to Metropolitan for their review and written approval, to avoid potential conflicts. They also requested that any future design plans associated with the Project should be submitted to Metropolitan's Substructures Team. Approval of the proposed Project should be contingent on Metropolitan's approval of design plans for portions of the Project that could impact Metropolitan facilities. Metropolitan included a map and the Planning Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way.

Several commentors from the LTDR expressed concerns about the land use plans in the area. Some commentors mentioned that the original land use plan included a golf course where the Project would be located.

A commentor from the LTDR expressed concerns about coordination with the Department of Defense, as the Project is in a fly zone, which the military uses for training.

Energy

Some commentors from the LTDR expressed concerns about the energy required to cool the BESS facility, and how much energy would be taken from the local grid. They expressed concerns about the heat in the region affecting battery efficiency.

The commentors suggested that the Project should include a no-action alternative based on local small scale distributed battery technology in urban centers. Additionally, commentors expressed concerns about the waste that batteries cause when they are no longer useful.

Noise and Vibration

Several commentors from the LTDR expressed concerns about noise from construction, especially due to the close proximity of the development to homes in the LTDR and nearby communities, as well as noise from increased traffic, and increase noise due to loss of vegetation. Some commentors expressed concerns about a constant "loud buzzing sound" that comes from solar developments.

Public Health and Safety

Several commentors expressed concerns about the increase in wind-blown dust, which carries silica, pollens, and other chemicals/pollutants (herbicides). The commentors are concerned with the health effects on those with Chronic Obstructive Pulmonary Disease (COPD), asthma, or other health issues. Some commentors asked about mitigation measures or other steps being proposed to prevent dust and protect medically at-risk people. Commentors expressed concern about high silica dust, which can cause Silicosis.

One commentor asked what assurances do they have that the LTDR community is safe, and who is responsible if they are not safe, due to dust?

Several commentors from the LTDR are concerned about the general health of the community, due to the high presence of sensitive receptors (small children through seniors).

Several commentors from the LTDR expressed concerns about the impact of Electromagnetic Fields (EMF) on the health of the community, due to the proximity of solar projects. The commentors specifically expressed concerns about EMF exposure causing headaches, nausea, fatigue, skin rashes, dizziness, sleep disorders, and cancer.

Several commentors stated that they are worried about the health of the community due to the stress of individuals worried about facing the loss of their quality of life. One commentor asked if any studies have been done to study the effects of solar installations on human health.

Some commentors expressed concerns about an increased need for law enforcement.

Recreation

Several commentors from the LTDR expressed concerns about the lower quality and decrease in availability of recreation, due to heat and wind, and the presence of solar developments preventing access for off-highway vehicles (OHVs), hiking, or other recreational activities, and contributing to a decrease in the scenic value of the region.

Several commentors have stated that the community has invested in equipment for recreation, such as OHVs, for use in the desert. Some commentors suggested allowing passages through Projects, to allow for easier access to recreational areas for OHV use and hiking.

Transportation and Traffic

Several commentors expressed concerns about the increased disturbance, dust, and noise created by construction vehicles and trucks, as well as the speed and presence of these vehicles impacting the safety of residents.

A commentor from the LTDR expressed concerns about coordination with the Department of Defense, as the Project is in a fly zone, which the military uses for training.

Hazards and Hazardous Materials

Several commentors from the LTDR expressed concerns about the increased risk of wildfires due to the increased presence of power lines.

Several commentors from the LTDR expressed concerns about the impacts of chemicals used for vegetation management, leaching into the water.

Several commentors from the LTDR expressed concerns about the hazardous materials that are present in solar panels that can be released when solar panels are broken.

3.3. Natural Environment Issues

Hydrology and Water Resources

Several commentors expressed concerns about the amount of water being used for the solar developments for construction, dust control, and panel washing, impacting the water supply for the Lake Tamarisk community. The residents claim that their water pumps and their water treatment system will need to be upgraded to account for the decrease in water supply and quality. Several commentors expressed concern about the lack of water supply being an issue if there were a fire. They state that there is not enough water/water pressure to suppress a community-wide fire. The LTDR stated that an above ground water reservoir is needed to assure water supply for community consumption and fire suppression. Currently, the only water supply at the LTDR requires electricity to pump, and if a fire were to kill the power supply, they wouldn't be able to pump water.

Several commentors expressed concerns about their aquifer being over drafted, and asked if there are mitigation measures in place to prevent this.

Several commentors expressed concern about the rising temperatures impacting their water supply.

Several commentors requested that a financial commitment be made by the County, solar developers, or both, to make improvements to the water and sewer systems in the community, and to provide a guaranteed water and fire-suppression system for the communities at risk. Some commentors requested that a well level depth study, going back 20 years, should be conducted.

Several commentors from the LTDR expressed concerns about the impacts of chemicals used for vegetation management, leaching into the water.

Several commentors expressed concerns about the potential for floods in their community, due to the modification of washes and removal of vegetation, creating impacts to stormwater runoff.

Metropolitan expressed concerns about solar development impacts on water supply. They are primarily concerned with the individual and cumulative impacts of any new demands on Colorado River water resources because the water supplies allocated to California are already fully apportioned and utilized. Metropolitan requests that, if the Project would utilize groundwater from on-site wells for its water supply, the lead agency provide an analysis of the utilization of groundwater from on-site wells, as well as a

cumulative analysis that includes the impact on the groundwater basin from the surrounding solar facilities.

Metropolitan is concerned that any use of groundwater may draw water from a groundwater basin that is hydro-geologically connected to the Colorado River, within an area referred to as the "accounting surface," and if the Project uses water from the Colorado River, it must have a documented right to do so. Metropolitan asked that regulators require as a condition of project approval that project developers monitor groundwater use to ensure that, over the life of the project, that there are no impacts to Colorado River resources. If impacts are detected, the project developer should be required to mitigate and offset such impacts.

Soils

Several commentors expressed concerns about the impacts of ground disturbance and grading changing drainages or washes.

Several commentors expressed concerns about what will happen to the Project and the site once the Project has reached the end of its useful life. They expressed concerns about the success or failure of the revegetation efforts, due to the existing and worsening arid climate and chemical vegetation treatments that are used. They expressed concerns that the soil would be sterilized.

Biological

One commentor expressed concerns about birds breathing dust, as they are more susceptible than humans.

Several commentors from the LTDR expressed concerns about the impact of solar panels on migratory birds, known as the Lake Effect, and requested that this should be studied prior to approval of the Project. Concerns include birds thinking the solar panels are water, which can lead to birds diving into the panels or disrupting their migration patterns.

Several commentors from the LTDR expressed concerns about the health and presence of migratory birds.

Several commentors from the LTDR expressed concerns about the impact of solar developments on desert tortoise and other species. Some commentors noted that they have seen less desert tortoise in recent years, following solar developments. Concerns include lack of shelter and vegetation and fencing around solar projects preventing passage of tortoises and other species.

Several commentors from the LTDR expressed concerns about the impacts of vegetation management, including erosion and flash floods. They are concerned about flash floods causing undetermined changes in erosion patterns. Impacts to desert dry wash woodland.

Several commentors from the LTDR expressed concerns about desert dry wash woodlands, ironwood trees, and the broad removal of vegetation. Ironwood trees are protected by the state of CA.

Some commentors from the LTDR expressed concerns about desert wildflower and other vegetation being lost to ground disturbance.

Some commentors expressed concerns about the success or failure of the revegetation efforts, due to the existing and worsening arid climate and chemical vegetation treatments that are used.

Some commentors from the LTDR expressed concerns about several desert wildlife species and other biological resources. The residents claim that they are seeing less wildlife due to the presence of solar developments and loss of habitat. The commentors are concerned about a wide range of species. These species include deer, coyote, cougar, lizards, road runner, and migrating birds.

Several commentors from the LTDR expressed concerns about the impacts of power lines on birds and other biological resources.

The California Department of Fish and Wildlife (CDFW) recommended that the Draft EIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project.

CDFW recommended that the Draft EIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The Lead Agency should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance and include a no-project alternative.

CDFW recommends that a California Endangered Species Act (CESA) incidental take permit (ITP) be obtained if the Project has the potential to result in take of a state-listed species, such as desert tortoise which have the potential to occur on site, either through construction or over the life of the project. They recommend early consultation and that the Draft EIR addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting plan that will meet the requirements of CESA.

CDFW recommends, to facilitate the issuance of a Lake and Streambed Alteration Agreement, if needed, that the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring reporting commitments. Early consultation is recommended, since modification of the proposed project may be required.

CDFW commented that the Project should report any special status species and natural communities detected during Project surveys to the CNDDB.

CDFW commented that the Project would have an impact on fish and/or wildlife, and therefore filing fees are necessary. They state that the fees are payable upon filing of the Notice of Determination (NOD) by the lead agency.

The United States Fish and Wildlife Service (USFWS) recommended that the Applicant conduct appropriate Service protocol surveys so that the USFWS may more effectively advise the County of potential impacts to endangered species act (ESA) listed species and other sensitive resources; recommend measures to avoid, minimize, and mitigate project impacts to them; and facilitate the Applicant's compliance with the ESA. The USFWS also recommended that the BLM Conservation Management Actions (CMAs) are included in the draft EIR to reduce the effects of renewable energy development to Federal trust resources.

The USFWS provided some specific recommendations based on the species that may be present in the Project area, such as Mojave Desert Tortoise, Yuma Ridgeway's Rail and other listed birds, non-listed migratory birds, and monarch butterfly. These recommendations included avoidance, minimization, and mitigation measures, and adaptive management measures.

3.4. Mitigation Measures

Several individuals have expressed concerns about the decrease in property value of the homes in LTDR and the homes near solar developments in Desert Center. These commentors have asked if and how the County, Applicant, and BLM would compensate the residents for the decreased property values.

Several commentors from the LTDR have requested measures to mitigate the impacts of the Project on the LTDR community. Some commentors requested that the Project not be approved unless these measures are imposed. These measures include:

- A 1- to 5-mile buffer around the community, where no development would be allowed, with natural vegetation, to minimize health issues of dust, EMF, and stress.
- Reparations for increased costs of vermin/extermination services, increased utility bills, and upgrades to the sewer and waters system that serves the community. Some recommendations are to provide AC units and maintenance to the LTDR and community, a 24-hour cooling center, and electrical credits to reduce costs of electricity.
- The community requested that taxes collected from the Easley Solar Project and paid to Riverside County should be earmarked for CSA 51 improvements to the entire community and infrastructure.
- Some commentors suggested allowing passages through Projects, to allow for easier access to recreational areas for OHV use and hiking.
- Some commentors suggested solid panel fencing along the Project boundaries that face the LTDR, to prevent light and noise impacts.
- The LTDR requested that the Project be relocated to the east of Highway 177, which is a focus area for renewable energy development.
- LTDR requested water is discharged from the canal at the Eagle Mountain Pump Station, to replace the entire loss of groundwater from current demands of the developments in the area. They also requested that replacement of pumps, water infrastructure, piping, and hydrant upgrades are essential, in addition to an above ground gravity-fed reservoir for fire suppression and human consumption in the event of a power outage.

3.5. Indirect and Cumulative Impacts

Several individuals and residents of the LTDR expressed concerns about their property values decreasing due to the presence and close proximity of the project.

Several commentors have expressed concerns about solar projects in Desert Center causing an increase in the average air temperature of the community. These individuals are concerned about the health issues of increased temperature, an increase in electrical bills due to the increased need for air conditioning, increase in winds due to temperature deltas, and the higher temperatures leading to less outdoor recreation opportunities.

Some individuals requested compensation for the increase in energy costs caused by rising temperatures and requested that studies be done to determine the proper temperature remediation options. Temperature remediation options that were recommended include: increased distance of solar arrays to communities, 24/7 public cooling centers, subsidies for power expenses, geographic berms and vegetation planting to direct air flow away from the population centers.

Some commentors from the LTDR expressed concerns about the need for the Project. The commentors stated that the Project would add a large cumulative impact to grid congestion in California. The commentors argued renewable energy generation exceeds demand in the middle of the day, then doesn't meet demand at the end of the day, when the solar projects go offline, causing the grid to need to use natural gas plants.

The USFWS recommended that the draft EIR consider the acreage already lost to solar development within the DFA along the I-10 solar corridor, and the acreage reasonably certain to occur as future development. The Service is particularly concerned about impacts to desert tortoise habitat connectivity and

the potential loss of gene flow within and among designated critical habitat units across the species' range. They recommend that the draft EIR examine potential impacts to the population connectivity requirements of desert tortoise and other wildlife species throughout the project area and its vicinity.

3.6. Project Alternatives

Some commentors from the LTDR expressed concerns about the alternatives analysis for the Project. They stated that a no-large-scale energy alternative is justified and should be analyzed. They argue that the California Energy Efficiency Strategic Plan (CEESP) 7, already exists as California state law, and prioritizes implementing rooftop solar and energy efficiency prior to developing large scale, remote solar and wind projects.

The commentors requested that the document should analyze an alternative that focuses on rooftop solar, and maximizes wildlife protection by avoiding, minimizing, and fully mitigating all direct, indirect, and cumulative impacts to wildlife and wildlife habitat to at least a no-net loss standard. The commentors suggested that the Project should include a no-action alternative based on local small scale distributed battery technology in urban centers.

3.7. Document Format, and Permitting Issues

Permitting and Consultation

Sempra Utilities commented that they have some medium pressure facilities in the Lake Tamarisk Area, and on Kaiser Road, therefore they are requesting that the applicant contact USA/Dig Alert prior to any excavations so they can have someone go out to locate and mark.

The Southern California Association of Governments (SCAG) sent a letter that listed the goals of the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal), and encouraged a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency, or non-applicability, with the plan, in a table format. The letter included 20 technical reports to support the goals of Connect SoCal, and emphasized the following goals: focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. Connect SoCal is adopted at the jurisdictional level, and a sustained regional outcome depends on informed and intentional local action. SCAG recommends referring to the Connect SoCal Demographics and Growth Forecast Technical Report.

SCAG staff recommends a review of the Final Program Environmental Impact Report (Final PEIR) for Connect SoCal for guidance, as appropriate. The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible.

3.8. Other Issues

The California Unions for Reliable Energy (CURE) requested mailed notice of the availability (NOA) of the environmental review document, as well as a copy of the environmental review document when it is made available for public review. They also requested mailed notice of any and all hearings and/or actions related to the project

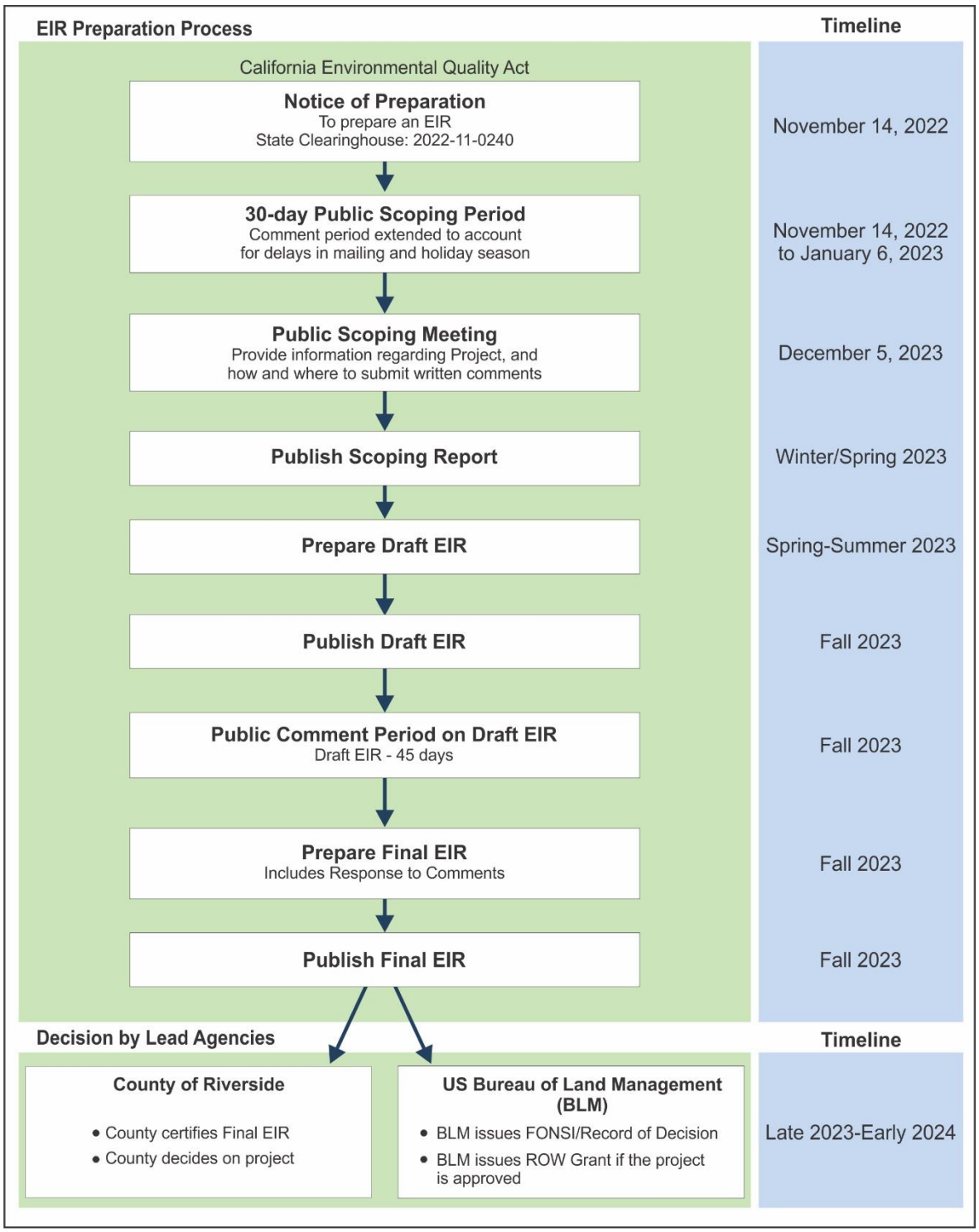
Several commentors expressed concerns about the impact of ground disturbance causing termites, rodents, and rattlesnakes coming closer to the community. These commentors expressed concerns that these species are entering the homes of people in the community, and termites are of specific concern, since it is costly to have them removed.

Several commentors requested that the comment period be extended, due to the mailings being received by property owners later than the start of the scoping period. LTDR residents claim that consultation with residents has been overlooked.

4. SUMMARY OF FUTURE STEPS IN THE ENVIRONMENTAL REVIEW PROCESS

An important part of the environmental review process is engaging the public and relevant agencies from the earliest stages of and throughout the process to identify issues, comments, and concerns. Figure 4-1 illustrates the steps in the CEQA review process and where the County decision falls within this process.

Figure 4-1. Project Review and Timeline



Appendix A

CEQA Notice of Preparation

RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Planning Director

COUNTY OF RIVERSIDE – NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT & SCOPING MEETING

DATE: November 14, 2022

TO: Responsible and Trustee Agencies, Interested Organizations, and Individuals

PROJECT CASE NO./TITLE: Easley Renewable Energy Project - Draft Environmental Impact Report
Conditional Use Permit No. 220021/ Development Agreement No. 2200016

LEAD AGENCY:	County of Riverside TLMA Planning Department 4080 Lemon Street, 12th Floor Riverside, California 92502-1409	Contact Person: Tim Wheeler Phone Number: (951) 955-6060 Email: TWheeler@rivco.org Website: http://planning.rctlma.org
APPLICANT:	IP Easley, LLC c/o Intersect Power, LLC 9450 SW Gemini Drive PMB#68743 Beaverton, OR 97008-7105	Contact Person: Camille Wasinger Phone Number: (303) 909-6396 Email: camille@intersectpower.com

PROJECT LOCATION: The Easley Renewable Energy Project (Easley or Project) is located in Riverside County, north of Interstate 10 (I-10) and approximately 2 miles north of the town of Desert Center, CA. The Project consists of 24 parcels on private land (~990 acres), and 13 parcels on BLM-administered lands (~2,745 acres). The APNs of which are listed on the attached sheet titled "Assessor's Parcels for Project Site CUP 220021 Easley Renewable Energy Project." The 500 kilovolt (kV) generation tie (gen-tie) transmission line would transmit the solar power generated from an onsite substation, on the southern edge of the Easley Project just west of Rice Road/State Route (SR) 177, to interconnect into the regional transmission grid approximately 6.7 miles to the east-southeast.

PROJECT DESCRIPTION: IP Easley, LLC ("Applicant"), a subsidiary of Intersect Power, LLC, proposes to construct, operate, and decommission the Easley Renewable Energy Project, a utility-scale solar photovoltaic (PV) electrical generating and storage facility and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid.

The proposed Project would generate and store up to 650 megawatts (MW) of renewable electricity via arrays of solar photovoltaic (PV) panels, battery energy storage system (BESS), and appurtenant facilities. A 6.7-mile 500 kV generation-tie (gen-tie) line would mainly traverse across the approved Oberon Renewable Energy Project site and connect into an approved substation that is under construction on the Oberon site, an adjacent solar and energy storage facility owned by Intersect Power. From the Oberon onsite substation, the power generated by the Easley Project would be transmitted to the SCE Red Bluff Substation via the Oberon 500 kV gen-tie line, which is expected to be online by the end of 2023.

Public lands within the Project solar application area include lands designated as Development Focus Area (DFA) by the Desert Renewable Energy Conservation Plan (DRECP) and associated Record of Decision (ROD), and thus, have been targeted for renewable energy development. Because the proposed Project is partially located on federal land under management of the U.S. Bureau of Land Management (BLM), the BLM is the lead agency under the National Environmental Policy Act (NEPA), 42 U.S.C. section 4321 et seq.

Depending on the timing of the interconnection agreement, the Easley Project could be online as early as late 2025 and its construction may be phased. The Project would operate for a minimum of 35 years and up to 50 or more years. At the end of its useful life, the Project would be decommissioned, and the land returned to its pre-Project contours. Revegetation would be conducted in accordance with an approved Decommissioning and Revegetation Plan, and revegetation success would depend on the climatic conditions in the area at the time of decommissioning.

Therefore, the Applicant is seeking a minimum 40-year CUP (CUP 220021) for the construction, operation, and decommissioning of the proposed solar facility and gen-tie line. The Applicant is also seeking cancellation of Williamson Act contracts, which will be considered by the County prior to Project approval. As part of the Project, the Applicant is seeking to vacate the facility's interior roadways and merge contiguous Project parcels. Roads along the Project perimeter on the solar facility lands would remain dedicated public access. Ancillary permits, including encroachment permits, grading and construction permits, and certificates of occupancy, are anticipated from the County. These permits and approvals are local ministerial actions that will follow CEQA compliance.

Pursuant to Riverside County Rules to implement the California Environmental Quality Act (CEQA), notice is given to responsible and interested agencies that the Riverside County Planning Department plans to oversee the preparation of an Environmental Impact Report (EIR) for the above-described Project. The purpose of this notice is to solicit guidance from Responsible and Trustee Agencies, Interested Organizations, and Individuals as to the scope and content of the environmental information to be included in the EIR. In accordance with the time limits mandated by State law, information in that regard should be submitted to this office as soon as possible, but not later than thirty (30) days after receiving notice. The public review period is from November 14 to December 16, 2022.

PUBLIC SCOPING MEETING: A scoping session has been scheduled in order to bring together and resolve concerns of affected federal, State, and local agencies, the proponent of the proposed Project, and other interested persons, as well as inform the public of the nature and extent of the proposed Project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The scoping session is not a public hearing on the merit of the proposed Project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the Project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address concerns expressed at the scoping session through revisions to the proposed Project and/or completion of a Final EIR prior to the formal public hearing on the proposed Project. Mailed notice of public hearing will be provide to anyone requesting such notification.

Easley Renewable Energy Project Scoping Meeting

Date:	Monday December 5, 2022
Time:	1:30pm or as soon as possible thereafter
Location:	Riverside County Planning Department 4080 Lemon Street, 12th Floor Riverside, California 92502-1409

Information on how to participate in the meeting will be available on the Planning Department website at: https://planning.rctlma.org. If you wish to participate (speak or view meeting) remotely during the meeting, please contact the TLMA Commission Secretary, Elizabeth Sarabia, by phone at (951) 955-6021, or email ESarabia@RivCo.org *AT LEAST 24 HOURS* prior to the meeting and provide your name, phone number, and agenda item. Once you provide the necessary information you will receive (either by phone or email) conformation of receipt of your request with the necessary meeting information to join.

For electronic documents and information related to the Notice of Preparation, please view the project webpage below:

https://planning.rctlma.org/Home/Planning-Notices/NOP-for-CUP220021-DA2200016

Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT
Attn: Tim Wheeler, Project Planner
PO Box 1409; Riverside, CA 95202-1409
TWheeler@rivco.org

Attachment A contains a brief project description and lists environmental topics that will be addressed in the Draft EIR. If you have any questions, please contact Tim Wheeler at (951) 955-6060 or by email at TWheeler@RivCo.org.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT

Tim Wheeler
Project Planner for Easley Renewable Energy Project

Easley Renewable Energy Project

Assessor's Parcels for Project Site (CUP 220021 / DA 2200016)	
Private Land Parcels	BLM-Administered Parcels
808-023-005	807-172-027
808-023-018	807-172-015
808-023-031	807-191-029
808-023-032	808-023-022
808-030-002	808-023-024
808-030-011	808-023-027
808-240-007	808-023-030
808-280-001	808-230-005
808-280-002	808-270-007
808-280-003	808-270-012
808-280-004	811-121-007
808-280-005	811-121-008
808-280-006	811-122-005
808-280-007	
808-280-008	
811-141-011	
811-270-001	
811-270-002	
811-270-003	
811-270-004	
811-270-005	
811-270-006	
811-270-007	
811-270-015	

NOTICE OF PREPARATION

ATTACHMENT A

EASLEY RENEWABLE ENERGY PROJECT

A. Description of the Proposed Project

Project Location

The Easley Renewable Energy Project is located on private land, as well as land administered by the U.S. Bureau of Land Management (BLM) in Riverside County, north of Interstate 10 (I-10) and approximately 2 miles north of the town of Desert Center, CA. Nearby land uses include previously developed or developing solar facilities, transmission lines, fallow and active agriculture, and rural residences. The private parcels consist of primarily manmade features that include deciduous orchard/fallow agriculture, or developed areas.

The existing Desert Sunlight and Desert Harvest solar projects are north of the proposed Project and the Athos Renewable Energy Project is located to the east-southeast. Solar projects that are under construction nearby include the Oberon Renewable Energy Project directly to the south and southeast, as well as the Arica and Victory Pass Solar Projects, which are located northeast and east of the Oberon Project, respectively. The Easley 500 kilovolt (kV) generation-tie (gen-tie) line would originate west of Rice Road/State Route (SR) 177, and would interconnect into the Oberon onsite substation, which is located to the east of the Easley site and Rice Road/SR 177 and north of I-10.

A portion of the solar facility site is located within the County of Riverside's jurisdiction. The remainder of the solar facility and the 500 kV gen-tie line would be located on BLM-administered public lands.

Project Description

The proposed Project is located on approximately 3,735 acres of private and BLM-administered land, in Riverside County north of Desert Center, California (see Figures 1 and 2). The Project would generate up and store up to 650 megawatts (MW) of renewable energy using PV technology with up to 650 MW of integrated energy storage capacity. A 6.7-mile 500 kV gen-tie line would traverse the Oberon Project site and connect into an approved substation that is under construction on the approved Oberon Renewable Energy Project site, an adjacent solar and energy storage facility owned by Intersect Power. From the Oberon onsite substation, the power generated by the Easley Project would be transmitted to the SCE Red Bluff Substation via the Oberon 500 kV gen-tie line, which is expected to be online by the end of 2023.

The proposed Project would consist of the following major components:

- **Solar and Energy Storage Facility** (990 acres of private land, 2,745 acres of BLM-administered land)
  - **Solar array field**, which may include thin-film PV panels, crystalline silicon panels, or any other commercially available PV technology. The proposed panel mounting system will depend on the PV panels ultimately selected but is expected to be single-axis trackers with a portrait module orientation. Either mono-facial or bi-facial modules could be used, and modules would either be mounted as single panels or stacked two high.
  - **Inverter-transformer stations** on a concrete pad or steel skid for each 2 to 5 MW increment of generation, containing up to 6 inverters, a transformer, a battery enclosure, a switchboard 8 to

11 feet high, a shade structure (depending on meteorological conditions), and a security camera at the top of an approximately 20-foot wood or metal pole.

- System of **34.5 kV interior collection power lines** located between inverters and substations, located underground and installed overhead on wood poles.
- At least one, and up to 2, **onsite substation yards**, each substation and associated equipment would require 25 acres within the project site. Electrical transformers, switchgear, and related substation facilities would transform 34.5 kV medium-voltage power from the project's delivery system to the 500 kV gen-tie system.
- **Upgrades to the Oberon Substation** within its fenceline to accommodate interconnection of the Easley 500 kV gen-tie line.
- One **operations and maintenance (O&M) building** for project security, employee offices, and parts storage. The O&M building would be constructed on a concrete foundation, approximately 3,000 square-feet and would be approximately 15 feet at its tallest point.
- **12 kV electrical distribution line** would supply electricity to the O&M building and substation via a new overhead or underground 12 kV distribution line from the existing SCE distribution system adjacent to the solar facility site.
- **Supervisory Control and Data Acquisition System (SCADA) and telecommunications facilities** to allow remote monitoring of facility operation and/or remote control of critical components. The fiber optic or other cabling typically would be installed in buried conduit within the access road, leading to a SCADA system cabinet centrally located within the project site or a series of appropriately located SCADA system cabinets constructed within the O&M building. External telecommunications connections to the SCADA system cabinets could be provided through wireless or hard-wired connections to locally available commercial service providers.
- **Meteorological (MET)** data collection system with MET stations throughout the solar facility. Each MET station would be up to 10 feet tall with multiple weather sensors.
- **Battery energy storage system (BESS)**, requiring up to 35 acres, located near the substation. utilizing an AC-coupled battery or other similar storage system housed in electrical enclosures and capable of storing up to 650 MW of power for up to 4 hours.
- **Perimeter fencing** would be installed around the boundary of the developed areas using chain link perimeter fences or a fence design determined in consultation with Riverside County and BLM.
- **Newly constructed access roads** from SR 177/Rice Road, surrounding County roads, and throughout the interior of the Project limits. Ingress/egress would be accessed via locked gates located at multiple points.
- **Nighttime security lighting** limited to areas required for operation, safety, or security. Lighting would be directed away or shielded from major roadways or possible outside observers on adjacent properties. Lighting would be controlled by switches, motion detectors, etc., to light the areas only when required. Portable lighting may be used occasionally and temporarily for maintenance activities during operations.
- **Site security system** includes infrared security cameras, motion detectors, and/or other similar technology to allow for monitoring of the site through review of live footage 24 hours a day, 7 days a week. Such cameras or other equipment would be placed along the perimeter of the facility and/or at the inverters.

- **New 500 kV Gen-tie Line**, approximately 6.7 miles, within a 175-foot ROW on BLM-administered land.

Applicant's Project Objectives

The Applicant's purpose of the Project is to generate, store, and transmit renewable energy to the statewide wholesale electricity grid. The Applicant's identified Project objectives are:

- Support achievement of President Biden's goal of a zero-carbon power sector by 2035 and zero-carbon economy by 2050 through development of clean electricity (power sector);
- Assist the nation to meet its Nationally Determined Contribution commitments under Article 4 of the Paris Climate Agreement to achieve a 50 to 52 percent reduction in U.S. greenhouse gas pollution from 2005 levels by 2030, and to achieve 100 percent carbon pollution-free electricity by 2035 in the electricity sector;
- Further the purpose of Secretarial Order 3285A1, establishing the development of environmentally responsible renewable energy as a priority for the Department of the Interior;
- Deliver up to 650 MW of affordable, wholesale renewable energy to California ratepayers under long-term contracts with electricity service providers;
- Assist with achieving California's renewable energy generation goals under the Clean Energy and Pollution Reduction Act of 2015 (Senate Bill 350) and the 100 Percent Clean Energy Act of 2018 (Senate Bill 100), as well as greenhouse gas (GHG) emissions reduction goals of the California Global Warming Solutions Act of 2006 (AB 32), as amended by Senate Bill 32 in 2016;
- Enhance California's fossil-free resource adequacy capabilities and help to solve California's "duck curve" power production problem by installing up to 650 MW of 2-hour and/or 4-hour battery energy storage capacity;
- Minimize environmental impacts and land disturbance associated with solar energy development by siting the facility on relatively flat, contiguous lands with high solar insolation, in close proximity to established utility corridors, existing transmission lines with available capacity to facilitate interconnection, and road access;
- Conform with the Desert Renewable Energy Conservation Plan, including Conservation Management Actions, on BLM-administered land;
- Bring living-wage jobs to Riverside County; and
- Bring sales tax revenues to Riverside County by establishing a point of sale in the County for the procurement of most major project services and equipment.

Land Use Considerations

The solar facility site is located within the County of Riverside's jurisdiction. The parcels are currently zoned W-2-10 (Controlled Development Areas), A-1-20 (Light Agriculture), and W-1-20 (Watercourse, Watershed, and Conservation Area). The Applicant would enter into a Development Agreement with the County of Riverside, which would set forth the rights and responsibilities of each party with respect to Project construction, operation, and decommissioning.

After leaving the solar facility, the 500 kV gen-tie line would traverse BLM-administered public lands within the Riverside East Solar Energy Zone (SEZ) of BLM's Western Solar Plan, and within the Desert Renewable Energy Conservation Plan (DRECP) Development Focus Area (DFA), which amends the

California Desert Conservation Area (CDCA) Plan. A portion of the gen-tie line would also be sited within the Section 368 Federal Energy Corridor as established by the Westwide Energy Corridor Final Programmatic Environmental Impact Statement (PEIS) and Record of Decision. The Applicant submitted an application for a Right of Way Grant to the BLM, which was serialized by BLM as CACA-057822.

Project Components

The Project would consist of two major components: a PV solar power and energy storage facility and a 500 kV generation tie (gen-tie) transmission line. The fenced-in renewable energy facility site would occupy approximately 990 acres on privately-owned land, and 2,745 acres of BLM-administered land. The renewable energy facility sites would include a solar array field, a system of interior collection power lines, inverters, substations, an O&M building, and several interior access roads. The gen-tie line would be approximately 6.7 miles and would be located within a 175-foot ROW on federal lands managed by the Bureau of Land Management (BLM), Palm Springs-South Coast Field Office.

Solar Arrays

The solar facility would include several million solar panels; the precise panel count would depend on the technology ultimately selected at the time of procurement. The ultimate decision for the panel types and racking systems described here would depend on market conditions and environmental factors, including the recycling potential of the panels at the end of their useful lives.

Types of panels that may be installed include thin-film panels (including cadmium telluride [CdTe or “cad tel”] and copper indium gallium diselenide [CIGS] technologies), crystalline silicon panels, or any other commercially available PV technology. Solar thermal technology is not being considered. The proposed panel mounting system will depend on the PV panels ultimately selected but is expected to be single-axis trackers with a portrait module orientation. Either mono-facial or bi-facial modules could be used, and modules would either be mounted as single panels or stacked two high.

The PV modules would be manufactured at an offsite location and transported to the Project site. Panels would be arranged in strings with a maximum height of 8 feet at full tilt or slightly higher due to topography. Panel faces would be minimally reflective, dark in color, and highly absorptive.

Inverters, Transformers, and Electrical Collection System

The Project would be designed and laid out primarily in module blocks of 2 to 5 MW increments which would include an inverter equipment area measuring 40 feet by 25 feet. Non-conforming module blocks would be designed and sized as appropriate to accommodate the irregular shape of the project footprint. The final module block increment sizes ultimately would depend on available technology and market conditions. Each 2 to 5 MW block would include an inverter-transformer station constructed on a concrete pad or steel skid centrally located within the PV arrays. Each inverter-transformer station would contain up to six inverters, a transformer, a battery enclosure, and an 8 to 11 feet high switchboard. The pads would contain a security camera at the top of an approximately 20-foot wood or metal pole. If required based on site meteorological conditions, an inverter shade structure would be installed at each pad. The shade structure would consist of wood or metal supports and a durable outdoor material shade structure (metal, vinyl, or similar). The shade structure, if utilized, would extend up to 10 feet above the ground surface.

Project Substations and Switchyards

At least one, and up to 2, project substation yards would transform or "step up" the voltage from 34.5 kV to 500 kV on the Easley site. The area of each substation and associated equipment would require approximately 25 acres within the Project site. The substation(s) would collect consolidated intermediate voltage cables from the medium voltage PV collector system. Electrical transformers, switchgear, and related substation facilities would be designed and constructed to transform medium-voltage power from the Project's delivery system via the new gen-tie to the Oberon substation, at which point Easley solar generated power would be transmitted to the SCE Red Bluff Substation via the Oberon 500 kV gen-tie line, which is currently under construction and anticipated to be online by the end of 2023. Upgrades would be required within the fenceline of the Oberon Substation to accommodate interconnection of the Easley 500 kV gen-tie line.

500 kV Gen-tie Transmission Line

The Project would include an approximate 6.7-mile 500 kV gen-tie line starting at the onsite substation located on private property (APN 808-023-018). Just south of the substation, the 500 kV gen-tie line would enter the Oberon Renewable Energy Project site and would be located within a 175-foot ROW on BLM-administered land for the remainder of the route. The gen-tie line would exit the substation and travel approximately 0.2 miles due south to cross Rice Road/SR 177, where it would turn southwest to parallel the eastern side of Rice Road/SR 177 for 1.1 miles before turning east and then southeast for nearly 1 mile to meet BLM Open Route DC379. The line would parallel the north side of BLM Open Route DC379 and the existing Desert Sunlight and Desert Harvest 230 kV gen-tie lines for 3.8 miles before turning south for 0.6 miles to interconnect to the Oberon Substation. From the Oberon Substation, Easley solar generated power would be transmitted to the SCE Red Bluff Substation via the Oberon 500 kV gen-tie.

The Project gen-tie line would be constructed with either monopoles, lattice steel structures, or wooden H-frame poles. Gen-tie structures would be on average 120 feet tall, with a maximum height up to approximately 199 feet. The total number of gen-tie support structures would be approximately 25 structures with the exact number to be determined by the final alignment of the gen-tie line.

Operation and Maintenance Building

New O&M facilities would be constructed at the Project site. The facilities would be designed for Project security, employee offices, and parts storage. The O&M building would be approximately 3,000 square feet in size and approximately 15 feet at its tallest point, which would accommodate operation and maintenance staff. The O&M building would be constructed on a concrete foundation.

SCADA and Telecommunications Facilities

The facility would be designed with a comprehensive Supervisory Control and Data Acquisition System (SCADA) system to allow remote monitoring of facility operation and/or remote control of critical components. The fiber optic or other cabling required for the monitoring system typically would be installed in buried conduit, leading to a SCADA system cabinet centrally located within the Project site or a series of appropriately located SCADA system cabinets constructed within the O&M building. External telecommunications connections to the SCADA system cabinets could be provided through wireless or hard-wired connections to locally available commercial service providers. The Project's SCADA system would interconnect to this fiber optic network at the switching station. To ensure full and true redundancy, two of the communication lines would be attached on the 500 kV gen-tie line transmission

structures. A third fiber optic line would be installed underground, likely in the gen-tie line access road to accommodate the separation requirements and minimize operational visual impacts.

Battery Energy Storage System

Battery energy storage systems (BESS) can assist grid operators in more effectively integrating intermittent renewable resources into the statewide grid. The Project could include, at the Applicant's option, a battery or flywheel storage system capable of storing up to 650 MW of electricity, requiring up to 35 acres that would be located near the substation. If provided, the storage system would consist of battery or flywheel banks housed in electrical enclosures and buried electrical conduit. The battery system would be located near the Project switching station to facilitate interconnection and metering. Alternatively, smaller individual BESS systems may be located near each the inverters.

Up to 300 electrical enclosures measuring approximately 40 feet by 8 feet by 8.5 feet high would be installed on concrete foundations designed for secondary containment. The Project could use any commercially available battery technology, including but not limited to lithium ion, zinc, lead acid, vanadium, sodium sulfur, and sodium or nickel hydride. Battery systems would require air conditioners or heat exchangers and inverters. In addition, a 10,000-gallon water tank is anticipated for each BESS unit/area.

Meteorological Data Collection System

The Project would include a meteorological (met) data collection system, such as a Soil Climate Analysis Network (SCAN) station or other applicable technology. Each met station would have multiple weather sensors: a pyranometer for measuring solar irradiance, a thermometer to measure air temperature, a barometric pressure sensor, and wind sensors to measure speed and direction. The 4-foot horizontal cross-arm of each met system would include the pyranometer mounted on the left-hand side and the two wind sensors installed on a vertical mast to the right. The temperature sensor would be mounted inside the solar shield behind the main mast. Each sensor would be connected by cable to a data logger inside the enclosure.

Access Roads

Primary access to the Project site would be provided from Rice Road/SR 177. BLM open routes and surrounding County roads would also be improved. If building structures, such as the O&M Building, and associated access roadways would be within 1,320 feet of SR 177, secondary access is not required by the Riverside County Fire Department. All new and improved access roads would be at least 24 feet wide with a two-foot-wide shoulder on each side, for a total width of approximately 30 feet, including allowances for side slopes and surface runoff control.

Fencing

The solar facility would be enclosed with fencing that meets National Electric and Safety Code (NESC) requirements for protective arrangements in electric supply stations. The boundary of the Project components (i.e., solar arrays, substation, BESS) would be secured by at least 6-foot-high chain link perimeter fences, likely topped with one foot of three strand barbed wire or a fence design determined in consultation with Riverside County and BLM. The fence would be set approximately 10 to 100 feet (average of 20 feet) from the edge of an array. Desert tortoise exclusion fencing would be constructed along the bottom of the security fence for project construction.

Water Requirements

Water for construction needs and related dust control would be obtained from either an on-site groundwater well or purchased offsite. Water tanks would likely be set up by any groundwater wells and near the O&M building. During the construction phase, it is anticipated that a total of up to 1,000 acre-feet would be used for dust suppression (including truck wheel washing) and other purposes during the 24-month construction timeframe. During construction, restroom facilities would be provided by portable units to be serviced by licensed providers.

During the operation and maintenance phase, water would be required for panel washing and maintenance, and for workforce facilities. Substation restroom facilities would be located adjacent to the O&M building. An associated leach field would not be located within 0.25 mile of any drinking water well. During operation, the solar array portion of the project would require the use of approximately 50 acre-feet annually for panel washing (up to four times per year) and other uses. No wastewater would be generated during panel washing as water would be absorbed into the surrounding soil or would evaporate. Water would be obtained from an onsite groundwater well or purchased offsite.

General Construction Process

Site Preparation

Mass grading would not be conducted on the project site. Several solar and storage facility locations would require specific ground treatments, but this represents a minority of the ground surface of the facility. The substation, storage container, O&M facility, laydown yards, pre-fabrication areas, and internal and external road locations would require mowing, grubbing, grading and compaction. Inverter station locations would require light grubbing. The solar array areas would require mowing and rolling of woody vegetation to a height of 12 inches in an effort to preserve vegetation and provide for better and faster post-construction site revegetation. In some locations, root balls would need to be removed, which would require light grading.

Certain areas of the site with highly irregular topography that provide important hydrologic functions to the site would be avoided by project design. Other irregular areas would be leveled or smoothed to provide for construction access and installation. The site cut and fill would be approximately balanced; minimal import/export would be necessary. On-site pre-assembly of trackers would take place in the staging area. After grubbing and light grading, construction of staging areas would occur.

Construction Activities

Construction is anticipated to require approximately 24-months, depending on Power Purchase Agree (PPA) and financing requirements. The on-site workforce would consist of laborers, craftsmen, supervisory personnel, supply personnel, and construction management personnel. The on-site workforce is expected to reach its peak of approximately 530 individuals with an average construction-related on-site workforce of 320 individuals.

Preconstruction surveys would be conducted, followed by construction of the main access road, security fencing around solar facility site and clearance surveys, clearing and construction of a laydown yard, site grading and preparation, construction of the O&M building, parking area, and pad mounts for transformers. Construction would continue with the installation of temporary power, construction of on-site roads, construction of the Project substation, and assembly and installation of panel blocks and wiring.

Construction, including automated construction techniques, would occur between the hours of 4:00 a.m. and 8:00 p.m. Monday through Friday for up to a maximum of 16 hours per day. As part of this application, the Applicant is seeking a variance to the Riverside County noise ordinance during construction.

During summer months, construction would begin early to minimize work during the hottest periods of the day. Likewise, limited, targeted night work may also be required by the interconnecting utility or for similar electrical work. Weekend construction work is not expected to be required on a regular basis, but may occur on occasion, depending on scheduling considerations.

The Project would be constructed in the following phases, which would occur simultaneously on different portions of the site:

- Phase 1: Site Preparation - Development of staging areas and assembly areas and grading of site access roads.
- Phase 2: Photovoltaic Panel System - Construction of arrays including pile installation, assembly of trackers, mounting of PV panels, and pile-driving of support piles, placement of trackers on support piles, and trenching and installation of electrical equipment for arrays.
- Phase 3: Inverters, Transformers, Substations and Electrical Collector System - Construction of electrical transmission facilities, including the construction of substations, gen-tie line, and O&M building.

Operation and Maintenance Activities

The solar modules at the site would operate during daylight 7 days a week, 365 days a year. Operational activities at the Project site would include:

- Maintaining safe and reliable solar generation;
- Site security;
- Responding to automated electronic alerts based on monitored data, including actual versus expected tolerances for system output and other key performance metrics; and
- Communicating with customers, transmission system operators, and other entities involved in facility operations.

During operation of the proposed Project, up to 10 permanent staff could be on the site at any one time for ongoing facility maintenance and repairs. Alternatively, approximately 2 permanent staff and 8 project operators would be located off-site and would be on call to respond to alerts generated by the monitoring equipment at the project site. Security personnel would be on-call. The staff would be sourced from nearby communities in Riverside County. The O&M building would house the security monitoring equipment, including security camera feeds for monitoring the project 24 hours per day.

The project site maintenance program would be largely conducted during daytime hours. Equipment repairs could take place in the early morning or evening when the plant would be producing the least amount of energy. Key program elements would include maintenance activities originating from the on-site O&M facility.

Maintenance typically would include: panel repairs; panel washing; maintenance of transformers, inverters, energy storage system, and other electrical equipment; road and fence repairs; and vegetation and pest management. The Applicant would recondition roads up to approximately once per year, such as after a heavy storm event that may cause destabilization or erosion.

Revegetation would be the primary strategy to control dust across the solar facility site. Soil binders would be used to control dust on roads and elsewhere on the solar facility site, as needed.

On-site vegetation would be managed to ensure access to all areas of the site, reduce fire risk, and to help screen project elements as needed. Onsite vegetation may be trimmed approximately once every three years, as needed. For the first year, weed management and control would be performed quarterly.

Solar modules would be washed as needed (up to four times each year) using light utility vehicles with tow-behind water trailers to maintain optimal electricity production. No chemical agents would be used for module washing.

No heavy equipment would be used during normal operation. O&M vehicles would include trucks (pickup and flatbed), forklifts, and loaders for routine and unscheduled maintenance and water trucks for solar panel washing. Large heavy-haul transport equipment may be brought to the solar facility infrequently for equipment repair or replacement. No helicopter use is proposed during routine operations although they may be used for emergency maintenance or repair activities.

Long-term maintenance schedules would be developed to arrange periodic maintenance and equipment replacement in accordance with manufacturer recommendations. Solar panels are warranted for 35 years or longer and are expected to have a life of 50 or more years, with a degradation rate of 0.5 percent per year. Moving parts, such as motors and tracking module drive equipment, motorized circuit breakers and disconnects, and inverter ventilation equipment, would be serviced on a regular basis, and unscheduled maintenance would be performed as necessary.

Decommissioning

At the end of the Project's useful life, the solar arrays and gen-tie line would be decommissioned and dismantled per an agency approved Closure and Decommissioning Plan. Upon ultimate decommissioning, a majority of project components will be suitable for recycling or reuse, and project decommissioning would be designed to optimize such salvage as circumstances allow and in compliance with all local, State, and federal laws and regulations in effect at the time of decommissioning. Following removal of the above-ground and buried project components as required in the Closure and Decommissioning Plan, the site would be restored to its pre-solar facility conditions, or such condition as appropriate in accordance with County and BLM policies at the time of decommissioning.

Decommissioning activities would require similar equipment and workforce as construction but would be substantially less intense. The following activities would be involved:

- Dismantling and removal of all above-ground equipment (solar panels, track units, transformers, inverters, substation, O&M buildings, switchyard, distribution lines, etc.)
- Excavation and removal of all above-ground cables
- Removal of solar panel posts
- Removal of primary roads (aggregate-based)
- Break-up and removal of concrete pads and foundations
- Removal of septic system and leach field
- Removal of 34.5 kV collector lines
- Dismantling of gen-tie line
- Scarification of compacted areas

The panels could be sold into a secondary solar PV panel market. The majority of the components of the solar installation are made of materials that can be readily recycled. If the panels can no longer be used

in a solar array, the silicon can be recovered, the aluminum resold, and the glass recycled. Other components of the solar installation, such as the tracker structures and mechanical assemblies, can be recycled, as they are made from galvanized steel. Equipment such as drive controllers, inverters, transformers, and switchgear can be either reused or their components recycled. The equipment pads are made from concrete, which can be crushed and recycled. Underground conduit and wire can be removed by uncovering trenches, removing the conduit and wire, and backfilling. The electrical wiring is made from copper and/or aluminum and can be reused or recycled, as well. It is estimated that 100 percent of copper components will be recycled and approximately 50 percent of aluminum and other components would be recycled.

Following decommissioning and dismantling of the solar facility, the Easley site would be made available for reversion to agricultural use or open space.

B. Environmental Topics to be Addressed

Introduction

The County of Riverside has determined that an Environmental Impact Report (EIR) shall be prepared to address the potential significant impacts of the proposed Easley Renewable Energy Project. The EIR will involve research, analysis, and study of the following environmental topics:

- Aesthetics/Visual Resources/Reflection
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Paleontological Resources
- Population and Housing and Socioeconomics
- Public Services and Utilities/Service Systems
- Recreation
- Traffic and Transportation
- Wildfire

The EIR will include all topical areas of content required by the California Environmental Quality Act (CEQA), including cumulative impacts, alternatives to the proposed Project, and growth-inducing impacts. For each resource topic, environmental impacts relating to construction, operations, and decommissioning phases of the Project will be identified. However, the level of analysis to be included may vary based on the complexity of the issues, public and agency input to this Notice of Preparation (NOP), and/or refinements to the Project description that may occur subsequent to the publication of this NOP. For impacts that are significant, mitigation measures will be proposed to alleviate or avoid the significant impact(s).

Aesthetics/Visual Resources/Reflection

Placement of PV solar panels, the transmission line, and other Project facilities may alter the views of the Project area. Potential visual impacts of this Project on sensitive receptors and scenic resources will be further evaluated in the EIR, including consideration of construction of other solar projects in the surrounding Project area. Photo simulations of the proposed Project from key observation points will be provided to assist in the evaluation. The EIR will also analyze the possible impacts of reflection of the sun off the solar modules and nighttime lighting of portions of the solar facility.

Agricultural and Forestry Resources

The potential impact on prime and unique farmlands and lands zoned as such and subject to a Williamson Act contract will be evaluated in the EIR, as will the potential impact of converting agricultural lands to non-agricultural uses.

Air Quality

The proposed Project site is located in the Mojave Desert Air Basin (MDAB), and air emissions are regulated by the South Coast Air Quality Management District. The Riverside County portion of the MDAB is designated as nonattainment for the State ozone and particulate matter under 10 micrometers in diameter (PM10) standards. The EIR will address consistency with regional and local air quality plans and evaluate and quantify the short-term and long-term sources of air pollutants generated by the Project, including mobile, stationary, and area source emissions.

Biological Resources

A biological resources assessment will be provided to evaluate the Project's effects on the area's vegetation communities, wildlife habitats, wildlife movement, wetlands and waters, habitat conservation plans/protection ordinances, and sensitive and/or listed species.

Cultural Resources and Tribal Cultural Resources

Cultural and tribal cultural resource effects will be analyzed in the EIR, including a query of the Northwest Information Center of the California Historical Resources Information System, analysis of sacred lands identified through consultation with the Native American Heritage Commission, and consultation with Native Americans and other interested parties (e.g., local historical societies). The evaluation will also address the potential impacts to historic resources.

Energy

The EIR will examine the potential for wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation and the Project's consistency with state or local plans for renewable energy.

Geology and Soils

The EIR will assess soil and geologic conditions of the Project area and address hazards related to seismic activity, including the potential for liquefaction, ground shaking, soil failure, soil stability, and erosion potential.

Greenhouse Gas Emissions

The EIR will address the potential construction- and operation-related impacts relative to greenhouse gas emissions.

Hazards and Hazardous Materials

The EIR will evaluate the presence of hazards or hazardous conditions that could affect construction and operation of the Project, including the location of nearby or on-site hazardous waste sites included on

State or federal databases, airport and airstrip hazard zones, emergency response routes, and wildfire hazards.

Hydrology and Water Quality

The EIR will include an analysis of existing drainage systems and will evaluate potential impacts to water resources.

Land Use and Planning

The proposed Project may affect the use of the project properties. The EIR will evaluate potential environmental effects to land use that include compatibility with existing and proposed local zoning and consistency with land use plans, policies, or regulations of the applicable jurisdictions, which include the Riverside County General Plan and the BLM's Desert Renewable Energy Conservation Plan (DRECP).

Mineral Resources

The EIR will address potential impacts, including loss of availability, to any known mineral resources in the Project area.

Noise

The EIR will determine noise levels due to construction and operation of the proposed Project and will evaluate impacts for consistency with applicable laws, regulations, ordinances, and guidelines.

Paleontological Resources

The EIR will address the occurrence of and potential impacts to paleontological (fossil) resources.

Population and Housing and Socioeconomics

The EIR will address the short- and long-term population and housing impacts that would result from the construction workforce. These effects could include physical and service-related changes within area communities associated with demand for temporary housing.

Public Services and Utilities/Service Systems

With the accommodation of the construction workforce, there may be a temporarily increased demand for public services and utilities, including community facilities and schools, and an increased need for police and fire protection services. The EIR will evaluate the potential for impacts on these public services.

Traffic and Circulation

The EIR will include a traffic study that evaluates changes in circulation that could result from the proposed Project, focusing on effects during Project construction.

Wildfire

The EIR will address whether construction, operation, or decommissioning of the Project would impact emergency response, exacerbate wildfire risk, and/or expose people or structures to significant risk due to wildfires and/or post-fire effects.

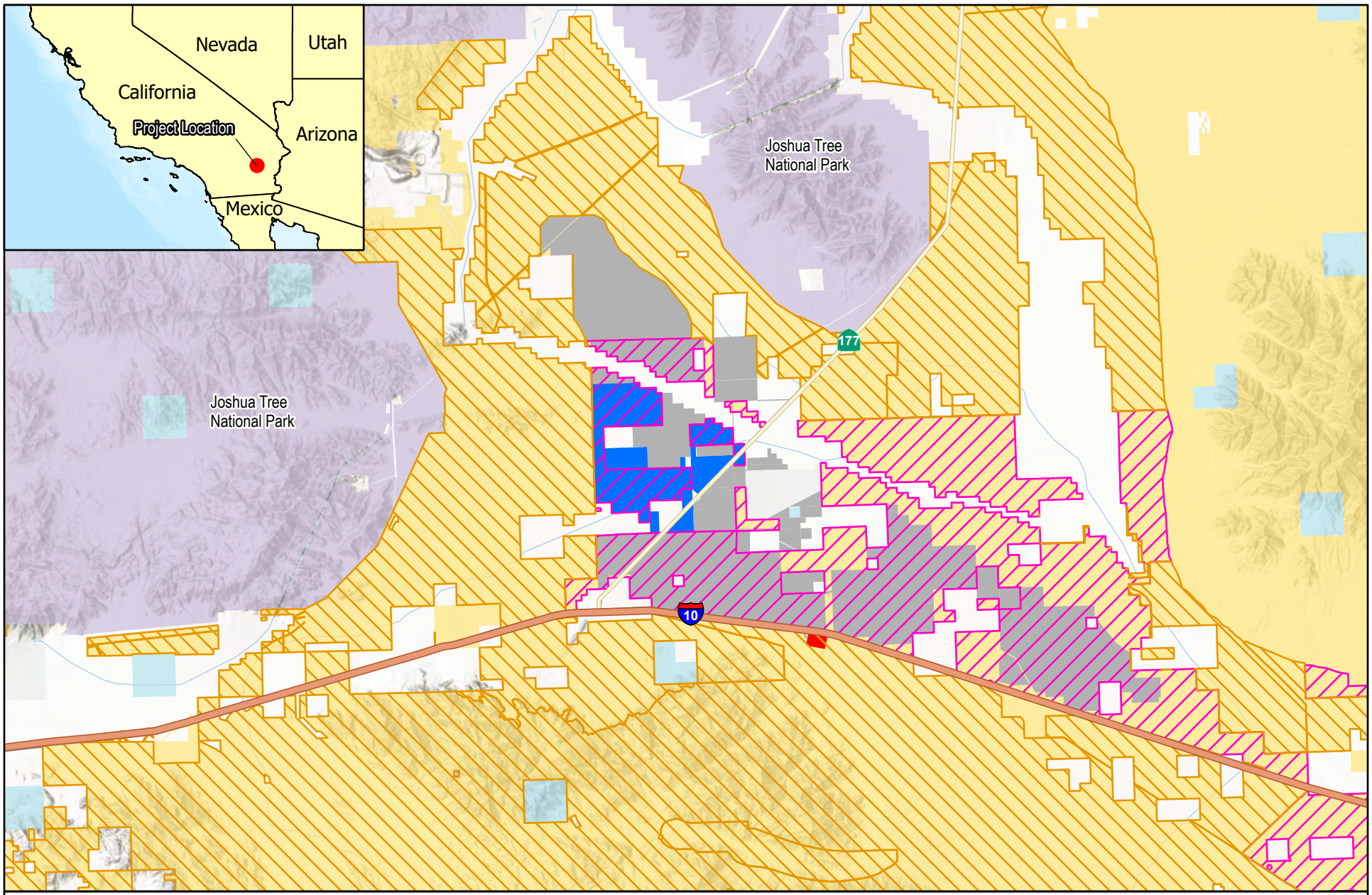
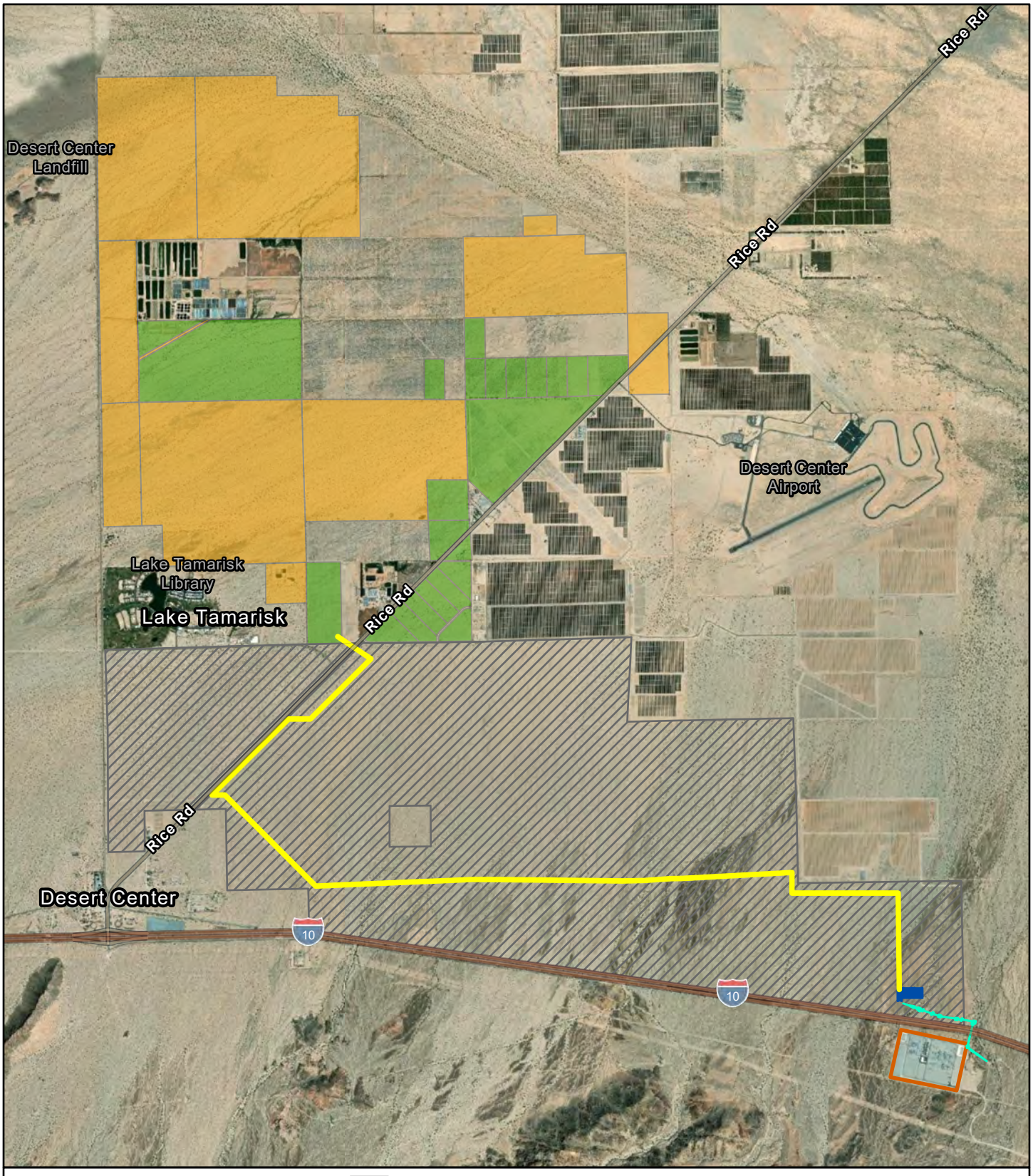


Figure 1

Project Vicinity

Sources: Aspen, 2022; Intersect Power, 2022; BLM, 2022; Esri, 2022.



Easley Project on Private Land
Easley Project on Public Land
Easley Proposed 500 kV Gen-tie Line (BLM-Administered Land)
Oberon 500 kV Gen-tie Line (BLM-Administered Land)
Red Bluff Substation
Oberon Renewable Energy Project (BLM-Administered Land)
Oberon Substation

0 0.5 1 Miles

Figure 2

Project Area

Sources: Aspen, 2022; BLM, 2022; Esri, 2022; Intersect Power, 2022.

Appendix B

Newspaper Ads: Scoping Meeting Announcement and Publication Affidavits

RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Planning Director

Public Notice of Preparation of a Draft Environmental Impact Report and Scoping Meeting

Date: November 14, 2022

To: Responsible and Trustee Agencies, Interested Organizations, and Individuals

The Riverside County Planning Department is currently reviewing a development application (herein, "Project") in Riverside County. The Project is subject to compliance with the California Environmental Quality Act (CEQA). This notice is to inform public agencies and the general public that an Environmental Impact Report (EIR) will be prepared for the Project, and to solicit guidance as to the scope and content of the required EIR.

Project Case No./Title: Easley Renewable Energy Project - Draft Environmental Impact Report
Conditional Use Permit No. 220021/ Development Agreement No. 2200016

Project Location and Description: The Easley Renewable Energy Project (Easley or Project) is located in Riverside County, north of Interstate 10 (I-10) and approximately 2 miles north of the town of Desert Center, CA. The Project consists of 24 parcels on private land (990 acres), and 13 parcels on land administered by the U.S. Bureau of Land Management (BLM; 2,745 acres). The 500 kilovolt (kV) generation tie (gen-tie) transmission line would transmit the solar power generated from an onsite substation, on the southern edge of the Easley Project just west of Rice Road/State Route (SR) 177, to interconnect into the regional transmission grid approximately 6.7 miles to the east-southeast. IP Easley, LLC ("Applicant"), a subsidiary of Intersect Power, LLC, proposes to construct, operate, and decommission the Easley Renewable Energy Project, a utility-scale solar photovoltaic (PV) electrical generating and storage facility and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid. The proposed Project would generate and store up to 650 megawatts (MW) of renewable electricity via arrays of solar photovoltaic (PV) panels, battery energy storage system (BESS), and appurtenant facilities. A 6.7-mile 500 kV generation-tie (gen-tie) line would mainly traverse across the approved Oberon Renewable Energy Project site and connect into an approved substation that is under construction on the Oberon site, an adjacent solar and energy storage facility owned by Intersect Power. From the Oberon onsite substation, the power generated by the Easley Project would be transmitted to the SCE Red Bluff Substation via the Oberon 500 kV gen-tie line, which is expected to be online by the end of 2023. Public lands within the Project solar application area include lands designated as Development Focus Area by the Desert Renewable Energy Conservation Plan (DRECP) and associated Record of Decision, and thus, have been targeted for renewable energy development. Because the proposed Project is partially located on federal land under management of the BLM, the BLM is the lead agency under the National Environmental Policy Act (NEPA), 42 U.S.C. section 4321 et seq.

Lead Agency	**Project Sponsor/Applicant**
Riverside County Planning Department	IP Easley, LLC
4080 Lemon Street, 12th Floor	c/o Intersect Power, LLC
P.O. Box 1409	9450 SW Gemini Drive PMB#68743
Riverside, CA 92501-1409	Beaverton, OR 97008-7105
Contact Person: Tim Wheeler, Principal Planner	Contact Person: Camille Wasinger

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit input from the public as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as

soon as possible, but not later than thirty (30) days after receiving this notice. The public review period is from November 14 to December 16, 2022.

SCOPE OF ANALYSIS: It is anticipated that the proposed Project would have the potential to result in significant impacts under the following issue areas. A detailed analysis of the following issue areas will be included in the forthcoming EIR:

Aesthetics	Hydrology and Water Quality
Agriculture and Forestry Resources	Land Use and Planning
Air Quality	Noise
Biological Resources	Paleontological Resources
Cultural and Tribal Cultural Resources	Population and Housing
Energy	Public Services and Utilities
Geology, Soils, and Mineral Resources	Recreation
Greenhouse Gas Emissions	Traffic and Transportation
Hazards and Hazardous Materials	Wildfire

PUBLIC SCOPING MEETING: A Scoping Session has been scheduled in order to bring together and resolve the concerns of affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The Scoping Session is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the Scoping Session, through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.

TIME OF SCOPING SESSION: 1:30pm **DATE OF SCOPING SESSION**: December 5, 2022

Information on how to participate in the meeting will be available on the Planning Department website at: https://planning.rctlma.org. If you wish to participate (speak or view meeting) remotely during the meeting, please contact the TLMA Commission Secretary, Elizabeth Sarabia, by phone at (951) 955-6021, or email ESarabia@rivco.org ***AT LEAST 24 HOURS*** prior to the meeting and provide your name, phone number, and agenda item. Once you provide the necessary information you will receive (either by phone or email) conformation of receipt of your request with the necessary meeting information to join.

For electronic documents and information related to the Notice of Preparation, please view the project webpage below:

https://planning.rctlma.org/Home/Planning-Notices/NOP-for-CUP220021-DA2200016

Please send all written correspondence to:

Riverside County Planning Department
Attn: Tim Wheeler, Principal Planner
P.O. Box 1409, Riverside, CA 92501-1409

If you have any questions, please contact Tim Wheeler, Principal Planner at TWheeler@rivco.org or (915) 955-6060.

Appendix B-1

Desert Sun Proof of Publication

Desert Sun mediagroup
PART OF THE USA TODAY NETWORK

PO Box 23430
Green Bay, WI 54305-3430
Tel: 760-778-4578 / Fax 760-778-4731
Email: legals@thedesertsun.com

PROOF OF PUBLICATION

STATE OF CALIFORNIA SS.
COUNTY OF RIVERSIDE

ASPEN ENVIRONMENTAL GROUP
235 MONTGOMERY ST, STE 640

SAN FRANCISCO CA 94104

I am over the age of 18 years old, a citizen of the United States and not a party to, or have interest in this matter. I hereby certify that the attached advertisement appeared in said newspaper (set in type not smaller than non pariel) in each and entire issue of said newspaper and not in any supplement thereof of the following issue dates, to wit:

11/16/2022, 11/30/2022

I acknowledge that I am a principal clerk of the printer of The Desert Sun, published weekly in the City of Palm Springs, County of Riverside, State of California. The Desert Sun was adjudicated a Newspaper of general circulation on March 24, 1988 by the Superior Court of the County of Riverside, State of California Case No. 191236.

I certify under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.. Executed on this 30th of December 2022 in Green Bay, WI, County of Brown.

Tina Kanitz
DECLARANT

Ad#:0005486482
P O : Legal Ad
This is not an invoice
# of Affidavits: 1

Public Notice of Preparation of a Draft Environmental Impact Report and Scoping Meeting

Date: November 14, 2022
To: Responsible and Trustee Agencies, Interested Organizations, and Individuals
The Riverside County Planning Department is currently reviewing a development application (herein, "Project") in Riverside County. The Project is subject to compliance with the California Environmental Quality Act (CEQA). This notice is to inform public agencies and the general public that an Environmetal Impact Report (EIR) will be prepared for the Project, and to solicit guidance as to the scope and content of the required EIR.
Project Case No./Title: Easley Renewable Energy Project - Draft Environmental Impact Report Conditional Use Permit No. 220021/ Development Agreement No. 2200016
Project Location and Description: The Easley Renewable Energy Project (Easley or Project) is located in Riverside County, north of Interstate 10 (I-10) and approximately 2 miles north of the town of Desert Center, CA. The Project consists of 24 parcels on private land (990 acres), and 13 parcels on land administered by the U.S. Bureau of Land Management (BLM; 2,745 acres). The 500 kilovolt (kV) generation tie (gen-tie) transmission line would transmit the solar power generated from an onsite substation, on the southern edge of the Easley Project just west of Rice Road/State Route (SR) 177, to interconnect into the regional transmission grid approximately 6.7 miles to the east)southeast. IP Easley, LLC ("Applicant"), a subsidiary of Intersect Power, LLC, proposes to construct, operate, and decommission the Easley Renewable Energy Project, a utility-scale solar photovoltaic (PV) electrical generating and storage facility and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid. The proposed Project would generate and store up to 650 megawatts (MW) of renewable electricity via arrays of solar photovoltaic (PV) panels, battery energy storage system (BESS), and appurtenant facilities. A 6.7-
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Lead Agency Project	**Sponsor/Applicant**
Riverside County Planning Department	IP Easley, LLC
4080 Lemon Street, 12th Floor	c/o Intersect Power, LLC
P.O. Box 1409	9450 SW Gemini Drive PMB#68743
Riverside, CA 92501-1409	Beaverton, OR 97008-7105
Contact Person: Tim Wheeler, Principal Planner	Contact Person: Camille Wasinger

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Please send all written correspondence to:
Riverside County Planning Department
Attn: Tim Wheeler, Principal Planner
P.O. Box 1409, Riverside, CA 92501-1409
If you have any questions, please contact Tim Wheeler, Principal Planner at TWheeler@rivco.org or (915) 955-6060.
Published: 11/16, 11/30/2022

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Environmental Impact Report and Scoping Meeting

Date: November 14, 2022
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4080 Lemon Street, 12th Floor	c/o Intersect Power, LLC
P.O. Box 1409	9450 SW Gemini Drive PMB#68743
Riverside, CA 92501-1409	Beaverton, OR 97008-7105
Contact Person: Tim Wheeler, Principal Planner	Contact Person: Camille Wasinger

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit input from the public as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but not later than thirty (30) days after receiving this notice. The public review period is from November 14 to December 16, 2022.
SCOPE OF ANALYSIS: It is anticipated that the proposed Project would have the potential to result in significant impacts under the following issue areas. A detailed analysis of the following issue areas will be included in the forthcoming EIR:

Aesthetics	Hydrology and Water Quality
Agriculture and Forestry Resources	Land Use and Planning
Air Quality	Noise
Biological Resources	Paleontological Resources
Cultural and Tribal Cultural Resources	Population and Housing
Energy	Public Services and Utilities
Geology, Soils, and Mineral Resources	Recreation
Greenhouse Gas Emissions	Traffic and Transportation
Hazards and Hazardous Materials	Wildfire

PUBLIC SCOPING MEETING: A Scoping Session has been scheduled in order to bring together and resolve the concerns of affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The Scoping Session is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the Scoping Session, through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.
TIME OF SCOPING SESSION: 1:30pm **DATE OF SCOPING SESSION**:December 5, 2022
Information on how to participate in the meeting will be available on the Planning Department website at: https://planning.rctlma.org. If you wish to participate (speak or view meeting) remotely during the meeting, please contact the TLMA Commission Secretary, Elizabeth Sarabia, by phone at (951) 955-6021, or email ESarabia@rivco.org **AT LEAST 24 HOURS** prior to the meeting and provide your name, phone number, and agenda item. Once you provide the necessary information you will receive (either by phone or email) conformation of receipt of your request with the necessary meeting information to join.
For electronic documents and information related to the Notice of Preparation, please view the project webpage below:
https://planning.rctlma.org/Home/Planning-Notices/NOP-for-CUP220021-DA2200016
Please send all written correspondence to:
Riverside County Planning Department
Attn: Tim Wheeler, Principal Planner
P.O. Box 1409, Riverside, CA 92501-1409
If you have any questions, please contact Tim Wheeler, Principal Planner at TWheeler@rivco.org or (915) 955-6060.
Published: 11/16, 11/30/2022

Appendix B-2

Press Enterprise Proof of Publication

Column

INTERIM AD DRAFT

This is the proof of your ad scheduled to run in **The Press-Enterprise** on the dates indicated below.
If changes are needed, please contact us prior to deadline at **(951) 368-9229**.

Notice ID: cmiHHBxvvwUE38K5ZDvH | **Proof Updated: Nov. 11, 2022 at 12:54pm PST**
Notice Name: Easley Notice of Preparation

FILER	FILING FOR
Grace Weeks gweeks@aspeneg.com (818) 597-3407	The Press-Enterprise

Columns Wide: 2

Ad Class: Legals

11/16/2022: Display Ad	277.64
11/30/2022: Display Ad	277.64

Subtotal	$577.49
Tax %	0.00
Total	**$577.49**

See Proof on Next Page

Riverside County Planning Department

Public Notice of Preparation of a Draft
Environmental Impact Report and Scoping Meeting

Date: November 14, 2022

To: Responsible and Trustee Agencies, Interested Organizations, and Individuals

The Riverside County Planning Department is currently reviewing a development application (herein, "Project") in Riverside County. The Project is subject to compliance with the California Environmental Quality Act (CEQA). This notice is to inform public agencies and the general public that an Environmental Impact Report (EIR) will be prepared for the Project, and to solicit guidance as to the scope and content of the required EIR.

Project Case No./Title: Easley Renewable Energy Project - Draft Environmental Impact Report
Conditional Use Permit No. 220021/ Development Agreement No. 2200016

Project Location and Description: The Easley Renewable Energy Project (Easley or Project) is located in Riverside County, north of Interstate 10 (I-10) and approximately 2 miles north of the town of Desert Center, CA. The Project consists of 24 parcels on private land (990 acres), and 13 parcels on land administered by the U.S. Bureau of Land Management (BLM; 2,745 acres). The 500 kilovolt (kV) generation tie (gen-tie) transmission line would transmit the solar power generated from an onsite substation, on the southern edge of the Easley Project just west of Rice Road/State Route (SR) 177, to interconnect into the regional transmission grid approximately 6.7 miles to the east-southeast. IP Easley, LLC ("Applicant"), a subsidiary of Intersect Power, LLC, proposes to construct, operate, and decommission the Easley Renewable Energy Project, a utility-scale solar photovoltaic (PV) electrical generating and storage facility and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid. The proposed Project would generate and store up to 650 megawatts (MW) of renewable electricity via arrays of solar photovoltaic (PV) panels, battery energy storage system (BESS), and appurtenant facilities. A 6.7-mile 500 kV generation-tie (gen-tie) line would mainly traverse across the approved Oberon Renewable Energy Project site and connect into an approved substation that is under construction on the Oberon site, an adjacent solar and energy storage facility owned by Intersect Power. From the Oberon onsite substation, the power generated by the Easley Project would be transmitted to the SCE Red Bluff Substation via the Oberon 500 kV gen-tie line, which is expected to be online by the end of 2023. Public lands within the Project solar application area include lands designated as Development Focus Area by the Desert Renewable Energy Conservation Plan (DRECP) and associated Record of Decision, and thus, have been targeted for renewable energy development. Because the proposed Project is partially located on federal land under management of the BLM, the BLM is the lead agency under the National Environmental Policy Act (NEPA), 42 U.S.C. section 4321 et seq.

Lead Agency	**Project Sponsor/Applicant**
Riverside County Planning Department	IP Easley, LLC
4080 Lemon Street, 12th Floor	c/o Intersect Power, LLC
P.O. Box 1409	9450 SW Gemini Drive PMB#68743
Riverside, CA 92501-1409	Beaverton, OR 97008-7105
Contact Person: Tim Wheeler, Principal Planner	Contact Person: Camille Wasinger

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit input from the public as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but not later than thirty (30) days after receiving this notice. The public review period is from November 14 to December 16, 2022.
SCOPE OF ANALYSIS: It is anticipated that the proposed Project would have the potential to result in significant impacts under the following issue areas. A detailed analysis of the following issue areas will be included in the forthcoming EIR:

Aesthetics	Hydrology and Water Quality
Agriculture and Forestry Resources	Land Use and Planning
Air Quality	Noise
Biological Resources	Paleontological Resources
Cultural and Tribal Cultural Resources	Population and Housing
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Geology, Soils, and Mineral Resources	Recreation
Greenhouse Gas Emissions	Traffic and Transportation
Hazards and Hazardous Materials	Wildfire

PUBLIC SCOPING MEETING: A Scoping Session has been scheduled in order to bring together and resolve the concerns of affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The Scoping Session is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the Scoping Session, through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.

TIME OF SCOPING SESSION: 1:30pm **DATE OF SCOPING SESSION**: December 5, 2022

Information on how to participate in the meeting will be available on the Planning Department website at: https://planning.rctlma.org. If you wish to participate (speak or view meeting) remotely during the meeting, please contact the TLMA Commission Secretary, Elizabeth Sarabia, by phone at (951) 955-6021, or email ESarabia@rivco.org ***AT LEAST 24 HOURS*** prior to the meeting and provide your name, phone number, and agenda item. Once you provide the necessary information you will receive (either by phone or email) conformation of receipt of your request with the necessary meeting information to join.

For electronic documents and information related to the Notice of Preparation, please view the project webpage below:

https://planning.rctlma.org/Home/Planning-Notices/NOP-for-CUP220021-DA2200016

Please send all written correspondence to:

Riverside County Planning Department
Attn: Tim Wheeler, Principal Planner
P.O. Box 1409, Riverside, CA 92501-1409

If you have any questions, please contact Tim Wheeler, Principal Planner at TWheeler@rivco.org or (915) 955-6060.

Appendix C

Scoping Meeting Presentation

IP Easley Renewable Energy Project

RIVERSIDE COUNTY
PLANNING DEPARTMENT

Public Scoping Meeting

December 5, 2022

1

Meeting Agenda

- Welcome and Introduction
- Purpose of Scoping
- CEQA Process
- Description of the Proposed Project
- Riverside County Process
- Public Comments

Key Players and their Roles in the CEQA Process

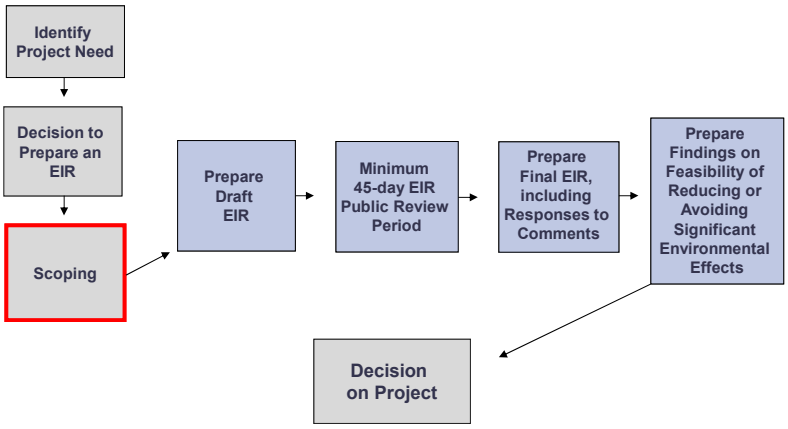
- **Riverside County Planning Department:**
  Lead Agency under California Environmental Quality Act (CEQA)
- **IP Easley, LLC:**
  The Applicant
- **Aspen Environmental Group:**
  Environmental Consultant for Riverside County

The Purpose of Scoping

- To inform the public and responsible agencies about an upcoming project for which an EIR will be prepared
- To inform the public about the environmental review process
- To solicit input regarding potential alternatives to the proposed project and the appropriate scope of issues to be studied in the environmental document
- To identify issues of concern and areas of potential controversy

4

CEQA Process



5

General Purpose and Content of an Environmental Document

- **Purpose**:
  - Provide technically sound information for decision-makers to consider in evaluating the proposed project
- **Content**:
  - Describe the environmental setting of the project area
  - Disclose potential environmental impacts of the project and alternatives
  - Propose measures to reduce or avoid significant environmental impacts (mitigation measures)

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Initial Study Analysis

Environmental Issue Areas

- Aesthetics
- Agricultural & Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology & Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Land Use & Planning
- Mineral Resources
- Noise
- Population & Housing
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resources
- Utilities & Service Systems
- Wildland Fire

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Applicant's Project Objectives

- Support climate and clean energy goals of the Inflation Reduction Act of 2022 by helping to tackle the climate crisis and work towards achievement of President Biden's goal of a zero-carbon power sector by 2035 and zero-carbon economy by 2050 through development of clean electricity (power sector);
- Assist the nation to meet its Nationally Determined Contribution commitments under Article 4 of the Paris Climate Agreement to achieve a 50 to 52 percent reduction in U.S. greenhouse gas pollution from 2005 levels by 2030, and to achieve 100 percent carbon pollution-free electricity by 2035 in the electricity sector;
- Deliver up to 650 MW of affordable, wholesale renewable energy to California ratepayers under long-term contracts with electricity service providers;
- Bring sales tax revenues to Riverside County by establishing a point of sale in the County for the procurement of most major project services and equipment;
- Further the purpose of Secretarial Order 3285A1, establishing the development of environmentally responsible renewable energy as a priority for the Department of the Interior;

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Applicant's Project Objectives cont'd

- Assist with achieving California's renewable energy generation goals under the Clean Energy and Pollution Reduction Act of 2015 (Senate Bill 350) and the 100 Percent Clean Energy Act of 2018 (Senate Bill 100), as well as greenhouse gas (GHG) emissions reduction goals of the California Global Warming Solutions Act of 2006 (AB 32), as amended by Senate Bill 32 in 2016;
- Enhance California's fossil-free resource adequacy capabilities and help to solve California's "duck curve" power production problem by installing up to 650 MW of 2-hour and/or 4-hour battery energy storage capacity;
- Minimize environmental impacts and land disturbance associated with solar energy development by siting the facility on relatively flat, contiguous lands with high solar insolation, in close proximity to established utility corridors, existing transmission lines with available capacity to facilitate interconnection, and road access;
- Conform with the Desert Renewable Energy Conservation Plan, including Conservation Management Actions, on BLM-administered land;
- Bring living-wage jobs to Riverside County.

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Proposed Project

- **Solar Facility** (990 acres private land; 2,745 acres BLM land)
  - Solar array field with single-axis solar PV trackers
  - Inverters and transformers
  - Collector power lines (34.5 kilovolt [kV])
  - Onsite substation yards
  - O&M building
  - SCADA and telecommunications facilities
  - Meteorological data collection system
  - Battery or flywheel storage system
  - Several interior access roads and driveway entrances
  - Vacate interior roadways & merge contiguous project parcels
- **500 kV Gen-Tie Transmission Line** (6.7 miles, BLM land)
  - Connect solar facility with Oberon Substation (under construction)
  - Utilize Oberon gen-tie line to interconnect to regional transmission grid at SCE Red Bluff Substation.

IP Easley Renewable Energy Project

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Easley Proposed Project Area

Solar & BESS Facility

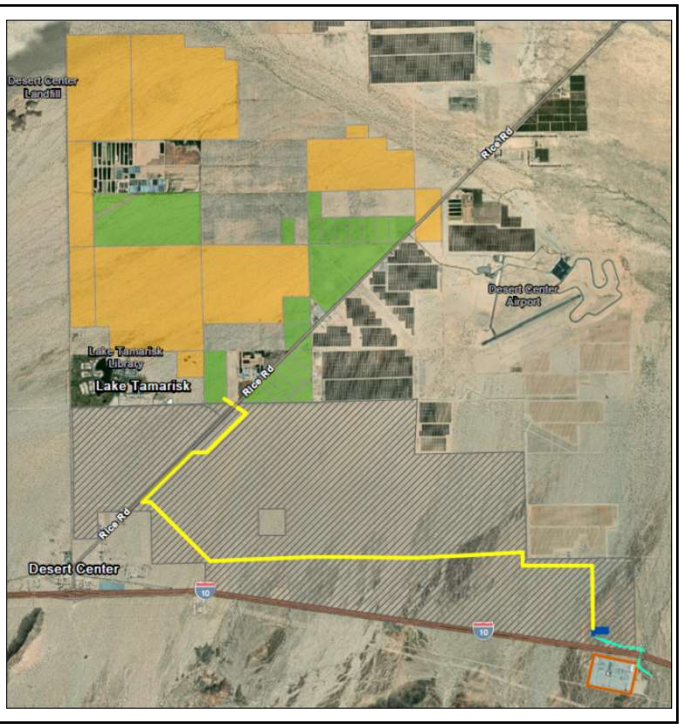
Private land (990 acres)

BLM land (2,745 acres)

500 kV Gen-Tie Line

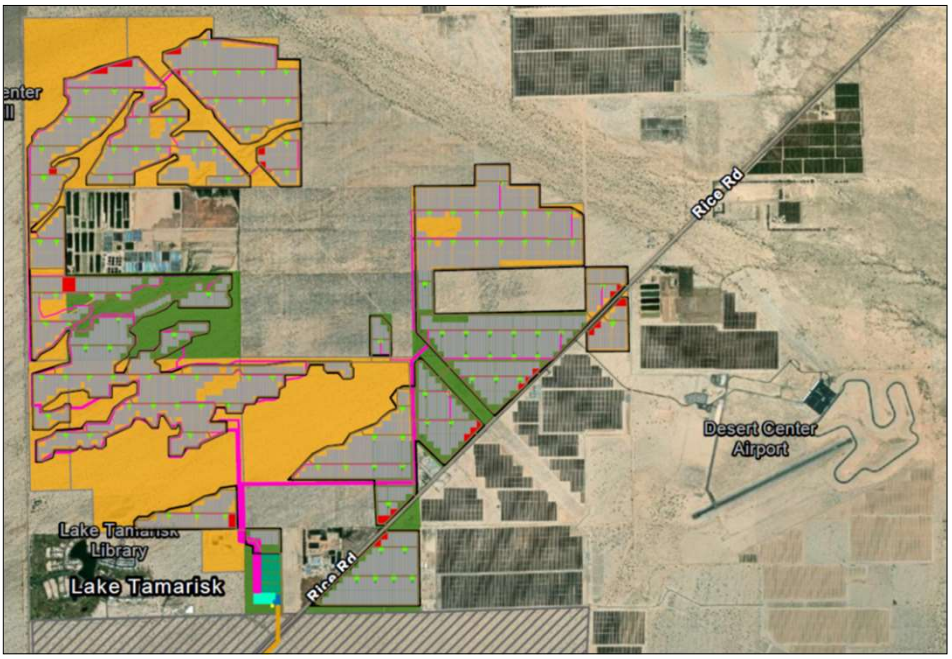
6.7-mile transmission line to Oberon Project Substation

Utilize Oberon gen-tie line to transmit energy to SCE Red Bluff Substation



11

Easley Proposed Solar PV Layout – *Initial Engineering/Design*



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What's Next?

- Public scoping period is being held from **November 14 through December 16, 2022**.
  - All public comments will be reviewed.
  - Environmental issues raised will be addressed in the EIR.
- Following review of public scoping comments, the County will prepare an EIR to be released for public review and comment.

IP Easley Renewable Energy Project

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Environmental Review Schedule

Activity	Date
IP filed a CUP/PUP Application	June 9, 2022
County Development Advisory Committee (DAC) Meeting	August 4, 2022
County issued DAC Completeness Letter	August 23, 2022
Notice of Preparation of an Environmental Document	November 14, 2022
Public Review of Draft Environmental Document • At least 45-day comment period	Spring 2023**
Final Environmental Document, including Responses to Comments	Fall 2023**
County Planning Board Hearing	Late 2023** (**Estimated)

Scoping Comments

The most useful scoping comments:

1. Identify potential environmental concerns regarding the proposed project.
2. Identify issue areas where the proposed project would not result in impacts or create concerns.
3. Recommend alternatives that would avoid or reduce concerns/impacts of the proposed project.
4. Provide comments in writing.

Comments

Please send comments by December 16th to:

Riverside County Planning Department
Attn: Tim Wheeler
PO Box 1409
Riverside, CA 92502-1409

or

Email: **TWheeler@rivco.org**

Please be sure to include your name, address, and email or phone number on all comments.

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Thank You for Your Input!

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Appendix D

Written Scoping Comments Received During Scoping Period

SCAG
INNOVATING FOR A BETTER TOMORROW

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

December 12, 2022

Tim Wheeler, Project Planner
County of Riverside Transportation and Land Use Agency, Planning Department
4080 Lemon Street, 12th Floor
Riverside, California 92501
Phone: (951) 955-6060
E-mail: TWheeler@rivco.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Easley Renewable Energy Project [SCAG NO. IGR10784]

Dear Tim Wheeler,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Easley Renewable Energy Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.[1]

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is the authorized regional agency for Intergovernmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Easley Renewable Energy Project in Riverside County. The proposed project includes the construction, operation, and decommission of a utility-scale solar photovoltaic electrical generating and storage facility for up to 650 megawatts, a 6.7-mile 500 kilovolt generation tie transmission line, and associated infrastructure to generate and deliver renewable energy to the statewide electricity transmission grid on a 3,735-acre site.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Annaleigh Ekman, Associate Regional Planner, at (213) 630-1427 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

[1] Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE EASLEY RENEWABLE ENERGY PROJECT [SCAG NO. IGR10784]

CONSISTENCY WITH CONNECT SOCAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with Connect SoCal.

CONNECT SOCAL GOALS

The SCAG Regional Council fully adopted Connect SoCal in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCAL GOALS	
Goal #1:	*Encourage regional economic prosperity and global competitiveness*
Goal #2:	*Improve mobility, accessibility, reliability and travel safety for people and goods*
Goal #3:	*Enhance the preservation, security, and resilience of the regional transportation system*
Goal #4:	*Increase person and goods movement and travel choices within the transportation system*
Goal #5:	*Reduce greenhouse gas emissions and improve air quality*
Goal #6:	*Support healthy and equitable communities*
Goal #7:	*Adapt to a changing climate and support an integrated regional development pattern and transportation network*
Goal #8:	*Leverage new transportation technologies and data-driven solutions that result in more efficient travel*
Goal #9:	*Encourage development of diverse housing types in areas that are supported by multiple transportation options*
Goal #10:	*Promote conservation of natural and agricultural lands and restoration of habitats*

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

	Goal	Analysis
Goal #1:	*Encourage regional economic prosperity and global competitiveness*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
Goal #2:	*Improve mobility, accessibility, reliability and travel safety for people and goods*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
etc.		etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the Connect SoCal webpage. Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect

SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the Connect SoCal Demographics and Growth Forecast Technical Report. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted Riverside County Forecasts			
	Year 2020	**Year 2030**	**Year 2035**	**Year 2045**	**Year 2020**	**Year 2030**	**Year 2035**	**Year 2045**
Population	19,517,731	20,821,171	21,443,006	22,503,899	2,492,601	2,852,599	2,995,509	3,251,705
Households	6,333,458	6,902,821	7,170,110	7,633,451	784,783	930,216	987,738	1,086,113
Employment	8,695,427	9,303,627	9,566,384	10,048,822	822,826	961,268	1,008,943	1,102,721

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG's Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the PEIR webpage and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Ecological Services
Palm Springs Fish and Wildlife Office
777 East Tahquitz Canyon Way, Suite 208
Palm Springs, California 92262

In Reply Refer to:
FWS-ERIV-2023-0022838

December 15, 2022
Sent Electronically

Tim Wheeler
County of Riverside
TLMA Planning Department
4080 Lemon Street, 12th Floor
Riverside, California 92501

Subject: Easley Renewable Energy Project, Note of Preparation of a Draft Environmental Impact Report, Conditional Use Permit No. 220021/Developmental Agreement No. 220016, Riverside County, California

Dear Tim Wheeler,

The U.S. Fish and Wildlife Service (Service) provides for your information our comments on the scope and content of the environmental analysis to be included in a draft Environmental Impact Report (EIR) as solicited on November 14, 2022, by the County of Riverside's (County) Notice of Preparation (NOP) under the California Environmental Quality Act (CEQA). IP Easley, LLC (the Applicant), a subsidiary of Intersect Power, LLC, proposes to construct, operate, and decommission the Easley Renewable Energy Project (Project) north of Interstate 10 (I-10) and approximately 2 miles north of the town of Desert Center in eastern Riverside County.

The proposed Project is a utility-scale solar photovoltaic (PV) electrical generating and storage facility with a 500 kilovolt (kV) generation-tie (gen-tie) line that spans 6.7 miles. The Project would be located on approximately 990 acres of private and approximately 2,745 acres of Bureau of Land Management (BLM) lands. The Project would generate and store up to 650 megawatts (MW) of renewable electricity. The gen-tie line would traverse through the Oberon Renewable Energy Project (Oberon) site and connect to the Red Bluff Substation via the Oberon 500 kV gen-tie line. The Applicant proposes to construct the Project within a Development Focus Area (DFA), as designated by the Desert Renewable Energy Conservation Plan (DRECP) Land Use Plan Amendment (LUPA), in the California Desert Conservation Area (CDCA).

The DRECP is an interagency landscape-scale planning effort that includes a BLM LUPA to the CDCA Plan. The DRECP has two primary goals, which include providing 1) a streamlined process for the development of utility-scale renewable energy generation and transmission in the California deserts, and 2) long-term conservation and management of special-status species and desert vegetation communities, as well as other physical, cultural, scenic, and social resources within the DRECP Plan Area. The DRECP Final Environmental Impact Statement (FEIS)

includes Conservation Management Actions (CMAs) designed to reduce the effects of renewable energy development on sensitive resources as well as highlighting other types of mitigation that might be required to further reduce impacts.

The Service's mission is working with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people. We offer our comments for the draft EIR according to authorities of the Department of the Interior, including our legal responsibility for threatened and endangered animals and plants listed under the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*). Federal trust resources that likely occur in the Project area include the federally threatened Mojave desert tortoise (*Gopherus agassizii*), endangered Yuma Ridgway's rail (*Rallus obsoletus yumanensis*), endangered southern willow flycatcher (*Empidonax trailii extimus*), endangered western distinct population segment of yellow-billed cuckoo (*Coccyzus americanus*), and candidate species monarch butterfly (*Danaus plexippus*). Other sensitive species in the project vicinity include the golden eagle (*Aquila chrysaetos*) and western burrowing owl (*Athene cunicularia*).

To assist with developing the draft EIR, we offer our standard comments below for utility-scale solar projects and recommend the Project be in accordance with the DRECP. Additionally, we recommend that the Applicant conduct appropriate Service protocol surveys so that we may more effectively advise the County of potential impacts to ESA-listed species and other sensitive resources; recommend measures to avoid, minimize, and mitigate project impacts to them; and facilitate the Applicant's compliance with the ESA. We also recommend that the CMAs are included in the draft EIR to reduce the effects of renewable energy development to Federal trust resources. Below are our specific comments as they relate to Federal trust resources.

Mojave Desert Tortoise

Solar projects in the surrounding area (i.e., Oberon, Desert Sunlight, and Palen solar projects) identified suitable desert tortoise habitat and the presence of desert tortoises. We assume the location for the proposed Project also provides suitable habitat for desert tortoise and potentially has individuals within the Project area. Therefore, we recommend a habitat assessment and implementation of pre-project protocol surveys (Service 2019) for desert tortoises.

The habitat assessment should include an evaluation of wildlife linkages and connectivity for desert tortoise and other desert species. We assume the construction and operation of the Project would result in the disturbance of desert tortoise habitat and recommend that the County require inclusion of avoidance, minimization, and mitigation measures as permit terms and conditions to offset any adverse effects to desert tortoise. Specifically, we recommend the inclusion of the CMAs described in the DRECP (Service 2016).

In addition, we recommend that the draft EIR evaluate the impacts to desert tortoise associated with increasing numbers of common ravens. Human development in the desert, including solar facilities, typically leads to a local increase in the number of common ravens, which prey on desert tortoises. Ravens are highly attracted to human activity, which "subsidizes" more ravens by providing new food sources and sites for nesting, roosting, and perching. Therefore, to reduce project impacts on desert tortoises from common ravens that may be attracted to the Project site, we recommend that the County require the Applicant to establish on-site measures to eliminate

or minimize the availability of subsidies and discourage the potential for common ravens to occupy the site during all Project phases, including construction, operation, and maintenance. The draft EIR should also evaluate the effects of any increases in raven numbers at the Project site to desert tortoises, as these birds travel long distances daily between roosting and foraging sites. To address these effects, we recommend that the County require the Applicant to contribute a per-acre fee to the Service's Regional Common Raven Management Program; please contact our office for more information on this regional plan.

Yuma Ridgway's Rail and other listed birds

Breeding populations of Yuma Ridgway's rail in southeastern California are restricted primarily to freshwater marshes along the lower Colorado River Valley and near the Salton Sea. In addition, the species has been observed sporadically throughout desert locations. Available data suggests that solar facilities in the desert pose a hazard to which variable rail species and other water-associated birds are particularly vulnerable. To date, we know two Yuma Ridgway's rails were killed at solar PV projects; one in May 2013 at the Desert Sunlight project and one in Imperial County in April 2014. Vulnerability of Ridgway's rail is also evidence by several incidentally observed fatalities of sora (*Porzana carolina*) and Virginia rail (*Rallus limicola*) at solar and transmission projects along the I-10 corridor and in the Imperial Valley. These data indicate a risk of mortality to all rail species caused by project-related features such as gen-tie lines, solar panels, and perimeter fencing.

We are concerned that utility-scale solar and transmission projects within the resident and dispersal range of Yuma Ridgway's rail may result in multiple fatalities over the lifespan of these projects, especially given the large cumulative disturbance footprint of existing and planned projects in the California desert. Because of the large size of these projects and the apparent lack of effective adaptive management measures and other design modifications sufficient to avoid the risk of an incidental take[1], we anticipate recurrent but low levels of take of Yuma Ridgway's rail at various project sites. Therefore, we recommend the draft EIR address the risk of take to Yuma Ridgway's rail, considering the direct, indirect, and cumulative effects of the Project to this federally endangered species. We also recommend the Project include CMAs regarding Yuma's Ridgway Rail and other listed birds in the draft EIR.

We are concerned that the proposed Project would increase fatalities of other listed birds (southwestern willow flycatcher, yellow-billed cuckoo) and non-listed sensitive species (golden eagle, burrowing owl), which are known to breed and migrate in riparian habitats in the Project vicinity and westward through the Coachella Valley and beyond. Dead willow flycatchers and yellow-billed cuckoos have been documented on or near existing solar projects in the California desert within their migratory range, yet distant from suitable habitat. Therefore, the draft EIR should include a rigorous analysis to determine the vulnerability of all avian taxa that could occur at the project site, with a risk assessment that quantifies potential fatalities and incidental take of listed species. This risk analysis should be based on a robust program of post-construction monitoring.

[1] "Take" is defined by the ESA as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or to attempt to engage in any such conduct.

Non-listed Migratory Birds

In general, systematically-collected mortality monitoring data for utility-scale solar facilities are limited and the magnitude of potential impacts has not yet been accurately quantified. Such projects under construction or recently put into operation are reporting incidental observations of fatalities and injuries to a wide range of avian species due to various features such as solar panels, evaporation ponds, fencing, distribution lines within the facility, and gen-tie lines. There is a growing recognition that "polarized light pollution" or a "lake effect" presents a particular hazard to water-associated birds and other species seeking aquatic migratory stopover habitat. Therefore, we recommend that the County require the Applicant to design and construct any aboveground electric lines to reduce powerline bird collisions and the likelihood of electrocution of large birds, such as raptors. Please refer to the guidance from the Avian Powerline Interaction Committee for options to reduce bird collisions and electrocutions at powerlines.

Given these multiple sources of bird hazards at solar facilities, we recommend that the draft EIR thoroughly address the risk potential on project-specific as well as cumulative scales. To help the Applicant reduce potential adverse effects to avian species, we encourage the Applicant to develop and implement a statistically robust, systematic avian monitoring program as a component of a project-specific Bird and Bat Conservation Strategy (BBCS), which should be analyzed as part of the draft EIR. The draft EIR should also include an adaptive management program that outlines the implementation and success of various bird deterrents during the construction and operational phases of the project. We advise you that mortality monitoring typically requires carcass collection, which must be authorized by a Special Purpose Utility Permit (SPUT). We encourage the County and the Applicant to begin the SPUT application process as early as possible to allow us to issue a permit prior to the onset of construction. Please contact us for BBCS guidance and SPUT permit requirements. We would also be glad to work with you and the Applicant to develop and implement options for appropriate mitigation of avian impacts.

Monarch Butterfly

Monarch butterflies are a candidate species for protection under the ESA. The proposed Project location may provide potential habitat for monarch butterflies during breeding and migration seasons since the Project crosses or intersects riparian and wetland areas.

Should monarch butterflies become listed during construction, operation, maintenance, and decommissioning of the Project, we recommend preparing management actions in the draft EIR to minimize effects on monarch butterflies. One suggestion is to avoid uprooting any nectar-bearing flowering plants that are relied upon for feeding during migration and avoid uprooting or damaging any milkweed species, which monarch butterflies rely upon for reproduction in the desert. Consultation under section 7 is not required for candidate species. However, we encourage the incorporation of avoidance, minimization, and conservation measures as appropriate.

Cumulative Effects

The draft EIR should consider the acreage already lost to solar development within the DFA along the I-10 solar corridor, and the acreage reasonably certain to occur as future development. Given the extent of existing and proposed renewable energy projects in the vicinity, we recommend that the draft EIR include a thorough analysis of all direct, indirect, and cumulative effects of the proposed Project. The Service is particularly concerned about impacts to desert tortoise habitat connectivity and the potential loss of gene flow within and among designated critical habitat units across the species' range. Therefore, the draft EIR should examine potential impacts to the population connectivity requirements of desert tortoise and other wildlife species throughout the project area and its vicinity.

If you have any questions about our comments, please contact Stephanie Menjivar of my staff or (760) 322-2070, ext. 412.

Sincerely,

VINCENT JAMES

Digitally signed by VINCENT JAMES
Date: 2022.12.15 08:10:50 -08'00'

Vincent James
Colorado Desert Division Supervisor

LITERATURE CITED

[Service] U.S. Fish and Wildlife Service. 2016. Biological opinion for the Proposed Land Use Plan Amendment under the Desert Renewable Energy Conservation Plan. (FWS-KRN/SBD/INY/LA/IMP/RIV-16B0138-16F0200), Kern/San Bernardino/Inyo/Los Angeles/Imperial/Riverside County, California, August 16, 2016. Carlsbad Fish and Wildlife Office, Carlsbad, California.

[Service] U.S. Fish and Wildlife Service. 2019. Mojave desert tortoise pre-project survey protocol. October 26, 2018. Desert Tortoise Recovery Office, Las Vegas, Nevada.

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

December 15, 2022
Sent via email

Tim Wheeler
County of Riverside
4080 Lemon Street, 12th Floor
Riverside, CA 92501
TWheeler@rivco.org

Notice of Preparation of a Draft Environmental Impact Report
Easley Renewable Energy Project (Project)
State Clearinghouse No. 2022110240

Dear Mr. Wheeler:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation of a Draft Environmental Impact Report (DEIR) from the County of Riverside (Lead Agency) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: IP Easley, LLC (Applicant)

Objective: The Applicant's purpose of the Project is to generate, store, and transmit renewable energy to the statewide wholesale electricity grid.

Location: The Project is located in Riverside County, north of Interstate 10 (I-10) and approximately two miles north of the town of Desert Center, CA. The Project consists of 24

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

parcels on private land (approximately 990 acres) and 13 parcels of Bureau of Land Management (BLM) lands (approximately 2,745 acres).

Timeframe: Construction is anticipated to take approximately 24 months and would be constructed in phases that would occur simultaneously on different portions of the site. The Project would operate for a minimum of 35 years and up to 50 or more years.

Description: The Applicant proposes to construct, operate, and decommission a utility-scale solar photovoltaic (PV) electrical generating and storage facility and associated infrastructure to generate and deliver renewable energy to the statewide electricity transmission grid. The Project would generate and store up to 650 megawatts (MW) of renewable electricity via arrays of solar PV panels, battery energy storage system (BESS) and appurtenant facilities. A 6.7-mile 500 kV generation-tie (gen-tie) line would mainly traverse the approve the approved Oberon Renewable Energy Project site and connect to an approved substation that is under construction at the Oberon site, an adjacent solar and energy storage facility.

The proposed Project would consist of the following major components:

- Solar and energy storage facility
- System of 34.5 kV interior collection power lines located between inverters and substations, located underground and installed overhead on wood poles.
- At least one, and up to two onsite substation yard
- Upgrades to the Oberon substation
- An operations and maintenance (O&M) building
- 12 kV electrical distribution line
- Supervisory Control and Data Acquisition System (SCADA) and telecommunications facilities to allow remote monitoring of facility operation and/or remote control of critical components.
- Meteorological (MET) data collection system with MET stations throughout the solar facility
- Battery energy storage system
- Perimeter fencing
- Newly constructed access roads
- Nighttime security lighting
- Site security system
- New 500 kV gen-tie line

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the Lead Agency in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

CDFW recommends that the forthcoming DEIR address the following:

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following

The Manual of California Vegetation, second edition (Sawyer et al. 2009[2]). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the project. CDFW's California Natural Diversity Database (CNDDB) in Sacramento should be contacted at (916) 322-2493 or CNDDB@wildlife.ca.gov to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

   Please note that CDFW's CNDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish & G. Code, § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018[3]).

5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).

6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. To ensure that Project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

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[2] Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California. http://vegetation.cnps.org/

[3] California Department of Fish and Wildlife (CDFW). 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plan Populations and Sensitive Natural Communities. State of California, Natural Resources Agency. Available for download at: https://wildlife.ca.gov/Conservation/Plants

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.

2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the project footprint, such as nearby public lands (e.g., Sonny Bono National Wildlife Refuge, Salton Sea National Wildlife Refuge, Imperial National Wildlife Refuge) , open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).

3. An evaluation of impacts to adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs.

4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Alternatives Analysis

CDFW recommends the DEIR describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would "feasibly attain most of the basic objectives of the Project," and would avoid or substantially lessen any of the Project's significant effects (CEQA Guidelines § 15126.6[a]). The alternatives analysis should also evaluate a "no project" alternative (CEQA Guidelines § 15126.6[e]).

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The Lead Agency should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.

2. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and

otherwise protect sensitive plant communities from project-related direct and indirect impacts.

3. *California Species of Special Concern* (CSSC): CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process. CSSC that have the potential or have been documented to occur within or adjacent to the project area, including, but not limited to: burrowing owl (*Athene cunicularia*), yellow warbler (*Setophaga petechia*), Le Conte's thrasher (*Toxostoma lecontei*), yellow-breasted chat (*Icteria virens*), and mountain plover (*Charadrius montanus*)

4. *Mitigation*: CDFW considers adverse project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail. Where habitat preservation is not available onsite, offsite land acquisition, management, and preservation should be evaluated and discussed in detail.

   The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

   If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center* v. *County* of *Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete *(Sundstrom* v. *County* of *Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry* v. *City* of *Murrieta (1995)* 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc.* v. *County* of *Orange* (2005) 131 Cal. App. 4th 777).

   CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project. Furthermore, for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.

5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a

sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

6. *Nesting Birds and Migratory Bird Treaty Act:* Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.

   CDFW recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: project phasing and timing, monitoring of project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the project site. If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

7. *Moving out of Harm's Way:* To avoid direct mortality, CDFW recommends that the lead agency condition the DEIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from project-related activities. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise by injured or killed, and individuals should be moved only as far a necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas). Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss.

California Endangered Species Act (CESA)

Based on knowledge of the Project site and general area, CDFW is aware that desert tortoise (*Gopherus agassizii*), listed as threatened and a candidate as endangered under CESA, have the potential to occur onsite. CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA

ITP be obtained if the Project has the potential to result in "take" (Fish & G. Code, § 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the project. CESA ITPs are issued to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. The California Fish and Game Code requires that CDFW comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of CESA.

Lake and Streambed Alteration Program

Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: Substantially divert or obstruct the natural flow of any river, stream or lake; Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or Deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code § 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to https://www.wildlife.ca.gov/Conservation/LSA/Forms.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative,

vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR to assist the County of Riverside in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Rose Banks, Senior Environmental Scientist (Specialist) at (760) 218-0022 or Rose.Banks@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Alisa Ellsworth
84FBB8273E4C480...

Alisa Ellsworth
Environmental Program Manager

ec: Office of Planning and Research, State Clearinghouse, Sacramento
State.Clearinghouse@opr.ca.gov

Rose Banks, Senior Environmental Scientist (Specialist)
California Department of Fish and Wildlife
Rose.Banks@wildlife.ca.gov

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

December 14, 2022 Via Electronic Mail

Tim Wheeler, Project Planner
Riverside County Planning
Department
P.O. Box 1409
Riverside, California 92502-1409

Dear Mr. Wheeler:

Notice of Preparation of a Draft Environmental Impact Report
for the Easley Renewable Energy Project, Riverside County, California

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Riverside County Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Easley Renewable Energy Project (Project), Riverside County, CA. Metropolitan is pleased to submit comments for consideration to Riverside County. Metropolitan provides these comments to ensure that any potential impacts on its facilities in the vicinity of the proposed Project and on Colorado River water resources are adequately addressed in the proposed environmental document.

Background

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies, serving approximately 19 million people in portions of six counties in Southern California. One of Metropolitan's major water supplies is the Colorado River via Metropolitan's Colorado River Aqueduct (CRA). Metropolitan holds an entitlement to water from the Colorado River. The CRA consists of tunnels, open canals and buried pipelines. CRA-related facilities also include above and below ground reservoirs and aquifers, access and patrol roads, communication facilities, and residential housing sites. The CRA, which can deliver up to 1.25 million acre-feet of water annually, extends 242 miles from the Colorado River, through the Mojave Desert and into Lake Mathews. Metropolitan has five pumping plants located along the CRA, which consume approximately 2,400 gigawatt-hours of energy when the CRA is operating at full capacity.

Concurrent with its construction of the CRA in the mid-1930s, Metropolitan constructed 305 miles of 230 kilovolt (kV) transmission lines that run from the Mead Substation in southern Nevada, extend south, then branch east to Parker, California, and then west along Metropolitan's CRA. Metropolitan's CRA transmission line easements lie on federally owned land, managed by the Bureau of Land Management (BLM). The transmission lines were built for the sole and exclusive purpose of supplying power from the Hoover and Parker projects to the five pumping plants along the CRA.

Metropolitan's ownership and operation of the CRA and its 230 kV transmissions system is vital to its mission to provide Metropolitan's 5,200-square-mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Project Understanding

IP Easley, LLC (Proponent), a subsidiary of Intersect Power, LLC, proposes to construct, operate, maintain, and decommission a 650 megawatt (MW) solar photovoltaic (PV) electricity generating station, battery energy storage system, electrical substation, generation intertie (gen-tie) lines and associated access roads on BLM managed and private land located near Desert Center in Riverside County, California. The Project is known as the Easley Renewable Energy Project.

The proposed Project covers approximately 2,745 acres of BLM-administered land and 990 acres of private land, located north of Interstate 10 (I-10) and adjacent to the community of Lake Tamarisk in Desert Center, California. The lands fall within the California Desert Conservation Planning Area and within the Development Focus Area pursuant to the Desert Renewable Energy Conservation Plan (DRECP) amendment.

The proposed Project would produce up to 650 MW PV generation from an integrated energy facility that would connect to Southern California Edison's (SCE) 500 kV Red Bluff Substation via the new Oberon 500 kV gen-tie line. The proposed Project would include up to two substation yards approximately 25 acres in size each, 6.7 miles of new 500 kV gen-tie line, new access roads, upgrades to the Oberon Substation to accommodate interconnection of the Easley 500 kV gen-tie line, a battery energy storage facility capable of storing 650 MW of power, an approximately 3,000-square-foot operations and maintenance (O&M) building, and ancillary facilities designed for project security, employee offices, and parts storage. Electrical power for the O&M building and substation would be supplied via a new overhead or underground 12 kV distribution line from the existing SCE distribution system adjacent to the solar facility site.

The Project Proponent proposes to use a total of up to 1000 acre-feet (AF) of water during the construction phase, which is expected to last 24 months. In addition, water would be required during the operations and maintenance phase for panel washing and maintenance, and for substation restroom facilities that would be located adjacent to the O&M building. The estimated water use during this phase is 50 AF annually. Water for construction-related activities and operations is expected to be obtained from either an on-site groundwater well or purchased off-site.

Power Generation: Potential Impacts to Metropolitan's Transmissions System

Metropolitan appreciates that the proposed Project would increase solar power to California's grid and provide a new source of flexible supply with the addition of battery storage capabilities. However, Metropolitan requests that the lead agency analyze and assess any potential impacts to Metropolitan's transmission system. Metropolitan also requests that the lead agency ensure that the California Independent System Operator (CAISO) includes Metropolitan as a Potentially Affected System for this proposed Project in accordance with the CAISO Tariff and Business Practice Manuals for the Generation Interconnection Procedures and be included in any related technical generation interconnection studies.

Water Resources: Potential Impacts on Colorado River and Local Water Supplies

Metropolitan is concerned about the potential impacts of desert projects on Colorado River water supplies. Of immediate concern to California's Colorado River water users is the accounting surface that extends west along the I-10 Corridor from the Palo Verde Valley into the Chuckwalla Valley. Water is a scarce resource in the desert southwest, and its use should reflect that scarcity. Metropolitan is primarily concerned with the individual and cumulative impacts of any new demands on Colorado River water resources because the water supplies allocated to California are already fully apportioned and utilized.

Should the proposed Project utilize groundwater from on-site wells for its water supply, Metropolitan requests that the lead agency provide an analysis of the utilization of groundwater from on-site wells, as well as a cumulative analysis that includes the impact on the groundwater basin from the surrounding solar facilities. Metropolitan is concerned that any use of groundwater may draw water from a groundwater basin that is hydro-geologically connected to the Colorado River, within an area referred to as the "accounting surface." The extent of the accounting surface area for the Colorado River was determined by the U.S. Geological Survey (USGS) and U.S. Bureau of Reclamation as part of a proposed rule-making process. See Notice of Proposed Rule Regulating the Use of the Lower Colorado River Without an Entitlement, 73 Fed. Reg. 40916 (July 16, 2008) at http://www.usbr.gov/lc/region/programs/unlawfuluse/FRnotice0708.pdf; USGS Scientific

Investigation Report No. 2008-5113 at http://pubs.usgs.gov/sir/2008/5113/. To the extent the proposed Project uses Colorado River water, it must have a documented right to do so.

In addition, Metropolitan asks that regulators require as a condition of project approval that project developers monitor groundwater use to ensure that, over the life of the project, that there are no impacts to Colorado River resources. If impacts are detected, the project developer should be required to mitigate and offset such impacts.

Rights-of-Way

Based on our review of Figures 1 and 2 provided in the NOP, the Project will be constructed adjacent to Metropolitan rights-of-way. A map of all Metropolitan rights-of-way in the project vicinity is enclosed. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to its facilities in order to maintain and repair its system. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, we require that any design plans for any activity in the area of Metropolitan's rights-of-way or facilities be submitted for our review and written approval. Any future design plans associated with this project should be submitted to Metropolitan's Substructures Team. Approval of the proposed Project should be contingent on Metropolitan's approval of design plans for portions of the project that could impact our facilities.

Detailed prints of drawings of Metropolitan's rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-7663 or via email at EngineeringSubstructures@mwdh2o.com. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, enclosed are the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. For further assistance, please contact Ms. Jolene Ditmar at (213) 217-6184 or jditmar@mwdh2o.com.

Very truly yours,

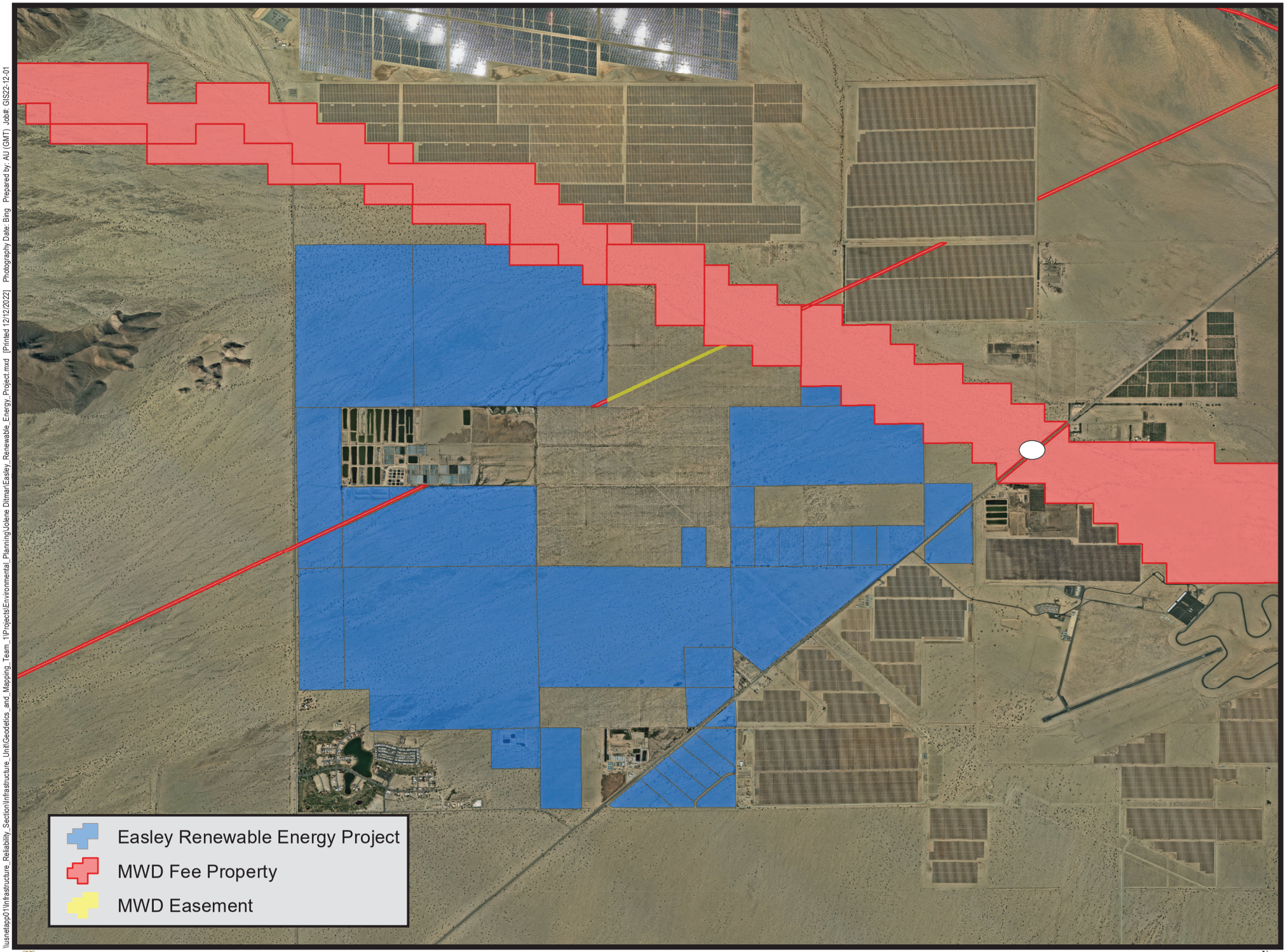
Digitally signed by
Sean Carlson
Date: 2022.12.15
08:46:01 -08'00'

Sean Carlson
Team Manager, Environmental Planning Section

JD:rdl
Riverside County_Easley Renewable Energy Project_NOP Comment Letter

Enclosures:

(1) Map
(2) Planning Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way



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The Metropolitan Water District of Southern California
Engineering Services Group

Metropolitan Right-of-Way

Easley Renewable Energy Project

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Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way

July 2018

Prepared By:
The Metropolitan Water District of Southern California
Substructures Team, Engineering Services
700 North Alameda Street
Los Angeles, California 90012

Additional Copies: To obtain a copy of this document, please contact the Engineering Services Group, Substructures Team.

Disclaimer

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as deemed prudent, to assure that project plans are correct. The appropriate representative from Metropolitan must be contacted at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

PUBLICATION HISTORY:

Initial Release	*July 2018*

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1.0 GENERAL INFORMATION

Note: Underground Service Alert at 811 must be notified at least two working days before excavating in proximity to Metropolitan's facilities.

1.1 Introduction

These guidelines provide minimum design and construction requirements for any utilities, facilities, developments, and improvements, or any other projects or activities, proposed in or near Metropolitan Water District of Southern California (Metropolitan) facilities and rights-of-way. Additional conditions and stipulations may also be required depending on project and site specific conditions. Any adverse impacts to Metropolitan's conveyance system, as determined by Metropolitan, will need to be mitigated to its satisfaction.

All improvements and activities must be designed so as to allow for removal or relocation at builder or developer expense, as set forth in the paramount rights provisions of Section 20.0. Metropolitan shall not be responsible for repair or replacement of improvements, landscaping or vegetation in the event Metropolitan exercises its paramount rights powers.

1.2 Submittal and Review of Project Plans/Utilities and Maps

Metropolitan requires project plans/utilities be submitted for all proposed activities that may impact Metropolitan's facilities or rights-of-way. Project plans shall include copies of all pertinent utilities, sewer line, storm drain, street improvement, grading, site development, landscaping, irrigation and other plans, all tract and parcel maps, and all necessary state and federal environmental documentation. Metropolitan will review the project plans and provide written approval, as it pertains to Metropolitan's facilities and rights-of-way. Written approval from Metropolitan must be obtained, prior to the start of any activity or construction in the area of Metropolitan's facilities or rights-of-way. Once complete project plans and supporting documents are submitted to Metropolitan, it generally takes 30 days to review and to prepare a detailed written response. Complex engineering plans that have the potential for significant impacts on Metropolitan's facilities or rights-of-way may require a longer review time.

Project plans, maps, or any other information should be submitted to Metropolitan's Substructures Team at the following mailing address:

Attn: Substructures Team
The Metropolitan Water District of Southern California
700 North Alameda St.
Los Angeles, CA 90012

General Mailing Address: P.O. Box 54153
Los Angeles, CA 90054-0153

Email: EngineeringSubstructures@mwdh2o.com

For additional information, or to request prints of detailed drawings for Metropolitan's facilities and rights-of-way, please contact Metropolitan's Substructures Team at 213-217-7663 or EngineeringSubstructures@mwdh2o.com.

1.3 Identification of Metropolitan's Facilities and Rights-of-Way

Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's, with official recording data, on the following:

A. All applicable plans

B. All applicable tract and parcel maps

Metropolitan's rights-of-ways and existing survey monuments must be tied dimensionally to the tract or parcel boundaries. Metropolitan's Records of Survey must be referenced on the tract and parcel maps with the appropriate Book and Page.

2.0 General Requirements

2.1 Vehicular Access

Metropolitan must have vehicular access along its rights-of-way at all times for routine inspection, patrolling, operations, and maintenance of its facilities and construction activities. All proposed improvements and activities must be designed so as to accommodate such vehicular access.

2.2 Fences

Fences installed across Metropolitan's rights-of-way must include a 16-foot-wide gate to accommodate vehicular access by Metropolitan. Additionally, gates may be required at other specified locations to prevent unauthorized entry into Metropolitan's rights-of-way.

All gates must accommodate a Metropolitan lock or Knox-Box with override switch to allow Metropolitan unrestricted access. There should be a minimum 20-foot setback for gates from the street at the driveway approach. The setback is necessary to allow Metropolitan vehicles to safely pull off the road prior to opening the gate.

2.3 Driveways and Ramps

Construction of 16-foot-wide commercial-type driveway approaches is required on both sides of all streets that cross Metropolitan's rights-of-way. Access ramps, if necessary, must be a minimum of 16 feet wide.

There should be a minimum 20-foot setback for gates from the street at the driveway approach. Grades of ramps and access roads must not exceed 10 percent; if the slope of an access ramp or road must exceed 10 percent due to topography, then the ramp or road must be paved.

2.4 Walks, Bike Paths, and Trails

All walkways, bike paths, and trails along Metropolitan's rights-of-way must be a minimum 12-foot wide and have a 50-foot or greater radius on all horizontal curves if also used as Metropolitan's access roads. Metropolitan's access routes, including all walks and drainage facilities crossing the access routes, must be constructed to American Association of State Highway and Transportation Officials (AASHTO) H-20 loading standards (see Figure 1). Additional requirements will be placed on equestrian trails to protect the water quality of Metropolitan's pipelines and facilities.

2.5 Clear Zones

A 20-foot-wide clear zone is required to be maintained around Metropolitan's manholes and other above-ground facilities to accommodate vehicular access and maintenance. The clear zone should slope away from Metropolitan's facilities on a grade not to exceed 2 percent.

2.6 Slopes

Cut or fill slopes proposed within Metropolitan's rights-of-way must not exceed 10 percent. The proposed grade must not worsen the existing condition. This restriction is required to facilitate Metropolitan use of construction and maintenance equipment and allow uninhibited access to above-ground and below-ground facilities.

2.7 Structures

Construction of structures of any type is not allowed within the limits of Metropolitan's rights-of-way to avoid interference with the operation and maintenance of Metropolitan's facilities and possible construction of future facilities.

Footings and roof eaves of any proposed buildings adjacent to Metropolitan's rights-of-way must meet the following criteria:

A. Footings and roof eaves must not encroach onto Metropolitan's rights-of-way.

B. Footings must not impose any additional loading on Metropolitan's facilities.

C. Roof eaves must not overhang onto Metropolitan's rights-of-way.

Detailed plans of footings and roof eaves adjacent to Metropolitan's rights-of-way must be submitted for Metropolitan's review and written approval, as pertains to Metropolitan's facilities.

2.8 Protection of Metropolitan Facilities

Metropolitan facilities within its rights-of-way, including pipelines, structures, manholes, survey monuments, etc., must be protected from damage by the project proponent or property owner, at no expense to Metropolitan. The exact location, description and method of protection must be shown on the project plans.

2.9 Potholing of Metropolitan Pipelines

Metropolitan's pipelines must be potholed in advance, if the vertical clearance between a proposed utility and Metropolitan's pipeline is indicated to be 4 feet or less. A Metropolitan representative must be present during the potholing operation and will assist in locating the pipeline. Notice is required, a minimum of three working days, prior to any potholing activity.

2.10 Jacked Casings or Tunnels

A. General Requirements

Utility crossings installed by jacking, or in a jacked casing or tunnel under/over a Metropolitan pipeline, must have at least 3 feet of vertical clearance between the outside diameter of the pipelines and the jacked pipe, casing, or tunnel. The actual

cover over Metropolitan's pipeline shall be determined by potholing, under Metropolitan's supervision.

Utilities installed in a jacked casing or tunnel must have the annular space between the utility and the jacked casing or tunnel filled with grout. Provisions must be made for grouting any voids around the exterior of the jacked pipe, casing, or tunnel.

B. Jacking or Tunneling Procedures

Detailed jacking, tunneling, or directional boring procedures must be submitted to Metropolitan for review and approval. The procedures must cover all aspects of operation, including, but not limited to, dewatering, ground control, alignment control, and grouting pressure. The submittal must also include procedures to be used to control sloughing, running, or wet ground, if encountered. A minimum 10-foot clearance must be maintained between the face of the tunneling or receiving pits and outside edges of Metropolitan's facility.

C. Shoring

Detailed drawings of shoring for jacking or receiving pits must be submitted to Metropolitan for review and written-approval. (See Section 10 for shoring requirements).

D. Temporary Support

Temporary support of Metropolitan's pipelines may be required when a utility crosses under a Metropolitan pipeline and is installed by means of an open trench. Plans for temporary support must be reviewed and approved in writing by Metropolitan. (See Section 11, Supports of Metropolitan Facilities).

3.0 Landscaping

3.1 Plans

All landscape plans must show the location and limits of Metropolitan's right-of-way and the location and size of Metropolitan's pipeline and related facilities therein. All landscaping and vegetation shall be subject to removal without notice, as may be required by Metropolitan for ongoing maintenance, access, repair, and construction activities. Metropolitan will not be financially responsible for the removal of any landscaping and vegetation.

3.2 Drought-Tolerant Native and California Friendly Plants

Metropolitan recommends use of drought-tolerant native and California Friendly® plants (excluding sensitive plants) on proposed projects. For more information regarding California Friendly® plants refer to www.bewaterwise.com.

3.3 Trees

Trees are generally prohibited within Metropolitan's rights-of-way as they restrict Metropolitan's ability to operate, maintain and/or install new pipeline(s) located within these rights-of-way. Metropolitan will not be financially responsible for the removal and replacement of any existing trees should they interfere with access and any current or future Metropolitan project located within the right-of-way.

3.4 Other Vegetation

Shrubs, bushes, vines, and groundcover are generally allowed within Metropolitan's rights-of-way. Larger shrubs are not allowed on Metropolitan fee properties; however, they may be allowed within its easements if planted no closer than 15 feet from the outside edges of existing or future Metropolitan facilities. Only groundcover is allowed to be planted directly over Metropolitan pipeline, turf blocks or similar is recommended to accommodate our utility vehicle access. Metropolitan will not be financially responsible for the removal and replacement of the vegetation should it interfere with access and any current or future Metropolitan project.

3.5 Irrigation

Irrigation systems are acceptable within Metropolitan's rights-of-way, provided valves and controllers are located near the edges of the right-of-way and do not interfere with Metropolitan vehicular access. A shutoff valve should also be located along the edge of the right-of-way that will allow the shutdown of the system within the right-of-way should Metropolitan need to do any excavation. No pooling or saturation of water above Metropolitan's pipeline and right-of-way is allowed. Additional restrictions apply to non-potable water such as Recycled Water and are covered on Table 3 of Page 20.

3.6 Metropolitan Vehicular Access

Landscape plans must show Metropolitan vehicular access to Metropolitan's facilities and rights-of-way and must be maintained by the property owner or manager or homeowners association at all times. Walkways, bike paths, and trails within Metropolitan's rights-of-way may be used as Metropolitan access routes. (See Section 2.4, Walks, Bike Paths, and Trails).

4.0 General Utilities

Note: For non-potable piping like sewer, hazardous fluid, storm drain, disinfected tertiary recycled water and recycled water irrigation see Table 1 through Table 3.

4.1 Utility Structures

Permanent utility structures (e.g., manholes, power poles, pull boxes, electrical vaults, etc.) are not allowed within Metropolitan's rights-of-way. Metropolitan requests that all permanent utility structures within public streets be placed as far from its pipelines and facilities as practical, but not closer than 5 feet from the outside edges of Metropolitan facilities.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation.

4.2 Utility Crossings

Metropolitan requests a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and any utility crossing the pipeline. Utility lines crossing Metropolitan's pipelines must be as perpendicular to the pipeline as possible. Cross-section drawings, showing proposed locations and elevations of utility lines and locations of Metropolitan's pipelines and limits of rights-of-way, must be submitted with utility plans, for all

crossings. Metropolitan's pipeline must be potholed under Metropolitan's supervision at the crossings (See Section 2.9).

4.3 Longitudinal Utilities

Installation of longitudinal utilities is generally not allowed along Metropolitan's rights-of-way. Within public streets, Metropolitan requests that all utilities parallel to Metropolitan's pipelines and appurtenant structures (facilities) be located as far from the facilities as possible, with a minimum clearance of 5 feet from the outside edges of the pipeline.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation (for more information See Table 1 on Page 18).

4.4 Underground Electrical Lines

Underground electrical conduits (110 volts or greater) which cross a Metropolitan's pipeline must have a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and the electrical lines. Longitudinal electrical lines, including pull boxes and vaults, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipeline or structures.

4.5 Fiber Optic Lines

Fiber optic lines installed by directional boring require a minimum of 3 feet of vertical clearance when boring is over Metropolitan's pipelines and a minimum of 5 feet of vertical clearance when boring is under Metropolitan's pipelines. Longitudinal fiber optic lines, including pull boxes, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipelines or structures. Potholing must be performed, under Metropolitan's supervision, to verify the vertical clearances are maintained.

4.6 Overhead Electrical and Telephone Lines

Overhead electrical and telephone lines, where they cross Metropolitan's rights-of-way, must have a minimum 35 feet of clearance, as measured from the ground to the lowest point of the overhead line. Overhead electrical lines poles must be located at least 30 feet laterally from the edges of Metropolitan's facilities or outside Metropolitan's right-of-way, whichever is greater.

Longitudinal overhead electrical and or telephone lines in public streets should have a minimum separation of 10 feet from the edge of a Metropolitan pipelines or structures where possible.

4.7 Sewage Disposal Systems

Sewage disposal systems, including leach lines and septic tanks, must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or the edge of its facilities, whichever is greater. If soil conditions are poor, or other adverse site-specific conditions exist, a minimum distance of 150 feet is required. They must also comply with local and state health code requirements as they relate to sewage disposal systems in proximity to major drinking water supply pipelines.

4.8 Underground Tanks

Underground tanks containing hazardous materials must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or edge of its facilities, whichever is greater. In addition, groundwater flow should be considered with the placement of underground tanks down-gradient of Metropolitan's facilities.

5.0 Specific Utilities: Non-Potable Utility Pipelines

In addition to Metropolitan's general requirements, installation of non-potable utility pipelines (e.g., storm drains, sewers, and hazardous fluids pipelines) in Metropolitan's rights-of-way and public street rights-of-way must also conform to the State Water Resources Control Board's Division of Drinking Water (DDW) regulation (Waterworks Standards) and guidance for separation of water mains and non-potable pipelines and to applicable local county health code requirements. Written approval is required from DDW for the implementation of alternatives to the Waterworks Standards and, effective December 14, 2017, requests for alternatives to the Waterworks Standards must include information consistent with: DDW's Waterworks Standards Main Separation Alternative Request Checklist.

In addition to the following general guidelines, further review of the proposed project must be evaluated by Metropolitan and requirements may vary based on site specific conditions.

A. Sanitary Sewer and Hazardous Fluids (General Guideline See Table 1 on Page 18)

B. Storm Drain and Recycled Water (General Guideline See Table 2 on Page 19)

C. Irrigation with Recycled Water (General Guideline See Table 3 on Page 20)

D. Metropolitan generally does not allow Irrigation with recycled water to be applied directly above its treated water pipelines

E. Metropolitan requests copies of project correspondence with regulating agencies (e.g., Regional Water Quality Control Board, DDW); regarding the application of recycled water for all projects located on Metropolitan's rights-of-way

6.0 Cathodic Protection/Electrolysis Test Stations

6.1 Metropolitan Cathodic Protection

Metropolitan's existing cathodic protection facilities in the vicinity of any proposed work must be identified prior to any grading or excavation. The exact location, description, and type of protection must be shown on all project plans. Please contact Metropolitan for the location of its cathodic protection stations.

6.2 Review of Cathodic Protection Systems

Metropolitan must review any proposed installation of impressed-current cathodic protection systems on pipelines crossing or paralleling Metropolitan's pipelines to determine any potential conflicts with Metropolitan's existing cathodic protection system.

7.0 Drainage

7.1 Drainage Changes Affecting Metropolitan Rights-of-Way

Changes to existing drainage that could affect Metropolitan's rights-of-way require Metropolitan's approval. The project proponent must provide acceptable solutions to ensure Metropolitan's rights-of-way are not negatively affected by changes in the drainage conditions. Plans showing the changes, with a copy of a supporting hydrology report and hydraulic calculations, must be submitted to Metropolitan for review and approval. Long term maintenance of any proposed drainage facilities must be the responsibility of the project proponent, City, County, homeowner's association, etc., with a clear understanding of where this responsibility lies. If drainage must be discharged across Metropolitan's rights-of-way, it must be carried across by closed conduit or lined open channel and must be shown on the plans.

7.2 Metropolitan's Blowoff and Pumpwell Structures

Any changes to the existing local watercourse systems will need to be designed to accommodate Metropolitan's blowoff and pumpwell structures, which periodically convey discharged water from Metropolitan's blowoff and pumping well structures during pipeline dewatering. The project proponents' plans should include details of how these discharges are accommodated within the proposed development and must be submitted to Metropolitan for review and approval. Any blowoff discharge lines impacted must be modified accordingly at the expense of the project proponent.

8.0 Grading and Settlement

8.1 Changes in Cover over Metropolitan Pipelines

The existing cover over Metropolitan's pipelines must be maintained unless Metropolitan determines that proposed changes in grade and cover do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance capability. Load and settlement or rebound due to change in cover over a Metropolitan pipeline or ground in the area of Metropolitan's rights-of-way will be factors considered by Metropolitan during project review.

In general, the minimum cover over a Metropolitan pipeline is 4 feet and the maximum cover varies per different pipeline. Any changes to the existing grade may require that Metropolitan's pipeline be potholed under Metropolitan's supervision to verify the existing cover.

8.2 Settlement

Any changes to the existing topography in the area of Metropolitan's pipeline or right-of-way that result in significant settlement or lateral displacement of Metropolitan's pipelines are not acceptable. Metropolitan may require submittal of a soils report showing the predicted settlement of the pipeline at 10-foot intervals for review. The data must be carried past the point of zero change in each direction and the actual size and varying depth of the fill must be considered when determining the settlement. Possible settlement due to soil collapse, rebound and lateral displacement must also be included.

In general, the typical maximum allowed deflection for Metropolitan's pipelines must not exceed a deflection of 1/4-inch for every 100 feet of pipe length. Metropolitan may require additional information per its Geotechnical Guidelines. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

9.0 Construction Equipment

9.1 Review of Proposed Equipment

Use of equipment across or adjacent to Metropolitan's facilities is subject to prior review and written approval by Metropolitan. Excavation, backfill, and other work in the vicinity of Metropolitan's facilities must be performed only by methods and with equipment approved by Metropolitan. A list of all equipment to be used must be submitted to Metropolitan a minimum of 30 days before the start of work.

A. For equipment operating within paved public roadways, equipment that imposes loads not greater than that of an AASHTO H-20 vehicle (see Figure 1 on Page 21) may operate across or adjacent to Metropolitan's pipelines provided the equipment operates in non-vibratory mode and the road remains continuously paved.

B. For equipment operating within unpaved public roadways, when the total cover over Metropolitan's pipeline is 10 feet or greater, equipment imposing loads no greater than those imposed by an AASHTO H-20 vehicle may operate over or adjacent to the pipeline provided the equipment is operated in non-vibratory mode. For crossings, vehicle path shall be maintained in a smooth condition, with no breaks in grade for 3 vehicle lengths on each side of the pipeline.

9.2 Equipment Restrictions

In general, no equipment may be used closer than 20 feet from all Metropolitan above-ground structures. The area around the structures should be flagged to prevent equipment encroaching into this zone.

9.3 Vibratory Compaction Equipment

Vibratory compaction equipment may not be used in vibratory mode within 20 feet of the edge of Metropolitan's pipelines.

9.4 Equipment Descriptions

The following information/specifications for each piece of equipment should be included on the list:

A. A description of the equipment, including the type, manufacturer, model year, and model number. For example, wheel tractor-scraper, 1990 Caterpillar 627E.

B. The empty and loaded total weight and the corresponding weight distribution. If equipment will be used empty only, it should be clearly stated.

C. The wheel base (for each axle), tread width (for each axle), and tire footprint (width and length) or the track ground contact (width and length), and track gauge (center to center of track).

10.0 Excavations Close to Metropolitan Facilities

10.1 Shoring Design Submittal

Excavation that impacts Metropolitan's facilities requires that the contractor submit an engineered shoring design to Metropolitan for review and acceptance a minimum of 30 days before the scheduled start of excavation. Excavation may not begin until the shoring design is accepted in writing by Metropolitan.

Shoring design submittals must include all required trenches, pits, and tunnel or jacking operations and related calculations. Before starting the shoring design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements, particularly as to any special procedures that may be required.

10.2 Shoring Design Requirements

Shoring design submittals must be stamped and signed by a California registered civil or structural engineer. The following requirements apply:

A. The submitted shoring must provide appropriate support for soil adjacent to and under Metropolitan's facilities.

B. Shoring submittals must include detailed procedures for the installation and removal of the shoring.

C. Design calculations must follow the Title 8, Chapter 4, Article 6 of the California Code of Regulations (CCR) guidelines. Accepted methods of analysis must be used.

D. Loads must be in accordance with the CCR guidelines or a soils report by a geotechnical consultant.

E. All members must be secured to prevent sliding, falling, or kickouts.

Metropolitan's pipelines must be located by potholing under Metropolitan's supervision before the beginning construction. Use of driven piles within 20 feet of the centerline of Metropolitan's pipeline is not allowed. Piles installed in drilled holes must have a minimum 2-foot clearance between Metropolitan's pipeline and the edge of the drilled hole, and a minimum of 1-foot clearance between any part of the shoring and Metropolitan's pipeline.

11.0 Support of Metropolitan Facilities

11.1 Support Design Submittal

If temporary support of a Metropolitan facility is required, the contractor shall submit a support design plan to Metropolitan for review and approval a minimum of 30 days before the scheduled start of work. Work may not begin until the support design is approved in writing by Metropolitan. Before starting design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements.

11.2 Support Design Requirements

Support design submittals must be prepared, stamped, and signed by a California registered civil or structural engineer. The following requirements apply:

A. Support drawings must include detailed procedures for the installation and removal of the support system.

B. Design calculations must follow accepted practices, and accepted methods of analysis must be used.

C. Support designs must show uniform support of Metropolitan's facilities with minimal deflection.

D. The total weight of the facility must be transferred to the support system before supporting soil is fully excavated.

E. All members must be secured to prevent sliding, falling, or kickouts.

12.0 Backfill

12.1 Metropolitan Pipeline Not Supported

In areas where a portion of Metropolitan pipeline is not supported during construction, the backfill under and to an elevation of 6 inches above the top of the pipeline must be one-sack minimum cement sand slurry. To prevent adhesion of the slurry to Metropolitan's pipeline, a minimum 6-mil-thick layer of polyethylene sheeting or similar approved sheeting must be placed between the concrete support and the pipeline.

12.2 Metropolitan Pipeline Partially Exposed

In areas where a Metropolitan pipeline is partially exposed during construction, the backfill must be a minimum of 6 inches above the top of the pipeline with sand compacted to minimum 90 percent compaction.

12.3 Metropolitan Cut and Cover Conduit on Colorado River Aqueduct (CRA)

In areas where a Metropolitan cut and cover conduit is exposed, the following guidelines apply:

A. No vehicle or equipment shall operate over or cross the conduit when the cover is less than 3 feet.

B. Track-type dozer with a gross vehicle weight of 12,000 lbs or less may be used over the conduit when the cover is a minimum of 3 feet.

C. Wheeled vehicles with a gross vehicle weight of 8,000 lbs or less may operate over the conduit when the cover is a minimum of 4 feet.

D. Tracked dozer or wheeled vehicle should be used to push material over the conduit from the side.

E. Tracked dozer or wheeled vehicle should gradually increase cover on one side of the conduit and then cross the conduit and increase cover on the other side of the conduit. The cover should be increased on one side of the conduit until a maximum of 2 feet of fill has been placed. The cover over the conduit is not allowed to be more than 2 feet higher on one side of the conduit than on the other side.

F. The cover should be gradually increased over the conduit until the grade elevations have been restored.

13.0 Piles

13.1 Impacts on Metropolitan Pipelines

Pile support for structures could impose lateral, vertical and seismic loads on Metropolitan's pipelines. Since the installation of piles could also cause settlement of Metropolitan pipelines, a settlement and/or lateral deformation study may be required for pile installations within 50 feet of Metropolitan's pipelines. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

13.2 Permanent Cast-in-place Piles

Permanent cast-in-place piles must be constructed so that down drag forces of the pile do not act on Metropolitan's pipeline. The pile must be designed so that down drag forces are not developed from the ground surface to springline of Metropolitan's pipeline.

Permanent cast-in-place piles shall not be placed closer than 5 feet from the edge of Metropolitan's pipeline. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

14.0 Protective Slabs for Road Crossings Over Metropolitan Pipelines

Protective slabs must be permanent cast-in-place concrete protective slabs configured in accordance with Drawing SK-1 (See Figure 2 on Page 22).

The moments and shear for the protective slab may be derived from the American Association of State Highway and Transportation Officials (AASHTO). The following requirements apply:

A. The concrete must be designed to meet the requirements of AASHTO

B. Load and impact factors must be in accordance with AASHTO. Accepted methods of analysis must be used.

C. The protective slab design must be stamped and signed by a California registered civil or structural engineer and submitted to Metropolitan with supporting calculations for review and approval.

Existing protective slabs that need to be lengthened can be lengthened without modification, provided the cover and other loading have not been increased.

15.0 Blasting

At least 90 days prior to the start of any drilling for rock excavation blasting, or any blasting in the vicinity of Metropolitan's facilities, a site-specific blasting plan must be submitted to Metropolitan for review and approval. The plan must consist of, but not be limited to, hole diameters, timing sequences, explosive weights, peak particle velocities (PPV) at Metropolitan pipelines/structures, and their distances to blast locations. The PPV must be estimated based on a site-specific power law equation. The power law equation provides the peak particle velocity versus the scaled distance and must be calibrated based on measured values at the site.

16.0 Metropolitan Plan Review Costs, Construction Costs and Billing

16.1 Plan Review Costs

Metropolitan plan reviews requiring 8 labor hours or less are generally performed at no cost to the project proponent. Metropolitan plan reviews requiring more than 8 labor hours must be paid by the project proponent, unless the project proponent has superior rights at the project area. The plan review will include a written response detailing Metropolitan's comments, requirements, and/or approval.

A deposit of funds in the amount of the estimated cost and a signed letter agreement will be required from the project proponent before Metropolitan begins or continues a detailed engineering plan review that exceeds 8 labor hours.

16.2 Cost of Modification of Facilities Performed by Metropolitan

Cost of modification work conducted by Metropolitan will be borne by the project proponent, when Metropolitan has paramount/prior rights at the subject location.

Metropolitan will transmit a cost estimate for the modification work to be performed (when it has paramount/prior rights) and will require that a deposit, in the amount of the estimate, be received before the work will be performed.

16.3 Final Billing

Final billing will be based on the actual costs incurred, including engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the total cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice for the additional amount will be forwarded for payment.

17.0 Street Vacations and Reservation of Easements for Metropolitan

A reservation of an easement is required when all or a portion of a public street where Metropolitan facilities are located is to be vacated. The easement must be equal to the street width being vacated or a minimum 40 feet. The reservation must identify Metropolitan as a "public entity" and not a "public utility," prior to recordation of the vacation or tract map. The reservation of an easement must be submitted to Metropolitan for review prior to final approval.

18.0 Metropolitan Land Use Guidelines

If you are interested in obtaining permission to use Metropolitan land (temporary or long term), a Land Use Form must be completed and submitted to Metropolitan for review and consideration. A nonrefundable processing fee is required to cover Metropolitan's costs for reviewing your request. Land Use Request Forms can be found at:

http://mwdh2o.com/PDF_Doing_Your_Business/4.7.1_Land_Use_Request_form_revised.pdf

The request should be emailed to RealEstateServices@mwdh2o.com,or contact the Real Property Development and Management (RPDM) Group at (213) 217-7750.

After the initial application form has been submitted, Metropolitan may require the following in order to process your request:

A. A map indicating the location(s) where access is needed, and the location & size (height, width and depth) of any invasive subsurface activity (boreholes, trenches, etc.).

B. The California Environmental Quality Act (CEQA) document(s) or studies that have been prepared for the project (e.g., initial study, notice of exemption, Environmental Impact Report (EIR), Mitigated Negative Declaration (MND), etc.).

C. A copy of an ACORD insurance certification naming Metropolitan as an additional insured, or a current copy of a statement of self-insurance.

D. Confirmation of the legal name of the person(s) or entity(ies) that are to be named as the permittee(s) in the entry permit.

E. Confirmation of the purpose of the land use.

F. The name of the person(s) with the authority to sign the documents and any specific signature title block requirements for that person or any other persons required to sign the document (i.e., legal counsel, Board Secretary/Clerk, etc.).

G. A description of any vehicles that will have access to the property. The exact make or model information is not necessary; however, the general vehicle type, expected maximum dimensions (height, length, width), and a specific maximum weight must be provided.

Land use applications and proposed use of the property must be compatible with Metropolitan's present and/or future use of the property. Any preliminary review of your request by Metropolitan shall not be construed as a promise to grant any property rights for the use of Metropolitan's property.

19.0 Compliance with Environmental Laws and Regulations

As a public agency, Metropolitan is required to comply with all applicable environmental laws and regulations related to the activities it carries out or approves. Consequently, project plans, maps, and other information must be reviewed to determine Metropolitan's obligations pursuant to state and federal environmental laws and regulations, including, but not limited to:

A. California Environmental Quality Act (CEQA) (Public Resources Code 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 1500-15387)

B. Federal Endangered Species Act (ESA) of 1973, 16 U.S.C. §§ 1531, et seq.

C. California Fish and Game Code Sections 2050-2069 (California ESA)

D. California Fish and Game Code Section 1602

E. California Fish and Game Code Sections 3511, 4700, 5050 and 5515 (California fully protected species)

F. Federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. §§ 703-712

G. Federal Clean Water Act (including but not limited to Sections 404 and 401) 33 U.S.C. §§ 1342, 1344)

H. Porter Cologne Water Quality Control Act of 1969, California Water Code §§ 13000-14076.

I. Title 22, California Code of Regulations, Chapter 16 (California Waterworks Standards), Section 64572 (Water Main Separation)

Metropolitan may require the project applicant to pay for any environmental review, compliance and/or mitigation costs incurred to satisfy such legal obligations.

20.0 Paramount Rights / Metropolitan's Rights within Existing Rights-of-Way

Facilities constructed within Metropolitan's rights-of-way shall be subject to the paramount right of Metropolitan to use its rights-of-way for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove or relocate any facilities from its rights-of-way, such removal and replacement or relocation shall be at the expense of the owner of the facility.

21.0 Disclaimer and Information Accuracy

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as you may deem prudent, to assure that your project plans are correct. The relevant representative from Metropolitan must be called at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

Table 1: General Guidelines for Pipeline Separation between Metropolitan's Pipeline[1] and Sanitary Sewer[2] or Hazardous Fluid Pipeline[3]

Pipeline Crossings	Metropolitan requires that sanitary sewer and hazardous fluid pipelines that cross Metropolitan's pipelines have special pipe construction (no joints) **and** secondary containment[4]. This is required for the full width of Metropolitan's rights-of-way or within 10 feet tangent to the outer edges of Metropolitan's pipeline within public streets. Additionally, sanitary sewer and hazardous fluid pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance between the top and the bottom of Metropolitan's pipeline and the pipe casing. These requirements apply to all sanitary sewer crossings regardless if the sanitary sewer main is located below or above Metropolitan's pipeline.
Parallel Pipeline	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requires that all parallel sanitary sewer, hazardous fluid pipelines and/or non-potable utilities be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, longitudinal pipelines require special pipe construction (no joints) **and** secondary containment[4].
Sewer Manhole	Sanitary sewer manholes are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests manholes parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment[5].

Notes:

[1] *Separation distances are measured from the outer edges of each pipe.*

[2] *Sanitary sewer requirements apply to all recycled water treated to less than disinfected tertiary recycled water (disinfected secondary recycled water or less).* Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

[3] *Hazardous fluids include e.g., oil, fuels, chemicals, industrial wastes, wastewater sludge, etc.*

[4] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

[5] *Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.*

Table 2: General Guidelines for Pipeline Separation between Metropolitan's Pipeline[1] and Storm Drain and/or Disinfected Tertiary Recycled Water[2]

Pipeline Crossings	Metropolitan requires crossing pipelines to be special pipe construction (no joints) or have secondary containment[3] within 10-feet tangent to the outer edges of Metropolitan's pipeline. Additionally, pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance.
Parallel Pipeline	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requests that all parallel pipelines be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, special pipe construction (no joints) or secondary containment[3] are required.
Storm Drain Manhole	Permanent utility structures (e.g., manhole. catch basin, inlets) are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests all structures parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment[4].

Notes:

[1] *Separation distances are measured from the outer edges of each pipe.*

[2] *Disinfected tertiary recycled water as defined* in Title 22, California Code of Regulations, Chapter 3 (*Water Recycling Criteria*), Section 60301.

[3] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

[4] *Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.*

Table 3: General Guidelines for Pipeline Separation[1] between Metropolitan's Pipeline and Recycled Water[2,4] Irrigations

Pressurized recycled irrigation mainlines	• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing pressurized recycled irrigation mainlines must be special pipe construction (no joints) or have secondary containment[3] within 10-feet tangent to the outer edges of Metropolitan's pipeline. • Longitudinal - must maintain a minimum 10-foot horizontal separation and route along the perimeter of Metropolitan's rights-of-way where possible.
Intermittently Energized Recycled Water Irrigation System Components	• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment[3]. • Longitudinal – must maintain a minimum 5-foot horizontal separation between all intermittently energized recycled water irrigation system components (e.g. irrigation lateral lines, control valves, rotors) and the outer edges of Metropolitan's pipeline. Longitudinal irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment[3].
Irrigation Structures	Irrigation structures such as meters, pumps, control valves, etc. must be located outside of Metropolitan's rights-of-way.
Irrigation spray rotors near Metropolitan's aboveground facilities	Irrigation spray rotors must be located a minimum of 20-foot from any Metropolitan above ground structures with the spray direction away from these structures. These rotors should be routinely maintained and adjusted as necessary to ensure no over-spray into 20-foot clear zones.
Irrigations near open canals and aqueducts	Irrigation with recycled water near open canals and aqueducts will require a setback distance to be determined based on site-specific conditions. Runoff of recycled water must be contained within an approved use area and not impact Metropolitan facilities. Appropriate setbacks must also be in place to prevent overspray of recycled water impacting Metropolitan's facilities.

Notes:

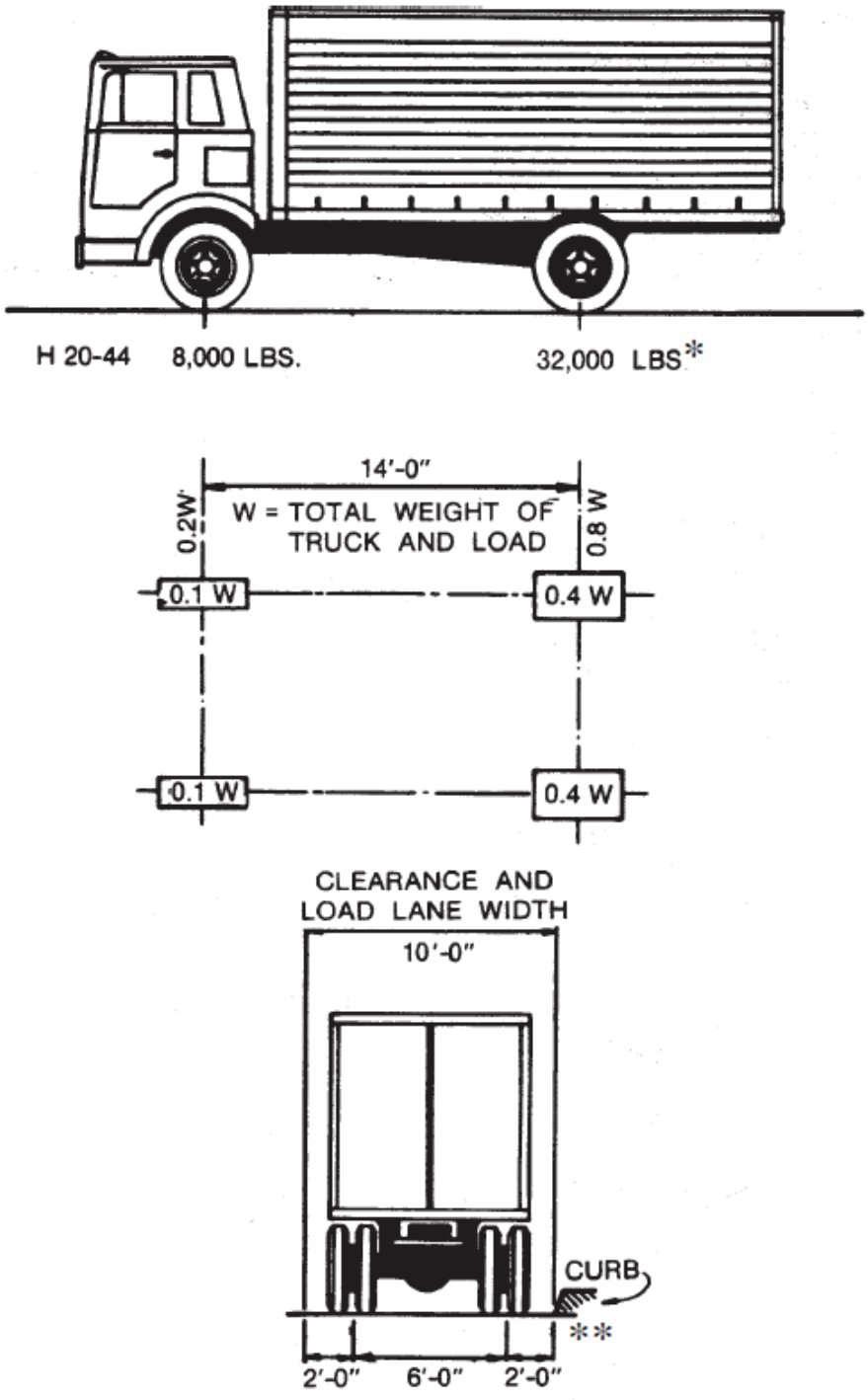
[1] *Separation distances are measured from the outer edges of each pipe.*

[2] *Requirements for recycled water irrigation apply to all levels of treatment of recycled water for non-potable uses.* Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (*Water Recycling Criteria*), Section 60301.

[3] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

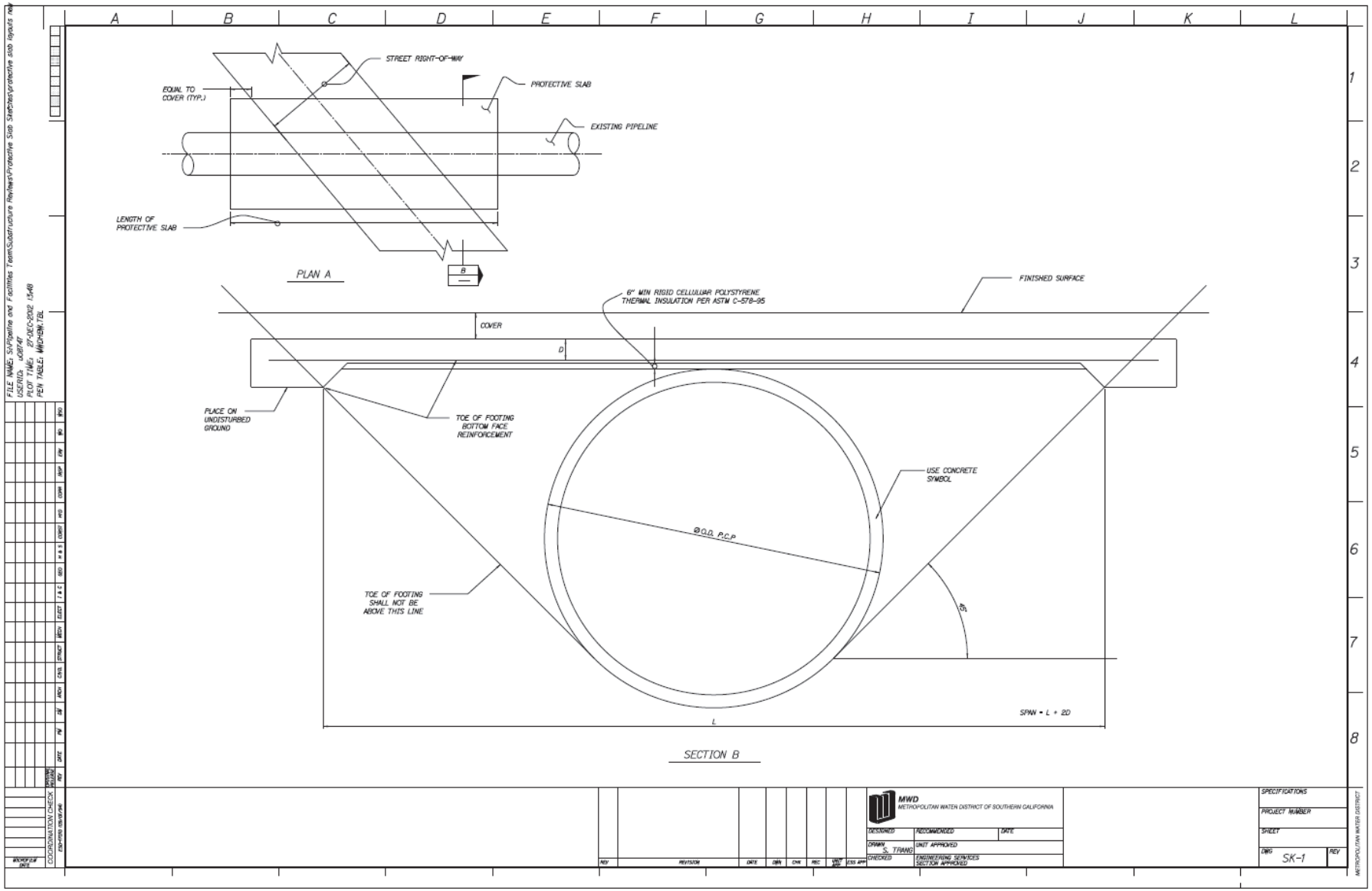
[4] *Irrigation with recycled water shall not be applied directly above Metropolitan's treated water pipelines.*

Figure 1: AASHTO H-20 Loading



Note: The H loadings consist of a two-axle truck or the corresponding lane loadings as illustrated above. The H loadings are designated "H" followed by a number indicating the gross weight in tons of the standard truck.

Figure 2: Drawing SK-1



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Of Counsel
MARC D. JOSEPH
DANIEL L. CARDOZO

November 16, 2022

VIA EMAIL AND U.S. MAIL

John Hildebrand, Planning Director
Riverside County Planning Department
4080 Lemon Street 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409
Email: jhildebr@rivco.org;
Planning@rivco.org

Riverside County Clerk of the Board
County Administrative Center
4080 Lemon Street, 1st. Floor
Riverside, Ca 92501
Email: cob@rcbos.org

VIA EMAIL ONLY

Tim Wheeler, Project Planner
Email: twheeler@rivco.org

Re: Request for Mailed Notice of Actions and Hearings – Easley Renewable Energy Project (Conditional Use Permit No. 220021, Development Agreement No. 2200016, SCH No. 2022110240)

Dear Mr. Hildebrand, Clerk of the Board, and Mr. Wheeler:

We are writing on behalf of California Unions for Reliable Energy ("CURE") to request mailed notice of the availability of any environmental review document, prepared pursuant to the California Environmental Quality Act, related to the Easley Renewable Energy Project (Conditional Use Permit No. 220021, Development Agreement No. 2200016, SCH No. 2022110240) proposed by Intersect Power (d.b.a. IP Easley, LLC), as well as a copy of the environmental review document when it is made available for public review.

The Project proposes to construct, operate, and decommission, a utility-scale solar photovoltaic (PV) electrical generating and storage facility and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid. The Project would generate and store up to 650 megawatts (MW) of renewable electricity via arrays of solar PV panels, battery energy storage system (BESS), and appurtenant facilities. The Project site is located on private land, as well as land administered by the U.S. Bureau of Land Management (BLM) in Riverside County, north of Interstate 10 (I-10) and

approximately 2 miles north of the town of Desert Center, California. A portion of the solar facility site is located within the County of Riverside's jurisdiction. The remainder of the solar facility and the 500 kV gen-tie line would be located on BLM-administered public lands.

We also request mailed notice of any and all hearings and/or actions related to the Project. These requests are made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108, 21152 and 21167(f) and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please send the above requested items by email and U.S. Mail to our San Francisco office as follows:

U.S. Mail
Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email
ssannadan@adamsbroadwell.com

Please call me at (650) 589-1660 if you have any questions. Thank you for your assistance with this matter.

Sincerely,

Sheila M. Sannadan
Legal Assistant

SMS:acp

6082-004acp

Email: Easley Renewable Energy Project EIR Team

From: Liao, William <WLiao@socalgas.com>
Sent: Monday, December 19, 2022 7:46 AM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Cc: SCG SE Region Redlands Utility Request <SCGSERegionRedlandsUtilityRequest@semprautilities.com>
Subject: Conditional Use permit 220021

Hi Tim.

Regarding Conditionpal Use Permit 220021, I have no concerns at this time. We have some medium pressure facilities in the Lake Tamarisk area, as well as on Kaiser Rd. I don't believe any of the APNs infringe upon those areas.

Just in case, though, please make sure to have them contact USA / Dig Alert prior to any excavations so we can have someone go out for locate and mark. Let me know if you have any questions.

Will Liao
Region Planning Supervisor
Redlands HQ / Southeast Region
Desk: 213-244-4543
Mobile: 562-889-1981

REFERENCING:

COUNTY OF RIVERSIDE -NOTICE OF PREPARATION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT & SCOPING MEETING

DATE: November 14, 2022

TO: Responsible and Trustee Agencies, Interested Organizations, and individuals

PROJECT CASE NO./TITLE: Easley Renewable Energy Project-Draft Environmental Impact Report Conditional Use Permit No. 220021/Development Agreement No. 2200016

LAKE TAMARISK DESERT RESORT AND SURROUNDING COMMUNITY FORMAL SOLAR SCOPING INPUT DOCUMENT (1/05/23)

Lake Tamarisk Desert Resort, Our Community, is a 55 years and older active Community Resort for Desert enjoyment including, birding, golfing, ATV, hiking, bike riding, swimming and other recreational activities. The Resort Community consists of 150 dwellings and recreational sites (most of which have 2 people) that are owned by its residents. The Community also includes 80 homes consisting of families with and without children. Approximately 60 school age children live in the community and attend a local school. There is a library, fire department and a post office, but no other services.

At this point, both the BLM and Riverside County have approved nearly 18,000 acres of large-scale solar in the area. About half has been built out and the other half under construction. The projects are:

Desert Sunlight Solar	4,400 acres
Desert Harvest Solar	1,200 acres
Athos Solar	3,400 acres
Palen Solar	3,000 acres
Acica Solar	2,000 acres
Victory Pass Solar	2,000 acres
Oberon Solar	2,700 acres

There are currently more proposed:

Easley Solar	3,500 acres
Sapphire Solar	approximately 2,500 acres

There are an additional 130,000 acres, to the east of highway 177, in the focus area for Renewable Energy Development. The proposed Easley Solar Project panels would be at 750 feet from the nearest residence. The infrastructure is proposed to be at 25 feet from the nearest resident.

THE SOLAR PROJECTS HAVE CREATED THE FOLLOWING PROBLEMS AND ISSUES FOR THE COMMUNITY. WE WOULD LIKE THESE ITEMS ADDRESSED AND STUDIED IN DETAIL AND INCLUDED IN THE SCOPE OF THE ENVIRONMENTAL ASSESSMENT:

HEALTH EFFECTS

- According to the World Health Organization, there is a health risk of electromagnetic hypersensitivity associated with the solar inverter boxes and transmission lines that are present in the solar fields. Potential EMF effects are headaches, nausea, fatigue, skin rashes, dizziness, sleep disorders and possible connections to cancer. These effects can be felt by not only seniors but also children and other sensitive individuals.
- The solar farms, existing and proposed, have caused stress and anxiety that continues to escalate with our uncertain future. Stress and anxiety affect the senior community manifesting itself in decreased feelings of well-being, decline in physical and mental health and decreasing seniors' ability to perform daily routines.

JUSTIFICATION FOR A DETAILED STUDY:

To name a few stress factors Lake Tamarisk residents are currently experiencing are concerns about: Health effects which include silicosis, COPD, Valley Fever, allergies to name a few. The visual beauty of the Resort is diminishing and being replaced by industrial solar compounds. We no longer have the tranquility and peace in our community. The insecurity and frustration of not knowing our future of our community is contributing to our stress levels. The fear of severe reduction in property values and the necessity of relocation manifests itself in our declining health.

Referencing a BlueShieldCa.com article: "Stress is a significant contributor to declining health and well-being; it has even been identified as a primary cause of cardiovascular diseases, mental health disorders and the weakening of the immune systems. These conditions (and their impact) only worsen as people get older".

"According to the American Psychological Association, anxiety, depression, insomnia, indigestion, headaches, and increased risk of heart attack or stroke are all long-term effects of stress".

- Dust and wind from cleared vegetation and ground disturbance carries silica which can cause silicosis and other health issues. Blowing dust not only affects those with COPD and other pulmonary issues but also can cause these issues in healthy people and animals.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

Removal of stabilized soils and biological soil crust creates a destructive cycle of airborne particulates and erosion. As more stabilized soils are removed, blowing particulates remaining crusts, thus resulting in more airborne particulates.

"The composition of sand varies, depending on local sources and conditions, but the most common constituent of sand in inland continental settings and non-tropical coastal settings is Silica (Silicon Dioxide, or SIO2), usually in the form of Quartz". (Wikipedia, "Sand")

The U.S. Dept. of Labor, on the OSHA website, under the topic of "Safety and Health Topics: Silica" states: "Breathing in very small (respirable) crystalline silica particles, causes multiple diseases including, silicosis, an incurable lung disease that leads to disability and death. Respirable crystalline silica causes lung cancer, chronic obstructive pulmonary disease (C.O.P.D.) and kidney disease. Exposure to respirable crystalline silica is related to the development of auto immune disorders and cardiovascular impairment. These occupational diseases are life-altering and debilitating disorders that annually affect thousands of workers across the U.S."

OSHA has established standards to protect workers exposed to silica in the workplace. There is no protection addressed for non-occupational exposure to the community. There is no determination of the risk of Silica exposure, to the communities, that these solar projects are affecting.

There is a lot of history of "dropping the ball" in this country when it comes to protecting our citizenry from airborne problems. It has not been shown to anyone in this community to any degree of satisfaction that we are to be anything but collateral damage.

- Fugitive Dust is a by-product of large solar projects being built in dry desert areas. As a result of impacted desert soils, there have been very large fugitive dust disturbances since the projects have been built out. This creates potential respiratory health issues and increases risk of Valley Fever.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

Epidemiologists investigated an outbreak of valley fever that had sickened 28 workers at two large solar power construction sites in San Luis Obispo County, CA. [1]

[1] *28 solar workers sickened by valley fever in San Luis Obispo County - Los Angeles Times (latimes.com)*

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

Fugitive dust from the Oberon Solar farm one-half mile South of Lake Tamarisk after approved dust abatement procedures. (Taken December 11, 2022 at 9:30am during 16 mph southwest winds with gusts to 30 mph).

MITIGATION OF HEALTH IMPACTS DUE TO PROPOSED SOLAR INSTALLATION:

- *A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to minimize the health issues of fugitive dusts, silica, EMF and stress related health issue on an entire community.*
- *Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of Highway 177 for solar development while there is 130,000 acres available, east of Highway 177, in the focus area for renewable energy development.*

AESTHETICS / VISUAL RESOURCES / REFLECTION

Our Unique Community, Lake Tamarisk, was chosen specifically by our residents because it is truly an Oasis in a vast open desert full of unique everchanging micro habitats for both plants and animals. The incredible 360-degree vistas of the Wilderness area including the mountains of Joshua Tree National Park, the peaks of the Chuckwalla Mountains, Coxcomb Mountains, Eagle Mountain, and the Palen Mountain areas are irreplaceable.

- Existing large solar installations north, east, southeast and south affect our view of these mountains. The incident of light reflecting from the panels is blinding and impacts the whole Community.

  JUSTIFICATION FOR A DETAILED STUDY:

  The reflection from the Easley Project, which will be immediately bordering our property to the north, will greatly impact our view out our back door. Below is a picture, taken January 1, 2023, that shows a landscape scale solar installation, five miles out, due North of Lake Tamarisk Resort. The proposed Easley installation would encompass all the desert landscape between the existing solar installation and Lake Tamarisk Desert Resort; totally destroying our desert view.
- The individuals of our community, come here to enjoy and view the vast expansion of the living desert. The life style we came here to enjoy is being taken from us without even consulting us.
- Dark Skies will be affected by the external lighting. This is one of the few areas in the US with Dark Sky.
- Easley Solar Installation would be seen from our homes at Lake Tamarisk Desert Resort. Visually, our desert of past is now filling up with solar panels. There is no way to hide such a big land disturbance.

  ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

  The Bureau of Land Management has created several near-by Areas of Critical Environmental Concern and National Conservation Areas regionally in association with the establishment of the Desert Renewable Energy Conservation Plan in 2016. These areas are managed under a higher Visual Resource Management Class (VRM Class)[2] and are adjacent to proposed and existing solar projects. The projects average about 3 to 5 square miles per project and create a very large visual contrast to private property and adjacent conservation areas.

[2] *Bureau of Land Management Visual Resource Management Classes (anl.gov)*

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY CONTINUED:

"DCAP 2.3 Assure that the design of new land uses subject to discretionary review visually enhances, and does not degrade, the character of the Desert Center region". Excerpt from County of Riverside General Plan, September 28, 2021.

"In certain respects, Desert Center is a sort of gateway into the entire region along this major artery spanning the nation. It triggers a change in the prevailing pattern of the landscape whether leaving the urbanizing portions of the region or approaching them from the east. At a very minimum, it is for many a welcome oasis as they cross the desert. For a much smaller number of residents and business operators, it is a small world of tranquil reality, with clean air, and little traffic and noise, that sets it apart from every other part of Riverside County. The Desert Center Area Plan contains policies that guide the physical development and land uses in this oasis in the unincorporated portion of eastern Riverside County." (Excerpt from County of Riverside General Plan, September 28, 2021).

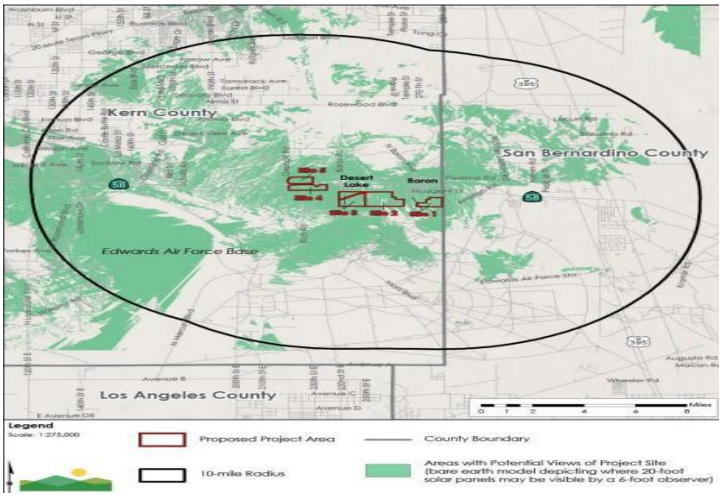
The above quoted excerpts state what should happen at the Desert Center area. Specifically, we at Lake Tamarisk Desert Resort, have not seen any protection of our immediately surrounding area from the Riverside County General Plan dated September 28, 2021.

"The uninhabited and natural character of the open space lands is expected to continue throughout the life of the plan." (Excerpt from County of Riverside General Plan dated September 28, 2021).

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

The below picture represents the view looking north towards an existing solar landscape scale installation five miles from Lake Tamarisk border. The proposed Easley project would encompass and destroy the entire desert view from Lake Tamarisk Desert Resort to the existing solar facility. Picture taken January 1, 2023.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:



^ A Visual Impact analysis map was made for the EIR for the Arietian Solar Project near Boron, CA. A similar map should be made for Easley Solar Project.

MITIGATION OF AESTHETICS/VISUAL RESOURCES/REFLECTION DUE TO PROPOSED SOLAR INSTALLATION:

- *A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to maintain the integrity and lifestyle of LTDR and Community.*
- *At these distances, where necessary to block the view of the solar panels, berms with mature native plantings and maintenance thereof is necessary.*
- *Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there*

is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

POPULATION AND HOUSING AND SOCIOECONOMICS

- Lake Tamarisk Desert Resort, Our Community, is a 55 years and older active Community Resort for Desert enjoyment. The Resort Community consists of 150 dwellings and recreational sites (most of which have 2 people) that are owned by its residents. The Community also includes 80 homes consisting of families with and without children. Approximately 60 school age children live in the community and attend a local school. There is a library, fire department and a post office, but no other services. The demographics of Lake Tamarisk is primarily active senior citizens.
- Lake Tamarisk Community is currently surrounded on 2 sides with vast solar arrays and with the proposed Easley Solar Project, we would be closely surrounded on 3 sides. The remaining side, to the west, contains high voltage lines and their towers. The identity of Lake Tamarisk Desert Resort and Community, in a vast living desert, will be lost.
- Quality of life would be severely diminished for all residents and visitors who come to the desert for the beauty and recreation.
- We are extremely concerned with the value of our properties and our desired way of life. Currently, properties are going up for sale due to the concerns and uncertainty of the multiple impacts of current solar fields and proposed solar fields that surround Lake Tamarisk Desert Resort. Our concern is that our property will inevitably be less desirable and thereby lose its value.
- Higher local temperatures will result in higher power bills and less outdoor opportunities.

JUSTIFICATION FOR A DETAILED STUDY:

An in-depth study needs to be done, going back ten years, on kilowatt usage year around home by home at Lake Tamarisk Desert Resort and Community as compared to the kilowatt usage that would be required to cool homes with the rise in temperature ranging from 3 degrees to 10 degrees going forward at least 10 years.

MITIGATION OF IMPACTS ON POPULATION AND HOUSING AND SOCIOECONOMICS DUE TO PROPOSED SOLAR INSTALLATION:

- *A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to maintain the integrity and lifestyle of LTDR and Community.*
- *Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there*

is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

AIR QUALITY

- Construction dust and wind that has been increased from vegetation removal, carries silica and herbicides. We are specifically concerned with the impact on our young and elderly.

JUSTIFICATION FOR A DETAILED STUDY:

Large-scale solar projects in the hot desert cause air quality problems. Dust control in hot, arid climates is very problematic. The removal of established vegetation, biological soil crusts and centuries old desert pavement creates opportunities for dust to be airborne every time the wind blows. Not only does fugitive dust create problems for visual and biological resources, it creates issues for public health as well. Efforts to mitigate fugitive dust on large desert regions often fall short.

- Valley Fever risk will be increased. (refer to Health section)

MITIGATION OF IMPACTS ON AIR QUALITY DUE TO PROPOSED SOLAR INSTALLATION:

- *A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary minimize the health issues of fugitive dusts and silica.*
- *Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.*

BIOLOGICAL RESOURCES

- To our immediate north, protected Desert Wash Woodlands are unique and this area has very old desert ironweed trees; some may be as much as 800-years-old. The Desert Wash Woodlands will be destroyed as solar encroaches.

JUSTIFICATION FOR A DETAILED STUDY:

The Desert Wash Woodlands due north of Lake Tamarisk Desert Resort, within the proposed Easley Solar project, lie running east and west throughout the desert in a finger fashion. These washes are critical habitat survival for many plants and animals.
An article published in 2000 by The Arizona-Sonora Desert Museum states that Ironwood is a keystone species and nurse plant. Ironwood provides essential shade to more than 500 species of plants and animals in the Sonora Desert.

- A vast amount of flora and fauna in this desert needs protection to preserve the desert for our current enjoyment and for future generations of residents and visitors. This would maintain our identity as a resort in an Oasis in the Desert.
- The conversion of so much land to solar panels removes the habitat for much of the local wildlife and plants. These species include, desert tortoise, burrowing owl, burro deer, kit fox, American badger, desert bighorn sheep and a host of other wildlife species.
- Lake Tamarisk is in the Colorado River Flyway which is part of the Pacific Flyway. We have about 300,000 birds that migrate through our flyway. Specifically, 304 species have been observed and reported in and around Lake Tamarisk;
  eBird, Cornell University.
- Research shows these migrating birds have been affected by solar arrays and EMFs from transmission lines and inverter boxes. Solar projects mimic lakes and have caused significant water fowl mortality.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

It is thought that the projects mimic water and cause birds to hit the solar panels. Data from 7 solar projects in California has revealed 3,545 bird kills from 183 species from 2012 to 2016. This can be referenced from the 2016 Multi-Agency Avian Solar Working Group conference from 2016[3].

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

A Federally Endangered Yuma Clapper Rail was killed on the Desert Sunlight Solar Project in 2015.

Black and Veatch (www.bv.com) reports that large solar fields such as those that have been built in the last several years in southern California and the desert Southwest can fool birds into changing flight direction, sometimes during migration, to approach them because they appear to be lakes from a distance. Many of the birds that have been killed at these large solar sites are waterbirds, which indicates that these birds fly to solar fields and realize too late in their descent that the solar panels are not water. The waterbirds then collide with the solar panels and are critically wounded or killed. Some waterbirds also have great difficulty taking off from non-water surfaces, which could leave them stranded in desert areas without food, water or shelter.

[3] *Developing Nesting Habitat Suitability Model for Greater Sage-Grouse Conservation in Wyoming Using Object-based Image Analysis (anl.gov)*

MITIGATION OF IMPACTS ON BIOLOGICAL RESOURCES DUE TO PROPOSED SOLAR INSTALLATION:

- *A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary minimize the impacts on biological resources.*
- *Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.*

GEOLOGY AND SOILS

- Desert Wash Woodlands, containing Ironwood, will be more impacted by flash floods causing undetermined changes in erosion and can be destroyed due to disruption, by the solar fields, of the natural flow of the water.
- We are currently experiencing termite swarms and more sightings of rattlesnakes due to nearby soil disturbance from the solar fields and the vibration of all the construction equipment. The use of the PD10 equipment that pounds the ground is of particular concern to insects and other animals.
- Concern about soil sterilization with the use of chemicals.
- Carbon sequestration of intact, undisturbed desert soils and vegetation should be considered in this review.

JUSTIFICATION FOR A DETAILED STUDY:

- ***Carbon sequestration of intact, undisturbed desert soils and vegetation should be considered in this review. CO2 as it is inhaled above ground and exhaled below ground and stored in a biological web of mycorrhizae is seldom if ever accounted for by environmental reviews of large-scale solar projects built on healthy, functioning desert ecosystems. This process of photosynthesis and respiration is as old as plant life systems.[4] The layered caliche underground at shallow depths in deserts is fossilized carbon. Cemented caliche (calcium carbonate) soils are common and widespread in the Mojave Desert, including on solar project sites. In 2011 Dr. Michael Allen, Professor of Biology, and Plant Pathology and Microbiology, University of California at Riverside, put out a white paper on the research needs in desert ecology raised in the face of large-scale renewable energy development. [5] These research needs include more studies in how climate change will shift species and habitats; sources and recharge of groundwater pumped by solar projects; persistence of rare species; invasive plants; and Carbon sequestration in desert vegetation and soils. All these areas have many unknowns, and more research still needs to be undertaken before land managers make sweeping decisions that will alter thousands of acres of desert ecosystems and hydrology for decades to come. Microphyll woodlands in the desert, for example, are a prime driver of carbon sequestration according to Allen "Many of the areas that are proposed to be developed for the solar development include Microphyll woodlands. The dominant plants (legume trees) have deep roots capable of reaching groundwater (several meters). When desert plants grow, they absorb carbon dioxide. The carbon (C), as sugars, moves into roots and soil organisms. Carbon dioxide is respired back into the soil, part of which reacts with calcium (Ca) in the soil to form calcium carbonate. This is how our deserts sequester large amounts of C and thus function to reduce atmospheric CO2. The magnitude of this carbon storage process is still a crucial research question and remains unknown for our California deserts. However, values of up to 100g/m2/y of C-fixation are reported from deserts in Baja and Nevada (Serrano-Ortiz et.al. 2010). After vegetation is removed to make way for solar arrays, carbon dioxide will be left to return to the atmosphere that ordinarily would have been used to form soil organic matter buried up to several meters deep, or released by roots and soil microbes as soil CO2, which in turn, binds with soil Ca to form caliche.*** *Our deserts have large amounts of CO2, stored as caliche (CaCO3). The amount of C in caliche, when accounted globally, may be equal to the entire C as CO2 in the atmosphere."* [6]

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[4] *Robin Kobaly, The Desert Under Our Feet – An extraordinary Biological Web that Serves Us in Countless Ways Desert Report, March 2019, synthesizes 29 scientific peer reviewed journal articles focused on carbon sequestration in desert soils*

[5] *http://basinandrangewatch.org/Michael%20Allen%20paper%20copy.pdf*

[6] https://www.scribd.com/document/50559956/Solar-Power-in-the-Desert-Michael-Allen

MITIGATION OF IMPACTS ON GEOLOGY AND SOILS DUE TO PROPOSED SOLAR INSTALLATION:

- *A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary minimize the impacts on geology and soils.*
- *Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.*

HAZARDS AND HAZARDOUS MATERIALS

- Chemical sprays will be used to control vegetation and invasive weeds.
- Solar panels contain dangerous chemicals that could be released if broken or damaged by hail storms, high winds and blowing gravel.
- Desert sand, disturbed by solar construction, is very high in silica, which can cause Silicosis.

MITIGATION OF IMPACTS ON HAZARDS AND HAZARDOUS MATERIALS DUE TO PROPOSED SOLAR INSTALLATION:

- *A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to minimize the health issues of fugitive dusts and silica due to hazards and hazardous materials*
- *Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.*

HYDROLOGY AND WATER QUALITY

- Configuration of solar panels can alter surface hydrology and create local flooding during rain events and monsoon season.
- Individual solar projects, such as Easley, will require over 1,000-acre feet of water for construction and dust mitigation. Tens of thousands of additional acre feet will be needed for all of the energy infrastructure built and planned for the area.

- The local Chuckwalla Aquifer is a critical need for our community and is already being depleted. The Proposed Eagle Crest Pumped Storage Project would have a cumulative impact on the aquifer depletion.

  JUSTIFICATION FOR A DETAILED STUDY:
  Referencing the 2017 NEPA Review for the Eagle Crest Pumped Storage project from the BLM:

  "An updated assessment of cumulative groundwater effects in the Chuckwalla Basin was performed accounting for a current list of projects and estimated water demands, and review of FERC required groundwater and water quality protection plans. At the time the FERC EIS was published in 2012, an estimated 14 solar projects were planned with total cumulative water use estimates of about 17,742 acre-feet for construction plus 2,506 acre-feet per year during operation. Since that time, many of the originally proposed solar projects have been withdrawn from consideration. Water usage estimates are also lower due to the cancellation of the Eagle Mountain landfill project and an updated schedule for the *implementation of the FERC Project's timing. A revised water balance was developed based on these changes in water use. The balance considers the timing of water use by projects and calculates the cumulative change in aquifer storage. The revised estimate indicates that outflows will exceed inflows from the start of the initial fill in 2020 until 2042 with a maximum reduction in aquifer storage of about 4,200 acre feet and will recover to pre-FERC Project conditions by 2046. Total cumulative water usage estimates are about 114,560 acre-feet lower than previously published. "*

  Since the above study is outdated, there are actually more solar project proposed. We request a new detailed analysis on these projects.

  Environmental_Assessment_and_Proposed_Plan_Amendment_April_2017.pdf (blm.gov) Section 1.6-,

- A well level depth study must be done covering several decades.
- An in-depth study of the quality and mineralization of water due to aquifer overdraft is essential.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

Renewable Energy Impacts on Ground Water in a Desert Basin

Noel Ludwig, U.S. Forest Service
Rocky Mountain Regional Office
noel.ludwig@usda.gov
Peter Godfrey, Bureau of Land Management
Arizona State Office
pgodfrey@blm.gov

Arizona Hydrological Society 2021 Annual Symposium
September 15to through 17th, Tempe, Arizona

The above presentation was made to the public during the 2021 annual conference of the Arizona Hydrological society. The content of the presentation caught my eye as an owner of two lots at Lake Tamarisk Resort near Desert Center, CA. (Kent Madison, Managing member of 3RValve LLC). This small resort community sits at the upper end of the Chuckwalla Valley in East Riverside County CA. The community's only water source is ground water with a carbon date of over 15,000 years and a declining static level. The basin has been over drawn from the time that the first well was drilled in the early 1950's. All the succeeding wells that have been developed have continued to increase the aquifer decline. During the mid-1980's when increased agriculture pumping was taking place, the decline was over 160 feet. This was well beyond what the natural aquifer recharge rate is and these wells and other in the area have never recovered back to their natural level.

The report also was coauthored by Peter Godfrey Hydrologist / Project Manager Jan 2010 - Jan 2015 · 5 yrs 1 mo California Desert District, Moreno Valley, CA • Project management of renewable energy projects through the Federal NEPA process for the California Desert District's Renewable Energy Coordination Office (RECO).

• BLM Project Manager through publication of a Draft EIS for the Haiwee Geothermal Leasing Area, including a proposed amendment to the California Desert Conservation Area Plan.
• BLM Hydrologist for the interdisciplinary team on the programmatic Desert Renewable Energy Conservation Plan authorized September 14, 2016.
• District Coordinator / POC for the West Chocolate Mountains Renewable Energy Evaluation Area and CDCA Plan Amendment through the Record of Decision.
• Contract Officer's Representative.
• RECO team hydrologist for solar, wind, and geothermal energy.
• Advocate for water resources on BLM lands in the California Desert District.
• Oversight and coordination of personnel.
• Active involvement with Section 106 of the NHPA.
• Address pertinent issues, laws, and regulations as applied to Federal actions.

• Address diverse resources including recreation, grazing, wilderness, biological, air, water, and climate.
• Technical reviews of NEPA and other documents.
• Point of Contact for the California Desert District Minerals Program with associated duties from 2012 to 2015.

As you can see from Peters work from 2010 to 2015, he is very knowledgeable of the desert environment and the impacts that increased water withdrawals will have on the local native ground water supplies.

The report continues to state that the average exceedance of water removed from the aquifer from several different models taken over the years shows a mean average of 1,072-acre feet of greater withdrawals than nature's ability to recharge the aquifer. This study also predicts that the future withdrawals will likely be twice that number as more solar projects are built in the basin.

So, the real takeaway from the report is there is a problem of groundwater declines in the Chuckwalla basin and it is only going to get worse if the trend is not stopped and reversed.

MITIGATION OF IMPACTS ON HYDROLOGY AND WATER QUALITY DUE TO PROPOSED SOLAR ISTALLATIONS:

We know that the State

and Nation want solar energy as a renewable power source and they see the Southwest as a major player in meeting the demand.

If society and industry is determined to place solar in the Chuckwalla valley then they should also be willing to solve the ground water supply problem.

Luckily the solution to the ground water problem is present in the upper end of the basin in the form of the Colorado River aqueduct or CRA. This 242-mile-long canal is operated by the Metropolitan Water District of Southern California and flows year-round transferring Colorado River water at a flow rate of 1,600 cubic feet per second. It supplies approximately 1.2-million-acre feet of water per year to Southern California. The district serves over 17.5 million people. To replace the entire loss of groundwater from the Chuckwalla basin due to past, current and future demands of over 2,200-acre feet, the area could divert 5 cubic feet of the 1,600 cubic feet per second flow from the canal to a shallow infiltration basin. This diversion of 5 cubic feet works out to be approximately 12 ounces per person in the water district. This could be done by a simple pipe discharge from the canal under the road at the current sand removal station located just before the Eagle Mountain pump station pipe intake located just Northeast of Eagle Mountain Mine. The capital cost would be next to nothing and the benefits to the Chuckwalla basin and the surrounding areas would be

forever. A detailed study needs to occur to fix our past and future problem before they become too big to solve.

LOCAL CLIMATE EFFECTS:

- An increase in temperature occurs from the large solar farms could be from 3 to 13 degrees. This has a great impact on not only the people in the community but also the animals and flora and fauna.
  Higher living expenses will occur with the increased temperature from air conditioning and dust abatement.

  JUSTIFICATION FOR A DETAILED STUDY:
  January 30, 2022 Article in Physics World magazine by Michael Allen states that is an increase of 3 to 7 degrees due to large solar farms. Consider the fact that we're located in the center of a shallow bowl with mountains surrounding nearly 280 degrees of our perimeter, holding in the heat. At this time the Easley Solar Project has proposed the first solar panels to be located 750 feet from our border.
  The proposed project would cover the light sandy ground with dark panels, the average daily ambient temperatures are guaranteed to increase based on the simple laws of physics. Whenever winds are calm, the mountains surrounding this area will hold that heat in our valley and extend the temperature on those hot midsummer days, now already reaching 124F+. Other sources indicate temperatures could increase as high as 13 degrees.

  ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY
  GreenBiz Article, by Zhengyao Lu and Benjamin Smith dated March 25, 2021 states "while the black surfaces of solar panels absorb most of the sunlight that reaches them, only a fraction (around 15 percent) of that incoming energy gets converted to electricity. The rest is returned to the environment as heat."
- The effects of solar farms contributing to tornado events should be studied.

  MITIGATION ON IMPACTS ON LOCAL CLIMATE EFFECTS DUE TO PROPOSED SOLAR INSTALLATION:
- *A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to minimize the local increase in temperature.*

- *Provide AC units and maintenance due to the increased usage of power to all inhabitants of LTDR and Community.*
- *Provide electrical credits in the form of payments, significant cost reduction on KW hour usage.*
- *Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.*

LAND USE AND PLANNING

- Our sewage settlement ponds are inside the perimeter of the proposed solar project as shown on site maps.
- The Area of Critical Environmental Concern (ACEC) that lies west of Kaiser Road and adjacent to Lake Tamarisk Desert Resort and Community is currently preserved and needs to remain protected. The BLM is currently changing land use designation, for this area, to allow for greater expansion of Landscape Scale Solar fields.

MITIGATION OF IMPACTS ON LAND USE AND PLANNING DUE TO PROPOSED SOLAR INSTALLATION:

- *The sewage settlement pond land needs to be assigned to Riverside County in care of CSA 51.*

CULTURAL RESOURCES/ARCHEOLOGY

- Solar projects destroy prehistoric artifacts. The Genesis Solar Project on Ford Dry Lake destroyed an entire archeological village and burial site. The viewsheds in the area are considered “Cultural Landscapes” by local tribes.
- Many people in our community are second and third generation families that carry on traditions including and respecting the historical area where General Patton trained one million troops for WWII. There remain many artifact and tank tracks in the area. Numerous foundations from Patton’s training grounds remain visible in the area and should stay that way. This area is of historical significance.

MITIGATION OF IMPACTS ON CULTURAL RESOURCES/ARCHEOLOGY DUE TO PROPOSED SOLAR INSTALLATION:

- *A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary*
- *to minimize the disruption of this area of historical significance.*

- *Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.*

NOISE

- The noise during construction is a concern. It causes stress which has an adverse effect on our quality of life. As a result of the solar facilities construction noise, our local property values and future growth of our community is in jeopardy.
- The removal of vegetation to the north, due to the proposed Easley Project, would dramatically increase the noise levels in the Lake Tamarisk Community from Chuckwalla Valley Raceway and Highway 177. This will be an on-going effect. The existing Oberon Project, to our south, now reflects the I-10 freeway noise to our resort.
- The continuous humming from the inverter boxes and battery storage air conditioning is not only annoying but also stressful; affecting our quality of life.

MITIGATION OF IMPACTS ON NOISE DUE TO PROPOSED SOLAR INSTALLATION:

- *A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to minimize the noise and disruption to LTDR and Community.*
- *Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.*

PUBLIC SERVICE AND UTILITIES/SERVICE SYSTEMS

- Fire concerns are increased by the power grid creating a need for a better water system to protect our homes.
- Our water pumping system cannot handle construction water usage and can't fight wind driven fires. The solar projects are using our equipment to pump water into their trucks and frack tanks.

JUSTIFICATION FOR DETAILED STUDY:

Riverside County CFO Andrew Ruiz met Fire Personnel at Desert Center a few months ago to test our water system for the planned Fire Station, and the system failed. It could be resolved by replacing some pumps. December 2022.

- *Additionally, if the power goes out there is no battery backup for our water supply.*

MITIGATION OF IMPACTS ON PUBLIC SERVICE AND UTILITIES/SERVICE SYSTEMS TO PROPOSED SOLAR INSTALLATION:

- *Due to the extensive use of water by the Solar Construction, Replacement of pumps, water infrastructure, piping, hydrant upgrade is essential. The above ground gravity feed reservoir is necessary for fire suppression and human consumption in the event of power outage.*

RECREATION

- The installation of solar farms has created a reduction in the access to off road vehicle designated trails and public lands for recreation and viewing.
- The Community has a large investment in equipment for ATV excursion, biking, bird watching, exploring flora and fauna and other recreational pleasures. This has an adverse effect on our quality of life and property values due to the decreased access to the desert trails.

JUSTIFICATION FOR A DETAILED STUDY:

^*Palen Solar Project east of Desert Center. This entire public road was cut off for the project.*

MITIGATION OF IMPACTS ON RECREATION USES DUE TO PROPOSED SOLAR INSTALLATION:

- *A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to maintain our recreational uses on designated trails and areas in and around LTDR and Community.*
- *Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.*

TRAFFIC AND TRANSPORTATION

- The ongoing dust and noise from trucks affects our quality of life.
- The speed and quantity of large vehicles on Oasis Road, Highway 177 and Kaiser Road, during construction, endangers bikers, hikers and ATV users of all ages (children and seniors.)
- School age children catching the bus are at risk.

WILDFIRE

- Transmission lines increase wildfire risk. Disturbance of so much habitat will proliferate the spread of invasive weeds which can carry wildfires.
- The Community's pumps and systems are aging and with the added use by the Solar, will need replacement. They are barely adequate for our community needs, but definitely inadequate for use in fighting wind driven wildfires and home fires.

MITIGATION OF IMPACTS ON WILDFIRE POTENTIAL TO PROPOSED SOLAR INSTALLATION:

- *Due to the extensive use of water by the Solar Construction, Replacement of pumps, water infrastructure, piping, hydrant upgrade is essential. The above ground gravity feed reservoir is necessary for fire suppression in the event of power outage.*

IN SUMMARY:

Lake Tamarisk is our home and refuge that we have chosen for its unique and beautiful Desert location. Our quality of life is being threatened. We came, to live at an oasis in a Desert Wilderness full of life and natural beauty, not to live on an island in a dead solar sea surrounded by barbed wire fences.

Any development within the five-mile natural desert buffer necessary, will impact our personal, economic, physical and mental well-being. There has not been any community wide human consideration, especially with the senior resort, within the scope of any environmental study or the original EIS from the 2016 DRECP.

Taxes collected from the Easley Solar Project and paid to Riverside County should be earmarked for CSA 51 improvements to the entire community and infrastructure.

The residents of Lake Tamarisk and Community do not want to be sacrificed for the benefit of reaching a national renewable energy goal. The reality of the total electrical production from solar farms of the two potential projects west of Highway 177, which include Easley and Sapphire, total less than 1000 megawatts out of over 20 gigawatts already slated to be developed in the region, an infinitesimal amount.

Relocation of the Easley Solar Project to the east of Highway 177 is reasonable because there only remains 6,000 acres west of highway 177 for solar development; while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

In our opinion the magnitude of this project should require evaluation through Individual Environmental Impact Statement.

ADDENDUM: PICTURES AND ALTERNATIVE

These photos represent the negative impacts of solar farms.

PHOTOS:

Represents Athos Solar fencing in close proximity to house.

Photo courtesy of Kevin Fitzgerald, CV Independent

Athos Solar Fencing in close proximity to Green Acres Park

Photo courtesy of Kevin Fitzgerald, CV Independent.

Transmission lines on Kaiser Road

Photo courtesy of Kevin Fitzgerald, CV Independent

After dust abatement

Photo courtesy of Kevin Fitzgerald, CV Independent

Photo due south of Lake Tamarisk Desert Resort with 5 miles north of the First Solar Plant and Oberon

Photo courtesy of Kevin Fitzgerald, CV Independent

Turtle/kit fox box for shade (not accessible or maintained)

Courtesy of Teresa Pierce December of 2022

Ironwood that is protected shown piled up for chipping. Taken from Oberson Project

Courtesy of Teresa Pierce December 2022

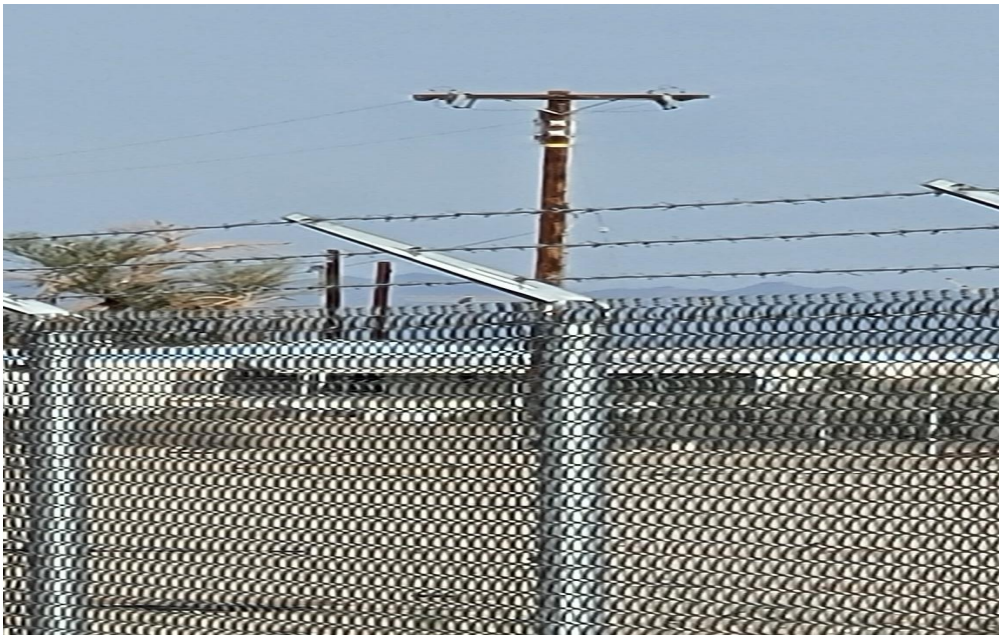
Oberon Solar land cleared for construction. This is where dust comes from.

Courtesy of Teresa Pierce December 2022

Lights from a transfer station taken at night from Lake Tamarisk.

Courtesy of Teresa Pierce December 2022

A view of Athos Solar prison style fencing next to a residence



Courtesy of Teresa Pierce December 2022

ALTERNATIVES:

A no large-scale energy alternative can be justified with the California Energy Efficiency Strategic Plan (CEESP) [7]. This plan already exists as California state law and it can be fully implemented now. This is a state plan that prioritizes implementing rooftop solar and energy efficiency prior to developing largescale, remote solar and wind projects. The Draft EIS should also include and analyze an alternative that maximizes wildlife protection by avoiding, minimizing, and fully mitigating all direct, indirect, and cumulative impacts to wildlife and wildlife habitat to at least a no-net loss standard.

The need for this project is questionable, as it adds a large cumulative impact to grid congestion in California. The state is currently experiencing a worsening glut of solar power at peak times on the transmission grid system, as measured by the California Independent System Operator. This has been shown as the Duck Curve, where renewable energy generation exceeds demand in the middle of the day, then causes the need to ramp up generation at the end of the day after the sun sets with inefficient natural gas peaker plants. At times, as much as 13,000 MW is needed in 3 hours in the evening hours, as solar projects go offline at night.

Would the battery facility need to be cooled? How much energy would be required to do so? This is a hot desert with summer temperatures reaching 124 degrees F at times. How will this heat affect battery efficiency? Will air-conditioning be used to cool battery bank buildings? How much electricity for air-conditioning will be parasitized off the grid? Or will liquid-cooling containers be used for batteries? All eyes will be watching to track the efficiency loss of battery storage in hot desert lowlands, compared with coastal urban load center alternatives. To conserve habitat, the BLM should consider a No Action Alternative based on local small scale distributed battery technology in urban centers. Battery storage is making advances for smaller scale solar energy and would not require such a large facility that would need cooling. Batteries will create a waste/recycling issue as well and the BLM should be asking if batteries will be recycled.

SOLAR COMMITTEE:

---

[7] *Energy Efficiency Strategic Plan (ca.gov)*

Teresa Pierce
Mark Carrington
Don Sneddon
Jerry Grey
Vicki Bucklin
Sharon Dilley

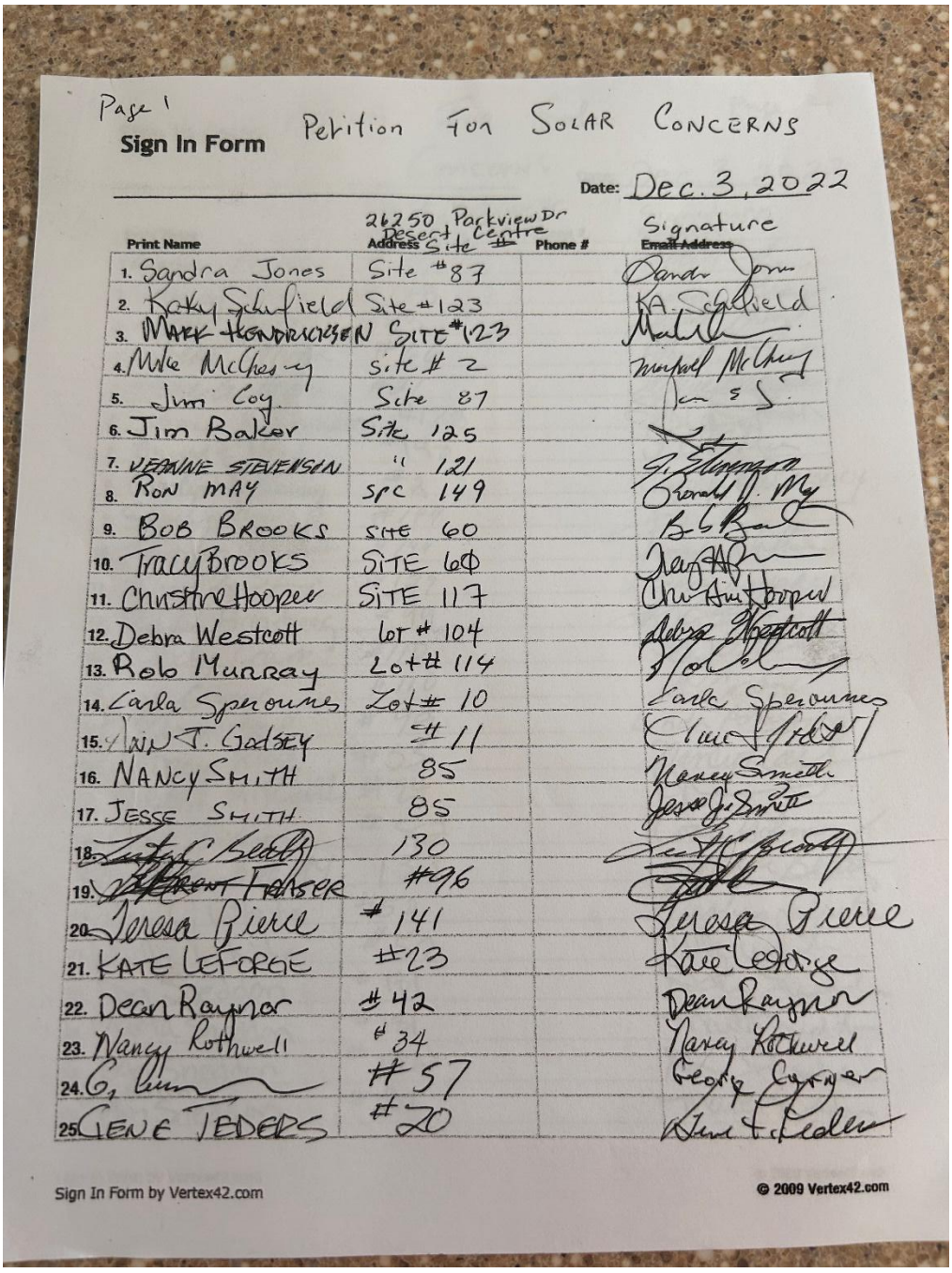
CONTRIBUTORS:

Skip Pierce
Kent Madison, 3R Valve LLC
Kevin Emmerich, Co-Founder Basin and Range Watch
Kevin Fitzgerald, CV Independent News
Bob Mitchell

Link to CV Independent News Article by Kevin Fitzgerald

https://cvindependent.com/2022/12/oasis-no-more-residents-of-lake-tamarisk-and-desert-center-worry-about-the-proliferation-of-utility-scale-solar-installations/

SUPPORTERS FROM LAKE TAMARISK DESERT RESORT AND COMMUNITY
IN OPPOSITION TO THE EASLEY SOLAR PROJECT



Page 1

Sign In Form Petition For Solar Concerns

Date: Dec. 3, 2022

Print Name	26250 Parkview Dr Desert Centre Address Site #	Phone #	Signature Email Address
1. Sandra Jones	Site #87		Sandra Jones
2. Kathy Schofield	Site #123		K A. Schofield
3. MARK HENDRICKSEN	SITE #123		
4. Mike McChesney	site # 2		Michael McChesney
5. Jim Coy	Site 87		
6. Jim Baker	Site 125		
7. VERAINE STEVENSEN	" 121		
8. RON MAY	SPC 149		
9. BOB BROOKS	SITE 60		
10. TRACY BROOKS	SITE 60		
11. Christine Hooper	SITE 117		
12. Debra Westcott	lot # 104		
13. Rob Murray	Lot # 114		
14. Carla Sprouse	Lot # 10		Carla Sprouse
15. WINT. GODSEY	# 11		
16. NANCY SMITH	85		Nancy Smith
17. JESSE SMITH	85		
18.	130		
19.	#96		
20. Teresa Pierce	# 141		Teresa Pierce
21. KATE LEFORGE	#23		
22. Dean Raynor	#42		
23. Nancy Rothwell	# 34		
24.	#57		
25. GENE JEDERS	#20		

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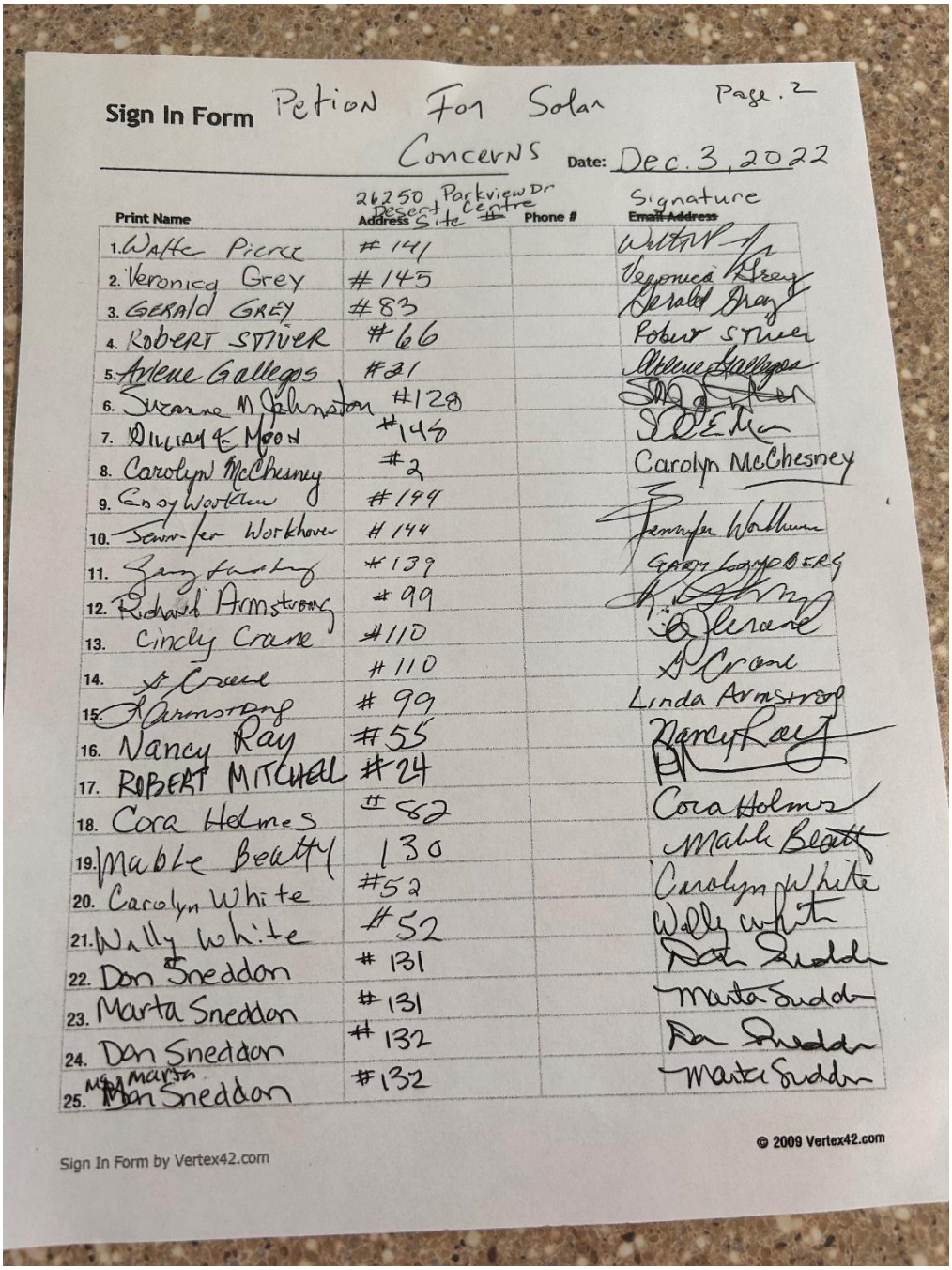

Sign In Form Petion For Solar Concerns Page. 2

Date: Dec. 3, 2022

Print Name	26250 Parkview Dr Desert Centre Address Site #	Phone #	Signature Email Address
1. Walter Pierce	#141		
2. Veronica Grey	#145		
3. GERALD GREY	#83		
4. ROBERT STIVER	#66		
5. Arlene Gallegos	#21		
6. Suzanne M Johnston	#129		
7. DILLIAM E MOON	#146		
8. Carolyn McChesney	#2		Carolyn McChesney
9. Cody Workman	#194		
10. Jennifer Workman	#144		
11. Gary Lapoint	#139		
12. Richard Armstrong	#99		
13. Cindy Crane	#110		
14.	#110		
15.	#99		Linda Armstrong
16. Nancy Ray	#55		
17. ROBERT MITCHELL	#24		
18. Cora Holmes	#82		Cora Holmes
19. Mable Beatty	130		
20. Carolyn White	#52		
21. Wally White	#52		
22. Don Sneddon	#131		
23. Marta Sneddon	#131		
24. Don Sneddon	#132		
25. Marta Sneddon	#132		

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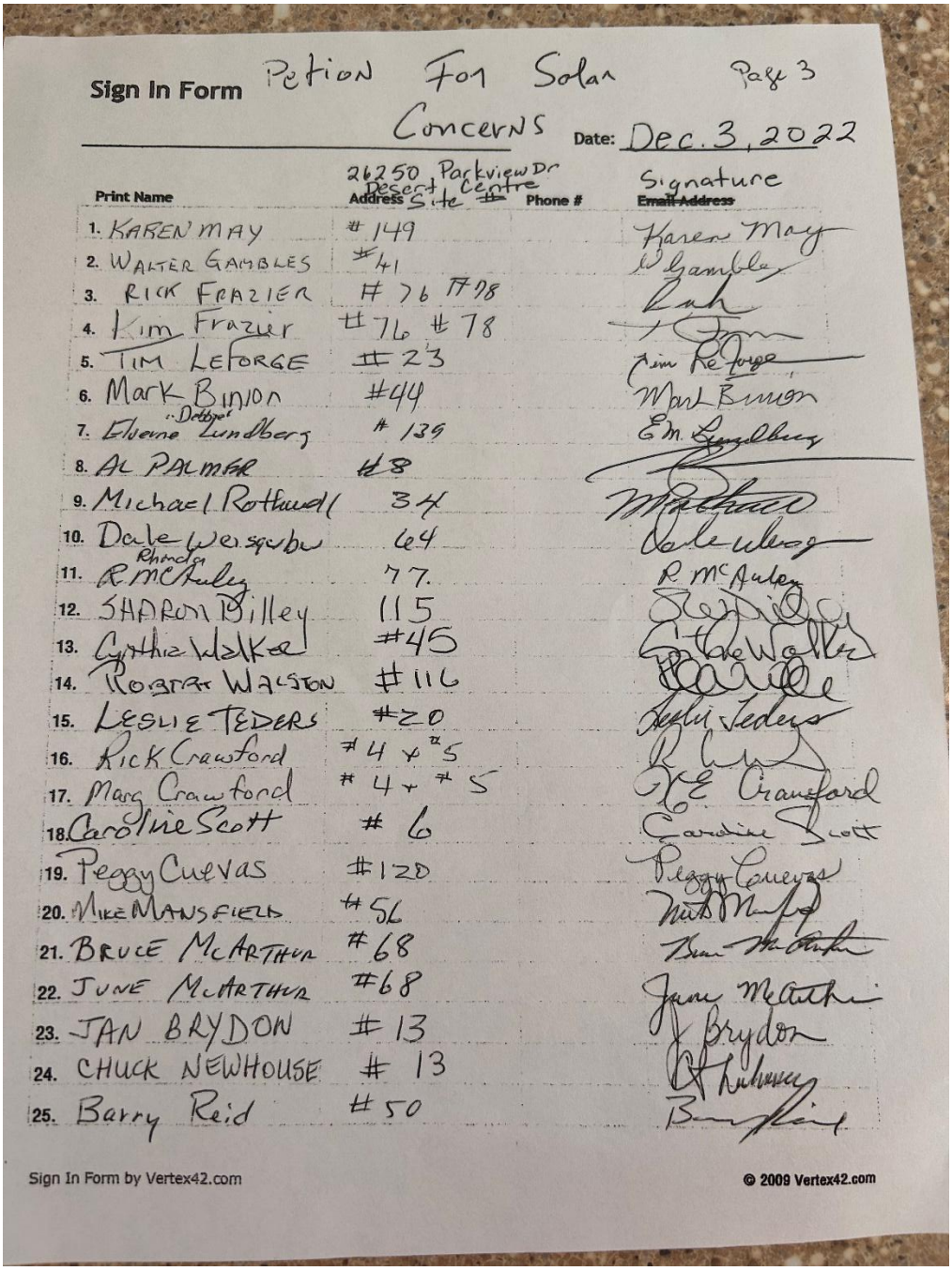
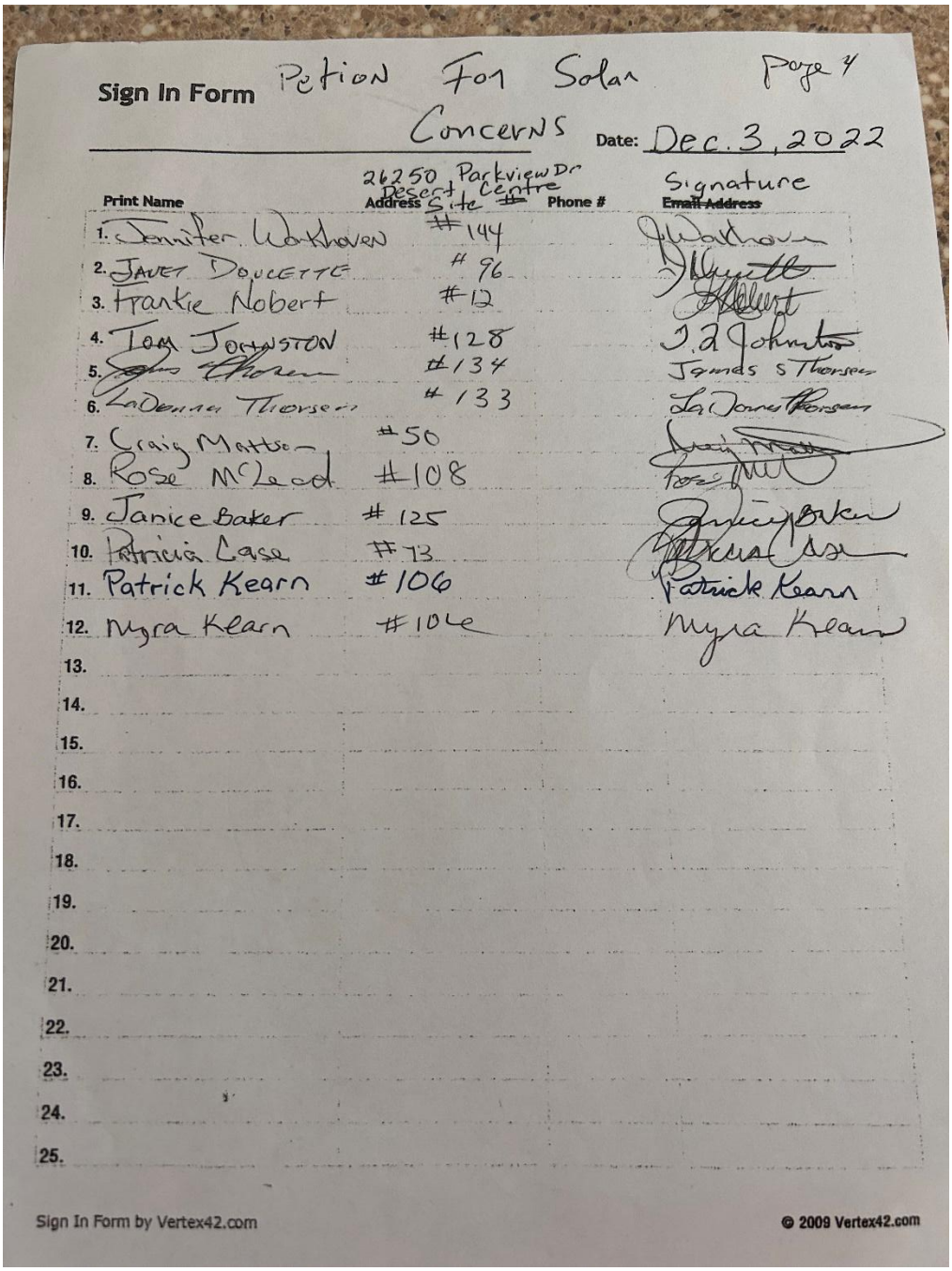


Sign In Form Petion For Solar Page 3

Concerns Date: Dec. 3, 2022

Print Name	Address 26250 Parkview Dr Desert Site Centre #	Phone #	Signature Email Address
1. KAREN MAY	#149		Karen May
2. WALTER GAMBLES	#41		W Gambles
3. RICK FRAZIER	#76 #78		
4. Kim Frazier	#76 #78		
5. TIM LEFORGE	#23		Tim LeForge
6. Mark Binion	#44		Mark Binion
7. Elvene "Debbie" Lundberg	#139		E M Lundberg
8. AL PALMER	#8		
9. Michael Rothwell	34		
10. Dale Weisgerber	64		Dale Weisg
11. R. McAuley Rhonda	77.		R McAuley
12. SHARON Billey	115		
13. Cynthia Walker	#45		Cynthia Walker
14. ROBERT WALSTON	#116		
15. LESLIE TEDERS	#20		Leslie Teders
16. Rick Crawford	#4 + #5		
17. Mary Crawford	#4 + #5		K E Crawford
18. Caroline Scott	#6		Caroline Scott
19. Peggy Cuevas	#120		Peggy Cuevas
20. MIKE MANSFIELD	#56		
21. BRUCE McARTHUR	#68		
22. JUNE McARTHUR	#68		June McArthur
23. JAN BRYDON	#13		J Brydon
24. CHUCK NEWHOUSE	#13		
25. Barry Reid	#50		



Sign In Form Petion For Solar Page 4

Concerns Date: Dec. 3, 2022

	Print Name	Address 26250 Parkview Dr Desert Centre Site #	Phone #	Signature Email Address
1.	Jennifer Workhoven	#144		
2.	JANET DOUCETTE	# 96		
3.	Frankie Nobert	#12		
4.	TOM JOHNSTON	#128		
5.		#134		Jgmds S Thorsen
6.	LaDonna Thorsen	#133		
7.	Craig Matteson	#50		
8.	Rose McLeod	#108		
9.	Janice Baker	#125		
10.	Patricia Case	#73		
11.	Patrick Kearn	#106		Patrick Kearn
12.	Myra Kearn	#104		Myra Kearn
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Petition for Moratorium to stop Solar around Desert Center

Sign In Form

Date:

Print Name	Address	Phone #	~~Email Address~~ Signature
1. Greg Chalker	space 112		
2. Bob Walke	Space 45	406 660 2152	
3. GORDON MATTSON	71	760 990 0531	
4. Leo Carriero	#3	250 604 2680	
5. [illegible]	46	907 394 2966	
6. Sharon Collins	46	"	
7. [illegible]	46	"	
8. [illegible]	46	"	
9. Arlene LaVigne	space 61	619-820-4206	
10. Chris LaVigne	Space 61	619-820-4206	
11. Ronald May	149	951-285-3356	
12. Ken [illegible]	Lot 92	4259239110	
13. [illegible]	Lot 58	[illegible]	
14. Beverly Malact	13228 [illegible] Way	480-370-2465	
15. [illegible]	44080 Crystal Way	9497064456	
16. Randy [illegible]	" "	949-607-9240	
17. Bertha Alvarez	43980 Shadow Way	760 668 9924	
18. Gregory Alvarez	43980 Shadow Way	760 668 9924	
19. [illegible] Jones	43971 Shasta Dr.	760-227-3245	
20. Vicki Jones	43971 Shasta Dr	760-227-3245	
21. Anchayah Mendoza	44020 Shadow way	442-370-9641	[illegible]
22. [illegible] Mihelich	44040 shadow way	442-306-6649	
23. Sherrie Nelson	44040 shadow way	442-306-6651	
24. Adrianna O	25980 Kaiser Rd	909 6409854	[illegible]
25. Jutta HOWE	Space 124	442 529-6218	

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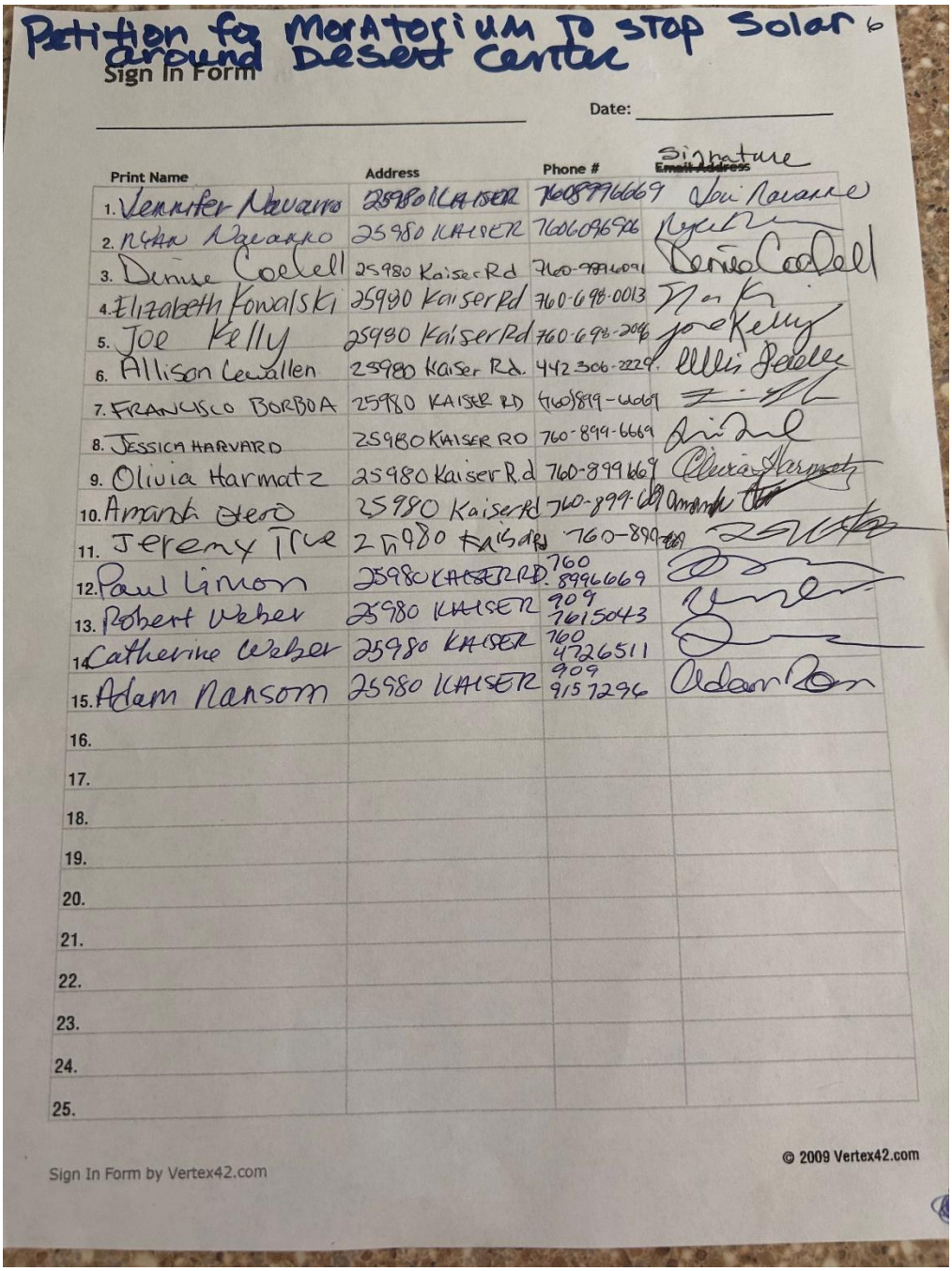

Petition for Moratorium to stop Solar around Desert Center

Sign In Form

Date: _____

	Print Name	Address	Phone #	Email Address / Signature
1.	Jennifer Navarro	25980 KAISER	7608796669	
2.	Ryan Navarro	25980 KAISER	7606096926	
3.	Denise Coelell	25980 Kaiser Rd	760-989-6091	
4.	Elizabeth Kowalski	25990 Kaiser Rd	760-698-0013	
5.	Joe Kelly	25980 Kaiser Rd	760-698-2046	
6.	Allison Lewallen	25980 Kaiser Rd.	442 306-2229	
7.	FRANCISCO BORBOA	25980 KAISER RD	(760)899-6669	
8.	JESSICA HARVARD	25980 KAISER RD	760-899-6669	
9.	Olivia Harmatz	25980 Kaiser Rd	760-899669	
10.	Amanda Otero	25980 Kaiser Rd	760-899-669	
11.	Jeremy True	25980 Kaiser Rd	760-899-669	
12.	Paul Limon	25980 KAISER RD.	760 899 6669	
13.	Robert Weber	25980 KAISER	909 7615043	
14.	Catherine Weber	25980 KAISER	760 4726511	
15.	Adam Ransom	25980 KAISER	909 915 7296	
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Sign In Form

Date: ____________

Print Name	Address	Phone #	Signature
1. Wendi Graingier	26501 Greenvale Way	843 421-0814	[signature]
2. Terry Ihepner	4408 Shadow	760289[illegible]	[signature]
3. Robert Amachore	44101 Crystal Way	760 861 9422	[signature]
4. LARRY EARNHART	43701 TAMARISK DR.	760 408 7786	[signature]
5. Eddie Mendoza	[illegible] Shadow Way	442 371 [illegible]	[signature]
6. Ann Ollivier	Shastaway		[signature]
7. Angelica Mendoza	Shadowway	(760) 619-6598	[signature]
8. Bryon Caster	43611 Tamarisk Dr	760777396	[signature]
9. Mark Carrington	26250 Lakewoods # 48	509-539-2266	[signature]
10.			
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STATE OF CALIFORNIA — Gavin Newsom, Governor

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West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

November 14, 2022

Tim Wheeler
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501

Re: 2022110240, Easley Renewable Energy Project, Riverside County

Dear Mr. Wheeler:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

Email: Easley Renewable Energy Project EIR Team

From: stevej8460@earthlink.net <stevej8460@earthlink.net>
Sent: Sunday, December 4, 2022 9:17 AM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Renewable Energy Project

Dear Mr. Wheeler,

My name is Stephen Jones. I live at 43971 Shasta Drive in Lake Tamarisk (Desert Center). On Friday, December 2, 2022 we received the notice of the Planning Department Meeting to be held on December 5, 2022. This notice was dated November 14, 2022 which is the beginning of a comment period lasting 30 days. However this notice was not sent in a timely manner and we feel that the end of the notice period should be extended the additional days that this notice was late.

This project affects my home as the project is with a few 100 feet of the West and South Boundary to the community. The community has struggled for the last 55 years as the largest land owner Kaiser Steel never finished developing the property. The property was sold a few years ago and the new owner has had his own struggles with development of the property as well.

I have retired to the community after working with The County of Riverside for the last 32 years as the Manager of the CSA here at Lake Tamarisk. The CSA 51 is responsible for the Water, Sewer and Golf Course/Recreation. The Sewer system for the community is on Government Property at the North and East corner of the property. The map shows the ponds for the system in the Government Land. Why it is on this property we have no idea. The sewer lines from the community exit the CSA and into the Government Land where the ponds are located and cannot be changed to a different location. The sewer lines are laid out in the vacant property for the continuation of the project they started 55 years ago. The lines are where they were to place streets and houses. This property that was Kaisers' does not seem to be in the parcels that are listed in the maps sent with the notice.

I was here when Kaiser started this project in 1968 and have lived in the community of Eagle Mountain as a sub-contractor for Kaiser Steel. This project makes it very difficult we are concerned with the viability of the community as people will not want to live this close to the Solar Field. We urge the planning department to reject the proposal as presented to find a more suitable alternative buffer zone to the community. We are not objecting to the Solar project just that it is much too close to the community.

Thank you for your time and thoughts to this project.

Sincerely,

Steve and Vickie Jones

Email: Easley Renewable Energy Project EIR Team

From: DawnRobert <chstiver@alaska.net>
Sent: Sunday, December 4, 2022 9:30 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Lake Tamarisk/IP Easley project

Hello Tim,

I'm writing to express my disappointment that solar fields are slated to be almost surrounding the Lake Tamarisk community. The current plans for the IP Easley project have it coming within 750 feet of our north fence, of which our RV storage area extends at least 200 feet out from that. You may see this as maximum use & efficiency because it's so close to existing power poles. To encroach this close to the only population area within so many square miles of open land all the way to Blythe is just pure & simple greed.

I also ride my electric fat tire bike in the desert a lot. It's a very enjoyable way to see and appreciate the desert. You can't ride too fast as you go north/south as you're constantly crossing washes that sometimes drop one to two feet within a span of 5 feet, though most are a little wider. I see the areas where they've cleared the ironwood & trees down & leveled everything. I'm curious how the land will act when water comes rushing down in storms like it will invariably do.

I've included a photo of the beautiful ironwood trees that I enjoy seeing & in this particular photo, you can see where scraps of plywood & other debris. It runs up about 18" on the creosote bush. It's not unusual to see parts of an old cabin wall or appliance part carried down the washes several miles out into the desert.

Looking at all of the fenced off areas & the map showing what the future looks like, it's going to be an ugly, dusty ride between fences if you want to ride away from all of the heavy traffic on the roads.

This project is like taking a rural community & putting up a city around it, destroying the recreational areas around it & making it congested like a concrete jungle, though yours will be made of metal & glass.

I sincerely hope that you would decide to move farther from the northern boundary of the Lake Tamarisk area. You have so much land that's available & that would be one face-saving way that you say that you're doing something for the good of a community & it's not going to really hurt you financially in the long term. You may need some of this good PR in the future. This isn't a good look for Riverside County.

I do hope that you'll consider leaving us a little bit of breathing space when we're 50 miles from the nearest stores.

Robert Stiver,
Lake Tamarisk, Desert Center

Email: Easley Renewable Energy Project EIR Team

From: Vicki Bucklin
Sent: Friday, December 2, 2022 2:37 PM
To: district4@rivco.org; alexperez@rivco4.org
Subject: FW: Help Us Hold Solar Installers Accountable - Ref IP Easley /Easley Renewable Energy Project

Hi Alexis,

I included your email with one to the Senator, so maybe that is why the glitch. The letter below gives you the overview. I am attaching a map that shows they are planning to surround us on 3 sides. We have a whole list of problems to cover. The biggest is the fact that we cannot survive a wind-driven fire with out current water system, and they have put huge power lines on two sides of us. One wildfire and our park is toast!! We need a water tank above ground so we can get water to fight it even if they shut off power.

Let me know what else I can do to bring you up to speed. We would welcome a visit before the meeting. Just call and we'll be happy to show you around. 360-200-2042.

From: Vicki Bucklin
Sent: Thursday, December 1, 2022 9:58 AM
To: senator.melendez@senate.ca.gov; district4@rivco.org
Cc: Vicki Bucklin <vickibucklin@pugetisland.com>
Subject: Help Us Hold Solar Installers Accountable - Ref IP Easley /Easley Renewable Energy Project

Help Us to Hold Solar Installers Responsible. We ask that you visit us and have a look around.

Lake Tamarisk Desert Resort is a rural senior park that is located on the edge of Joshua Tree National Park. It is surrounded by a small community of around 300 people. This resort has provided Desert-loving seniors and their families with the opportunity to golf, bike, hike and explore the beauty of the Desert for many years. Homes in this park have been passed down through generations because of the opportunity for healthy recreation and sunshine. The only available services here are a library, fire station and post office. We must travel to Indio or Blythe, nearly an hour away, to buy groceries.

Our community is being enveloped by solar fields. Solar fields emit heat long past sunset. The current project under consideration will guarantee a future increase in the temperature of our local environment of at least 3 degrees F.** Given our unique geography, (a valley surrounded by mountains) the increase is likely to be even higher. For the most recent project, Easley Renewable Energy Project by Intersect Power, construction markers are now within 750 feet of our property. Previous installations have scraped the sand of Ironwood and other vegetation, and wind now carries the dust, silica, and chemical herbicides for miles without that buffer. Some residents have already given up their homes due to health concerns.

The IP Easley project as proposed will place unacceptable pressure on our community through higher power bills, inability to spend time outdoors, and potential health effects from heat, wind-carried debris, snakes, termites, and other vermin that are being disrupted in the Desert and seeking the only uncovered ground.

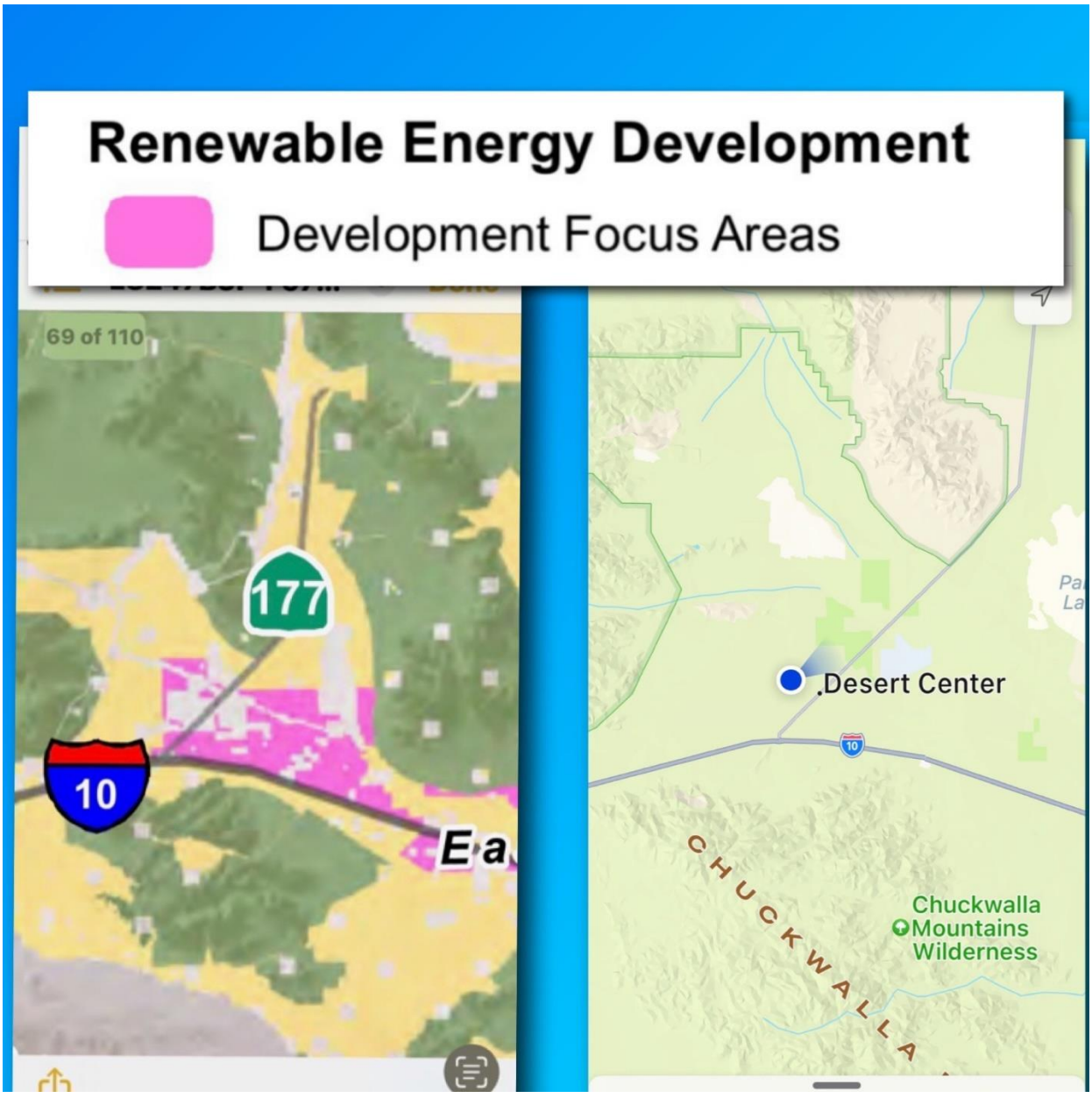
There's an immediate increase in risk of wildfires here due to new massive overhead power lines. Our water system may be at risk as temperatures increase and the remaining plants draw what they can to survive. Our local water system is not designed for wildfires here, as without the power lines, risk would be minimal. A report from our local fire station shows we can fight a single house fire, but a wind-driven wildfire would move too quickly.

Historic communities like Lake Tamarisk Desert Resort should not be sacrificed for the convenience of solar companies. Lines can be drawn, and remediation can be offered to keep those communities viable. We have already lost our backyard access to recreation. Panels mar our pristine views. Our health is at risk in ways we never imagined. We need guarantees of distance and vegetation buffers, we need guarantees of first rights to water and compensation for high power bills.

Please support us by contacting people involved with the development of this IP Easley Project. There is still time to reduce the impact on our residents. Ask them to move their projects at least a few miles away from residential housing. Ask them to provide a guaranteed water and fire-suppression system for communities they put at risk. Your community could be next.

a. **Elizabeth Knowles** <elizabeth@intersectpower.com 914-960-9003 **Director of Community Engagement at Intersect Power**
b. **Tamera Faust** tfaust@blm.gov **BLM**
c. **Camille Wasinger (**303) 909-6396 camille@intersectpower.com **Intersect Power**
d. **Tim Wheeler** (951) 955-6060 TWheeler@rivco.org Website: http://planning.rctlma.org **Riverside County**
e. **2022 Physics World Article https://physicsworld.com/a/solar-panels-can-heat-the-local-urban-environment-systematic-review-reveals/

Vicki Bucklin



Email: Easley Renewable Energy Project EIR Team

From: Vicki Bucklin
Sent: Friday, December 2, 2022 3:34 PM
To: district4@rivco.org; alexperez@rivco4.org
Cc: teresapierce52@gmail.com
Subject: LTDR Concerns about IP Easley Solar Project

Hi Alex,

Attached is a list of topics we would like to have consideration on. These will be brought up at the meeting.

We are also having a community meeting here at Lake Tamarisk on December 15 and would like very much to have you attend.

Thanks,
Vicki

TALKING POINTS for LTDR Solar Meeting Monday, Dec. 5, 2022

"BECOMING AN ISLAND IN A SEA OF SOLAR PANELS"

INTRO: PRESENTED FROM THE COMMUNITY PERSPECTIVE.

LTDR is a retired 55 years and older community resort for golfing, ATV, hiking, bike riding, swimming, and other recreational activities. The Community also includes 200-300 rural homes consisting of families with and without children. Approximately 60 school age children live in the community and attend a local school. There is a library, fire department and a post office but no other services.

HEALTH EFFECTS

- Dirty Power from Electro Magnetic Fields: According to the World Health Organization there is a health risk of electromagnetic hypersensitivity associated with living next to solar farms. Triggered by EMF exposure: Note headaches, nausea, fatigue, skin rashes, dizziness, sleep disorders and possible connections to cancer.
- Concerned with the health of the community ranging from small children through seniors
- Dust/wind from cleared vegetation and ground disturbance carries silica, pollens, and other pollutants, affecting those with COPD or other pulmonary issues.

AESTHETICS/VISUAL RESOURCES/REFLECTION

- Solar panels North and East affect our views. The scenic views are impacting the whole community.
- Dark Skies will be affected by the external lighting. This is one of the few areas in the US with Dark Sky.
- Reflection from the panels can be extreme, and some now point toward our community.
- Debris gets caught in the fencing

AIR QUALITY

- Valley fever risk will be increased

- Dust, that created by construction, and long-term from vegetation removal, carries pollutants, silica, and herbicides – We're specifically concerned for our young and elderly community

BIOLOGICAL RESOURCES

- Migration of birds (birds are dying when they hit the panels thinking it is water)
- Water in the lake accumulating dust
- Migrating birds have been affected. We have found bodies near solar arrays.

CULTURAL RESOURCES

- We are a desert resort community. We come here to enjoy the beautiful Desert and to spend time outdoors. Many people are second and third generation families that carry on traditions.
- Historical area where General Patton trained one million troops for WWII to go to Egypt. There remain many artifacts and tank tracts in the area. Numerous foundations remain visible in the area.

GEOLOGY AND SOILS

- Impact of disturbance of soil: termites, rodents, rattlesnakes
- Desert wash woodlands are impacted by flash floods causing undetermined changes in erosion.
- Ironwood is protected, yet we are witnessing complete removal on acres and acres of ground.

HAZARDS AND HAZARDOUS MATERIALS

- Chemicals and sprays are currently being used to reduce vegetation around the Blythe solar installations
- Concerns of use of soil sterilization (I don't understand what this is-VB)
- Desert sand is very high in Silica, which can cause Silicosis, an incurable condition.

- Solar panels contain dangerous chemicals that can be exposed when broken.

HYDROLOGY AND WATER QUALITY

- Our aquifer is a critical need and is verified as unreplenishable.
- We need Well level depth study going back 20 years
- Quality of water noting the mineral concentration changes
- Film appearing on washed items.
- Concern of pumps and wells being overused. Construction workers are currently using our pumps for water to abate construction dust. Our pumps are old and not able to sustain use without upgrades.
- An above ground water reservoir is needed to assure water supply for community consumption and fire suppression. At present a wind-driven fire in our community would kill our power supply and wipe out the park. Our only viable water source requires pumping.

LOCAL CLIMATE EFFECTS

- Physics World article notes how the increased temperature
  From solar panels affects people and climate.
- More dry spells in an area already affected by heat.
- Higher living expense and lower quality recreation opportunity due to heat and wind

LAND USE AND PLANNING

- How does the solar affect the settling ponds used for sewage treatment? Initial plans show them inside the proposed project perimeter.
- Original land use plans here include a second nine-hole golf course, not solar.
- Protect Ironwood. We are witnessing complete removal on acres and acres of ground.

NOISE

- Construction noise early and late. Distance can remedy this problem.

POPULATION AND HOUSING AND SOCIOECONOMICS

- If the current proposal is approved, our community will be surrounded by 3 sides with solar projects.
- Community is affected by a huge power pole network, emitting EMFs
- Higher temperatures will result in increased power bills and less outdoor opportunities.
- Quality of life is diminished for the residents who come for the desert and the beauty of the area.
- The community wants to preserve its heritage and value, keeping a safe place for future generations.

PUBLIC SERVICE AND UTILITIES/SERVICE SYSTEMS

- Fire concerns are increased by the power grid. We need a better water system to protect our homes.
- Our water pumping system is old and in need of repair/replacement. The construction projects are using it and causing extreme wear beyond our usual daily needs.

RECREATION

- Changes in our availability to use the desert. Changes in what we see when we DO use it.
- Community has a large investment in equipment for ATV Excursions, Golf, biking, etc., for use throughout the desert.
- Loss of enjoyment of the desert and local wildlife due to visual and physical existence of solar panel.
- Concern of blocking existing trails for ATV and hiking.

TRAFFIC AND TRANSPORTATION

- Dust and noise from trucks
- The speed of the vehicles is dangerous to the community
- There are children and seniors out walking, biking and ATVing who are now at risk.

WILDFIRE

- Transmission lines increase wildfire risk.
- The Community's pumps and systems are aging and in need of repair/replacement. They are barely adequate for our current needs, but definitely inadequate for use in fighting wildfires and home fires. The system is maxed.

Email: Easley Renewable Energy Project EIR Team

Hello and good morning,

I am a long-time resident of Desert Center and recently I feel as if the solar construction is pushing myself and my family out.

We received (Homeowners) a letter regarding the construction of an industrial size solar site right next-door feet from our residence, giving us 30 days to make complaints or concerns. The letter was dated Oct. 7, 2022 it was received on Oct 19,2022.

We feel that the letter was not sufficient notification and has caused stress and anxiety. We have been attempting to sell our home for over 6 months and now our home value has decreased. I am reaching out to ask as you are our representative of this area can this be discussed and what can be done to compensate my family so both the homeowners and solar are happy?
Respectfully,

Cynthia Green
SUDCC II 10606
Substance Use Disorder Certified Counselor II
Phoenix House of California
CVSP Chuckwalla Valley State Prison
19025 Wiley's well road
Blythe, Ca. 92225

Email: Easley Renewable Energy Project EIR Team

From: Georgia Beckwith <skipperbee@sbcglobal.net>
Sent: Wednesday, January 4, 2023 12:35 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Solar Project

My name is Georgia Beckwith and I have a home at Lake Tamarisk in Desert Center, California, near the east side of Joshua Tree National Park. It is a major concern to me that a solar project is planned that will be very close to our homes.

Lake Tamarisk Desert Resort is a community of senior citizens who moved here for the peace and tranquility that the desert and wildlife provide. There are also many families with children living in homes in close proximity.

A unique biosystem exists here that revolves around two lakes that draw numerous birds, including migratory birds. The surrounding desert provides shelter and sustenance to a diverse wildlife and plant life, which is part of the joy of living here. These creatures would not be able to survive the disruption that the installation and maintenance that solar panels require. Also, many seniors and other residents will be affected adversely by the noise and dust created by the installation of the solar panels due to respiratory problems. The panels will also disrupt the beautiful views we have here.

It is incomprehensible that solar panels will be placed so close to a community where people are living. If they must be placed in the desert, they should be put miles away in a remote location.

Please use your influence to stop this project from being put right in our back yard, so we can continue to enjoy the desert for the reasons we moved here.

Thank you. Georgia Beckwith, Lake Tamarisk Desert Resort, Desert Center, California.

Lake Tamarisk

Sent from my iPad

Email: Easley Renewable Energy Project EIR Team

From: June McArthur <jmcarthur@cciwireless.ca>
Sent: Wednesday, January 4, 2023 3:31 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Cc: elizabeth@intersectpower.com; tfaust@blm.gov; camille@intersectpower.com
Subject: IP Easley Renewable Energy Project

Dear Mr Wheeler,

When you take the exit off the I-10 at the junction of Highway 177 at Desert Center, you may believe you've come upon a run down, God forsaken desert oasis, but you couldn't be farther from the truth. You've actually discovered the most diverse, vibrant, caring, respectful, close-knit community you could ever have the pleasure of calling home. It isn't abandoned! It is thriving with 195 citizens of the area accounted for in the most recent California census, along with the residents of the 150 sites at Lake Tamarisk Desert Resort two miles north of the highway.

A handful of the folks at the park stay year round, but the rest of us arrive from across the USA and Canada in the fall and stay throughout the winter months. We have members here who are the third generation now able to come and enjoy the gifts of our desert paradise. I feel we've all gathered here, not so much because of our similarities, but because of our differences. We are totally unique in that every person contributes their knowledge and expertise to the betterment of the quality of lives of the whole community.

Our park members serve on the local school board and Lions club. We pay taxes, yearly fees to the golf course and the golf clubs contribute time and funds to assist with upkeep of the facility. Friends of the Lake Tamarisk Library raise money to help support the local library and have contributed magazines, furniture, craft materials for children, a Cricut machine and software for the Librarians, large print books, DVDs, etc. throughout the years. LTDR Hospitality members organize Easter Egg hunts and gather to provide Halloween treats to the local children each year. One of our biggest events of the year is a golf tournament where money is raised to purchase and wrap a desired gift for each child in the community school and their siblings. Our resident Santa presented more than sixty gifts to the children at their concert held at the CSA hall this year. A highway garbage pickup is held in the spring where we try to make the entrance to town a little more presentable.

Some of the children in this area have come with their parents to live at the Set Free Church which is very close to our park and the golf course. I understand the people come to help get their lives on a better path, and we love to hear the children's laughter as they play outside. The church is right in line with the Easley project which is threatening the enjoyment of our neighborhood. These people will be affected as well.

The LTDR Solar Committee has been working hard presenting our concerns which include water aquifer use, heat increase, dust, related health issues, the impact on native plants and animals etc. There's only one chance to get this right, now is the time pay attention to the details.

Many assessments have been done in regard to the Easley Solar installation, but I fear that none has been done on the personal impact to the people who actually live their lives here. It's been very unsettling to everyone involved to think of what's happening to our surrounding areas and the effect it may have on us. We do realize that the destruction of a large area of the desert we have come to love has been declared necessary for solar development for the future. It's been decided and we must accept it.

I would like you to **PLEASE give some serious consideration to leaving a decent buffer of natural habitat from solar development** for the sake of the people who have chosen this community as their home. It would be gratefully appreciated.
Respectfully,

June McArthur
Lake Tamarisk Desert Resort #68
Desert Center CA
jmcarthur@cciwireless.ca

Email: Easley Renewable Energy Project EIR Team

From: Tim LeForge <tleforge@gmail.com>
Sent: Wednesday, January 4, 2023 4:14 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Solar Project

Hi Tim,
I'm writing in regard to the solar farms coming so close to our residential area. As I write this I'm looking North from Lake Tamarisk Desert Resort and can see the sea of silicon in the distance … and it doesn't seem too out of place - at this distance. It might even be misconstrued as agricultural fields - at this distance.

I'm sure that you've heard from other folks about the loss of animal habitat and the decrease in air quality for the residents of this area, the majority of whom are elderly with ages ranging from 55 to 97. Believe me, if you have COPD, it's hard enough breathing regularly, much less with a haboob heading your way.

Desert Center is truly an oasis in the middle of nowhere. People come here for the tranquility that the desert provides, golf, and other recreational activities. The unlit skies at night provide stargazing opportunities for the LTDR astronomy club. All this and more is now in jeopardy.

The local library and fire department complement the community's stability for the future of this area, particularly since the stranglehold that a local family has held over Desert Center's growth has finally been broken. Except for the Chuckwalla Racetrack, this is the first time since George Patton was here that Desert Center has had a chance to spread it's wings and develop it's own personality. Now there is this threat that the solar farm encroachment into and near possible commercial developments will snuff out the embers of hope that the long time residents have yearned for.

Birders from around the country come to Desert Center due to it's strategic location as part of the Pacific flyway.

If you look around, you will see that the desert is and has been a land of broken dreams … please don't let this happen again to this oasis. Increase your buffer zones, restrict your construction to a reasonable distance from possible development and redirect any light sources away from budding astronomers. California already has too many ghost towns.

Thank you for your consideration in this matter.

Tim LeForge
POBOX 532
Desert Center CA 92239

Email: Easley Renewable Energy Project EIR Team

From: Leann Kingsley <dandlkings@msn.com>
Sent: Wednesday, January 4, 2023 5:25 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: IP Easley Renewable Energy Project

We live at Lake Tamarisk Desert Resort at Desert Center, California. We have lived here for 16 ½ years. While we have lived here we have enjoyed the desert scenery, wild flowers, clear air and recreation.

Our desert has been changing with the installation of solar projects. Our quality of life has deteriorated and our environment has changed.

We are concerned that our property values will decrease if the proposed projects are allowed to be completed. Not only will our scenery be drastically reduced, but we are concerned about our air quality, health issues and lack of recreational activities.

We have been able to ride ATV's in the desert and view the desert tourtoise, view desert wild flowers that will be destroyed and enjoy the desert peace and quiet. This will no longer exist with the construction of the Solar projects.

We have all been very conscious of the desert and how delicate the balance of nature and man is and have worked very hard to protect that. The solar projects will do nothing to protect that.

We are also concerned what will happen when the life of the solar panels expires. What will be left behind?

Please be considerate of our community when granting these solar projects to come in. We may not be able to completely block them, but please give us some consideration as to how close to our neighborhood they will be built and what access we will still have to the desert.

Thank you for your consideration.

William D. and Leanna Kingsley

Email: Easley Renewable Energy Project EIR Team

From: DawnRobert <chstiver@alaska.net>
Sent: Wednesday, January 4, 2023 6:11 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Lake Tamarisk solar field is TOO close

Hello Tim,
I'm sure that you've heard a lot of negative comments about the solar. I understand that it's a necessary evil in these times of green energy dependence. It is a necessary evil, same as all of the wind turbines in the Palm Springs area. But to bring the solar fields up to within 750 feet of our fence line, that's just pretty greedy for these companies & tells us how much they care about our quality of life here.
We're just a small population, but we're the only population within this whole area all the way up to Blythe. Why take away what little we have here. This doesn't really qualify for the NIMBY story, as it's the only back yard around & it's being taken from us. Shame on anyone who has the power to curb this overreach & just lets it go.
Cheers,
Robert Stiver
Lake Tamarisk.

Email: Easley Renewable Energy Project EIR Team

From: Jim Baker <jbc11989@gmail.com>
Sent: Wednesday, January 4, 2023 7:21 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: solar concerns

Dear Tim,

My wife and I are residents of Lake Tamarisk Desert Resort. We purchased this property in order to enjoy the desert, its flora, fauna and the wonderful weather so conducive to hiking, biking and riding ATVs.

However, we are now nearly completely surrounded with Solar Farms and have grave concerns regarding the impact on the environment and the native species both endangered and non-threatened. Our concerns are as follows:

- A disregard for the residents: Consultation with the residents has been completely overlooked with recent projects.

- Water Issues: Both during construction and after, solar plants use huge volumes of water for dust control and panel washing. This is taken from our aquifer which is rapidly being depleted. More brackish water is found near the bottom of an aquifer and will need further treatment. We are concerned that we will need an entirely new water system, wells and treatment plants and the costs will be ours to bear.

- Noise Pollution: During construction we are bombarded with constant noise from pile drivers and increased traffic. After construction, noise from the highway and race track will increase due to the complete loss of vegetation. This is already apparent.

- Dust: Construction and traffic lead to more dust in the air. This may lead to more cases of desert fever, a grave concern. This dust comes from the disturbed desert that has been treated with powerful soil sterilizers: surely not healthy to inhale.

- Visual Appearance: These panels are reflective and an ugly blight on our landscape.

- Wildlife: Migrating birds mistakenly believe the reflective panels are water and land on them at their peril. Will this cause them to lose a flight path they have used for centuries? Tortoises have nothing to eat and no habitat left in which to shelter. Snakes and lizards, insects and arachnids make their way into homes for shelter. We have yet to see a tortoise this year, but have noted other less welcome wildlife in greater numbers.

- Increased traffic: Which leads to more dust, more disturbed desert and more litter. The desert is a living ecosystem, not a wasteland.

- Permanent damage to the soil: Will anything ever be able to grow here again after being treated with powerful sterilizing chemicals? These chemicals will leach into our water system and poison our water. This creates a loop back - with no plants to hold the soil, more dust is created and erosion and flash floods will result.

- Increased temperature: Studies have shown that solar farms can increase the temperatures of the surrounding areas by as much as seven degrees. An increase in temperature is not a goal worth pursuing when the polar ice caps are melting and we have so many challenges with climate change.

- Lowered property values: We are mostly retired folks out here and on fixed incomes. A decrease in the value of our homes is not something we have planned for and many people cannot afford to relocate.

Looking forward to a town hall meeting in Desert Center to address these issues and find ways to reach a compromise acceptable to all parties. Regulations need to be in place so solar farms are not so close to residential communities.

Sincerely yours,

Jim and Janice Baker

Email: Easley Renewable Energy Project EIR Team

From: Ken Stamp <kengstamp@yahoo.ca>
Sent: Wednesday, January 4, 2023 9:18 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>; elizabeth@intersectpower.com; tfaust@blm.gov; camille@intersectpower.com; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>
Subject: Solar farms near Desert Center

Tim,
I am writing to you to express my concern regarding the existing and proposed solar farms surrounding my property. I have lived on the eastern perimeter of Lake Tamarisk Desert Resort since 2007 and have enjoyed uninterrupted views of the natural desert and the Palen Mountains.

My concerns include:
1. Severe damage to the aquifer
2. Possible damage to our pumps because of the lower level of the aquifer
3. Loss of natural desert flora, which causes increased dust and wind damage
4. Risk of negative impact to health caused by spraying of soil sterilants and airborne particulates
5. Increased energy costs caused by proven temperature increases from 1-7 degrees
6. Loss of desert access for ATVing, which is one of the main draws to the area
7. Loss of total dark skies
8. Decreased property value

I would like to see the following:
1. Buffer of at least three miles
2. Native plantings to soften the visual impact of the panels
3. Compensation for increased energy costs caused by rising temperatures
4. Respect for our community of 145 modular homes, 75 family homes and several farms

Thank you for your consideration.
Yours truly,
Ken Stamp
#15 Parkview Drive, Lake Tamarisk Desert Resort
Sent from my iPad

Lester BeattyTim Wheeler
Riverside County Planning Department
TWheeler@ rivco.org
Subject: Easley Solar Project

My name is Lester Beatty and I live in Lake Tamarisk, a residential community two miles north of Desert Center. I am really concerned about the numerous solar installations surrounding our community and how these solar arrays.

- Cause a several degree rise in the air temperature in a valley that is already quite hot in the summer. I have read that the temperature in our community may increase as much as seven degrees due to the solar arrays. Causing increase utility costs due to the environmental climate changes.
- affect the migrating birds that fly through our area, adding hazards from reflection leading to fatal incidents to the birds.
- disrupt the termite nests creating swarms of them entering our homes, which causes resident to spend moneys to prevent infesting to our homes.
- disrupt the rodents habitat, who then infiltrate our homes.
- disrupt the rattlesnakes that have now moved into our neighborhood in increasing numbers.
- create a drain on our valuable water supply. These solar installations use millions of gallons of water.
- disrupted our view of the surrounding mountains. The reflective glare in the afternoon off the currently installed solar arrays is almost blinding.
- will increase electrical bills due to the need for more air conditioning in the summer.

Would you please consider regulating these solar farms so that they are not close to residential areas.

Thank you.

Sincerely,
Your Name
Your E-mail Address

Tim Wheeler
Riverside County Planning Department
TWheeler@ rivco.org
Subject: Easley Solar Project

My name is Mable Beatty and I live in Lake Tamarisk, a residential community two miles north of Desert Center. I am really concerned about the numerous solar installations surrounding our community and how these solar array

- impact the wildlife in our valley. The animals and tortoises are prevented from entering the solar array by fences, but may have to travel miles along the fence to get to non-solar areas.
- cause a several degree rise in the air temperature in a valley that is already quite hot in the summer. I have read that the temperature in our community may increase as much as seven degrees due to the solar arrays.
- affecting the migrating birds that fly through our area causing unjust fatalities.
- disrupt the termite nests creating swarms of them entering our homes causing home owners to pay for termite pertection.
- disrupt the rodents habitat, who then infiltrate our homes.
- disrupt the rattlesnakes that have now moved into our neighborhood in increasing numbers.
- create a drain on our valuable water supply. These solar installations use millions of gallons of water.
- disrupted our view of the surrounding mountains. The reflective glare in the afternoon off the currently installed solar arrays is almost blinding.
- will increase electrical bills due to the need for more air conditioning in the summer.

Would you please consider regulating these solar farms so that they are not close to residential areas.

Thank you.

Sincerely,
Your Name
Your E-mail Address

Email: Easley Renewable Energy Project EIR Team

From: Julie Anderson <larsjulie@comcast.net>
Sent: Thursday, January 5, 2023 7:18 AM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Solar Project

Dear Tim,

My name is Julie Anderson and I live in Lake Tamarisk Desert Resort, an over 55 residential community that is located near Desert Center, California. Let me start by saying that I am totally for alternative energy and support all forms of renewable energy including solar panels. However, I am very concerned about the numerous solar panel installs surrounding our community and how they are affecting our quality of life. Regulations are needed NOW to ensure that these solar panel farms are not installed so close to residential areas. Some of the issues that we are already seeing are:

- Termite infestations in our homes (termites have never been a problem in Lake Tamarisk)
- Similar problem with rats and snakes
- Loud buzzing sounds night and day
- Blinding reflections when the sun hits the solar panels
- Disruption of soil causing clouds of dust every time the wind blows. This is a senior community and the airborne dust is more dangerous for an older population
- Wildlife disruption including bird migration
- Temperature increase in the valley which is already high

There is plenty of space in the desert to install these farms far away from where people live. I truly believe that we can all benefit if the proper regulations are put in place now before this all gets out of hand.

Thanks for your consideration,
Julie Anderson
larsjulie@comcast.net

Email: Easley Renewable Energy Project EIR Team

From: John Wilmoth <cjjwfarms@live.com>
Sent: Thursday, January 5, 2023 4:10 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Fwd: IP Easley Renewable Solar Farm, Desert Center, CA

First off, thank you for the opportunity on Dec. 5, 2022, to dial in on the Zoom call to discuss some concerns on this project. I will address others below and look forward to the answers to these questions/concerns.

My wife and I are new residents of Lake Tamarisk Desert Resort, investing in a park model in Jan 2020. We looked at several areas before making this decision. Desert landscapes, county golf course and community center, fire station, library, a friendly community. All elements that we and others look for and forward to in a desert location. The proposed project will surround our community, the only community 50 miles east of Indio and 50 miles west of Blythe. Yep, out in the middle of nowhere, in the middle of the desert. Given the expanse of available sites for VRE in the DRECP, 10,400 square miles, why would a project like this be considered or given the light of day, to surround a community, the only community, with an industrial scale solar farm. The other surprising fact to me is that the bulk of the facility lies within the incorporated boundaries of Desert Center. Given the vastness of the DRECP, why on earth here?

The site is a part of the DRECP but includes a proposed amendment to exempt the projects Conservation Management actions. The site has desert tortoise, coyote, cougar, lizards, road runner, migration routes (243 species at last count), protected Ironwood trees (State of California) as well as other flora and fauna.

A few questions come to mind I believe deserve to be addressed and the information provided to the affected residents -

1 – If approved, what offsets is the applicant/BLM making to improve access to the desert, protect flora and fauna, protect desert landscapes, water quality, etc.?

2 – Construction will disturb the fragile caliche soils in the area. (2014 UC Riverside study for California Energy Commission). On page 2 of the Riverside County Planning Department Notice of Preparation of a Draft Environmental Impact Report & Scoping Meeting, dated November 14, 2022, states the following – “ At the end of its useful life, the Project would be decommissioned, and the land returned to its pre-Project contours. Revegetation would be conducted in accordance with an approved Decommissioning and Revegetation Plan, and revegetation success would depend on the climactic conditions in the area at the time of decommissioning.” Solar farms compromise value of solar energy by releasing stored inorganic carbon into the atmosphere and destroy

the ability of the deserts to sequester carbon. Desert plants take years to grow and have a difficult enough time currently. How can this revegetation plan be expected to work given the existing arid climate, application of pesticides and herbicides, climate change and existing and growing water shortages? Applicant must provide multiple examples of recent Revegetation Plans that have been successfully implemented in a similar desert environment, under similar construction and operations proposals. Additionally, what steps are being proposed and would be taken to keep dust down so as not to affect medically at-risk people.

3 – Storm water runoff – Currently large channels run throughout the desert in the proposed area as the result of large amounts of rainfall that cannot be absorbed by the arid soils. How will this construction affect those channels and how will it impact potential flooding of resident's homes?

4 - If you look at the BLM National NEPA Register of documents for this project, in Appendix B, the list of Pesticides and Herbicides to be used over the life of the facility will more than sterilize the soils, rendering revegetation impossible. Large swaths of the desert are still barren from the earlier propagation of asparagus and jojoba. What are proposed remedies?

5 – Large scale solar farms produce a "lake effect" resulting in the death of birds. Some say there is no proof of this. It is also said that no studies have been done. A study should be required to be completed prior to consideration or approval, which could be used in the future for other considered project proposals.

6 – Historical and Cultural significance of site/s in this location – This was the training area used by General Patton, encompassing 18,000 square miles, (CA, AZ, NV). In an April 11, 2022 article from the BLM, Doran Sanchez speaks about the area and in summation states: "The BLM is dedicated to preserving the remaining features at these historically significant sites through the protection and interpretation for the benefit of future generations." An approval would appear to go against the stated objectives of the BLM. Again, what offsets are being proposed to be completed to mitigate these losses, by the county, applicant, and BLM, if the project were to be approved. In addition, a recent article in the Desert Sun, January 3, 2023 states that the area is being considered for expansion of Joshua Tree National Park to the east (Eagle Mountain area) and south of the existing boundaries and the new Chuckwalla National Monument stretching from the Coachella Valley all the way to the Colorado River along Interstate 10. It talks about all the threatened and endangered species that would have habitat preserved. How can this project advance those stated goals? How does having vast solar arrays impact the views from the park and the monument? Does it impact the very environment these proposals are trying to protect?

7 – Water usage – Does the applicant have senior or long-term water rights for this project? Have they purchased them? The proposal states the project will use 1000-acre feet of water (325,000,000 million gallons) of water during construction and 2000-acre feet (650,000,000 million gallons) during the life of the project. Water is to be pumped from deep wells. Studies have shown that the aquifer/water table dropped 130 feet during the agricultural times in the area and have yet to recover years later. This has increased the levels of lead, boron, and arsenic in the ground water. This water is to be pumped onto the land for dust abatement and cleaning of panels over the project life, further sterilizing the land, leaching nutrients out of the soil, further reducing/eliminating the possibility of revegetation. This also has the potential to increase, humidity and comfort levels for the local population. What studies have been done on the aquifer levels and recharge, the effects of increased levels of lead, boron, and arsenic on the land and its airborne, wind driven consequences. Given the current water shortages and calls for reductions in water consumption, is this prudent use of these scarce resources?
8 - Solar panels – Are the solar panels being produced in the United States or in a foreign plant? The only industrial scale plant that is close to the proposed location is a First Solar plant in Arizona. Is this the location the panels will be sourced from? If not and produced overseas, how does this effect the carbon footprint that California and others are trying to reduce? Is it being considered?

9 –Location and Decommissioning - I am personally involved in the energy efficiency business. In reaching out to a fellow team member who is involved in the solar arena, he said the two largest costs for an industrial sized solar farms are 1- The cost of the transmission line to get the produced power to the distribution facility and 2 – the cost of remediation of the site. He said that remediation rarely works, so he was surprised that the facility would be decommissioned at all. He indicated that at “end of life” commercial grade panels still produce at 80% so should be left to continue generating at the reduced rate indefinitely. The SCE Red Bluff Substation is 6.7 miles roughly to the east. Why not move the facility outside the incorporated town boundaries and closer to the substation?

10 – Reflection off panels - The heat index near solar farms has been shown to raise local temperatures 1.5 to 7 degrees Fahrenheit. It is also known to be an issue with commercial airline pilots. How are these issues being addressed by applicant, county, BLM, et al.?

11 - Military Training Area – Has the Department of Defense been contacted and made aware of this large-scale solar array and weighed in and given their opinion/approval/waiver? This site happens to be in a fly zone for numerous training missions of our military. We have experienced many high- and low-level flyovers by military aircraft on their training missions in our location. How will this facility affect those trainings? Has it even been addressed?

12 – Economic Damages – Residents in the area have made substantial long-term financial investments in their properties. How will the solar arrays affect the values of the properties? How will the county, applicant and BLM compensate said residents for their reduced values? Is the county willing to waive/reduce property taxes for those affected? How would this be fair to other taxpayers? How will values be determined?

There are so many more questions that need to be asked, addressed, and answered, studies to be done by the state, county, applicant and BLM, National Park Service, Military, etc. As a resident of LTDR, I look forward to getting the answers to my questions/concerns as do the other residents of LTDR and Desert Center to their questions/concerns.

John Wilmoth

415 Hogans Way
Chewelah, WA 99109
509-342-5217

26250 Parkview Drive #84
PMB 723
Desert Center, CA 92239

Email: Easley Renewable Energy Project EIR Team

From: Lori Carney <loriannecarney@gmail.com>
Sent: Thursday, January 19, 2023 2:47 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Renewable Energy Project EIR (and other solar projects in the area)

Dear Mr. Wheeler,

My name is Lori Carney and I own the property at 24475 Rice Road, in Desert Center, CA. This property has been in my family for over 100 years. I've recently been renovating my house to move back there and I've been very disappointed by the massive solar development in the area. I realize the benefits of solar, but this feels overly concentrated in one remote area, with an outsized negative impact. I understand that I've missed most of the planning and public comment meetings but I'm hoping that you can respond to a few of my concerns.

1. Light pollution. I have noticed that these developments have what I'm assuming are power transformer "stations" scattered throughout and that these stations are brightly lit at night, with no down shielding that I can see. Light pollution is of concern to everyone, it negatively impacts the insects and animals in the area, and detracts from the night sky for humans. These installations are close to Joshua Tree National Park, a "dark sky" park. Limiting the amount light shed from these projects would be a simple and pragmatic fix. They could do down shading or limit some of the excessive bright lights they have on things. I understand the need for bright lights to perform maintenance at night - but these are always on. Also, I don't think they are a deterrent to theft in such a remote area.

2. Dust. I know that many people have commented on the dust being generated by these projects, both during construction and after they go live. Obviously this is because they are clear cutting thousands of acres of plants. What are the plans to reduce dust during operation? This dust is bad for everyone, including the nearby I-10 and I would assume the panels themselves.

3. Water consumption. I read in a press article that the studies show these installations will be overdrafting the existing aquifer. Is this true? What are the plans to mitigate this?

Thank you very much for your time and attention.

Sincerely,

Lori Carney

Email: Easley Renewable Energy Project EIR Team

From: Vicki Bucklin <vickibucklin@pugetisland.com>
Sent: Sunday, November 27, 2022 9:33 AM
To: Faust, Tamara J <tfaust@blm.gov>
Cc: Vicki Bucklin <vickibucklin@pugetisland.com>; Mark Carrington <mcarrington81@gmail.com>; teresapierce52@gmail.com <teresapierce52@gmail.com>
Subject: [EXTERNAL] IP EASLEY SOLAR PROJECT

My name is Vicki Bucklin. I'm an owner and resident at Lake Tamarisk Desert Resort.

I have worked in temperature management and monitoring for over 20 years. In 2013 I retired from Fluke Electronics, a US leader in mapping and monitoring temperature.

Today I'm presenting an article that discusses many recent studies, most having proven that an array of solar panels will, indeed, increase the local ambient temperature.

Exhibit A:

https://physicsworld.com/a/solar-panels-can-heat-the-local-urban-environment-systematic-review-reveals/

January 30, 2022 Article in PHYSICS WORLD magazine by
Michael Allen Title: "**Solar panels can heat the local urban environment, systematic review reveals**"

Some of these studies covered concerns about the urban temperature increase due to solar being installed by large manufacturing plants. The impact was greatest when huge light-colored roofs were covered with dark panels, eliminating their reflective properties. A good number if studies in this group have also considered large solar arrays as they affect the surrounding local temperatures. The general consensus is that an increase of up to 3F can be expected.

However… OUR case is unusually dire. Consider the fact that we're located in the center of a shallow bowl with mountains surrounding nearly 280 degrees of our perimeter, holding in the heat.

At this time solar workers have placed markers as close as 750 feet from our line. **IF** they cover the light sandy ground **surrounding our park** with dark panels, the average daily ambient temperatures are **guaranteed** to increase based on the simple laws of physics.

There is no doubt that the Easley Solar developers are already aware of that fact.

Whenever winds are calm, the mountains surrounding this area will collect that heat and extend the temperature on those hot midsummer days, now already reaching 120F+.

Our park managers, workers, and year-round residents WILL suffer higher power bills and general discomfort because of this project.

No form of compensation has been offered to locals to help with this life-changing impact.

It is irresponsible and unethical to place massive arrays surrounding remote, rural communities who don't have funds to fight their impact. It's **especially** unethical in places like Desert Center, **where high temperature is already a risk to human life.**

There is even one MORE difficult issue:

What will increased heat do to our **water table** as the local plants become desiccated? Developers already know there is high potential for long-term drought effects from such a gigantic project. **Owners near these developments MUST be guaranteed first rights to water.**

Based on the most recent maps and data presented, we believe the developers of this project have NOT given adequate consideration to the local populace.

If this development is to continue, further studies MUST be done to determine appropriate temperature remediation options* and placement at a greater distance from our local communities.

Potential remediation options:

* Placement of arrays distanced
* 24/7 Public Cooling Centers
* Subsidies for power expense
* Geographic berms and plantings to direct air flow away from populace

These are a few potential options.

Vicki Bucklin
360-200-2042

physicsworld

ENVIRONMENT AND ENERGY | RESEARCH UPDATE

Solar panels can heat the local urban environment, systematic review reveaP s

30 Jan 2022 P

It's complicated: Rooftop solar cells daP affect the temperature of a building in several different ways. (Courtesy: iStock/MarioGuti)

A systematic re iew of 116 papers looking at how solar panels affect the surrounding en ironment has found that they can significantly warm cities during the day. This heating can also affect the performance of the photovoltaic (PV) systems, the study found. The researchers suggest future work should focus on increasing the reflectance of wavelengths of sunlight not converted to electricity. Lead P author of the review, David Sailor of Arizona State University, explains why.

Why was there a need for a systematic review like this?

I was frustrated that there have been a handful of publications that have introduced inaccurate representations of the energy balance of PVs in the urban environment and have, as a result, made claims about the potential for PVs, for example, to cool the urban environment P when, in fact, the energy balance is much more complex and the implications for the urban environment are correspondingly complex. P

What research did you include in your study?

We felt that it would be useful to provide a more holistic viewpoint of PVs in the environment. We wanted to understand not just how putting PV systems in the urban environment affects buildings and urban air temperatures and so forth, but also – the other end of that

equation – how the urban en ironment affects the performance of PV systems.

What did you find?

We arrived at several key conclusions. One had to do with PVs and their relationship with the urban energy balance. Specifically, we found that PVs can significantly warm the urban environment during the day, but typically cool the urban environment at night.

The second key finding was that, for a number of reasons, when you put PVs in an urban setting, they don't perform as well as they might in some other settings, rural and suburban, for example.

Why do solar panels have this heat effect on the urban environment?

It's important to put all of my discussion on this topic in the context that it depends on what you're comparing a particular application to. So, the example would be if you put PVs on an existing black roof, you're not having as much of an adverse effect on the urban thermal environment as if you put those PVs on a white roof, because a white roof would normally be a relatively cool surface.

When you put PVs on that white roof, the PV panels typically absorb in the order of 90% of the energy of the Sun. And the PV panels then do convert some of that energy to electricity, but typical panels today are only maybe 16–20% efficient. These panels are absorbing a tremendous amount of energy from the Sun, converting some of it into electricity, but then warming up because they're not able to use all of the energy.

So, these PV panels tend to be rather hot surfaces in the environment. They're almost always installed in an elevated format – above a roof surface or above ground level in a field. And as a result, you end up having two hot surfaces, the top surface of the panels and the underside surface of the panels. And so, as air flows over these panels, it readily picks up that heat essentially twice as effectively as it would if you had the same temperature on a building surface or a ground surface.

What effect does this heating have on the local urban environment?

There are several studies out there that have looked at panels from a modelling perspective and others have looked at observational data.

I've been involved in one project where we went out into the field and did measurements in and around a PV array in the desert, and then in an area not too far away that was a similar desert environment [the reference site]. What we found in that observational study was that the average air temperature at 1.5 m in the PV array site was about 1.3 °C warmer than the reference site, which is the non-PV site. At P night we found almost no effect. And so, our observational studies led us to conclude that PVs do, in fact, have this warming effect during the day, whereas at night the effect can either be very small, or negligible and difficult to measure.

Other studies, particularly modelling studies, had previously suggested a daytime cooling effect of PVs. But those had a flawed representation of the PV panels, where they ignored the fact that PVs are able to convect heat from both the top and bottom surfaces. P

Does this have an impact on people's energy use for the cooling of buildings?

It does. And again, we found that impact to be very complex. There are a number of studies out there that have demonstrated that if you put PVs on a rooftop of a building, you reduce the annual air-conditioning energy consumption of that building. And that makes sense in that these PV panels provide shading from direct sunlight. So, the building doesn't get nearly the solar load it would normally have penetrating through the roof surface. And that's a mechanism whereby we would expect to have an air-conditioning benefit. P

Likewise, you could have a heating penalty in the winter where you desire to have that solar radiation reaching the building surface, but PV panels are actually shading the building. P

We found that in particularly warm climates such as Phoenix [Arizona, USA] for residential building stock, the PV panels actually have a rather complicated set of trade-offs. They do give us a benefit of shading our buildings directly from the Sun during the day. But at night, where the building roof surface would normally radiate its energy out into space and help to cool that roof surface rapidly, the PV panels actually obstruct the view of the building to the sky, slowing that heat loss at night-time. As a result, you actually increase the air- P conditioning load of a residential building at night.

You mentioned that this heating can affect the solar panels. How does that work?

Traditional silicon-based PVs have what's known as a temperature coefficient, that is, their efficiency is a function of the surface temperature of the solar cells themselves. And so, if you are in a hotter environment, if the PV surface is hotter, then it will be less efficient. The temperature coefficient is typically on the order of about 4% per degree Celsius for the cell temperature. What this means is that while PVs are typically tested at a standard test condition of 25 °C, if you're operating in an urban environment – we've had plenty of measurements of PVs in installations here in Phoenix – where the PV surface temperature easily gets to 60–65 °C or even hotter, you reduce the efficiency by something on the order of 10–15% overall.

What can be done to mitigate these effects?

I don't want to be interpreted as suggesting that PVs are not good things. PVs are a very important component of our future energy mix as we try to save the planet from global warming. That said, I think there's an opportunity to design panels that are more effective at rejecting the heat that they don't turn into electricity.

For the portion of the spectrum that [the panel] is not able to convert into electricity, perhaps we can design coatings on our PV systems that are essentially highly reflective of these wavelengths or more highly emissive of their own energy. You can look to some of the recent advances in material science that are known as passive radiative cooling technologies. If you can imagine a surface that is extremely efficient at radiating its energy in, say, the eight to 13 micron range, then you can essentially radiate the heat away from the surface through the atmospheric window.

I can imagine combining some of these innovations in material science with our conventional developments of PVs and creating a next generation of maybe what we might call "cool photovoltaics". So, PV panels that are perhaps only as efficient as our current generation of PVs but are thermally much more efficient so that they run much cooler. Also, because of the temperature coefficient, they would likely receive an additional benefit in terms of efficiency – running at cooler temperatures and provide less warming to the urban environment.

The review is published in *Energy and Buildings*.

Michael Allen is a science writer based in the UK

Email: Easley Renewable Energy Project EIR Team

From: stevej8460@earthlink.net <stevej8460@earthlink.net>
Sent: Sunday, December 4, 2022 9:17 AM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Renewable Energy Project

Dear Mr. Wheeler,

My name is Stephen Jones. I live at 43971 Shasta Drive in Lake Tamarisk (Desert Center). On Friday, December 2, 2022 we received the notice of the Planning Department Meeting to be held on December 5, 2022. This notice was dated November 14, 2022 which is the beginning of a comment period lasting 30 days. However this notice was not sent in a timely manner and we feel that the end of the notice period should be extended the additional days that this notice was late.

This project affects my home as the project is with a few 100 feet of the West and South Boundary to the community. The community has struggled for the last 55 years as the largest land owner Kaiser Steel never finished developing the property. The property was sold a few years ago and the new owner has had his own struggles with development of the property as well.

I have retired to the community after working with The County of Riverside for the last 32 years as the Manager of the CSA here at Lake Tamarisk. The CSA 51 is responsible for the Water, Sewer and Golf Course/Recreation. The Sewer system for the community is on Government Property at the North and East corner of the property. The map shows the ponds for the system in the Government Land. Why it is on this property we have no idea. The sewer lines from the community exit the CSA and into the Government Land where the ponds are located and cannot be changed to a different location. The sewer lines are laid out in the vacant property for the continuation of the project they started 55 years ago. The lines are where they were to place streets and houses. This property that was Kaisers' does not seem to be in the parcels that are listed in the maps sent with the notice.

I was here when Kaiser started this project in 1968 and have lived in the community of Eagle Mountain as a sub-contractor for Kaiser Steel. This project makes it very difficult we are concerned with the viability of the community as people will not want to live this close to the Solar Field. We urge the planning department to reject the proposal as presented to find a more suitable alternative buffer zone to the community. We are not objecting to the Solar project just that it is much too close to the community.

Thank you for your time and thoughts to this project.

Sincerely,

Steve and Vickie Jones

Email: Easley Renewable Energy Project EIR Team

From: Teresa Pierce <teresapierce52@gmail.com>
Sent: Sunday, December 4, 2022 9:45 PM
To: DawnRobert <chstiver@alaska.net>
Cc: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Re: Lake Tamarisk/IP Easley project

On Sun, Dec 4, 2022 at 10:30 PM DawnRobert <chstiver@alaska.net> wrote:

Hello Tim,

I'm writing to express my disappointment that solar fields are slated to be almost surrounding the Lake Tamarisk community. The current plans for the IP Easley project have it coming within 750 feet of our north fence, of which our RV storage area extends at least 200 feet out from that. You may see this as maximum use & efficiency because it's so close to existing power poles. To encroach this close to the only population area within so many square miles of open land all the way to Blythe is just pure & simple greed.

I also ride my electric fat tire bike in the desert a lot. It's a very enjoyable way to see and appreciate the desert. You can't ride too fast as you go north/south as you're constantly crossing washes that sometimes drop one to two feet within a span of 5 feet, though most are a little wider. I see the areas where they've cleared the ironwood & trees down & leveled everything. I'm curious how the land will act when water comes rushing down in storms like it will invariably do.

I've included a photo of the beautiful ironwood trees that I enjoy seeing & in this particular photo, you can see where scraps of plywood & other debris. It runs up about 18" on the creosote bush. It's not unusual to see parts of an old cabin wall or appliance part carried down the washes several miles out into the desert.

Looking at all of the fenced off areas & the map showing what the future looks like, it's going to be an ugly, dusty ride between fences if you want to ride away from all of the heavy traffic on the roads.

This project is like taking a rural community & putting up a city around it, destroying the recreational areas around it & making it congested like a concrete jungle, though yours will be made of metal & glass.

I sincerely hope that you would decide to move farther from the northern boundary of the Lake Tamarisk area. You have so much land that's available & that would be one face-saving way that you say that you're doing something for the good of a community & it's not going to really hurt you financially in the long term. You may need some of this good PR in the future. This isn't a good look for Riverside County.

I do hope that you'll consider leaving us a little bit of breathing space when we're 50 miles from the nearest stores.

Robert Stiver,

Lake Tamarisk, Desert Center

Email: Easley Renewable Energy Project EIR Team

From: cygreen2020@yahoo.com <cygreen2020@yahoo.com>
Sent: Thursday, October 27, 2022 6:35 PM
To: District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>
Subject: Feeling Pushed Out

Hello and good morning,

I am a long-time resident of Desert Center and recently I feel as if the solar construction is pushing myself and my family out.

We received (Homeowners) a letter regarding the construction of an industrial size solar site right next-door feet from our residence, giving us 30 days to make complaints or concerns. The letter was dated Oct. 7, 2022 it was received on Oct 19,2022.

We feel that the letter was not sufficient notification and has caused stress and anxiety. We have been attempting to sell our home for over 6 months and now our home value has decreased. I am reaching out to ask as you are our representative of this area can this be discussed and what can be done to compensate my family so both the homeowners and solar are happy?

Respectfully,
Cynthia Green
Cynthia Green

SUDCC II 10606
Substance Use Disorder Certified Counselor II
Phoenix House of California
CVSP Chuckwalla Valley State Prison
19025 Wiley's well road
Blythe, Ca. 92225
CyGreen2020@yahoo.com
Cynthia.Green11@cdcr.ca.gov

Email: Easley Renewable Energy Project EIR Team

From: Vicki Bucklin
Sent: Friday, December 2, 2022 2:37 PM
To: district4@rivco.org; alexperez@rivco4.org
Subject: FW: Help Us Hold Solar Installers Accountable - Ref IP Easley /Easley Renewable Energy Project

Hi Alexis,

I included your email with one to the Senator, so maybe that is why the glitch. The letter below gives you the overview. I am attaching a map that shows they are planning to surround us on 3 sides. We have a whole list of problems to cover. The biggest is the fact that we cannot survive a wind-driven fire with out current water system, and they have put huge power lines on two sides of us. One wildfire and our park is toast!! We need a water tank above ground so we can get water to fight it even if they shut off power.

Let me know what else I can do to bring you up to speed. We would welcome a visit before the meeting. Just call and we'll be happy to show you around. 360-200-2042.

From: Vicki Bucklin
Sent: Thursday, December 1, 2022 9:58 AM
To: senator.melendez@senate.ca.gov; district4@rivco.org
Cc: Vicki Bucklin <vickibucklin@pugetisland.com>
Subject: Help Us Hold Solar Installers Accountable - Ref IP Easley /Easley Renewable Energy Project

Help Us to Hold Solar Installers Responsible. We ask that you visit us and have a look around.

Lake Tamarisk Desert Resort is a rural senior park that is located on the edge of Joshua Tree National Park. It is surrounded by a small community of around 300 people. This resort has provided Desert-loving seniors and their families with the opportunity to golf, bike, hike and explore the beauty of the Desert for many years. Homes in this park have been passed down through generations because of the opportunity for healthy recreation and sunshine. The only available services here are a library, fire station and post office. We must travel to Indio or Blythe, nearly an hour away, to buy groceries.

Our community is being enveloped by solar fields. Solar fields emit heat long past sunset. The current project under consideration will guarantee a future increase in the temperature of our local environment of at least 3 degrees F.** Given our unique geography, (a valley surrounded by mountains) the increase is likely to be even higher. For the most recent project, Easley Renewable Energy Project by Intersect Power, construction markers are now within 750 feet of our property. Previous installations have scraped the sand of Ironwood and other vegetation, and wind now carries the dust, silica, and chemical herbicides for miles without that buffer. Some residents have already given up their homes due to health concerns.

The IP Easley project as proposed will place unacceptable pressure on our community through higher power bills, inability to spend time outdoors, and potential health effects from heat, wind-carried debris, snakes, termites, and other vermin that are being disrupted in the Desert and seeking the only uncovered ground.

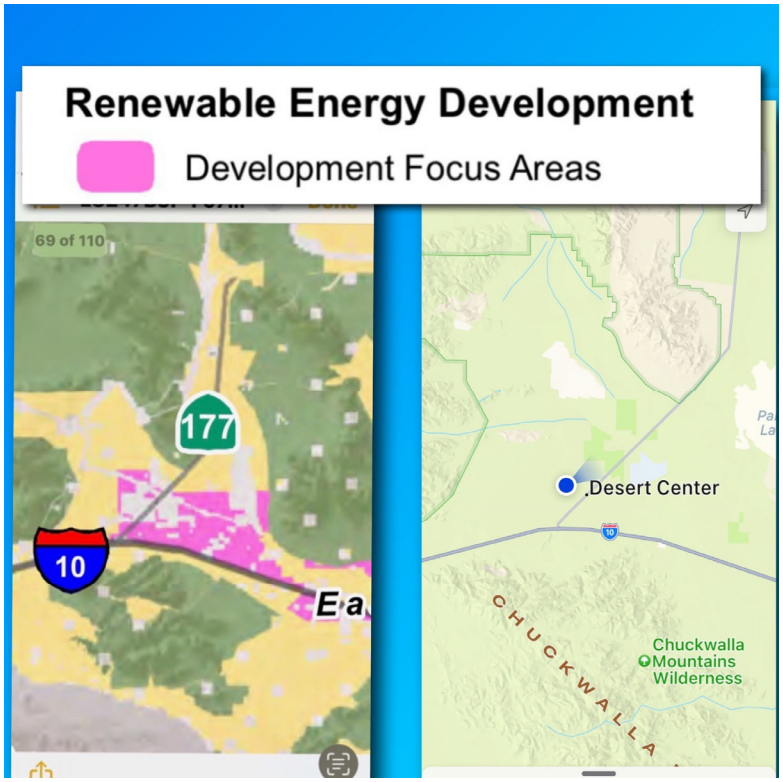
There's an immediate increase in risk of wildfires here due to new massive overhead power lines. Our water system may be at risk as temperatures increase and the remaining plants draw what they can to survive. Our local water system is not designed for wildfires here, as without the power lines, risk would be minimal. A report from our local fire station shows we can fight a single house fire, but a wind-driven wildfire would move too quickly.

Historic communities like Lake Tamarisk Desert Resort should not be sacrificed for the convenience of solar companies. Lines can be drawn, and remediation can be offered to keep those communities viable. We have already lost our backyard access to recreation. Panels mar our pristine views. Our health is at risk in ways we never imagined. We need guarantees of distance and vegetation buffers, we need guarantees of first rights to water and compensation for high power bills.

Please support us by contacting people involved with the development of this IP Easley Project. There is still time to reduce the impact on our residents. Ask them to move their projects at least a few miles away from residential housing. Ask them to provide a guaranteed water and fire-suppression system for communities they put at risk. Your community could be next.

a. **Elizabeth Knowles** <elizabeth@intersectpower.com 914-960-9003 **Director of Community Engagement at Intersect Power**
b. **Tamera Faust** tfaust@blm.gov **BLM**
c. **Camille Wasinger (**303) 909-6396 camille@intersectpower.com **Intersect Power**
d. **Tim Wheeler** (951) 955-6060 TWheeler@rivco.org Website: http://planning.rctlma.org **Riverside County**
e. **2022 Physics World Article https://physicsworld.com/a/solar-panels-can-heat-the-local-urban-environment-systematic-review-reveals/

Vicki Bucklin



Email: Easley Renewable Energy Project EIR Team

From: Vicki Bucklin <vickibucklin@pugetisland.com>
Sent: Sunday, December 4, 2022 5:14 PM
To: Sarabia, Elizabeth <ESarabia@RIVCO.ORG>
Subject: FW: LTDR Concerns about IP Easley Solar Project

Elizabeth,

We have been trying to share this information with Alexis in the office of Manuel Perez in preparation for our meeting at the planning department tomorrow. Unfortunately, the email has bounced multiple times.

A second email will follow.

Please forward this message to her ASAP. You may contact me with any questions.

Vicki Bucklin
360-200-2042

From: Vicki Bucklin
Sent: Friday, December 2, 2022 3:34 PM
To: district4@rivco.org; alexperez@rivco4.org
Cc: teresapierce52@gmail.com
Subject: LTDR Concerns about IP Easley Solar Project

Hi Alex,

Attached is a list of topics we would like to have consideration on. These will be brought up at the meeting.

We are also having a community meeting here at Lake Tamarisk on December 15 and would like very much to have you attend.

Thanks,
Vicki

TALKING POINTS for LTDR Solar Meeting Monday, Dec. 5, 2022

"BECOMING AN ISLAND IN A SEA OF SOLAR PANELS"

INTRO: PRESENTED FROM THE COMMUNITY PERSPECTIVE.

LTDR is a retired 55 years and older community resort for golfing, ATV, hiking, bike riding, swimming, and other recreational activities. The Community also includes 200-300 rural homes consisting of families with and without children. Approximately 60 school age children live in the community and attend a local school. There is a library, fire department and a post office but no other services.

HEALTH EFFECTS

- Dirty Power from Electro Magnetic Fields: According to the World Health Organization there is a health risk of electromagnetic hypersensitivity associated with living next to solar farms. Triggered by EMF exposure: Note headaches, nausea, fatigue, skin rashes, dizziness, sleep disorders and possible connections to cancer.
- Concerned with the health of the community ranging from small children through seniors
- Dust/wind from cleared vegetation and ground disturbance carries silica, pollens, and other pollutants, affecting those with COPD or other pulmonary issues.

AESTHETICS/VISUAL RESOURCES/REFLECTION

- Solar panels North and East affect our views. The scenic views are impacting the whole community.
- Dark Skies will be affected by the external lighting. This is one of the few areas in the US with Dark Sky.
- Reflection from the panels can be extreme, and some now point toward our community.
- Debris gets caught in the fencing

AIR QUALITY

- Valley fever risk will be increased

- Dust, that created by construction, and long-term from vegetation removal, carries pollutants, silica, and herbicides – We're specifically concerned for our young and elderly community

BIOLOGICAL RESOURCES

- Migration of birds (birds are dying when they hit the panels thinking it is water)
- Water in the lake accumulating dust
- Migrating birds have been affected. We have found bodies near solar arrays.

CULTURAL RESOURCES

- We are a desert resort community. We come here to enjoy the beautiful Desert and to spend time outdoors. Many people are second and third generation families that carry on traditions.
- Historical area where General Patton trained one million troops for WWII to go to Egypt. There remain many artifacts and tank tracts in the area. Numerous foundations remain visible in the area.

GEOLOGY AND SOILS

- Impact of disturbance of soil: termites, rodents, rattlesnakes
- Desert wash woodlands are impacted by flash floods causing undetermined changes in erosion.
- Ironwood is protected, yet we are witnessing complete removal on acres and acres of ground.

HAZARDS AND HAZARDOUS MATERIALS

- Chemicals and sprays are currently being used to reduce vegetation around the Blythe solar installations
- Concerns of use of soil sterilization (I don't understand what this is-VB)
- Desert sand is very high in Silica, which can cause Silicosis, an incurable condition.

- Solar panels contain dangerous chemicals that can be exposed when broken.

HYDROLOGY AND WATER QUALITY

- Our aquifer is a critical need and is verified as unreplenishable.
- We need Well level depth study going back 20 years
- Quality of water noting the mineral concentration changes
- Film appearing on washed items.
- Concern of pumps and wells being overused. Construction workers are currently using our pumps for water to abate construction dust. Our pumps are old and not able to sustain use without upgrades.
- An above ground water reservoir is needed to assure water supply for community consumption and fire suppression. At present a wind-driven fire in our community would kill our power supply and wipe out the park. Our only viable water source requires pumping.

LOCAL CLIMATE EFFECTS

- Physics World article notes how the increased temperature
  From solar panels affects people and climate.
- More dry spells in an area already affected by heat.
- Higher living expense and lower quality recreation opportunity due to heat and wind

LAND USE AND PLANNING

- How does the solar affect the settling ponds used for sewage treatment? Initial plans show them inside the proposed project perimeter.
- Original land use plans here include a second nine-hole golf course, not solar.
- Protect Ironwood. We are witnessing complete removal on acres and acres of ground.

NOISE

- Construction noise early and late. Distance can remedy this problem.

POPULATION AND HOUSING AND SOCIOECONOMICS

- If the current proposal is approved, our community will be surrounded by 3 sides with solar projects.
- Community is affected by a huge power pole network, emitting EMFs
- Higher temperatures will result in increased power bills and less outdoor opportunities.
- Quality of life is diminished for the residents who come for the desert and the beauty of the area.
- The community wants to preserve its heritage and value, keeping a safe place for future generations.

PUBLIC SERVICE AND UTILITIES/SERVICE SYSTEMS

- Fire concerns are increased by the power grid. We need a better water system to protect our homes.
- Our water pumping system is old and in need of repair/replacement. The construction projects are using it and causing extreme wear beyond our usual daily needs.

RECREATION

- Changes in our availability to use the desert. Changes in what we see when we DO use it.
- Community has a large investment in equipment for ATV Excursions, Golf, biking, etc., for use throughout the desert.
- Loss of enjoyment of the desert and local wildlife due to visual and physical existence of solar panel.
- Concern of blocking existing trails for ATV and hiking.

TRAFFIC AND TRANSPORTATION

- Dust and noise from trucks
- The speed of the vehicles is dangerous to the community
- There are children and seniors out walking, biking and ATVing who are now at risk.

WILDFIRE

- Transmission lines increase wildfire risk.
- The Community's pumps and systems are aging and in need of repair/replacement. They are barely adequate for our current needs, but definitely inadequate for use in fighting wildfires and home fires. The system is maxed.

Email: Easley Renewable Energy Project EIR Team

From: Sharon <swdilley@gmail.com>
Sent: Wednesday, December 7, 2022 4:46 PM
To: elizabeth@intersectpower.com <elizabeth@intersectpower.com>; Faust, Tamara J <tfaust@blm.gov>; camille@intersectpower.com <camille@intersectpower.com>; TWheeler@rivco.org <TWheeler@rivco.org>; kfitzerrald@cvindependent.com <kfitzerrald@cvindependent.com>
Cc: Teresa Pierce <teresapierce52@gmail.com>; Vicki Bucklin <vickibucklin@pugetisland.com>
Subject: [EXTERNAL] Lake Tamarisk Desert resort and surrounding community vs Solar fields

Sent from Mail for Windows

December 7, 2022

To: Tim Wheeler, Camille Wasinger, Tamera Faust and Elizabeth Knowles

My name is Sharon Dilley. I am a resident at Lake Tamarisk Desert Resort. I'm writing to express my concern with the Solar Arrays that are surrounding our Community. I have several concerns that I will address. I have been coming here since the late 1980's. My parents owned here and I not only visited them many times through the years but drove them back and forth from Oregon for 6 years as their health began to decline. They last were here in 1999. Upon my retirement, I bought a lot at the resort and park a fifth wheel here for five plus months a year. This is my second home and I plan on coming until I can not longer do so. That plan is for another 15 years.

My biggest concern is the health effects that the building of the Solar fields is bringing. The disruption to the soils and removal of vegetation is allowing the dust to infiltrate our homes and park. The Silica and other pollutants can and will damage our lungs and ability to be outside hiking, biking and golfing and other outdoor recreation. That is why we moved here; to enjoy the desert environment.

Another concern is the visual affect the solar panels have on our daily enjoyment of our surroundings. We are encased by them. They reflect light and heat up our environment. We have some of the most beautiful Dark Skies in the nation. This is being impacted dramatically. We used to enjoy looking at the Ironwood trees surrounding the community. Where did they go? I thought they were protected? The washlands surrounding our community not only help distribute rain waters but also held vegetation unique to the desert. They have been destroyed. The potential for floods could reach our community.

Last but not least by any means is the impact on our aquifer. The amount of water being used during construction is putting a huge burden on the pumps and resources here at Lake Tamarisk Desert Resort and surrounding community. The long term use of water from the aquifer is very troubling. We are very concerned for fire safety and fire prevention in the community.

We would request that a focus group come to Lake Tamarisk and see for yourself the impact of the solar fields. We are requesting that they stop encroaching on our community. Thank you.

Email: Easley Renewable Energy Project EIR Team

From: Bruce <burnbrae@ymail.com>
Sent: Saturday, December 31, 2022 10:42 AM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Fwd: Easley Solar Project

Dear Tim:

We live at the Lake Tamarisk Desert Resort at Desert Center and we need you to understand what is happening in our community. We are being encroached upon by the Easley Solar Project. For some reason, Easley solar is potentially being allowed to install their solar panels within 750 feet of our property and their infrastructure within 25 feet.

The residents of our resort are all seniors who have chosen to come to enjoy life in this community for the remainder of their years. If this project is allowed to come this close to our residences, our quality of life will be affected. We already get the reflective glare from the panels that are south and southeast of us.

We need a buffer zone around our community. This vegetation would help with the blowing dust from the project. They are bulldozing all habitat in the desert. This includes the protected ironwood trees that will be eliminated if this is allowed to continue.

The solar projects are allowed to use our wells to pump water from the aquifer. That aquifer has been verified as unreplenishable. They are using millions of gallons of non-replaceable water.

The Lake Tamarisk Solar Committee, representing our community, has a list of concerns they presented at the scoping meeting on Monday, December 5, therefore there is no need to repeat that lengthy list.

It is difficult for us to understand why the authorities did all the studies on how solar development would affect the environment, their employees, etc., but there was no study done on how it would affect the residents of this community. I know that if the officials that passed this project lived in this community, there would be a different set of restrictions.

Please take a hard look at our concerns.

Thank you very much,

Bruce McArthur
Lake Tamarisk Desert Resort
Site #68
Phone 403 888-2107

Tim Wheeler
Riverside County Planning Department
TWheeler@ rivco.org
Subject: Easley Solar Project

My name is Brian Hagman and I live in Lake Tamarisk, a community two miles north of Desert Center. I am really concerned about the numerous solar installations surrounding our community and how these solar arrays disrupt the topsoil creating clouds of airborne silica dust every time the wind comes up. My respiratory system is already compromised and the clouds of silica are creating an additional health hazard for me.

Would you please consider regulating these solar farms so that they are not close to residential areas.
Thank you
Sincerely
Brian Hagman
bhagman@live.com

Email: Easley Renewable Energy Project EIR Team

From: Richard Armstrong <laketamarisk99@gmail.com>
Sent: Sunday, January 1, 2023 12:32 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Solar Project

Dear Sir, I-live in Lake Tamarisk , a community two miles north of Desert Center.I am really concerned about the numerous solar installations surrounding our community and how they impact the wildlife in our valley.

People driving down I-10 believe the desert is a wasteland with nothing of value. Here is a list of all the animals that are being affected by the removal of their feed and the blocking of their migration routes between the mountains and the washes.

Big Horn Sheep. Qual
MuleDeer. Vultures
Mountain Lion. Wrens
Bobcats. Other small birds
Coyotes. Rattle snakes
Jack Rabbits. Bull Snakes
Bunny Rabbits. Desert Tortoises
Chuckwallas Toranchulas
Mice

Do the solar companies inform you of the deer that get tangled in the fences and the tortoises that die along the fence line?

The other animals will all die from lack of vegetation and food sources because the eco system can not support the area being lost.

Would you please consider regulating these solar farms so they are not close to residential areas.

Sincerely,
Linda Armstrong
laketamarisk99@gmail.com

Email: Easley Renewable Energy Project EIR Team

From: Peter Longman <pklongman@telus.net>
Sent: Sunday, January 1, 2023 1:09 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Solar Project

My name is Peter Longman and I live in LakeTamarisk, a community two miles North of Desert Center.

I am really concerned about the numerous solar installations surrounding our Community and how these solar arrays create an electromagnetic field around Our community.

Would you please consider regulating these solar farms so they are not so close To residential areas.

Sincerely
Peter Longman
pklongman@telus.net

Email: Easley Renewable Energy Project EIR Team

From: Frankie Nobert <frankienobert@yahoo.com>
Sent: Sunday, January 1, 2023 5:25 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Solar project

My name is _____F. Nobert_____ and I live in Lake Tamarisk, a residential community two miles north of Desert Center.
I am very concerned about the millions of solar installations encroaching our community.
I am concerned that these solar arrays
·

Impact the wildlife in our valley.

cause a several degree rise in the air temperature in valley that is already quite hot in the summer.
drastically increase our power usage for air conditioning
· are impacting the value of our homes.
· create a loud buzzing sound all day and night.
· create an electromagnetic field around our community.
· affect the migrating birds that fly through our area.
· disrupt the termite nests and rodent habitat, who then move and infiltrate our homes
· disrupt the rattlesnakes that have now moved into our neighborhood in increasing numbers.
· create a drain on our valuable water supply.
solar installations use millions of gallons of water.
As we know water is an already threatened resource in this state!!
· disrupts our view of the surrounding mountains.
reflective glare in the afternoon is almost blinding.

With the millions of desolate desert in the state,
I question why it is so necessary to be close to an existing community?
What studies have been done about the effects of solar installations, on human health ?
I do not consent to be the Guinea pig in this experiment!
Our health and well-being is important too, and is being affected!!
·

Would you please consider regulating these solar farms so that they are not close to residential areas.
Thank you.
Sincerely,
F. Nobert
frankienobert@yahoo.com

To: Mr. Tim Wheeler
TLMA Planning Department, Riverside County

Dear Mr. Wheeler,

I am writing to add my voice of concern to those other residents of Lake Tamarisk Desert Resort (LTDR) and the Desert Center community who are uncomfortable with the massive commercial solar installations that will virtually surround us and are either already in place, in the process of being installed or slated for installation in the very near future.

We are a community of approximately 150 mobile homes and RV lots that have been populated by retirees, for the most part, for several decades. We chose to live here because of our love for the desert and all it affords us - peaceful surroundings, the beauty of nature and the opportunity to explore these. Surrounding our resort are 70 conventional homes, occupied by families with anywhere from 60-80 school-age children, in total, a Fire Hall, Library, CSA hall and the Lake Tamarisk Golf Course.

There are a number of concerns that I have, most of which seem not to have been considered by the developers of the solar fields, the County of Riverside or the Bureau of Land Management (BLM). In order of importance to me, they are as follows:

* There has been virtually no communication with our community with regard to the solar field installations. It is as if our community does not exist. How will the fields impact our quality of life? The value of our homes? Our ability to continue to enjoy life here as we have in past? In other words, what will be the socio-economic impact of these solar fields? Only recently, as we became aware of the extent of the planned development and started to voice our concerns, have decision makers at the BLM, Riverside County and the solar field developers come here to meet with us, see our community and the effect these farms will have. We thank them for their time.

* The effect of the increased dust in the air we breath is of concern. The defoliation of the solar fields prior to installation has left us susceptible to exposure to chemically treated soils that now have no barrier to erosion and wind transportation. During this period of installation, heavy equipment operation and the movement of trucks create even more dust and once in operation, we anticipate little reduction in the dust.

* The aquifer we draw our water from will be drastically reduced as both the installation process and the day-to-day operation of the solar fields require vast amounts of water. There are no rivers in the area to replenish this water.

* The destruction of the natural environment and the effect it will have on the populations of bird, butterfly, insect and animal migrations and the annual spring wildflowers that we have enjoyed cannot help but be extreme. The desert is not a wasteland but a thriving and vital home to highly specialized flora and fauna.

* There are studies that indicate an increase in the average air temperature due to the presence of vast numbers of photovoltaic panels can be between 2 and 7 degrees Fahrenheit. In a location such as ours where daytime highs in the summer months can easily exceed 110F, any increase is unwelcome.

I do not expect to have any effect of the inevitability of these solar fields; President Biden has made it eminently clear that he wants them in place and operating as quickly as possible. What I would ask is that consideration be given to our community; that, if possible, the solar panels and battery storage buildings be kept at a distance of one mile from our property boundaries,

that any new transmission lines and towers be positioned at least one mile from our property boundaries and that a financial commitment be made by either Riverside County and/or the solar field developers to make much needed improvements to the water and sewer system in both our mobile home park (LTDR) and the surrounding subdivision.

Respectfully submitted by:

Kathy Schofield and Mark Hendrickson
26250 Parkview Dr, PO Box 552,
Desert Center, CA 92239

Email: Easley Renewable Energy Project EIR Team

From: Candace Ryding <cm@ryding.com>
Sent: Monday, January 2, 2023 10:02 AM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Solar Project

Our names are Candace and Ross Ryding. We have lived in Lake Tamarisk since 2014. We are very involved in our community (board members of the CSA 51, local school board and local hospitality organization). We are also involved in many other activities including supplying a not-for-profit internet service for the local residents.

We are writing today because of our concern with the proposed additional solar installations surrounding our homes, and the impact they will have on our lives, because of their close proximity to our homes. There are numerous concerns, but I would like to address just a few of them with you today.

Health of our community. Not just from EMF exposure but also from the extreme stress that individuals are experiencing when faced with the loss of their quality of life.

According to the World Health Organization, there is a health risk of electromagnetic hypersensitivity associated with living next to solar farms. Triggered by EMF exposure includes headaches, nausea, fatigue, skin rashes, dizziness, sleep disorders and possible connections to cancer.

Northwestern Medicine lists four very typical medical issues related to stress. When a body releases adrenaline in response to stress, it causes your breathing and heart rate to speed up. This can increase what's known as systemic vascular resistance, affecting your heart health. For some, chronic stress also increases the risk for developing depression and anxiety. Stress also is often the cause of gastrointestinal health issues and tension/migraine headaches.

Disturbance of the soil. Desert Wash Woodlands are impacted and although Ironwood is protected, we are witnessing complete removal over large areas of the desert. Dust from cleared vegetation and ground disturbance carries silica, pollens, and other pollutants, affecting those with COPD or other pulmonary issues. Valley fever risk will be increased. Desert sand is also very high in Silica, which can cause Silicosis, an incurable condition. We have already experienced an increase in dust from the solar farms already in place around us. That dust has exacerbated Ross' asthma, which up until recently was never a problem. It has resulted in a dozen bronchoscopies in the last two years.

According to Science Daily and Arizona State University states that dust in the parched southwestern United States has gone from being a nuisance to a major health hazard, as scientists have discovered harmful chemicals and microorganisms hitching a ride on the airborne particles. Although the fine dirt may look harmless, chronic inhalation of contaminated dust could lead to increased risk for cancer.

Birds and Wildlife (flora and fauna). We bought our home because it is on the lake and we cherish the daily enjoyment of bird watching. Migration of birds into Lake Tamarisk is a source of enjoyment not only for the residents and the numerous bird watchers that visit our area year-round. eBird reports that there have been 304 species observed in and around Lake Tamarisk. Their reporting started in 1972, with the most recent sightings in December of 2022. We are also in the Colorado River Flyway (part of the Pacific Flyway) with about 300,000 birds migrating through our flyway.

Black & Veatch reports that large solar fields such as those that have been built in the last several years in Southern California and the desert Southwest can fool birds into changing flight direction, sometimes during migration, to approach them because they appear to be lakes from a distance. Many of the birds that have been killed at these large solar sites are waterbirds, which indicates that these birds fly to solar fields and realize too late in their descent that the solar panels are not water. The waterbirds then collide with the solar panels and are critically wounded or killed. Some waterbirds also have great difficulty taking off from non-water surfaces, which could leave them stranded in desert areas without food, water or shelter.

We are also home to a great vpariety of animals. These animals require vast open spaces to roam and find food. And we are also home to a large number of plant species. Science Struck reports that our desert is believed to be the home for around 1,750 to 2,000 species of plants, and as many as 700 species of animals.

Please consider regulating any future solar farms, so that they are not literally on top of residential areas.

Thank you for your time,

Candace and Ross Ryding
cm@ryding.com

Email: Easley Renewable Energy Project EIR Team

From: ROBERT WALSTON SR <bjwalston@comcast.net>
Sent: Monday, January 2, 2023 10:07 AM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Solar Project

We would like to preface this letter by stating that we are proponents of solar energy.

We have been coming to Lake Tamarisk since 2006. What attracted us to this unique, beautiful oasis is the golf, ATVing, small community vibe, Riverside County Library and Fire Station (with EMTs), bird migration route and desert views. We invested retirement funds to secure that we, our sons, granddaughters and great grandchildren will have a place to come to for recreation in the winter months.

In the last few years the solar companies have installed several thousands of acres of solar panels. Each project has been coming closer and closer to our quiet community with **little or no notice** or a chance to give any input. They have disturbed the bird migration, scraped and graded the desert without any consideration of the vegetation (especially the Ironwood) and General Patton's training ground relics. They claim when the life expectancy of the solar panels has ended, they will be removed and the desert would be put back to the way it was. We all know that is an impossibility! The noise and level of dust (we both suffer from COPD) have increased immensely and termites, that have never been here before, have invaded our homes. Also the amount of water needed for these projects is of very deep concern to all of us. We have been told by solar workers that we would not believe the amount of water that they are drawing from our aquifer

Respectfully,
Bob and Judy Walston
Lot 116 Lake Tamarisk Golf & RV Resort

Tim Wheeler
Riverside County Planning Department
TWheeler@ rivco.org
Subject: Easley Solar Project

My name is Nancy Ray and I live in Lake Tamarisk, a community two miles north of Desert Center. I am really concerned about the numerous solar installations surrounding our community and how these solar arrays disrupt the rattlesnakes that have entered our community in much larger numbers.

I also have concern for the migrating water fowl. These farms have disrupted the migration patterns. There
there has been a decline in numbers of birds passing through hour area on their way to the Salton Sea and farther. The waterfowl are confused that the solar panels are a body of water. The birds lungs respirate 100 % air on both inhale and exhale. They are more susceptible to dust (scilica) than humans. (thus the canaries in the mines) .
To name a few of the Birds are Sandhill Cranes, Pelicans, Herons Merganzers, Geese, a variety of ducks.
We used to have 50 or more Mexican and Morning Doves and Quail. I have only seen 3 doves this year and no Quail.
They are collateral damage as well as we are.
Would you please consider regulating these solar farms so that they are not too close to residential areas.

Thank you.
Sincerely
Nancy Ray
minidetail50@gmail.com

Email: Easley Renewable Energy Project EIR Team

From: Barry Reid <barry.reid1982@gmail.com>
Sent: Monday, January 2, 2023 1:46 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Solar

To whom it may concern:

Mr Wheeler my name is Barry Reid and I own a house in Lake Tamarisk.

I have one major question " WHY RIGHT HERE". With so much open BLM land why encroach so close to the only town for miles. How would you like a solar field in your backyard? (Or 5) I have major concerns with future property values, with all the side effects. The termite population is very notably increasing. I had a termite inspector highly recommend a defensive actions at my expense. My understanding is if we have a wind driven fire we would not have the water pressure to stop multiple houses from burning. That could lead to litigation for the county. Move the proposed projects back to reasonable distance and apply money to the community. Upgraded infer structure from money the county is already collecting could go along way to calming fears.

Thank you for your attention to this issue.

Barry Reid
509-681-0282
Desert Center California

Email: Easley Renewable Energy Project EIR Team

From: Bob Mitchell <rcm1946@gmail.com>
Sent: Monday, January 2, 2023 2:40 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Cc: Teresa Pierce <teresapierce52@gmail.com>
Subject: Easley Solar Project

My name is Bob Mitchell and I live in Lake Tamarisk, a residential community two miles north of Desert Center. I am really concerned about numerous solar installations surrounding our community and how these solar arrays disrupt the topsoil (desert sand)creating clouds of airborne dust, dust containing silica (quartz), a regulated health hazard and known carcinogen. The current proposal is to place solar panels 750' from housing, housing inhabited by elderly and small children, the most vulnerable to airborne contaminents in our society. This reminds me of the days when we were trying to ban smoking in public spaces. Early remedies were to designate smoking areas for those who wanted to smoke. If you went to a restaurant, for example, you might be seated near a smoking section, three feet from the guy that lights up while you are eating your meal. Eventually, smoking was banned in all but a few designated areas away from non-smokers and everyone was reasonably happy. But, in this case, once the solar projects go in, and they are already in, there will no going back, the established community, along with desert life will become collateral damage.

The following are current standards for regulating silica:

OSHA	PEL	0.05mg/m3	TWA
ACGIH	TLV	0.025mg/m3	TWA
NIOSH	REL	0.05mg/m3	TWA
MSHA		10mg/m3 / %silica+2	TWA

At the OSHA PEL, if you can see the dos you are overexposed

What, if any, alternative designs have been proposed to reduce dust exposure(i.e. ground matting. etc.)? What assurances do we have that our community is safe and who will be responsible if it is not?

Thank You,
Robert C. Mitchell
rcm1946@gmail.com

Email: Easley Renewable Energy Project EIR Team

From: Ron Simmons <slushymeadows@gmail.com>
Sent: Monday, January 2, 2023 2:42 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>; LTDR Manager <info@laketamariskdesertresort.com>
Subject: Easley Solar Project

Mr. Tim Wheeler
Riverside County Planning Department
Riverside, California

I live in Tamarisk Lake Desert Resort (TLDR) in Desert Center, CA. This is my only home--not a second, or vacation home. TLDR is a well kept but very modest community. I chose to buy at TLDR because of the quiet, and the desert wilderness and wildlife here--which I consider very beautiful.

Up until now I have been very supportive of the solar developments in surrounding spaces, north and east of TLDR. However, I reviewed the map of the proposed Easley Solar Project and have become very concerned about the extreme closeness to residences here at TLDR--if approved and built as planned.

My concerns include the following: increased ambient temperatures; excessive dust and particulate matter, during and after construction--especially since I have lung disease; extreme glare from panels and racking; night security lighting; wholesale destruction of our desert flora and fauna.

This area is not barren desert; it is beautifully covered with large Palo Verde and Desert Acacia trees, some of which are hundreds, perhaps thousands, of years old--and which provide critical habitat and forage for many desert mammals and birds.

I ask the Riverside County Planning Department to do the following: (1)
Provide minimum buffer of one-half mile from any solar development and LTDR.
(2) Require all lighting to not exceed the height of equipment it protects--and shrouded so no light escapes upwards or outwards.

Solid-panel fencing along development boundaries facing LTDR might be the solution to most aspects mentioned in (1) and (2) above.

I recommend members of the Planning Department travel to Desert Center and walk the landscape that is scheduled for destruction--and visit the LTDR community.

Thank you,
Ron Simmons 505-470-3014 slushymeadows@gmail.com
P.O. Box 715
26250 Parkview Drive space #70
Desert Center, CA 92239

Email: Easley Renewable Energy Project EIR Team

From: Gary Lundberg <glundberg39@gmail.com>
Sent: Monday, January 2, 2023 3:54 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Solar Project

Dear Mr. Wheeler,

I have been requested to write you expressing my feelings toward the Solar projects near Desert Center. My wife and I have been 5+ month snowbird residents of Lake Tamarisk for 22 years; one of the longest term residents in the park.

First of all, I am not attempting to talk you out of approving Solar Projects because we all know the current political winds are blowing towards alternative sources of electricity. What I do find problematic is the seemingly lack of concern for placement of projects so close to residents when there is a whole wide open desert out there.

We are all concerned about the environment, the wild-life, the iron wood trees. Unless, of course, it fits a narrative and money. I know you have heard all of the complaints of dust, use of water, noise, etc. These things may have been considered but has the livability of current residents been considered? We love the solitude, views and migrating birds and access to the desert.

These Solar farms are encroaching on 3 sides. Is it asking too much to leave a mile or two buffer zone so that we can co-exist? The initial Solar project owners did show concern on how they affected this community. They had several outreach programs to attempt to be good neighbors. These past several projects have not made much of an attempt to be good neighbors.

One final issue that I cannot prove but we have had more incidents that have involved reaching out to law informant since all these projects started. This may be true in many other areas but this has been an area where we did not worry too much about out personal belongings.

Thank you for your time,

Gary and Debbie Lundberg
glundberg39@gmail.com

Email: Easley Renewable Energy Project EIR Team

From: janlee4shaw.ca <janlee4shaw.ca@proton.me>
Sent: Monday, January 2, 2023 5:49 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: NO TO SOLAR PROJECT near Lake Tamarisk

My name is Lee Petersen and I live in Lake Tamarisk, a residential community two miles north of Desert Center. I am very concerned about the numerous solar installations and the impact to the delicate desert habitat!

These are just some of my concerns

· the disruption of topsoil creating clouds of airborne dust every time the wind comes up. My respiratory system is already compromised . This is predominately a retirement age community our respiratory systms are fragile enough especially with covid.

· the impact to the delicate desert flaura and fauna!!!!!!

·the increase of ambient temperature in the valley and the associated increase in winds because of temperature deltas!

· the impact to value of our homes being so close to an industrial EYESORE!

· the loud buzzing sounds all day and night.

· the electromagnetic fields created by these projects.

· the effect to migrating birds that fly through our area.

· the disruption of termite nests creating swarms of them entering our homes.

· the disruption of rodent habitat, who then infiltrate our homes.

· the disruption to delicate rattlesnake habitat !!!

· the drain on our valuable water supply. These solar installations use millions of gallons of water.

· the disruption to our views of the beautiful mountain vistas and associated reflective glare!

· the increase electrical bills due to the need for more air conditioning in the summer.

These are just SOME of my concerns. This project does not have to impinge on a beautiful resort community! There are THOUSANDS of other acres that this environment destroying project could use, It does not have to be built CLOSE to this our beautiful community! We would be far better off with Natural gas generating stations. They destroy far less HABITAT.

Thank-you for your strong consideration of the above.

Lee Petersen

Email: Easley Renewable Energy Project EIR Team

From: Ken Jacks <kenjacks504@gmail.com>
Sent: Tuesday, January 3, 2023 10:58 AM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Solar Project

Mr. Wheeler

My name is Kenneth Jacks and I live in Lake Tamarisk, a residential community two miles north of Desert Center. I am really concerned about the numerous solar installations surrounding our community and how these solar arrays disrupt the topsoil creating clouds of airborne dust every time the wind comes up and leading to an angry wife that has to clean. Happy wife, happy life.

Another concern is a rise in air temperature by several degrees when it is already quite hot in the summer. I have read that the temperature in our community may increase as much as seven degrees due to the solar arrays, thus causing summer electrical bills to increase.

This impacts the value of our homes plus puts a major question mark as to how it is going to impact our community water supply or migrating birds that fly through our area.

Many more concerns could be listed, but I'm sure you have heard it before.

Please regulate the these developments so that they are not right on top of communities like Lake Tamarisk. Protect our water.

Kenneth R. Jacks
25260 Parkview Dr. Sp90
Desert Center, CA

208-798-9442
kenjacks504@gmail.com

TO: Tim Wheeler, Riverside County

FROM: Wally and Carolyn White (307-250-3002)

DATE: January 3, 2023

SUBJECT: IP Easley Renewable Energy Project

We are residents at Lake Tamarisk Desert Resort near Desert Center, California. We live at Lot 52 and have owned that property for five years. During those five years we have thoroughly enjoyed riding in the surrounding desert, viewing wild animals and flowers as well as clear, blue skies.

However, with the installation of acres and acres of solar panels, our quality of life is significantly deteriorating. The following is a list of our concerns as the solar panels continue to multiply:

1. We firmly believe our property values will significantly decrease in the next year or two. People will not want to purchase lots when they are surrounded on three sides with enormous fields of solar panels. The solar panels are ruining the views of the desert, increasing blowing dust, raising the general surrounding temperature of the air, and eliminating access to the desert which we came to enjoy.

2. Five years ago, we could ride or hike any direction out of the Lake Tamarisk area and see the occasional Desert Tortoise. In the last two years we HAVE NOT SEEN ANY DESERT TORTOISE WITHIN A FIVE-MILE RADIUS of Lake Tamarisk. In the winter of 2022, we saw ONE DESERT TORTOISE TEN MILES AWAY from Desert Center/Lake Tamarisk. This is a serious issue. We cannot believe the Easley Project or the Bureau of Land Management conducted sufficient research on the Desert Tortoise habitat or behavior prior to starting this huge project. We cannot believe the utter disregard for a protected and **endangered** species.

3. Four years ago, we could ride or hike in almost any direction out of Lake Tamarisk and see Desert Lilies in bloom since that was a “super bloom” year. Unfortunately, the installation of thousands of solar panels was accomplished by scraping the desert floor bare for miles and miles and thus, completely destroying desert lilies and numerous other beautiful desert foliage. There is a very small Desert Lily Preserve in the area, but far more Desert Lily plants were found outside of the preserve…never to be seen again. We have been told that the ground has been treated so no plant life will ever grow again.

4. Last, but not least, we are very concerned about the loss of recreational space…one of the most attractive reasons to come here. All of the ATV riders in the Lake Tamarisk Park are deeply aware of the unique beauty of the desert. We all are very careful to not

unnecessarily disturb the plants, animals and terrain. We stay on marked roads when directed to. We are offended when we are told we can no longer use this or that road. Guards stop riders for trespassing frequently. We are told we have to turn around and go a different way which adds to the length of a day trip or changes our plans for the day completely.

As concerned citizens who spend a good deal of money in the area for recreation, nice lifestyle, and consumers of goods and services in your state, we just ask for your consideration in this matter.

We would like to ask that the solar farms not be built any closer than one to two miles around our dwelling places. What's done is done. But please consider not building any closer to us.

Please consider allowing passage to areas for riding and hiking. We are already blocked out of the Joshua Tree National Forest. Now we are being blocked out of the Mohave Desert.

Please consider some remuneration and reparations for the damage that has already been done.

Email: Easley Renewable Energy Project EIR Team

From: Debra Westcott <deb.westcott@gmail.com>
Sent: Wednesday, January 4, 2023 7:53 AM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Easley Solar Project

Dear Mr. Wheeler,

My name is Debra Westcott, and like the snow birds that flock to our Lake Tamarisk during the winter, I too spend winter months here at Lake Tamarisk, Desert Center, CA. I am writing to express my concerns regarding the progression of solar installations in the desert around our community.

We have enjoyed for years all the birds that make this temporary desert home come to life with their songs and the wind rushing through their wings. But now we are aware of their diminished number and variety.

I am aware that when the solar panels reflect the sun in such a manner as to appear to be a body of water, birds attempt to land on them, and die. I am also concerned that the removal of foliage and sterilization of the soil will further damage the environment that support the creatures and birds.

I understand the growing desire by Riverside County to address the need for affordable power. My question is: at what cost?

If, by continuing to install massive solar farms, plus battery storage, and the high voltage power lines connecting these farms to the power grid, the environment is so negatively impacted that the birds and other creatures disappear, then is the cost simply too high?

It seems to me, that in our haste to address the problem of power needs, there also needs to be a balance, that addresses the environment for animals and humans alike.

Would you please give attention to these concerns, and consider regulating these solar farms, so they would be required to stay a long distance away from established communities such as ours? Thank you for your attention to this matter.

Sincerely,
Debra Westcott
deb.westcott@gmail.com

Email: Easley Renewable Energy Project EIR Team

From: Leann Kingsley <dandlkings@msn.com>
Sent: Wednesday, January 4, 2023 7:43 PM
To: Faust, Tamara J <tfaust@blm.gov>
Subject: [EXTERNAL] IP Easley Renewable Energy Project

January 4, 2023

Ms Faust

We live at Lake Tamarisk Desert Resort at Desert Center, California. We have lived here for 16 ½ years. While we have lived here, we have enjoyed the desert scenery, wild flowers, clear air, peaceful nights and great recreation.

Our desert has been changing with the installation of solar projects. Our quality of life has deteriorated, our environment changed and property values declined.

We are concerned that our property values will further decrease if the proposed project is allowed to be completed. Not only will our scenery be drastically reduced, but we are concerned about our air quality, health issues and lack of recreational activities.

We have been able to ride ATV's in the desert and view the desert tortoise, view desert wild flowers and that will be destroyed ,and enjoy peace and quiet. This will no longer exist with the construction of additional solar projects.

We have been very conscious of the desert and how delicate the balance of nature and man is and have worked very hard to protet that. The solar projects will do nothing to protect that.

We have been told that the newest project might be built at our property line. I ask you would you like to look out your living room window to view a solar project? Also, concerns are what will happen when the life of the solar panels expire in 25 years? What will be left behind.

Please consider our community when granting these solar projects to come in. We may not be able to completely block them, but please give us consideration as to how close they come to our community and how many are allowed to come in. Our health and lively hood depends on it.

William and Leanna Kingsley

Email: Easley Renewable Energy Project EIR Team

From: Patti Cockcroft <patti.cockcroft@gmail.com
Sent: Wednesday, January 4, 2023 9:12 PM
To: Wheeler, Timothy
Cc: elizabeth@intersectpower.com; tfaust@blm.gov; camille@intersectpower.com; District 4 Supervisor V. Manuel Perez
Subject: Fwd: Solar farms near Desert Center

Hi Tim,
My husband and I have numerous concerns regarding the installation of solar farms surrounding our property in the Lake Tamarisk Desert Resort, which we have owned for 16 years.

These concerns include:
1. Health - I am asthmatic and worry about the increased particulates in the dust

2. Decreased property value - ATVing is a big draw to the park and I fear that ATVers will look for a more hospitable locale

3. Aquifer - The output is now higher than the input and who knows what problems that might cause

4. Energy consumption - Temperatures around solar farms have been proven to increase significantly, which will lead to higher energy costs

We would like to see the following:
1. A buffer zone of at least five miles

2. Compensation for increased energy costs

3. Compensation for decreased property value

4. Compensation for potential damage to aquifer infrastructure

5. Native plantings to obscure the panels

Thank you for your consideration.
Sincerely,
Patti Cockcroft
#15 - Lake Tamarisk Desert Resort

Sent from my iPad